COTSWOLD
District Council

3 December 2025

DEPUTY LEADER AND CABINET MEMBER FOR HOUSING AND PLANNING DECISION MEETING

A Deputy Leader and Cabinet Member for Housing and Planning Decision Meeting will be held at the Council Chamber - Council Offices, Trinity Road, Cirencester, GL7 1PX on **Thursday, 11 December 2025 at 9.30 am.**

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. **Introductions**
   Welcome to the public and introduction of participants.

2. **Apologies**
   To receive any apologies for absence.

3. **Declarations of Interest**
   To receive any declarations of interest by the Cabinet Member or any officers present.

4. **Officer overview of the report** (Pages 5 - 824)
   Officer to provide a brief verbal summary of the report with key details relating to the decision, providing any updates that need to be considered by the Cabinet Member when taking the decision.

   Purpose:
   To approve the procurement of Examination of the Chipping Camden Neighbourhood Plan

5. **Confirmation of comments**
   Confirmation of comments received by officer or Democratic Services.

6. **Public Questions**
   The Cabinet Member may allow members of the public present at the meeting to speak or make representations. However, all questions must relate directly to the decision being discussed. If a question is deemed irrelevant by the Cabinet Member the member of the public will be advised where to direct their question.

7. **Cabinet Member questions**
   The Cabinet Member may request clarifications on the report and the proposed decision, including any alternative options for consideration.

8. **Decision**
   The Cabinet Member will verbally confirm the decision, stating whether they:
   - Accept the recommendations of the officer,
   - Decide to take a different decision contrary to the officer's recommendation, or
   - Decide to refer the decision to a meeting of Cabinet.

   The Cabinet Member must inform the Democratic Services Officer of the reason for the decision, which will be officially recorded on the Decision Notice.

COTSWOLD
District Council

Council name	**COTSWOLD DISTRICT COUNCIL**
Name and date of Committee	**CABINET MEMBER FOR HOUSING AND PLANNING DECISION MEETING, THURDAY 11 DECEMBER**
Subject	**CHIPPING CAMPDEN NEIGHBOURHOOD PLAN EXAMINATION (REG 17)**
Wards affected	Campden & Vale
Accountable member	Juliet Layton, Deputy Leader and Cabinet Member for Housing and Planning Email: juliet.layton@cotswold.gov.uk
Accountable officer	Mark Harrison, Senior Local and Neighbourhood Planning Policy Officer Email: mark.harrison@cotswold.gov.uk
Report author	Mark Harrison, Senior Local and Neighbourhood Planning Policy Officer Email: mark.harrison@cotswold.gov.uk
Summary/Purpose	**To approve the procurement of Examination of the Chipping Camden Neighbourhood Plan**
Annexes	**Annex A** – Regulation 15 Draft CCNP **Annex B** – Basic Conditions Statement **Annex C** – Consultation Report **Annex D** – SEA and HRA Screening **Annex E** – Design Guide **Annex F** - Policies Map **Annex G** – Note to Examiner on Policies Map **Annex H** – Reg. 16 Consultation Representations (redacted) **Annex I** – Invitation to Quote (incl. Specification, Requirements, Price/ Quality Assessment) **Annex J** – Terms and Conditions for appointment
Recommendation(s)	That the Cabinet Member for Housing and Planning resolves that: 1. CDC will procure through a bid process an independent

	examiner, suitably qualified and experienced, to undertake examination of the Chipping Camden Neighbourhood Plan. The appointment must be consented by the qualifying body (Chipping Camden Town Council).
Corporate priorities	**All of the corporate priorities are captured by the submitted Neighbourhood Plan:** • Delivering Good Services • Responding to the Climate Emergency • Delivering Housing • Supporting Communities • Supporting the Economy
Key Decision	~~YES /~~ **NO** (A Key Decision is an executive decision that is likely to: 1. Require a budget expenditure of £150,000 or more or generate savings of £150,000 or more; or 2. Have a significant impact on communities living or working in an area comprising two or more District Wards. See Democratic Services Handbook for further guidance on key decisions.) **Whilst a Neighbourhood Plan *could* have a significant impact in regards part 2, the submitted Chipping Camden Neighbourhood Plan is not deemed to have a *significant* impact to the planning framework.**
Exempt	~~YES /~~ **NO** (see Democratic Services Handbook for guidance on exempt (i.e. private) papers)
Consultees/ Consultation	Ciaran O'Kane (Senior Business Partner in Procurement) has advised on the procurement process.

COTSWOLD
District Council

EXECUTIVE SUMMARY

1.1 The Council must appoint an appropriate person to examine the Chipping Camden Neighbourhood Plan in accordance with Paragraph 7 of Schedule 4B of the Town and Country Planning Act 1990.

2. BACKGROUND

2.1 CDC approved a Regulation 16 consultation on the Chipping Camden Neighbourhood Plan, which was undertaken and ended on 15th August 2025.

2.2 The responses have been received, collated and redacted (see Annex H). These along with the submission documents of the Neighbourhood Plan (Annexes A-E), plus Annex F (Policies Map) and Annex G (Note to Examiner), should be passed to an independent examiner to make recommendations.

2.3 Please note, omission of a Policy Map was noticed by the Officer, and as such one has now been prepared (Annex F). As this was not part of the Regulation 16 consultation, only the Examiner can recommend to include it with the Plan, for clarity or to meet basic/ legal conditions. This is explained further in Annex G.

3. MAIN POINTS

Process

3.1 Once a draft neighbourhood plan has gone through its Reg 16 consultation, CDC should source an Examiner. The Examiner will consider the submitted documents and any comments made during the consultation period on the submitted plan.

3.2 The Independent Examiner will examine whether the plan meets the 'Basic Conditions' and other relevant legal requirements (e.g. consultation).

3.3 The Independent Examiner may recommend that the plan proceed to the referendum stage (i.e. that it meets all the legal requirements) or may suggest that modifications are needed to the plan before it can proceed to the referendum.

3.4 Following receipt of the recommendations, the next step will be for another Cabinet Member Decision Meeting to decide on the following:

- Reg 18: Publication of the Examination Report and CDC Decision Statement;

- Arrange a Referendum for Chipping Camden parish to vote on adopting the Neighbourhood Plan;
- Making (or adoption) of the Plan if a majority (>50%) support its adoption (this decision could be deferred to a later meeting).

Procurement

3.5 An Invitation to Quote document has been prepared (Annex I) with details of the bidding process and how bids will be assessed and decided by the Officer. As the price will be below £30,000, under CDC's procurement process, only two quotes are required.

3.6 These will be sought from Intelligent Plans and Examinations Ltd, who have completed examination of six previous plans for CDC, and the Officer will also use the NPIERS service (operated by RICS) which is an Examiner finder service.

3.7 However, the Officer may have to complete NPIERS application form, rather than share the ITQ document. Any examiners offering their services through NPIERS will still be assessed on the same basis as any consultants, except NPIERS examiners have a set daily rate (see para 6.1 below). An NPIERS examiner will still have to agree to CDC's T&Cs.

3.8 In deciding on an Examiner, Paragraph 7 of Schedule 4B of the Town and Country Planning Act 1990 applies, particularly that the person appointed:

a) Is independent of the qualifying body and the authority;
b) Does not have an interest in any land that may be affected; and
c) Has appropriate qualifications and experience.

3.9 As the qualifying body, Chipping Camden Town Council must consent to the appointment. As such, the Officer can share all bids and/ or make recommendations with the Town Council.

4. ALTERNATIVE OPTIONS

4.1 The Council could take a different approach to the bid process, e.g. only inviting bids from planning consultancies, or only using the NPIERS Examiner finder service. A hybrid approach is deemed fairest and likely to receive the most bids to give choice.

5. CONCLUSIONS

It is recommended that the Cabinet Member for Housing and Planning resolves that CDC will procure through a bid process an independent examiner, suitably qualified and experienced, to undertake examination of the Chipping Camden Neighbourhood Plan. The appointment must be consented by the qualifying body (Chipping Camden Town Council).

6. FINANCIAL IMPLICATIONS

6.1 As an example, NPIERS charge £750 + VAT and expenses per day. The examination is expected to take between 5-10 days. The total amount could reach up to £10,000. Cost will be a factor when deciding on the bids.

6.2 The Council already have financial obligations towards the procedural elements of Neighbourhood Planning following Reg. 15. Some or all of this can be reclaimed from the Government (MHCLG).

6.3 Officer support towards Neighbourhood Planning is already budgeted for.

7. LEGAL IMPLICATIONS

7.1 An agreement/ T&Cs with CDC will need to be signed by the successful bidder.

7.2 Once adopted the Neighbourhood Plan must be considered as part of relevant planning applications, and planning is a statutory function for Cotswold District Council.

8. RISK ASSESSMENT

8.1 Payment is usually made after the completion of the examination, which should ensure services meet the required quality before payment is made.

8.2 CDC could fund this examination, and other elements of the Plan process, only for the Plan to be withdrawn or not adopted, meaning some or all of the funds would not be able to be claimed back from the Government.

8.3 This stage involves comments from the public being passed from CDC to the Examiner and necessary redaction will be required at risk of GDPR breach.

9. EQUALITIES IMPACT

9.1 Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to eliminate discrimination and promote equality in relation to:

- Race
- Disability
- Gender, including gender reassignment
- Age
- Sexual Orientation
- Pregnancy and maternity
- Religion or belief

9.2 The Examiner should ensure the Plan meets this legal duty, and make recommendations if it appears to discriminate.

9.3 The bid process should operate with complete equality.

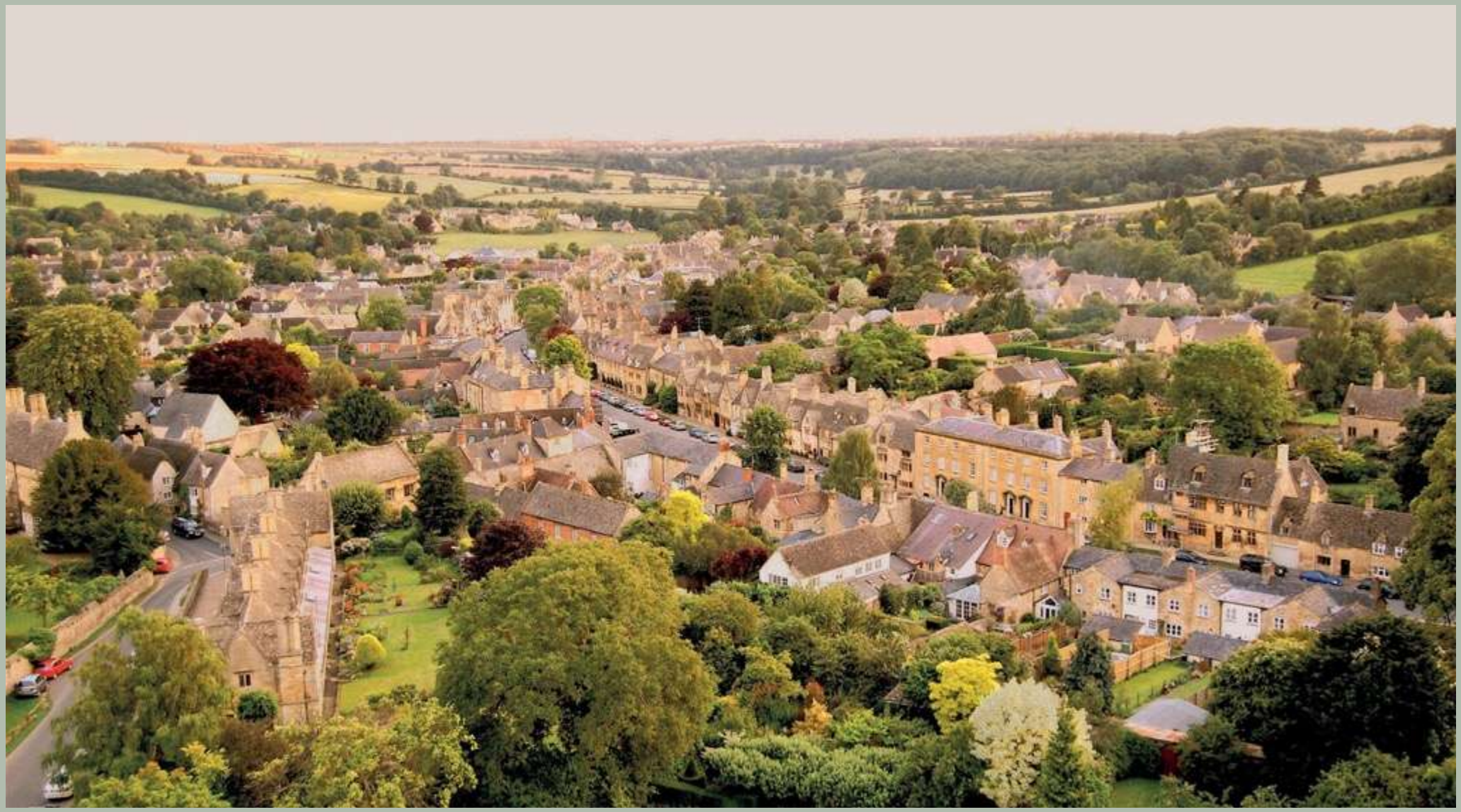
10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

10.1 The Plan contains policies on Nature Recovery Areas and Local Green Spaces (some of which are proposed for their rich wildlife) (see Annex A).

10.2 The Examiner should ensure the Plan does not contradict the sustainable balance of development in line with national policy and guidance, including climate change/ adaptation.

11. BACKGROUND PAPERS

None



Chipping Campden Parish Neighbourhood Development Plan (CCNDP) 2023 - 2031

Regulation 15 Submission Version 4th March 2025


Noel Arms Hotel

Contents

Foreword and acknowledgements p 5

1. Introduction p 7
   a. Consultation p 9
   b. Key diagram p 10
   c. Neighbourhood Plan Area p 11
2. Vision for Chipping Campden Parish p 12
   a. Objectives p 14
3. Historic and present-day context p 17
   a. Overview p 18
   b. Chipping Campden p 20
   c. Broad Campden p 23
   d. Creative industries and the local economy p 24
   e. The natural environment p 28
   f. Population characteristics p 31
   g. Housing completions and type p 35
4. Community concerns and aspirations p 39
   a. Better Town Centre Parking p 44
   b. Railway Station p 44
   c. Campden BRI and Campden Business Park p 44
   d. Replacement Primary School p 45
   e. Health Centre p 45
   f. Indoor Sports Facility p 45
5. Planning Policies p 47
   a. Planning Policy context p 48
   b. Cotswold District Council Local Plan p 50
   c. Sustainable development p 51
   d. Policy 1. Chipping Campden Town Centre p 53
   e. Policy 2. Community facilities and infrastructure p 64
   f. Policy 3. Design p 69
   g. Policy 4. Non-designated heritage assets p 73
   h. Policy 5. Biodiversity Net Gain and Local Nature Recovery p 76
   i. Policy 6. Local Green Spaces p 83
6. Appendices p 87
   1. Creative Industries p 88
   2. Natural Environment p 92
   3. Town Centre Land Uses p 99
   4. Social and community infrastructure p105
   5. Non-designated heritage assets p120
   6. Local Nature Recovery Areas p128
   7. Local Green Spaces p135

Chipping Campden Town Council,
Old Police Station,
High Street,
Chipping Campden,
Gloucestershire,
GL55 6HB

Telephone: 01386 841298
Email: clerk1@chippingcampden-tc.gov.uk

Images: Chipping Campden Town Council is very grateful to the following for permission to use images:
Keyna Doran, Arthur Cunynghame, Campden BRI, Chipping Campden School, Chipping Campden Music Festival / Simon Hanagarth, Cotswold District Council, Chipping Campden Surgery, Betty Stocker, Hedgehog Bus, Portus & Whitton, Caroline Richardson and Virginie Thizy

This document and supporting appendices and other evidence can also be viewed on our website at www.chippingcampden-tc.gov.uk/



Foreword and acknowledgements

The Chipping Campden Neighbourhood Development Plan (CCNDP) has evolved over a decade or more and there are several reasons for this. Prominent among these have been the desire to take account, where possible, of the differing views held by residents of the parish. Many, if not most, of our residents have a strong emotional attachment to the settlements of Chipping Campden and Broad Campden. This is hardly surprising – the town is a jewel in the Cotswolds – while both have a unique history and architecture which fuels a natural wish to protect this wonderful heritage.

It is important we recognise we cannot stand still and try to prevent any changes to the main settlements and wider parish. In fact, to do so will gradually harm what we seek to protect. We must do our best to improve our services, support our businesses, and enhance employment opportunities and ultimately our quality of life.

In that regard, it is important to understand two things about the CCNDP.

The first is that the CCNDP is a tool. It does not dictate to planners what they can and cannot do when making planning decisions. Our CCNDP does not have the authority to do that. But what it does constitute is a compendium of information about our town, and an indication of the wishes of our townsfolk regarding future development. Cotswold District Council can refer to the CCNDP to help make their decisions in a way that is most suited to us. You will see that there is a good deal of "technical" language in the CCNDP, and that is precisely because it has been prepared for an expert planner to read.

The second important point is that the CCNDP is not fixed for all time. It is a document that can and should evolve. What seems appropriate now may not be so in due course, and of course there may be elements of the CCNDP that you would have framed differently. Once a NDP is adopted it can still be changed at a later date if there is a will to do this.

Many people have been involved in bringing the CCNDP to this stage, too many to individually mention here. Nonetheless, we would like to acknowledge and say thank you to all of those who have spent a considerable amount of their time helping to secure a positive future for their community through this document.

Chipping Campden Town Council


CHIPPING CAMPDEN

Introduction













Introduction

by Chipping Campden Town Council

The Chipping Campden Parish Neighbourhood Development Plan (CCNDP) is based on the provisions of the Localism Act 2011, which allows local communities to form a shared vision for their area's future. Chipping Campden Town Council (CCTC) has been responsible for leading the plan-making for Chipping Campden Parish with significant support from an advisory group, Cotswold District Council, local societies residents and organisations.

The CCNDP seeks to address the issues identified by the local community during community consultations carried out by the Town Council since 2014. It contains planning policies to help ensure that future developments in Chipping Campden Parish are of a high quality, will protect and enhance the environment of the Parish, Chipping Campden, and Broad Campden; provide adequate housing and parking, and support local employment. It also includes 'Community Proposals' which are projects and actions that are not planning policies but which the community wishes to pursue.

It is supported by a 'Community Design Guide' (CDG), a separate document comprising design guidelines to inform and encourage anyone proposing development in the Parish to create developments which complement and enhance the area's outstanding architectural and environmental qualities.

Local people and groups have been engaged throughout the process, resulting in the accumulation of an "evidence base" for our plan.

The CCNDP has been prepared to comply with the requirements of government policies and guidelines, particularly the National Planning Policy Framework (December 2024 amended with minor changes in February 2025) and the Cotswold District Local Plan 2011 - 2031

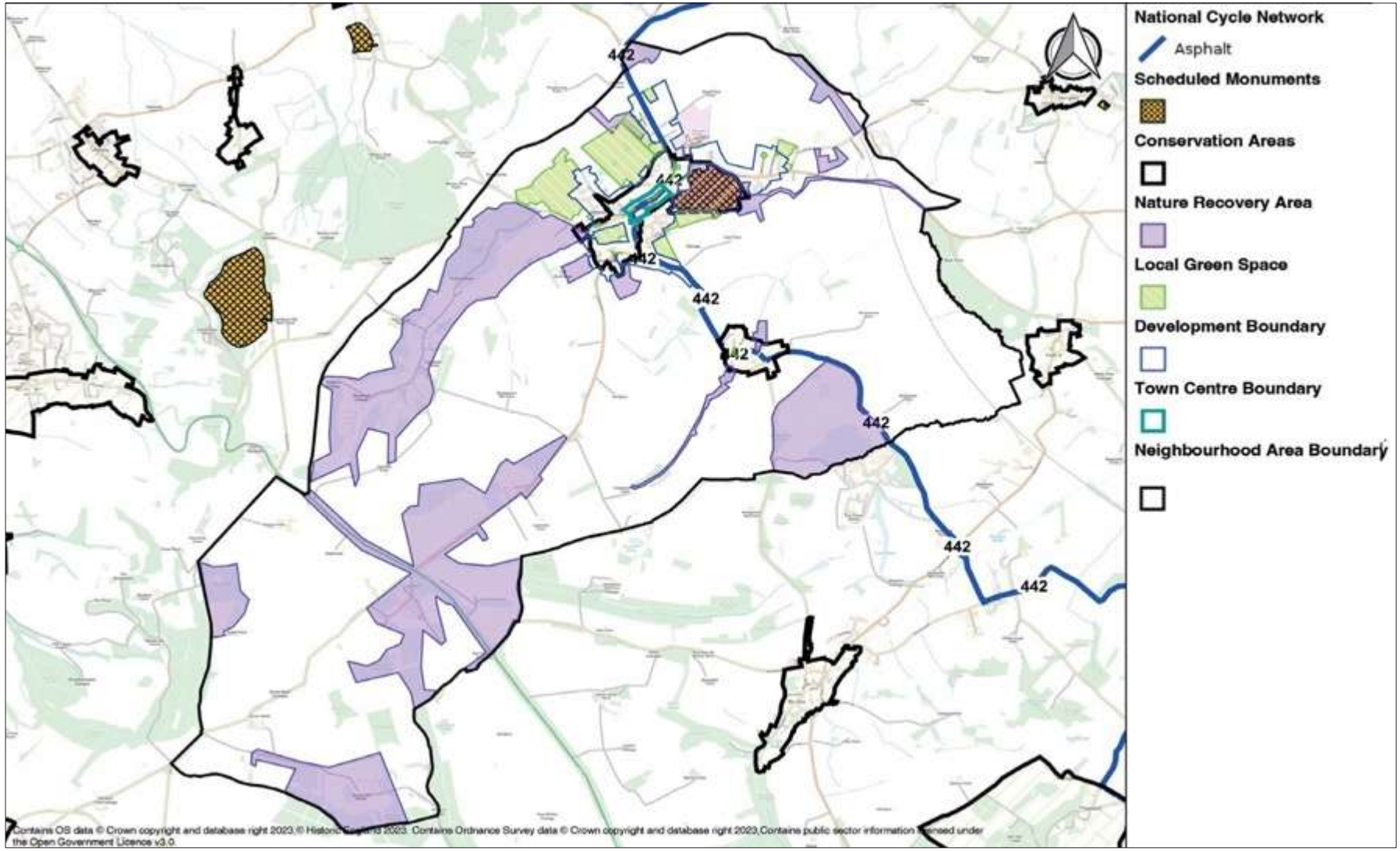


Consultation

Consultation processes have included the following

- "Your town needs you" letter sent to all parish households 5.11.2013
- CCNDP survey sent to all households in parish 20.11.2013
- Survey on CDC SHLAA proposals sent to all households 15.3.2014
- Public exhibition of CDC SHLAA sites 19.3.2014
- Drop-in event regarding parking 2.6.2014
- Meeting with residents to form CCNDP team 10.7.2014
- Draft proposals for business strategy sent to all local businesses 29.8.2014
- Discussions with Campden Business Forum Sept-Dec 2014
- Survey of proposed housing development sites sent to all households Jan 2015
- Public exhibition of CDC Local Plan 17.2.2015
- Public meeting to discussed town's response to Local Plan 17.2.2015
- Meeting with CDC Highways 27.4.2015
- Meetings with various local landowners 30.8.2014-22.9.2015
- Drop-in event for residents to give feedback on CCNDP proposals 5.3.2016 and 12.3.2016
- Meeting with CPRE regarding environmental considerations for CCNDP 13.4.2016
- Meeting with Principal of Chipping Campden Academy to discuss future secondary school provision 2.5.2016
- Invitation to local primary schools to discuss future primary school provision 3.5.2016
- Draft CCNDP published on town council website 20.3.2017
- Public exhibition in town hall of CCNDP and supporting documents 21.4.2017
- Letters to all household regarding LGS proposals 30.9.2017
- Letters to landowners regarding LGS proposals 30.9.2017
- LGS proposals placed on Campden Hub 1.10.2017
- Parking Survey. CC Business Forum 2017
- CDC discussion re CCNDP proposals 16.8.2022 & 23.9.2022
- Meeting with Campden Society 1.9.2022
- Letters sent to LGS landowners, September-November 2022
- CDC confirmation Design Guide accepted 6.12.2022
- Consultation with Cotswold District Council September / October 2023
- Parking Survey. CC Town Council November 2023
- Regulation 14 Consultation between 6th March and 20th April 2024

Key Diagram for the Chipping Campden Parish NDP



Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Chipping Campden Parish Neighbourhood Plan Area

Neighbourhood Plan Period

The CCNDP supports policies in the Cotswold District Local Plan 2011 – 2031. The CCNDP period is tied to the local plan and covers the period to 2031. Where local plan policies change some of the policies in this CCNDP may become out of date and a review of the NDP would be justified.

Chipping Campden Parish Neighbourhood Area

The Chipping Campden Parish Neighbourhood Area is based on the boundaries of Chipping Campden Parish as determined by Cotswold District Council on 14th February 2014 (see Figure 1).

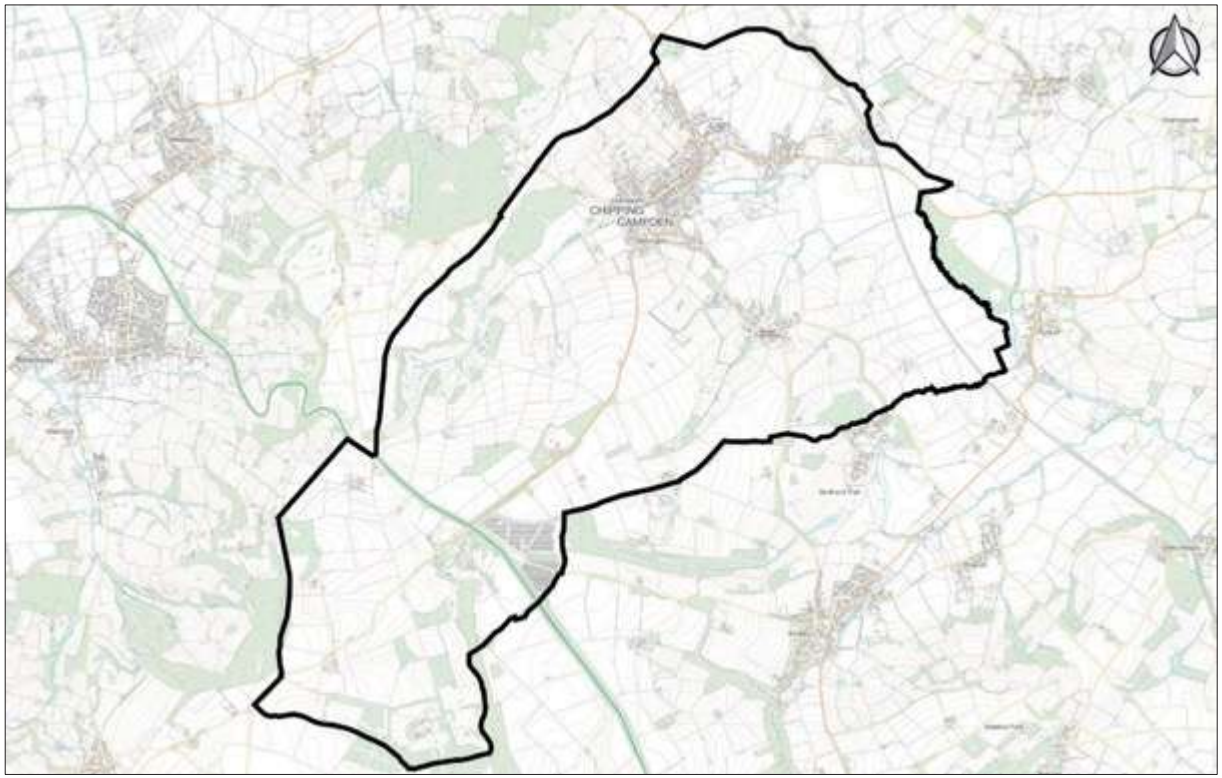


Fig 1. Chipping Campden Parish Neighbourhood Area
Source: Andrea Pellegram Ltd, under OS licence AC0000808712

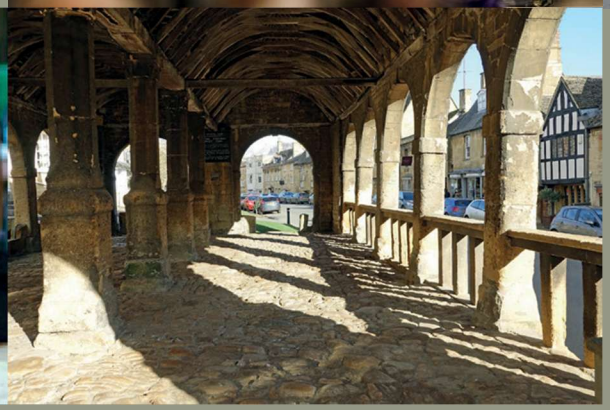
Vision for
Chipping Campden Parish





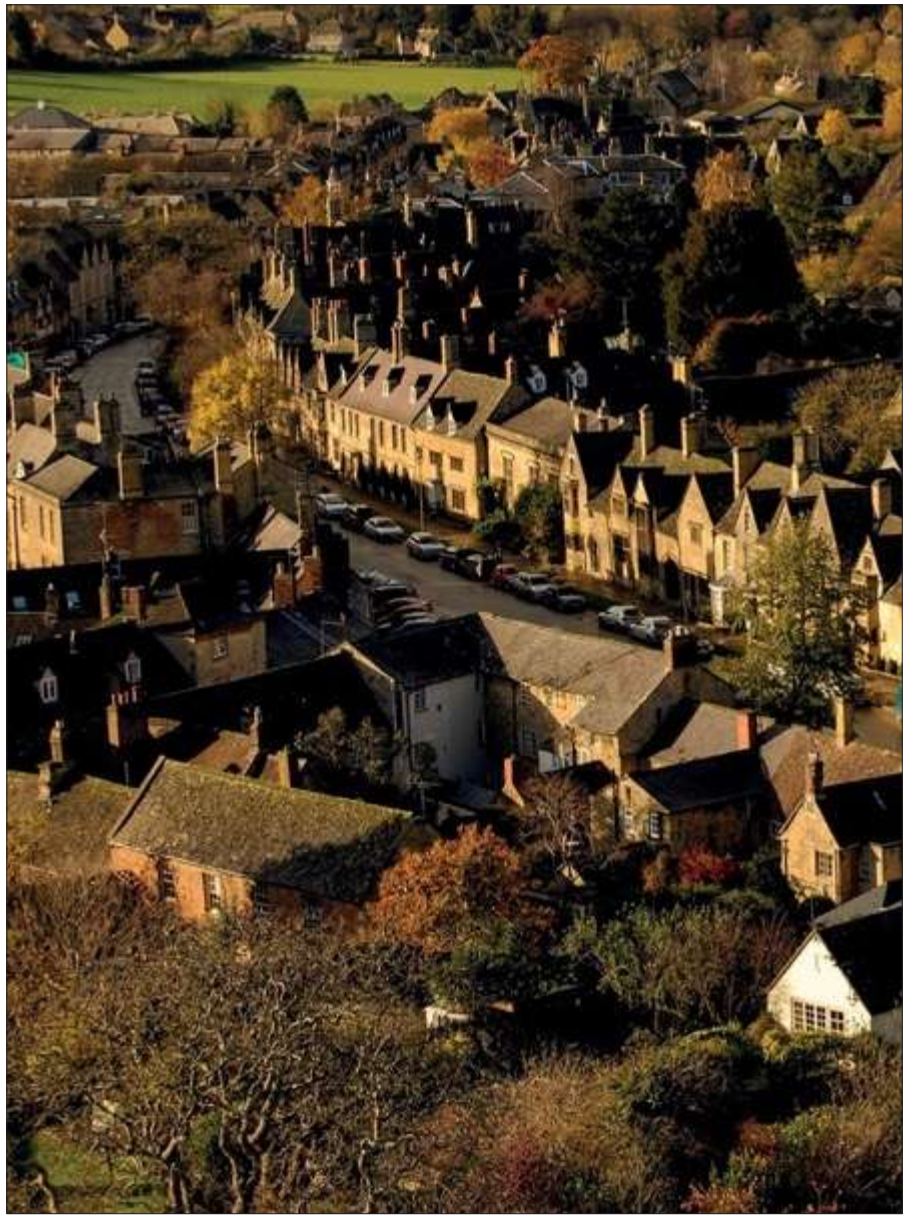






Our vision for Chipping Campden, often described as “The Jewel of the Cotswolds”, is that it will continue to be:

‘A vibrant rural community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings, agriculture and natural surroundings. Our aim for the CCNDP is to foster a society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents to promote wellbeing, and amenities for all visitors to the area. A beautiful natural and built environment within the Cotswolds National Landscape that provides safe and accessible housing for all residents where the historic legacy is preserved.’



Objectives

The CCNDP sets out a strategy for development both of the town centre and of the parish as a whole. To achieve our vision, the CCNDP has identified objectives within six themes:

- Environment and Sustainability
- Housing
- Economy
- Design
- Facilities, Services and Amenities
- Traffic and Transport

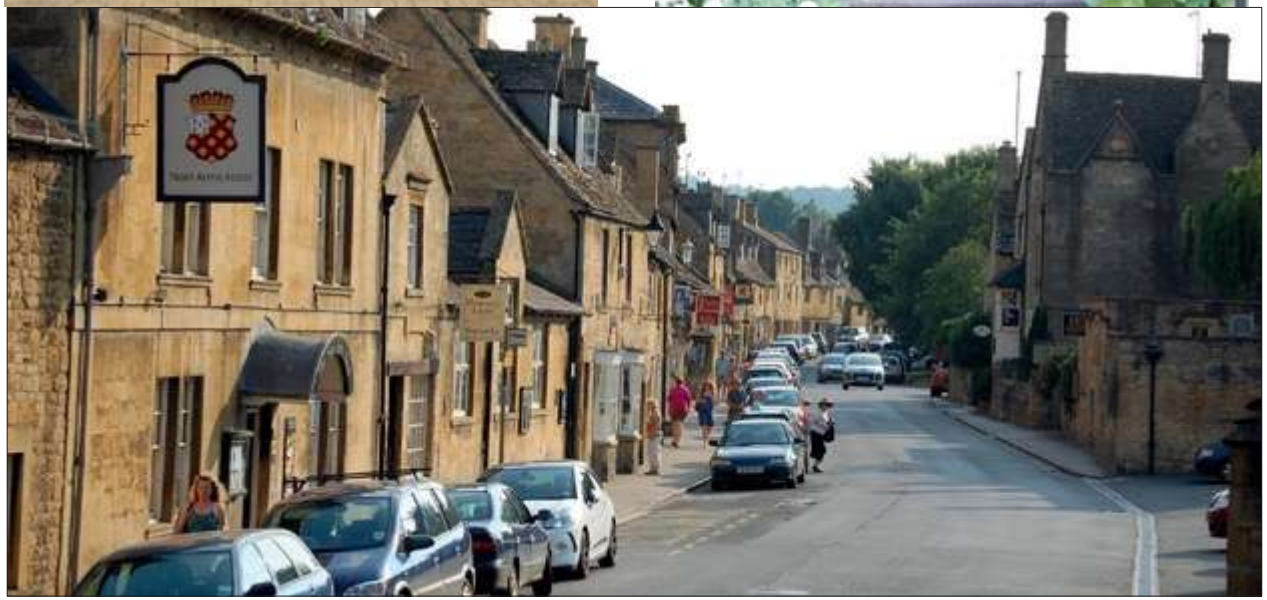
Environment & Sustainability	Housing	Economy
To conserve and enhance the natural environment, and encourage a wide diversity of flora and fauna	To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside	To protect and develop the town's economy
To conserve and enhance the natural setting that characterises the parish	To ensure that new housing location is consistent with the environmental objectives noted above, and is designed in accordance with the design objectives below	To strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail, hospitality and other commercial offerings
To provide and / or maintain green corridors for wildlife across and around the parish		To improve the tourism offer and the parish's attraction to tourists and visitors by improving existing facilities and introducing new ones
To meet the challenge of climate change, flooding and light pollution		To ensure that there is an appropriate balance between rental accommodation for tourists and that which meets the needs of residents and their families
		To support the development of specialist food and food-related industry and businesses
		To support the local agricultural industry

Design	Facilities, Services and Amenities	Traffic and Transport
To protect and enhance the parish's heritage assets and its location within the Cotswold National Landscape, by encouraging development and conservation projects for uses that are sympathetic to the character of Chipping Campden and Broad Campden and their beautiful landscape setting and resisting developments for inappropriate uses, or that are unsympathetic to the character and setting of the settlements	To ensure that the community has appropriate infrastructure in terms of health services, sports / leisure facilities, amenities, public transport and green infrastructure	To improve facilities for car parking
To manage impacts brought about by climate change and flooding using natural capital and management	To protect existing green spaces and to increase the provision of green spaces	To improve the facilities and safety for cyclists and pedestrians

Where it is not within the power or resources of the Town Council itself to achieve these objectives, it will encourage and support to the best of its ability all efforts by public bodies, commercial entities, individuals and others to achieve the objectives.







Historic and present-day context







Overview

Chipping Campden is an architectural gem, having a very high density of listed buildings, many dating from the Middle Ages. Its mellow, honey-coloured façades have earned it the nickname of "the Jewel in the Crown of the Cotswolds", and its High Street has been described as "the most beautiful in all England"[1].

Sir Nikolaus Pevsner, the renowed architectual historian, described Chipping Campden as 'the best piece of townscape in Gloucestershire, arguably one of the best in England'.

1 GM Trevelyan

Following the grant of its Market Charter in 1185, Chipping Campden's economy has centred around agriculture, particularly the wool trade in earlier times. Then, in the early 1900s, the Arts and Crafts Movement and CR Ashbee' 'decamped' to the town, giving rise to a variety of creative industries.

Chipping Campden Parish, the Neighbourhood Area, lies within the Cotswold National Landscape (formerly the Cotswold Area of Outstanding Natural Beauty or AONB). There are two conservation areas within the CCNDP area, one in Chipping Campden and one in Broad Campden. Chipping Campden Parish contains 5 Grade I, 22 Grade II* and 228 Grade II 'list entries'. Campden House formal garden and associated medieval cultivation earthwork is a scheduled monument. Spring Hill House, at the southern-most part of the parish is an 18th century landscape park and is registered as a Park and Garden of Special Historic Interest.

Alongside its traditional agriculture and creative industries, Chipping Campden Parish now supports a variety of light industries, and it is a major draw for tourists on account of its beautiful natural setting, heritage and architecture.
In addition, it is home to the world-renowned Campden BRI food research centre which provides consulting, technical and legal advice for the food industry as a membership organisation, which fits well with the agricultural and market history of the town.

A world-class Music Festival is the highlight of a thriving cultural scene throughout the year. The town also hosts a popular Literature Festival, the Robert Dover's Games / Cotswold Olimpicks and the Scuttlebrook Wake. Chipping Campden has a highly regarded Academy school with a long and distinguished history dating back to 1440. The school has now developed a performing arts centre which is supporting expansion of the town's well-established cultural festivals.

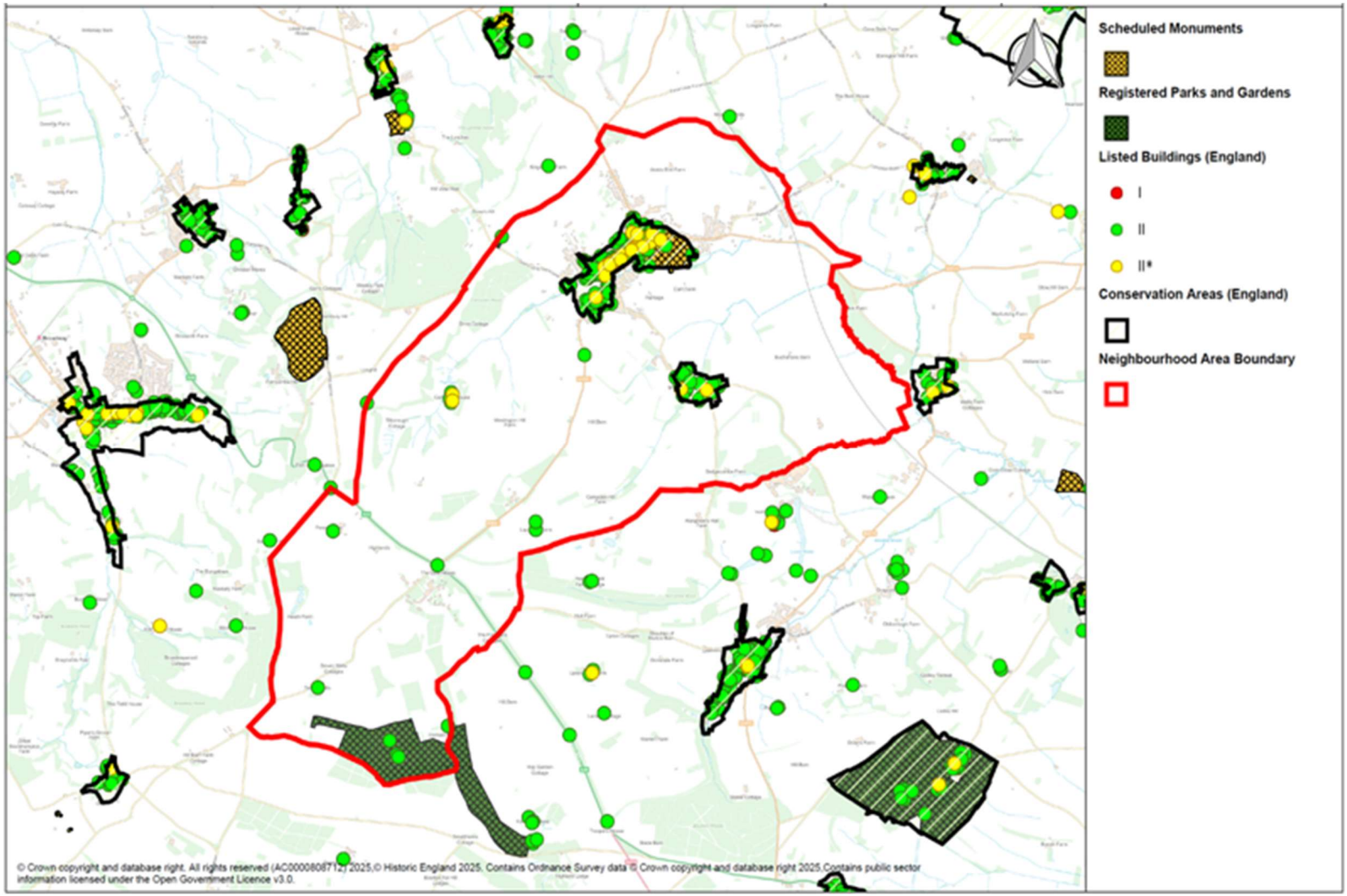
The town is very popular as a base for undertaking long distance walks, being the start of the Cotswold Way long distance footpath, and on the Monarch's Way and the Heart of England long-distance footpaths. These named walks and the many other footpaths in the countryside around the Town provide magnificent views into the town and out towards the rolling Cotswold countryside.

Chipping Campden





Figure 2: Chipping Campden Parish historic features



Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Chipping Campden

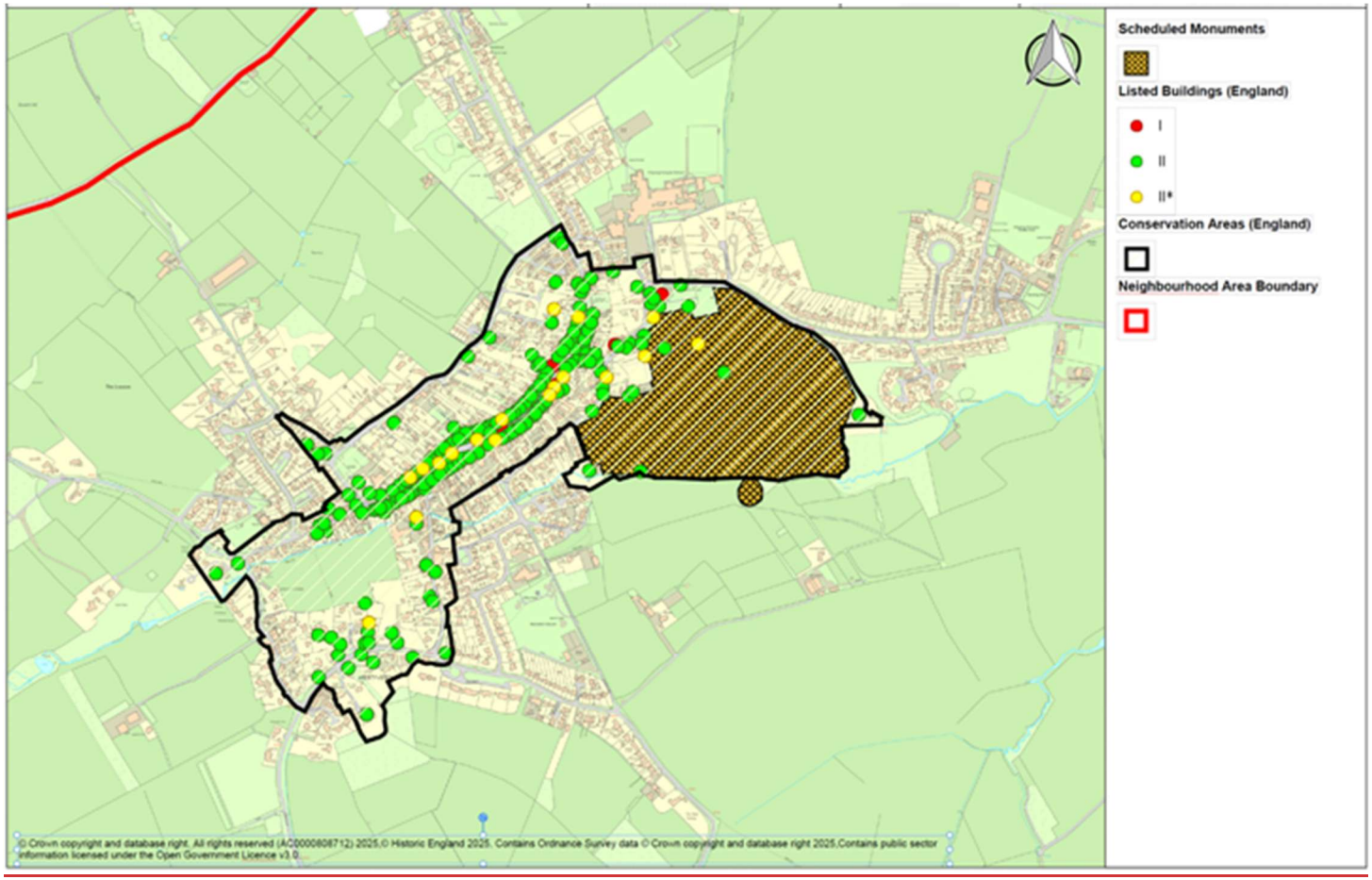
Figure 2, above, shows the nationally designated heritage assets of Chipping Campden Parish, and **Figure 3** shows them for Chipping Campden town in greater detail, illustrating its exceptional historic built environment. These features include listed buildings, Scheduled Monuments, and Conservation Areas, all of which are formally designated heritage assets. The High Street is dominated by Grade I (yellow dots) and Grade II (green dots) listed buildings. The black outline shows the extent of the conservation area.

The remains of Old Campden House are designated as a Scheduled Monument (brown hatching): the history of this exceptional feature can be seen on the Chipping Campden History Society website and it is currently available for hire from the Landmark Trust.

The site itself contains a number of listed buildings and structures including Old Campden House, East and West banqueting houses, tithe barns and stables, and the remains of a formal garden and associated medieval cultivation earthworks.



Figure 3: Historic Features – Chipping Campden inset



Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Broad Campden

Broad Campden is a village which also contains noteworthy and beautiful historic buildings. **Figure 4** shows the locations of Grade I listed buildings (yellow dots) and Grade II listed buildings (green dots) scattered throughout the settlement, creating a charming and intimate historic setting within the Conservation Area (black outline).

Broad Campden is a unique settlement that retains a separate identity and building style from Chipping Campden.

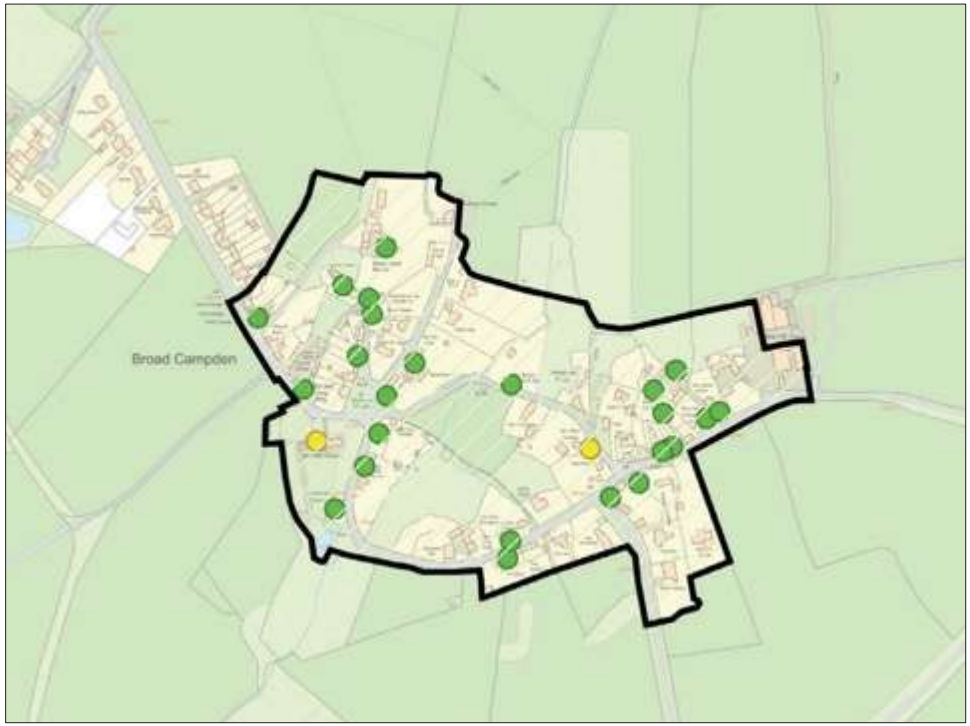


Figure 4: Historic Features – Broad Campden inset
Source: Andrea Pellegram Ltd, under OS licence AC0000808712







Creative industries and the local economy

Chipping Campden hosts a very wide variety of creative industries that add to and define the local economy.
Though the parish is very rural in nature, commerce is not dominated by agriculture but rather by tourism and the creative industries.

The Arts and Crafts movement drew many artists to Chipping Campden. According to the Campden online website[1], Chipping Campden became known as a centre for the Cotswold Arts and Crafts movement early in the 20th Century, following the move of Charles Robert Ashbee with the members of his Guild and School of Handicraft from the East End of London in 1902. The Guild of Handicraft specialised in metalworking, producing jewellery and enamels, as well as hand-wrought copper and wrought ironwork, and furniture.

A number of artists and writers settled in the area, including F.L. Griggs, the etcher, who built Dover's House, one of the last significant Arts and Crafts houses, and set up the Campden Trust with Norman Jewson and others, initially to protect Dover's Hill from development. H. J. Massingham, the rural writer who celebrated the traditions of the English countryside, also settled near the town.

Another main contributor to Chipping Campden's creative economy is from the Campden BRI[2] which is a leader in global food and drink science and research, possessing both the knowledge and practical expertise to deliver results that safeguard businesses and unlock opportunities.

The historical influences of the Arts and Crafts Movement, arguably anti-technology, and the Campden BRI which embraces it, have together created a fertile environment for creativity and innovation in the local economy which is dominated by specialisms in food and drink, artisans and makers, and music.

The beautiful Cotswold stone buildings in the parish date back to the Middle Ages when Chipping Campden was a wool trading centre, and for centuries after the town has benefited from the patronage of wealthy wool merchants. Agriculture remains a major component of the local economy, and the parish a farming community; albeit sheep farming has generally declined over recent decades. The main crops grown currently are winter wheat, oilseed rape, and spring barley, with the areas of maize and set-aside increasing. Forthcoming plans for the parish should ensure the protection of the agricultural industry, which not only provides food but an attractive backdrop to the to the town.

[1] https://www.chippingcampdenonline.org/ [2] https://www.campdenbri.co.uk/






Chipping Campden
APPLE JUICE


Cotswold House





Campden BRI

The Cotswold Local Plan Policy EC4 (Special Policy Areas) supports the growth and development of the Campden
BRI site (which is mainly outside the neighbourhood area) and the adjacent Camden Business Park. These are strategic policies and therefore not suitable for the neighbourhood plan to comment upon, but the impact of the BRI and the opportunities for growth and innovation on the Business Park, allow for the local economy to grow, thrive and innovate. Much of Chipping Campden's economy is tied to the success of these enterprises.

Food and drink

As discussed above, the tourism market generates demand for, and supports, the need for eating and drinking establishments so that residents enjoy a much wider range of gastronomic opportunities than they might otherwise.

In 2023, there were 21 different eating and drinking establishments, shown in **Appendix 1**, ranging from cafes, restaurants and bakeries to cooking schools.

Artisans and makers

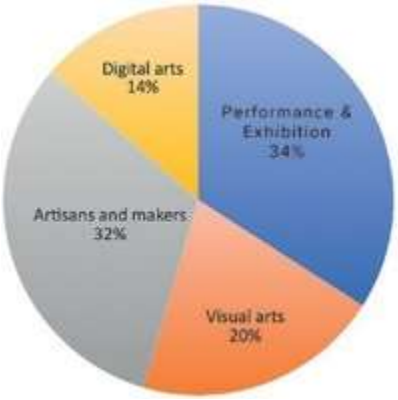
Many Chipping Campden Parish residents are artisans and makers in the "art of things": floristry, bespoke shoemaking, jewellers, printing, fabric design, glass making and pottery. In 2023, there is also a thriving performance and exhibition community.

In 2023, there were the following commercially active organisations, plus many more semi-professional and amateurs: 12 organisations that specialised in performance and exhibition; 10 "visual artists" including painters and photographers; 13 artisans and makers including jewellers, printers, florists and textile designers; and three digital designers and publishers.

The full list of organisations and individuals is provided in **Appendix 1.**

Most of these creative industries are based in private homes or small business units: many are located on the High Street. The CCNDP policies on the town centre are therefore highly relevant.

In addition, Chipping Campden provides marketing space for these industries in a regular weekly food market (Country Market) and monthly craft and gift market (Campden Market), held in the Town Hall, and also regular craft markets in the Market Hall.



Music & Literature

Each May, some of the world's top classical musicians come to perform at the Chipping Campden Music Festival. The festival lasts for two weeks and, apart from the stellar list of leading performers, a feature of the second week is the Festival Orchestra, reconvened each year and comprising of young musicians just starting their professional careers, paired with experienced professionals. The orchestra gives three full performances, each featuring a renowned soloist. The festival was started in 2002 and has always been run by local people and supported financially by a loyal group of patrons and friends, originally all local but now expanded due to the international reputation of the festival. Most concerts are completely or nearly sold out; audiences in the most recent festivals totaled around 4,500 each year.

Alongside the music festival is a Literary Festival hosted in the Cidermill Theatre. Another cultural highlight of Chipping Campden is its traditional Morris dancing, which dates back centuries and is still thriving today. Campden Morris are a local group who perform lively and colourful dances at events throughout the year, particularly around May Day and during the town's celebrations.

The natural environment

Chipping Campden Parish sits in the midst of some of England's most iconic countryside in the Cotswold National Landscape. The settled areas of Chipping Campden and Broad Campden are contained by steep hills from which a number of vantage points offer beautiful views, the main high points shown as stars are shown in **Figure 5**.

Detailed information published in 2017 about Chipping Campden Parish's environment can be found in **Appendix 2**. Here, it is sufficient to say that the River Cam which runs across the parish and through the Chipping Campden town is subject to flooding with large areas in Zones 2 and 3.

There are also patches of ancient orchard and notable woodlands. Flooding and woodlands are illustrated in **Figure 6**. There are no nationally designated sites of special scientific interest or other nationally designated nature sites in the parish though there are immediately outside.





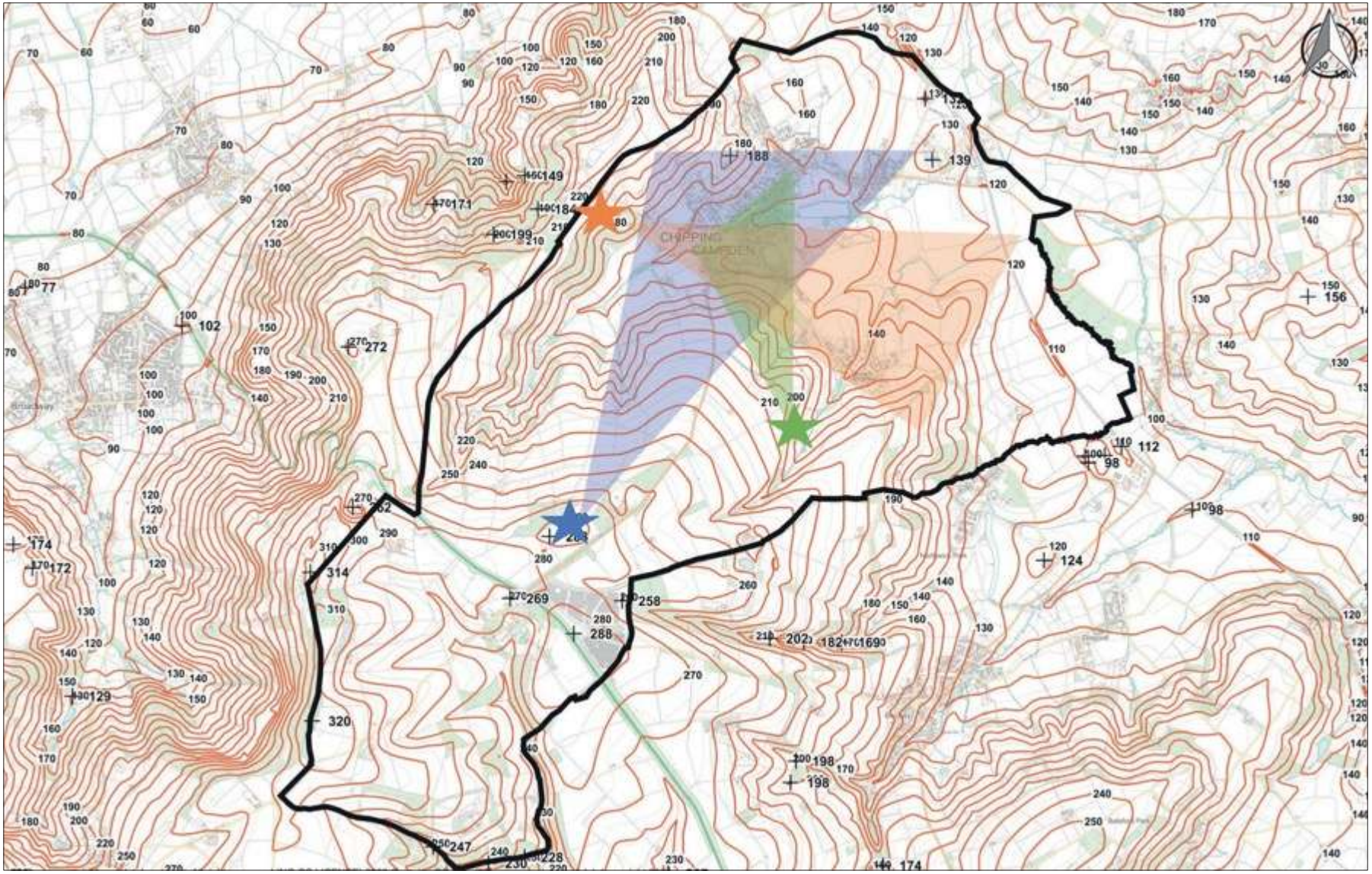


Figure 5: Topographical map of Chipping Campden Parish neighbourhood with key views

Source: Andrea Pellegram Ltd, under OS licence AC0000808712

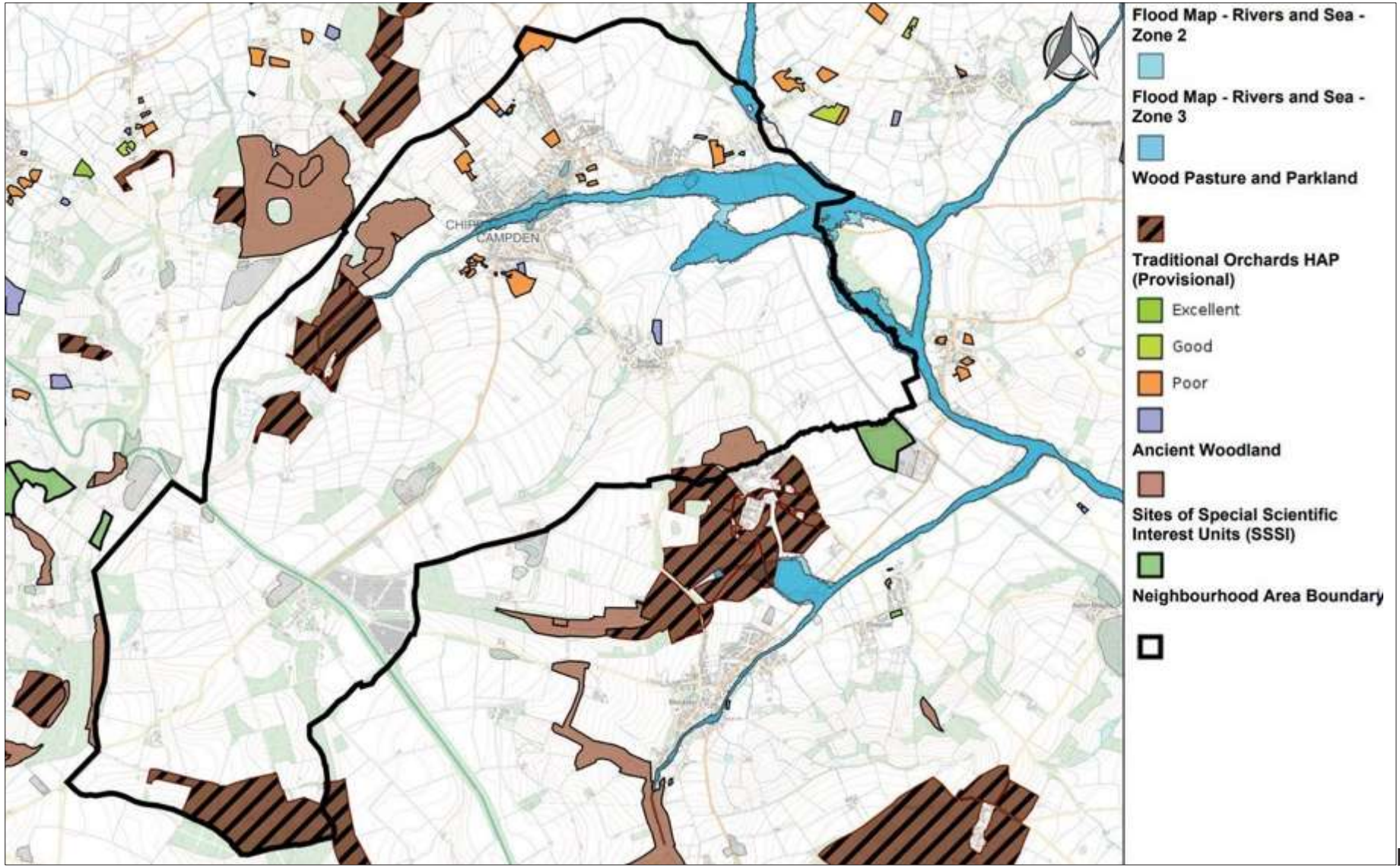


Figure 6: Flooding and woodlands in Chipping Campden Parish
Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Population characteristics

The Census 2021 (see **Table 1**) shows that the population was 2,400 living in 1,100 households. The population is older than for the UK as a whole with a lower proportion of people aged 15-49. Around 92% of residents were born in the UK and are 98% white. The proportion of population who are school children is relatively lower than for England (14% students in Chipping Campden Parish compared with 20% in England).

Chipping Campden Parish has a higher proportion of one and two person households compared to England as a whole and household composition is dominated by one person households (35%) and single-family households (62%). Household deprivation is lower than for England and general health is good.

Housing is dominated by houses and bungalows (91%) with only 8% of the population living in flats. The proportion of houses with 1-3 bedrooms is lower than for England as a whole but there is a much higher proportion of homes with 4 or more bedrooms (33% in Chipping Campden Parish compared with 21% for England). Since households are generally smaller, and homes are generally larger than for England, it is expected that the occupancy rating for bedrooms (having more bedroom than is strictly necessary for the number and type of occupants) shows that there is and "excess" of bedrooms indicating that some older single people are occupying large homes.

Most homes are owned outright which is much higher than for England as a whole (49% for Chipping Campden Parish, 33% for England), social renting is on par with England, and there is a lower amount of private renting.

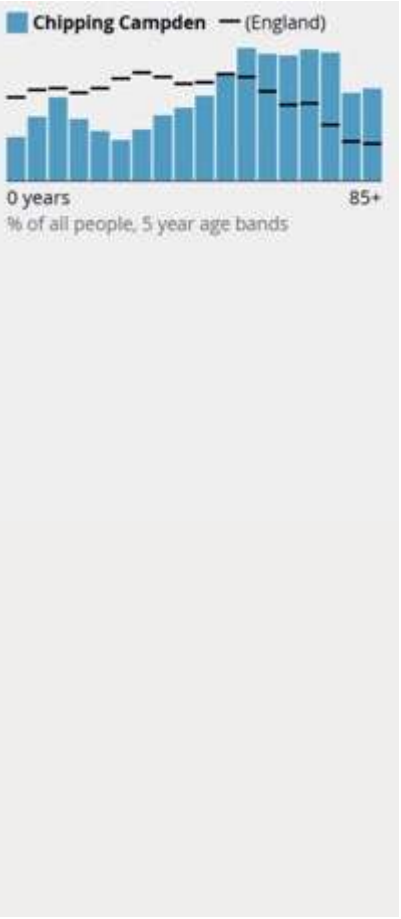
Chipping Campden Parish is a rural parish and is not accessible to major employment locations by train – there is support for a new train station which will be discussed below. Chipping Campden Parish shows a lower level of economic activity than for England (Chipping Campden Parish has 49% of the population as economically active compared with 57% for England) and 41% of these people work mainly from home. For those who travel to work, the majority tend to work locally.

The dominant occupations are as managers/directors (27% which compares to 13% in England) and professionals and associated professionals. Socio economic classifications show higher values than for England.

Table 1: Key Indicators from the Census 2021 for Chipping Campden Parish and England

Source: www.ons.gov.uk/visualisations/customprofiles/build/

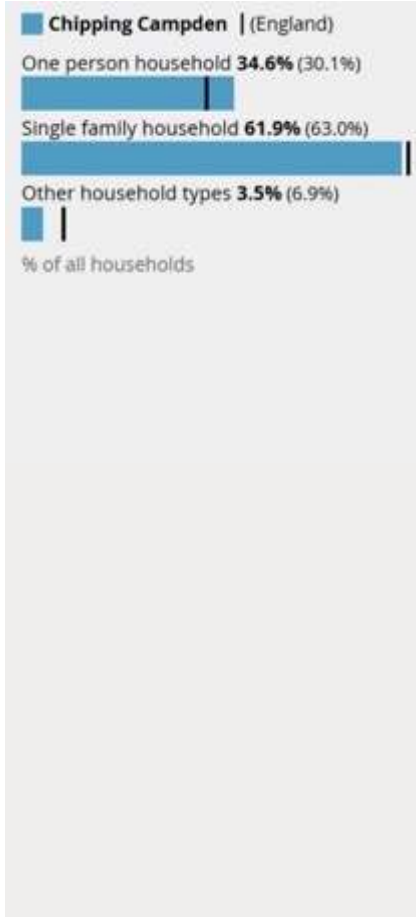
Age Profile



Household Size



Household Composition



Household Deprivation



General Health



Number of Bedrooms



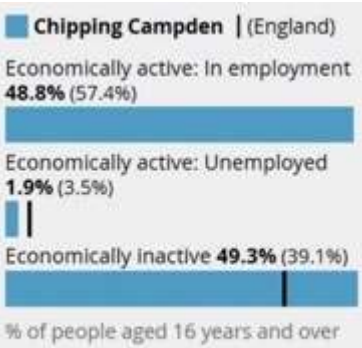
Occupancy Rating for Bedrooms



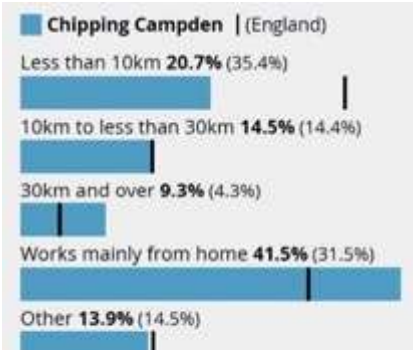
Tenure of Household



Economic Activity Status



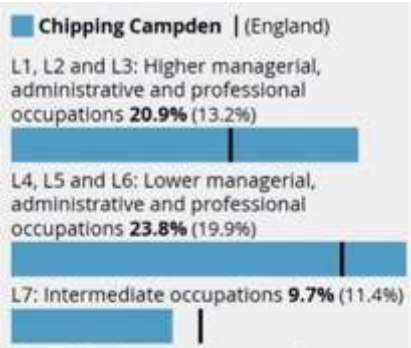
Distance Travelled to Work



Occupation



Socio-Economic Classification (NS-SeC)



Housing completions and type

Since 2012 Chipping Campden Parish has seen substantial housing development: 288 houses have been built, with another 76 in the Local Plan proposed for the Aston Road development (see Local Plan). But very little new social housing has been built for many years, and the older stock of social housing has been significantly reduced through the exercise of right to buy. Over the 1930s and 1950s approximately 200 social houses were provided, with another 20 or so private houses available for low rent. In the present day there are approximately 58 properties available as social housing within the town. This lack needs to be addressed.



The Town Council requested housing completions data from Cotswold District Council for 1 April 2018 to 31 March 2023 (5 years), summarised in **Table 2**. Most dwellings were built on greenfield land - there is not much previously developed land in the parish and that new housing development will probably, of necessity, need to be located on greenfield sites.

Year	Net completions	Dwellings on greenfield land	Dwellings on brownfield land
2018/19	10	23	0
2019/20	24	10	13
2020/21	38	34	4
2021/22	23	10	14
2022/23	23	3	7
Annual Average	18	16	2

Table 2: Residential completions 2018/19 –2022/23
Source: Cotswold District Council

Data in 2023 was recorded differently from the preceding years and for that year (2022/23) it is possible to review house sizes. Almost two thirds of new homes were large and there was a relatively small number of one- and two-bedroom properties. This confirms the census data that shows that many homes have "unoccupied" bedrooms. This is shown in **Figure 7.**

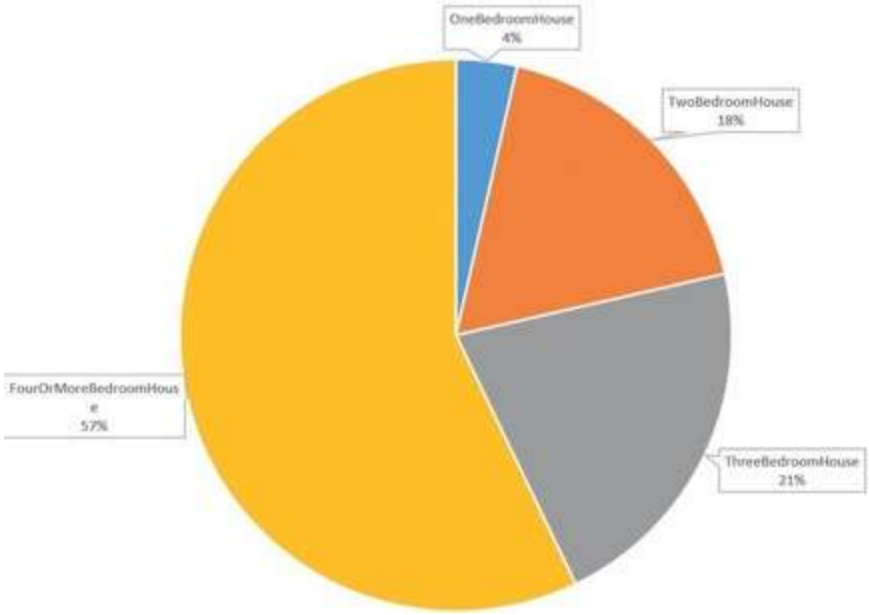


Figure 7: Residential completions in 2022/23 by number of bedrooms
Source: Cotswold District Council










NEW BARRELS PITCH

Community concerns and aspirations







Community concerns

- Details of the consultation with the local community during the CCNDP preparation process which began in 2014, and included meetings, open days and community surveys are contained in the Consultation Report which is a separate document. The CCNDP reflects the results of these consultations. A summary of the key findings of community consultations for the CCNDP and of the approved Local Plan is set out below.

- Because of its international reputation as the 'Jewel in the crown of the Cotswolds', Chipping Campden Parish is an attractive location for people with means to purchase homes, including weekend or second homes. The impact of this has also been felt in surrounding villages and hamlets, with high house prices, disruption of communities and the stifling of economic activity, a fact recognised in Local Plan Policy S16.[3]

- There is a need for affordable and / or social housing for local people, housing suitable for an aging population, and conversion of properties within the town where this would restore listed buildings in line with the Cotswold Design Code but would not result in the loss of retail, hospitality or employment floorspace.

- There is strong opposition to new peripheral housing developments outside the Chipping Campden Development Boundary.

- There is a need to protect the unique townscape and natural environment and setting of the Town and Parish. These should be conserved and enhanced, not spoilt by poorly designed and/or sited developments for inappropriate uses which can affect the Town and the area's attraction to tourists and damage the local economy.

- A Community Design Statement is needed to support the Cotswold Design Code.

[3] Cotswold District Council Local Plan

- Neighbourhood Plan policies should protect land quality and the sensitivity of Chipping Campden Parish's environment and setting, by resisting development on the valley floor of the Cam and the Coneygree to the south of the church and the steep slopes on the north-west edge of the town, the view corridors and vistas to the church; landscape to the south between Chipping Campden and Broad Campden, and the rising ground to the west.

- Plan policies should seek to maintain and develop the Town's economy, protect and develop existing employment sites, create new employment opportunities within the parish, and support and develop tourism.

- The Town is very fortunate to have the range of shops available and residents should 'either use them or lose them'. The weekly and monthly markets prove popular and provide additional retail choice in the town, Most people used the Town for 'top-up' grocery shopping rather than mainstream shopping.

- Additional parking is required (including bus parking), better access to public transport is needed and a reduction in the impact of through traffic is required, especially relating to Heavy Goods Vehicles.

- Residents tend to use their cars for heavier weekly shopping although this means that they do not do their 'weekly shop' in the Town. Comments made about the need to have a car park close to the shopping facilities included – 'Parking diabolical, street blocked all day by office/ shop workers and Cotswold Way walkers, Get A Car Park! Parking is the essence, too many long-term parked vehicles by people walking the Cotswold Way, Whenever planning permission is given, parking provision should be mandatory, opportunities in the past missed'.

- Many leading food retailers offer home delivery services within the Parish.




A.I.M.Logistics
Ltd








Campden BRI
food and drink innovation



















Community aspirations

The Cotswold District Local Plan has offered a number of as yet unrealised opportunities that the community continues to support: these include the opportunity to create better car parking facilities in the town centre alongside the redevelopment of Chipping Campden School and the opening of a new railway station. These matters are strategic in nature and beyond the capacity of a neighbourhood plan to deliver. However, the main opportunities can be summarised as follows and mapped in **Figure 8**. This figure should not be construed as an allocation.

Better town centre parking

It is hoped that eventually, Chipping Campden School will have a new school campus that will offer new car and coach parking opportunities for residents and tourists out of school hours.

It is understood that Chipping Campden School has been working closely with Gloucestershire County Council to develop an overall plan for the delivery of the Bratches Development including the new access road and car park and is in discussion with Gloucestershire County Council with respect to the financing of the road and car park. The school has consulted widely and has received substantial support for the project.

Railway Station

Chipping Campden Town Council supports the reopening of the Cheltenham to Stratford-upon-Avon railway line (Local Plan Policy SP6, INF3), a railway station at Chipping Campden, and the review of HGV routes and traffic management improvements in the CCNDP area.

The re-opening of the Cheltenham to Stratford-upon-Avon railway line is an opportunity to add a new mode of travel to the town.

Improvements to the Honeybourne line, and the inclusion of a railway station at Chipping Campden could allow residents and visitors to travel by more sustainable modes than the current reliance on private cars.

Campden BRI, Campden Business Park and start-up industries

The Town Council supports the master-planning and development of the BRI site, expansion of the Campden Business Park for international and local start-up businesses.

- Ensuring buildings are of a high standard of design to attract high quality industry.
- Encouraging new firms to start up or relocate to Chipping Campden for new laboratories, business space, conference and training facilities and food testing.
- Chipping Campden Library in the town centre provides a local business hub offering 3-D printing, graphic design hardware and other business support.

Chipping Campden Town Council supports the development of a replacement primary School, Health Centre and Indoor Sports Facility on a site adjacent to the Bratches Housing Development off Aston Road.

Replacement Primary School

St James and Ebrington Primary School on Cherry Tree Close is on a cramped site where all the children from the current two sites cannot be all accommodated at once. The children who do attend regularly need to spill out onto the adjacent Recreation Ground for supervised fun and games. Parking and drop-off at school opening and closing times is chaotic on narrow residential streets. A new site for a bigger school with playgrounds and easy access would be welcome, improve school children's outcomes, and relieve congestion in Chipping Campden.

Health Centre

With an increasing population due to extra housing, and with an increasingly ageing residential profile, the current surgery in Back Ends cannot cope with demand and car parking is virtually non-existent. A new larger health centre with parking would overcome these problems.

Indoor Sports Facility

The secondary school has a small indoor swimming pool and gym made available to the Town outside school hours. The Town does not have a general access public indoor leisure facility and relies on the school and whilst these are valuable, the standard of facilities requires improvement. An indoor facility to help keep the townsfolk generally healthier, and to allow expert coaching and practice would be a great asset. A shared car park for these facilities also makes sense.



Figure 8. Community aspirations
Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Plannning Policies



Planning Policy context

The Development Plan[4] for Chipping Campden is the Cotswold District Local Plan 2011 – 2031, adopted August 2018. Notable policies are:

- Policy DS1 identifies Chipping Campden as a Principal Settlement.
- Policy DS2 allows development within Development Boundaries.
- Policy CHI3 allocates land for a car park which has since that allocation has proven to be undeliverable.
- Policy S16 (Chipping Campden)
  - Allocates land at Aston Road for 36 dwellings (this has been delivered through planning permission 18/04768/ OUT granted in 2020).
  - Allocates land for a burial ground that has also proven to be undeliverable.
  - An extension to the Campden Business Park.
  - Identifies the need to safeguard the railway station site to accommodate requirements in the Local Transport Plan for a new station.
  - A new pocket park is allocated.
- Policy EC4 (which is predominantly outside the neighbourhood area) contains policies for the Campden BRI.
- Policy EC7 identifies the Key Centre Boundary.
- Policy SA3 in relation to INF1 identified the strategic infrastructure requirement for the expansion of Chipping Campden Secondary School.

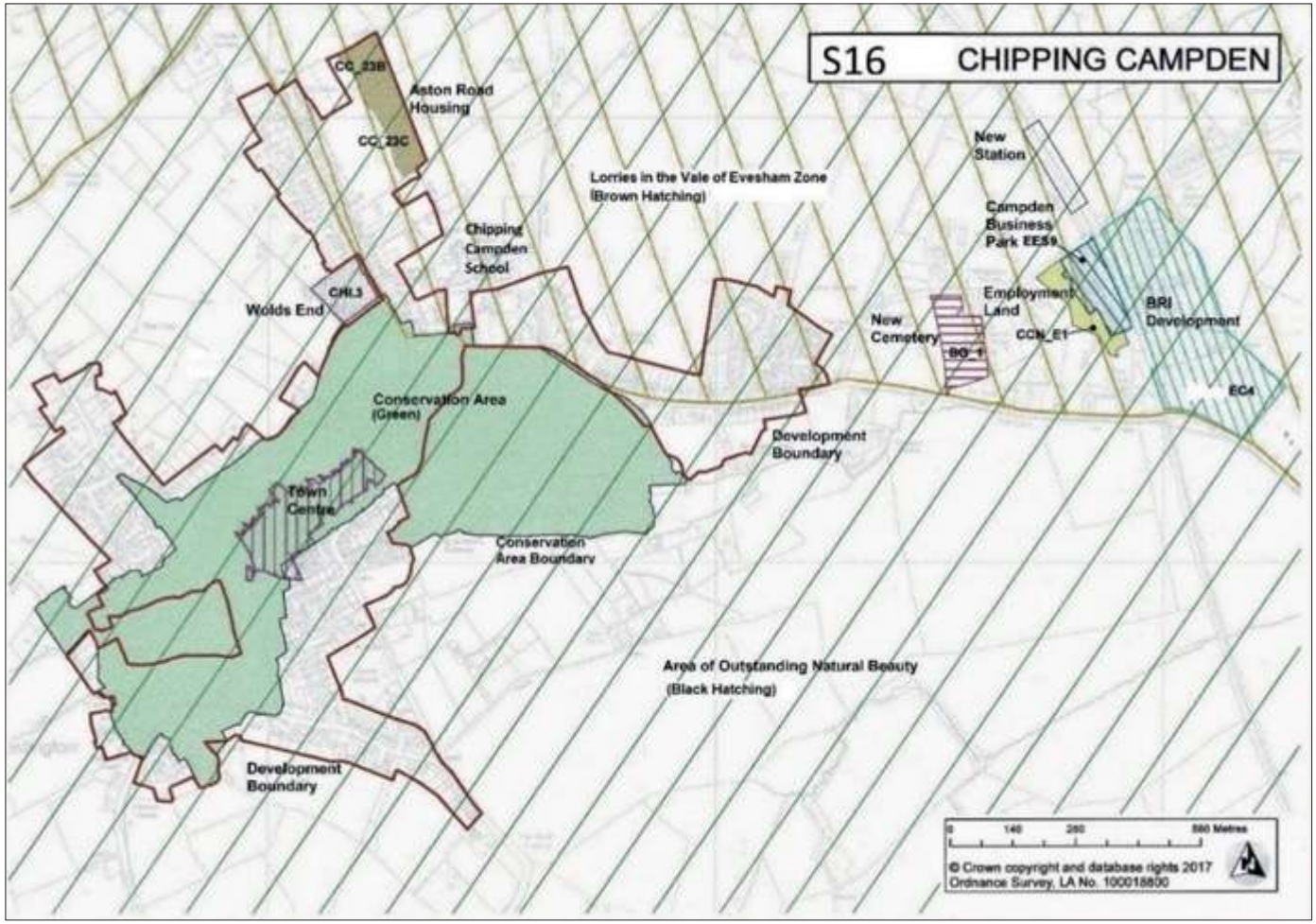
[4] Waste and minerals plans produced by Gloucestershire County Council are not



Cotswold District Council Local Plan

The local plan is being updated and where policies change substantially, this may render some of the CCNDP policies out of date.

The Cotswold District Local Plan contains many policies to support the Local Plan's Development Strategy. These are not repeated in the CCNDP and any reading of the CCNDP should be accompanied by a study of the District Local Plan so that the full implications of both plans are understood.



Sustainable development

The NPPF requires plans to be based upon the presumption in favour of sustainable development to meet the development need of their area, align growth and infrastructure, improve the environment, and mitigate climate change. Sustainable development is defined as having economic, social and environmental objectives.

The CCNDP has set out policies to meet the requirement for sustainable development and this is illustrated in **Table 4**.

CCNDP policy	Economic Objective	Social Objective	Environmental Objective
1: Chipping Campden Town Centre			
2: Social and community infrastructure			
3: Design of the built and natural environment			
4: Non-designated heritage assets			
5: Biodiversity net gain and local nature recovery			
6: Local Green Spaces			

Table 4: How the CCNDP promotes sustainable development objectives









Policy 1: Chipping Campden Town Centre

Objectives

- **to protect and develop the town's economy**
- **to strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail, hospitality and other commercial offerings**
- **to improve the town's tourism offer and its attraction to tourists and visitors by improving existing facilities and introducing new ones.**
- **To ensure that there is an appropriate balance between rental accommodation for tourists and that which meets the needs of residents and their families**
- **To improve facilities for car parking**
- **To improve the facilities and safety for cyclists and pedestrians**

Chipping Campden town centre is a key attraction for tourists to the town and the surrounding area. It also provides for the day-to-day needs of residents because there is no major supermarket in the parish. Residents must drive to Evesham and Stratford-upon-Avon for their main shopping.

The town centre, because of its beauty and historic integrity, is very popular for visitors and attracts a mix of day visitors, people who stay in local hotels and B and Bs (including AirBnB) and for those who are passing through as walkers on the Cotswold Way which starts in Chipping Campden High Street.

The visitor economy is crucial to the well-being of permanent residents because their trade keeps small local businesses open and boosts the local economy to provide for more eateries, pubs and cafes than would normally be possible in such a small settlement. Providing for and supporting tourism is critical to the continued success of Chipping Campden town centre.

Tourism brings negative impacts as well and these must be managed. Overnight visitors are better-located in the town centre where they can walk to shops and hostelries; and existing shops, which create the vibrant and enjoyable town centre experience and create its character, should be protected.

The town centre is also an important employment location as the provider of a range of professional and other services required by residents and other local businesses.

Although the scope for housing may be limited, the town centre could be a good location for the elderly or those people who work there and cannot afford to travel. There can often be opportunities for housing conversion in the upper floors of commercial premises.


campden
gallery

Town Centre land uses

Local Plan Policy EC7 (Retail) identifies Chipping Campden as a key centre.

Policy EC8 (Town centre uses) states that the preferred sequence of locations for main town centre uses are in the centre only for key centres, and out of centre locations will only be considered if there are no suitable town centre locations. Policy EC8 goes on to require that all town centre uses should help maintain an appropriate mix of use in the centre and contribute to the quality, attractiveness and character of the settlement and the street frontage within which the site is located. The policy goes on to state that within the centre boundaries, town centre uses will be permitted where they would complement and enhance the retailing offer and that loss of town centre uses will be resisted.

Where the loss of a main town centre use is proposed, evidence must be submitted to demonstrate that the property has been continually, actively and effectively marketed for at least 12 months and that the use is no longer of commercial interest. Upper floor conversion in the town centre for housing will be permitted.

The CCNDP working party mapped all the main town centre uses in Chipping Campden for the area within and immediately adjacent to the key centre boundary (EC7) for ground and upper floors. This map is very detailed and has been repeated in **Appendix 3** in a smaller scale so that individual properties can be identified. **Figure 9**, below, shows the key centre boundary and the individual properties with their land uses.

Figure 9 shows that in October 2023, there was a good mix of town centre land uses although residential use clearly dominates[5]. As will be shown below, many of these residential properties also function as visitor accommodation according to evidence on the AirBnB website[6].

It is likely that visitor trade is responsible for the good mix of retail and food and drink establishments in the town centre – there is clearly a positive inter-relationship between town centre uses and the tourism industry. Other north Cotswold settlements that are a similar size as Chipping Campden, such as Mickleton and Northleach, do not boast as many shops and eateries though Stow has a thriving town centre.

As intended by Local Plan Policy EC8, the mix of town centre uses defines the character of the high street and to a greater extent the Conservation Area it sits within. No clear data on town centre land uses in Chipping Campden was available until this CCNDP mapped them. The data in **Figure 9** and **Appendix 3** should be considered the baseline for Local Plan policy EC8 as the basis of future planning decision-making with regard to EC8 (4) (b). The data shows the town centre land uses in 2023 and can be used to monitor change in land use over time.

[5] Sui Generis denotes activities that don't have a standard land use and therefore must always require planning permission to change use.

[6] Holiday Homes & Apartment Rentals - Airbnb, November 2023.



Figure 9: Town Centre Land Uses in Chipping Campden Key Centre
Source: Street survey October 2023, map by Andrea Pellegram Ltd, under OS licence AC0000808712

Changes to key centre boundary

Chipping Campden High Street runs in a south-westerly direction from its junction with Church Street to the east and Leysbourne to the north-east – the High Street runs on to become Leysbourne, and where they meet a T-junction is formed with Church Street.

The current key centre boundary line cuts across the High Street just a few metres short of its junction with Leysbourne and Church Street. CCTC believes this is not consistent with key centre main uses and functionality. On the northern side of the street, just 3 more properties lie between the existing boundary (which cuts through The Malt House): The Old School House, Grevel's House and Ivy House. The road sign for the High Street is situated at the front of Ivy House as shown in **Figure 10**.

Grevel House is Grade I listed, and is the oldest building in Chipping Campden, much photographed by tourists **Figure 12**. On the opposite side of the street, at the commencement of the High Street where it forms the junction with Church Street, is Chipping Campden Pharmacy, which is perhaps the most important facility on the High Street, serving the whole community and surrounding area with medicines, other pharmaceutical products, and services such as blood pressure testing.

The existing key centre boundary relating to Local Plan policy EC7 will be modified to better reflect the real function of the high street, as reflected in the geometry of the junctions and the existence of a key town centre use that is currently outside control of Policy EC8, but should be included within, given its importance to the community. The revised boundary is shown in **Figure 13.**



Figure 10: Commencement of High Street at Ivy House, three properties away from existing boundary.



Figure 11: Opposite Ivy House, junction with Church Street, and commencement of High Street, with Chipping Campden Pharmacy.



Figure 12: Grevel House; 14th Century, Grade I listed.

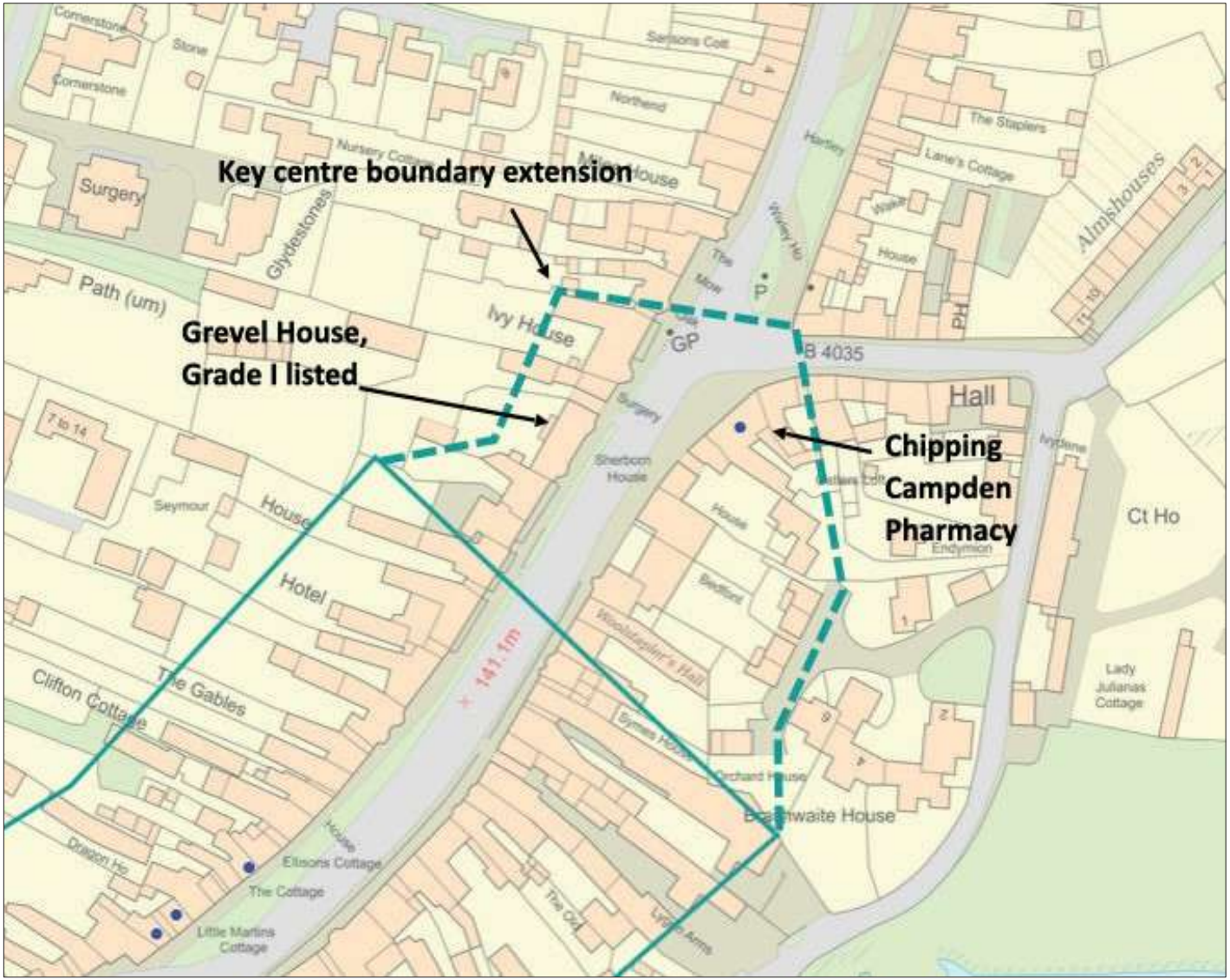


Figure 13: Revised Key Centre Boundary (Local Plan Policy EC7)

Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Visitor accommodation

As already mentioned, Chipping Campden is the "jewel of the Cotswolds", an ancient wool town, centre of the Arts and Crafts Movement, an exquisite wedding location, hosting a world-class music festival, location for Court Barn museum, start of the iconic Cotswold Way long distance footpath, near some of the National Trust's best sites such as Hidcote Manor Garden and is located in the world-renowned Cotswold National Lanscape.

Chipping Campden is a visitor attraction in itself: an immaculate and perfect example of the Cotswold design vernacular where the local Cotswold Stone is evident throughout its extremely well-preserved historic environment and rural setting.

Tourism is a key part of the local economy as a result, providing footfall for local businesses and maintaining the vitality of the high street. **Figure 14** shows a snapshot of the number of AirBnB accommodation addresses listed in November 2023 as a snapshot, though the number of units will probably change over time. **Figure 14** shows (in blue) that there are 3 hotels in Chipping Campden that also provide restaurant and pub spaces.

Local Plan Policy EC10 takes a positive approach towards the creation of new tourism facilities and visitor attractions that have a relationship with the historic and natural heritage of the area. Policy EC11, as it would be applied in the neighbourhood area, would allow for new hotels and serviced accommodation through the change of use of existing buildings within the Chipping Campden development boundary. Likewise, that policy requires that the creation of self-catering accommodation should also be provided in existing buildings and within the development boundaries.

This policy has implications for the Chipping Campden town centre because existing residential units can be converted without planning permission (in most cases) into holiday accommodation such as that advertised on the AirBnB site. At present, there is no separate use class for this sort of visitor accommodation and as such, these changes from residential to visitor accommodation are outside planning control. However, it is understood that the Government may introduce a new use class for short term holiday lets and if this is done, it may be possible to exert greater control over this form of development in Chipping Campden.

Under current rules, planning permission or listed building consent may be required where the existing buildings need to be altered to make the change from residential to visitor accommodation. Many of the buildings in Chipping Campden are listed and where this is the case, consent is normally required for:

- demolition - in whole or in part.
- any works of alteration or extension which would affect its character as a building special architectural or historic interest.
- any repair work that could affect the historic character of the building.
- replacement of historic features, fittings or fabric. It is a common misconception that only the exterior of a building is protected. Listed Building protections can extend to both the interior and exterior of the property. Protection can also extend to the curtilage of a listed buildings or structure.

Clearly, short term holiday let accommodation generates tourist visitors who are customers which help to keep Chipping Campden high street businesses alive. If the change from residential to visitor accommodation goes too far, it could become a threat to the vitality of the high street. Seasonality of tourism visits to the area is a key consideration and there is a balance that needs to be struck between retaining local residents who shop all year round, and visitors who may only visit the high street seasonally, thus leaving local shops vulnerable during off-peak tourist season.

Until there is planning control to regulate changes from residential uses to AirBnB type uses, planning control is limited to change under listed building consents and perhaps the change of use of shops to tourism accommodation which falls under Local Plan Policy EC8.

Chipping Campden town centre is currently functioning well and the current levels of footfall from both permanent residents and visitors is sufficient to maintain this vibrant town centre. The creation of new non-serviced short-term holiday let visitor accommodation from existing residential accommodation in the town centre could result in loss of retail and service activity, particularly in low tourist season.

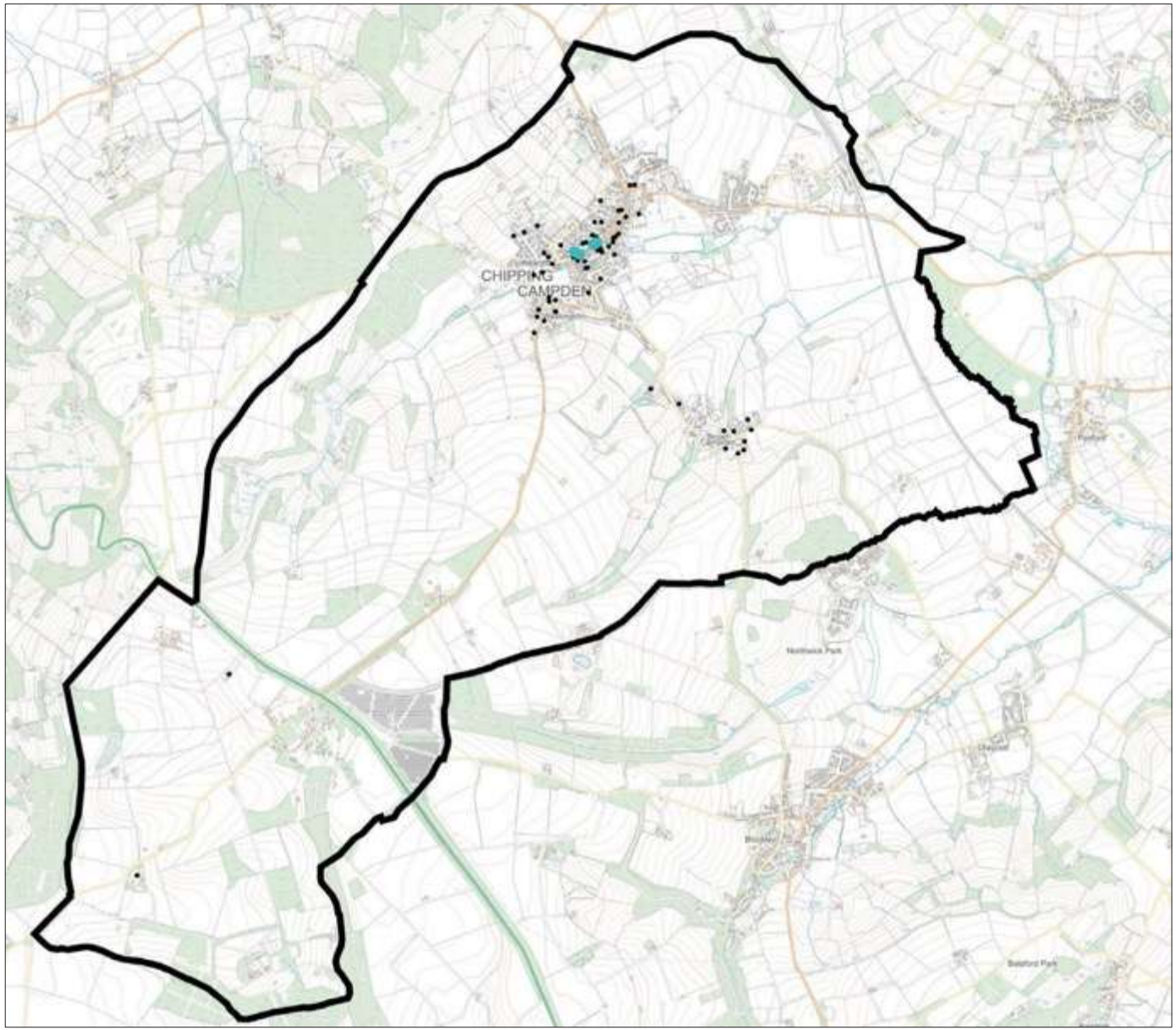


Figure 14: AirBnB accommodation and hotels in Chipping Campden Parish (November 2023)

Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Town centre parking

Community discussions around the Vision and Objectives identified that local residents were concerned that there was insufficient parking in the town centre and elsewhere in the two main settlements. The result is cars searching for spaces causing congestion, vibration and pollution in the town centre.

The Town Council undertook a parking survey in November 2023. A survey form was sent to all households inside the *Campden Bulletin* and 167 forms were returned. **Table 5** shows the results of the survey in order of support with the highest average score indicating greatest support.

The most popular options were time-limited parking and parking provided at the school. Other popular suggestions (38 respondents) were for parking at Cutt's Yard in the town centre. None of these suggestions can be progressed through the neighbourhood plan as policies but they can be progressed by the Town Council in response to planning applications and proposed policies from Gloucestershire County Council as the Highways Authority.

The Highways Authority, publishes data on road casualties. The 2019-21 data shows that for the parish as a whole, there were two fatalities in that year, 3 serious accidents, and 9 slight accidents. These figures (except for casualties) should be considered as under-reported since not all accidents are logged into the Gloucestershire database.

Local Plan policy S16 allocates land at Wold's End Orchard as a car and coach park. However, this site has been withdrawn since the site has been acquired by the Campden Society and maintained as a working orchard.

Initial discussions are progressing on a proposal to construct a new Chipping Campden School car and coach park on a site within the School campus to the north of Chipping Campden School. The car park would be accessed by a road integrated with the 'Bratches' housing development, on land in the ownership of Gloucestershire County Council; partly on the existing access road to Wolds End Farm, which would be upgraded; with the final section of the road being within the School Campus.

At present, the site proposed for the car park is a rough grassed area, bordered by the Wolds End Farm boundary, the Heart of England Way and Monarch's Way long distance footpaths, the School's Astroturf football / hockey pitch and the school playing field.

Chipping Campden is expanding, with 348 extra houses recently constructed or awaiting planning permission, putting significant strain on the Town's road and parking infrastructure. For some time, Chipping Campden has required a new public car park for coaches and cars particularly for visitors and local workers.

The creation of a new car park for the School would allow the existing School car park to be used for public parking providing approximately 100 additional public parking spaces within safe walking distance of the Town Centre. This will help meet the growing demand for parking from visitors to Chipping Campden and improve road safety standards, while alleviating congestion and reducing pollution to help improve the health and wellbeing of school children and residents.

The existing Chipping Campden School car park has capacity for around 100 cars, but the School anticipates an increase in students over the next five years which will lead to an increase in the demand f or car and coach parking. At present, access is via Cidermill Lane, a one-way narrow gyratory system, which serves roads to the north, south and east of Chipping Campden. Throughout term time, sixteen coaches transport students to and from the School – between 8-9am and 2.30-4pm – at the beginning and end of each school day.

During the school day, the existing car park is available for parking by staff, students, and school visitors, however, the central area of the car park requires to be vacated twice a day when coach movements take place. Random parking of cars, camper vans and coaches, when combined with the arrival and departure of School student coaches causes severe congestion.

The Town Council undertook a parking survey in November 2023. A survey form was sent to all households inside the *Campden Bulletin* and 167 forms were returned. **Table 5** shows the results of the survey in order of support with the highest average score indicating greatest support.

Table 5: November 2023 Parking Survey Priorities

Source: Chipping Campden Town Council, November 2023

Respondents scored various proposals, with 1 being opposed and 10 being fully supportive. The averages where:	Average score
Provide new school car park and free up existing school car park for all to use (usual fees)	6.8
School car park freed-up, with reduced parking fees for all town residents and employees	6.5
Time-limited, with permits for long-term parking for residents lacking off-street parking	6
Time-limited parking, but permits for town-centre residents to park long-term	5
School car park freed-up, with reduced parking fees for town employees only	5
New public car park off Aston Road	4.6
Paid permit parking for residents of town centre with no time-restriction	3.6
New public car park on Back Ends	3.6
New public car park on Station Road next to sewage works	3.4
No change to current situation	3.3
Time-limited (eg 2-hours) parking on street for all	3.2
Paid permit parking for all Campden residents with no time-restriction	3
Pedestrianise the town centre	2
Ban on all on-street parking in the town centre (as defined in survey form)	1.7

Policy 1: Chipping Campden Town Centre

The information in Appendix 3 in this plan should be the baseline for Local Plan Policy EC8, and there will be a presumption that town centre uses (Class E, Sui Generis and all forms of visitor accommodation) will be retained.

The Key Centre Boundary is extended as shown in Figure 13.

Where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre.

Proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported.

Policy 2: Community facilities and infrastructure

Objective

- **To ensure that the community has appropriate infrastructure in terms of health services, sports / leisure facilities, amenities, public transport and green infrastructure**

Chipping Campden is fortunate to have a full range of community facilities, local health services, opportunities to meet, high quality recreation for all ages, and beautiful and tranquil open spaces within the built up areas. This is in addition to the beautiful countryside in the Cotswolds National Lanscapes and the many recreational opportunities that it provides.

It is important to take stock of what is available and to ensure that provision is maintained in the long term so that this high level of quality services is maintained for future generations.

Local Plan policy INF2 defines social and community infrastructure as being:

- doctors' surgeries and dental practices, day-care centres, hospitals and other healthcare/social service facilities;
- community safety and emergency services (fire, police, ambulance: the "blue light" services);
- education and training facilities (including adult and further education), pre-school centres and other children's services community halls/hubs, including places of worship and youth provision;
- cultural facilities, such as arts centres, libraries and museums;
- waste management, collection, recycling and disposal services;
- local shops, meeting places, and public houses;
- sports facilities and open space of public or nature conservation value; and
- parks, gardens, allotments and amenity open space together with natural or semi-natural green spaces such as disused canals or railway lines.

Table 6 and **Appendix 4** list all the social and community infrastructure in Chipping Campden Parish as the baseline of what exists and that should be protected under Local Plan policy INF2. Some infrastructure shown in the table such as defibrillators and the specific activities that are carried out inside commercial sites do not require planning permission to change use and so it will be important to maintain an overview of the current provision in these cases.

Table 6: Social and community infrastructure in Chipping Campden Parish

Allotments
- Chipping Campden Allotments - F2

Care Homes
- Mill House Care Home - C2
- Jecca's House / Campden Home Nursing - C2

Churches
- St James Church - F1f
- Chipping Campden Baptist Church - F1f
- St Catherine's Church - F1f
- St Michael and All Angels Church - F1f
- Friends (Quaker) Meeting House - F1f

Defibrillators
- Berrington Road telephone kiosk
- Broad Campden telephone kiosk
- Leisure Centre
- Chipping Campden Pharmacy
- Post Office
- St Catharine's School

Dentists
Today's Dental Care - Ee
Ashbee Dental Care - Ee

Doctors' Surgeries
- Chipping Campden Surgery - Ee

Gardens and parks
- Ernest Wilson Gardens - F2c
- Wolds End Orchard - F2c

Fire Stations
- Fire Station

Meeting Rooms / Facilities
- Church Rooms - F2c
- Town Hall - F2c
- Old Police Station – Courtroom - F2c
- Broad Campden Village Hall - F2c
- Baden Powell Centre - F2c

Opticians
- Dr C.P. Grey - Ee

Play areas
- Recreation Ground Play Area (George Lane) - F2
- Castle Gardens Play Area - F2
- Recreation Ground Play Area (Olimpick Drive) - F2

Post Offices
- Post Office - F2a

Public Houses
- The Eight Bells
- The Lygon Arms Hotel
- The Noel Arms Hotel
- The Red Lion
- The Volunteer Inn
- The Bakers Arms
- Cotswold House Hotel

Schools
- Chipping Campden School - F1a
- St James and Ebrington C of E Primary School - F1a
- St Catharine's Catholic Primary School - F1a

Shops (Groceries)
- The Co-operative (Co-op) - Ea
- Fillet & Bone - Ea
- The One Stop Shop – Ea
- Toke's – Ea
- Maylams - Ea

Spas
Cotswold House Spa Ed

Sports Facilities
- Recreation Ground - F2c
- Chipping Campden Bowling Club - F2c
- Chipping Campden Cricket Club - F2c
- Chipping Campden Tennis Club - F2c
- Chipping Campden Leisure Centre - F2c

Toilets
- Sheep Street Public Convenience - F2
- Old Police Station - F2

Theatres, museums and library
- Court Barn Museum - F1c
- Cidermill Theatre
- The Old Silk Mill - F1c
- Chipping Campden Library - F1d
- Visitor information centre - F2a






Mickleton HS
PRONTO
YN08 SOH



Nationally permitted development and use classes

National legislation[7] allows for the change of shops (Use Class E) to dwellings (Use Class C3) under most circumstances (referred to as Class MA development). This means that it is easy for landowners to convert town centre uses such as shops into dwellings. This does not apply to the Chipping Campden town centre because of the policy does not apply where the proposed building to change use:

- has floorspace that exceeds 1,500 sq. m.
- is a listed building
- is in a conservation area
- is within a National Landscape (formally referred to as AONB).

All these exemptions apply in Chipping Campden Key centre and therefore there is no nationally permitted change of use from shops to residential.

Planning permission will be required for these conversions and then Local Plan Policy INF2 and EC8 will apply.

Some shops are not considered to be Use Class E but are Use Class F2 (local community) where they are smaller than 280 metres square and there is no other such facility within 1000 metres radius of the shop's location. This is limited to shops that sell 'essential goods, including food, to visiting members of the public'.

The criteria set out above relates to shops selling 'essential goods' which include food but are not limited to food. In Chipping Campden, the post office also serves essential purposes in selling a range of household products, some foods, operating as a post office and additionally as a bank. It can therefore be considered to be Use Class F2a because if it were to close, the community would lose an essential service which sells a range of daily products and services and where there is no alternative within 1000 metres.

Similarly, at present, there are three small shops that would be defined as Use Class F2a, if they were the last shop standing. This means that it might be possible for two shops to close but the third and remaining shop should be retained.

Other services, such as the optician and dentist, are Use Class E but it could be argued that they important community facilities. However, these businesses rely upon the willing trading of individual trained professionals who may, out of personal choice, cease trading. There is that the planning system can do when the occupants of commercial premises vacate.

Other essential infrastructure

Some other infrastructure is essential to life in Chipping Campden but is not referred to in Local Plan policy INF2. This includes defibrillators and care homes. Defibrillators provide an essential safety feature in the case of an emergency. These are listed in **Table 6** and should be retained.

There is a care home at Mill House that provides residential accommodation and care for older people who can no longer live independently. This is a valued component of local community infrastructure. Additionally, there are two assisted living developments at Badgers Croft and Saxon Grange. Finally, there is a home care service charity (Campden Home Nursing) providing end of life nursing care to people in their homes.

Burial plots

A recent survey (March 2024) commissioned by CCTC confirmed that there were a potential additional 44 burial plots remaining. Land allocated in the Local Plan for burial space is no longer available. New burial land is therefore required and will become urgent in time. The Town Council has not identified potential sites. All sites require the approval of the Environment Agency regarding pollution impacts to groundwater. Burial sites should be accessible to all members of the community on foot, cycle or car, and

[7] The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2023 (legislation.gov.uk) The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (legislation.gov.uk)

should accommodate the needs of all faith groups.

Policy 2:
Social and community infrastructure

The infrastructure identified in Table 6 and Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8.

The provision of suitable land for human burial will be supported.

Policy 3 Design

Objective

- **To protect and enhance the area's heritage assets and its location within the Cotswold National Landscape, by encouraging development and conservation projects focuses that are sympathetic to the scale, design, heritage, and character of Chipping Campden Parish and its beautiful landscape setting and resisting developments for inappropriate uses, or that are unsympathetic to the scale, design, heritage and character of the town and its landscape setting.**

The Cotswold Local Plan provides very strong control over building design for the district in general and further advice is available from the Cotswolds National Landscape Management Plan.

The Cotswold Local Plan provides very strong control over building design for the district in general and further advice is available from the Cotswolds National Landscape Management Plan[8]. However, neither of these important documents are specific to Chipping Campden or Broad Campden and for this reason, the Town Council secured free technical support to prepare The Chipping Campden Design Guide. This can be found as a supporting document to the CCNDP. The Design Guide provides general advice for applicants and should be consulted in the development of designs.

In addition to the design of the built environment, Building With Nature[9] provides standards for green infrastructure and even offers accreditation for meeting those standards. Given the exceptional

quality of Chipping Campden Parish's environment, Building With Nature will ensure that new development makes the best contribution possible to improving the natural environment.

The historic environment is equally important in defining Chipping Campden Parish's unique identity and this is discussed further in Policy 4 for non-designated heritage assets. The historic environment is protected through Conservation Area status, listed building designations and Scheduled Monument protections, all of which are discussed elsewhere in the CCNDP.

The Historic Environment Record can also be consulted to reveal other assets and can be accessed by email at *her@gloucestershire.co.uk*

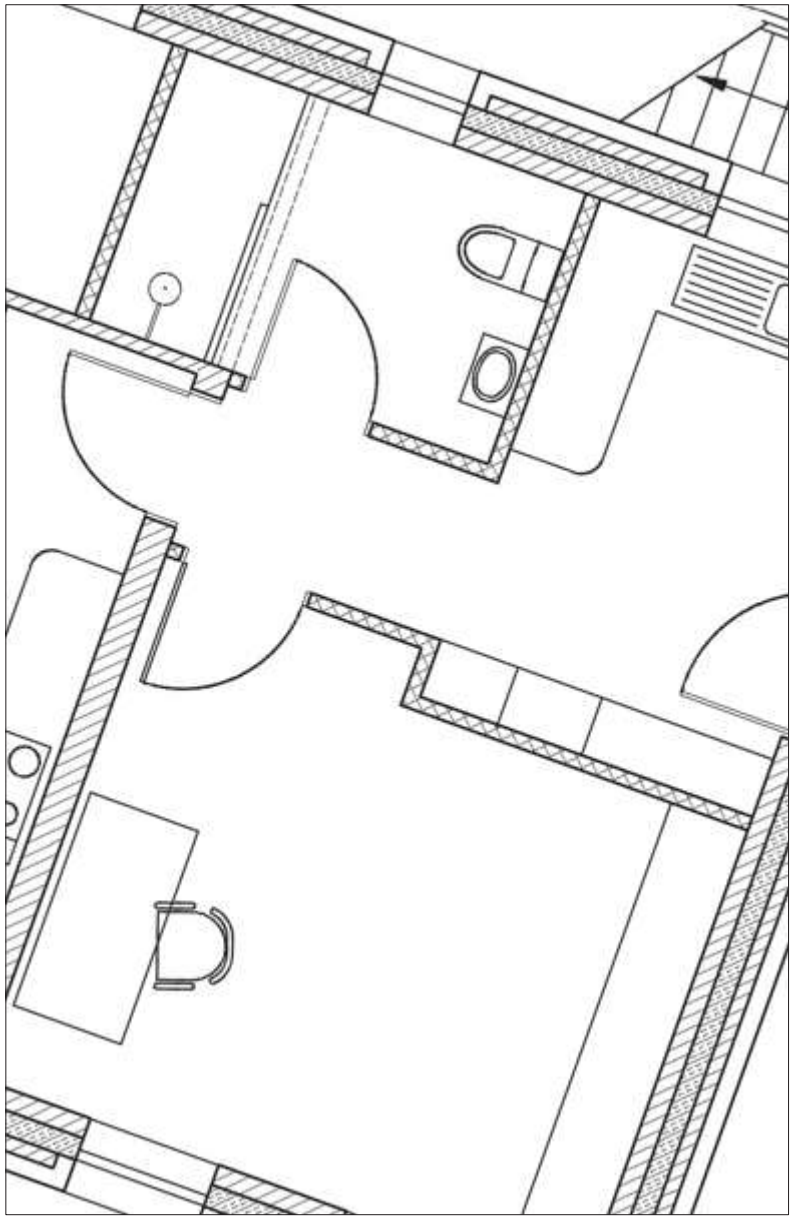
[8] https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/

[9] https://www.buildingwithnature.org.uk/













Policy 3:
Design of the built and natural environment

Planning proposals, particularly those with Design and Access Statements, should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed according to the Building with Nature Standards Framework or equivalent.

Policy 4: Non-designated heritage assets

Objective

- **To protect and enhance the area's heritage assets and its location within the Cotswold National Landscape, by encouraging development and conservation projects focuses that are sympathetic to the scale, design, heritage, and character of**

Chipping Campden Parish and its beautiful landscape setting and resisting developments for inappropriate uses, or that are unsympathetic to the scale, design, heritage and character of the town and its landscape setting

Local Plan policy EN12 manages development affecting non-designated heritage assets and where possible, seeks to enhance the character of the non-designated asset whilst avoiding its demolition or total loss subject to a balanced assessment of its significance. Table 6 of the Local Plan sets out the criteria for deciding whether a building, site or structure should be considered to be a non-designated heritage asset.

As set out earlier in this CCNDP, Chipping Campden Parish has two conservation areas and numerous listed buildings. These designations afford a tremendous level of protection for the historic environment and the CCNDP cannot, and should not, attempt to subvert these protections.

However, sometimes the small and overlooked historical features add a charm and character that formal listing may not protect. Examples of these sorts of features are signs, pumps, boot scrapers, sundials, post boxes and other small but significant features that add to Chipping Campden Parish's unique character. These small and sometimes humble features are worth preserving and are identified for preservation under Local Plan Policy EN12.

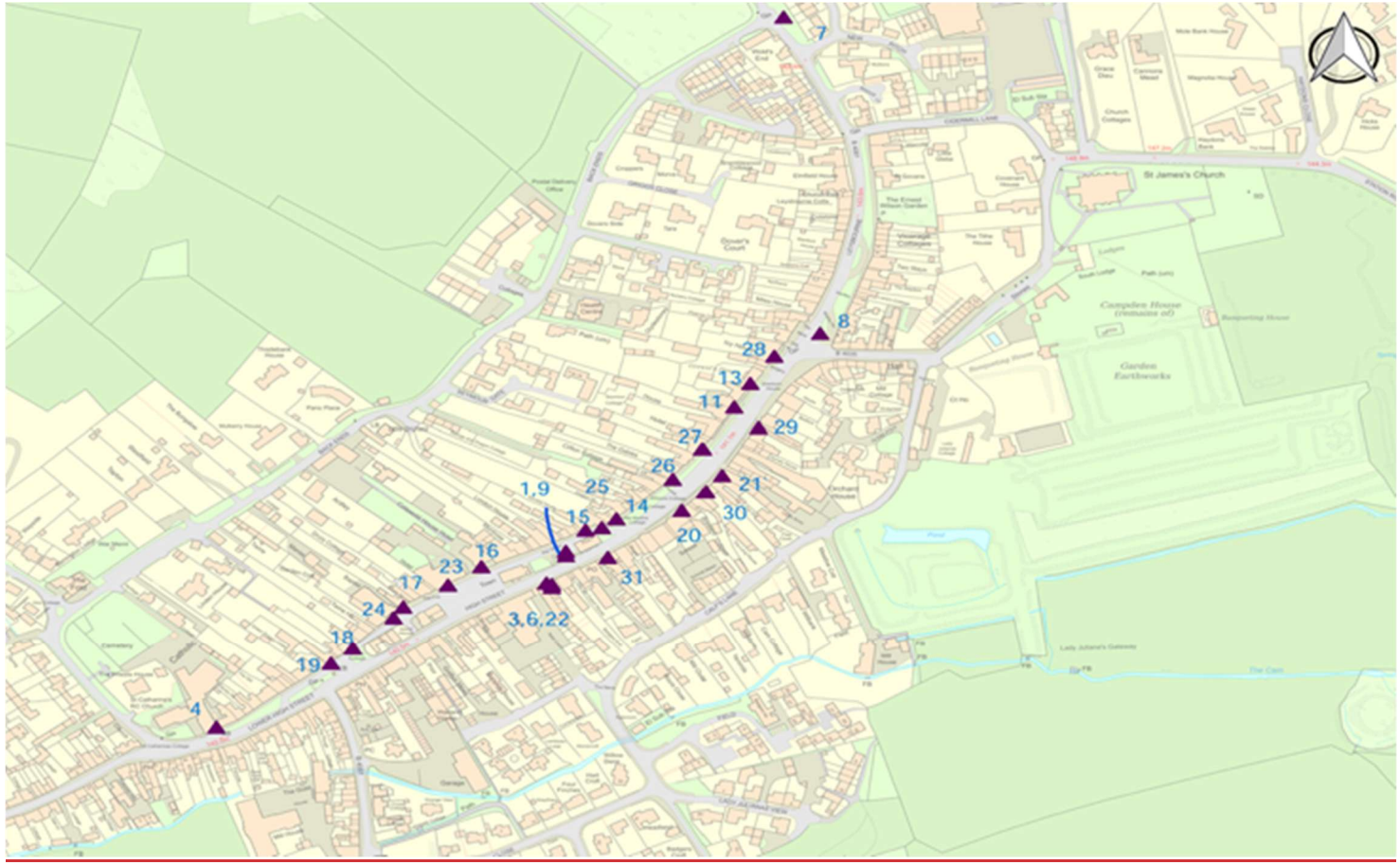
The main criteria that have been used to select these features derive from Local Plan Table 6, Buildings and structures, namely:

- Historic interest
- Age
- Rarity
- Aesthetic merits
- Representativeness of Chipping Campden Parish
- Historic association
- How they contribute to "group value"
  - Known architect / designer / builder
  - Social or communal value.

Appendix 5 gives detail of all the non-designated heritage assets in Chipping Campden Parish, provides their address, and explains their local significance. Some of the important features of buildings are already protected under existing legislation, national and local planning policy. Features of listed buildings are generally protected. However, there is no way to monitor the smaller features such as sundials and boot scrapers and they are therefore listed in Policy 4 so that decision-makers are aware of their existence.

Figure 15 shows the location of the town centre assets. The numbering on the figure corresponds to the asset number in **Appendix 5** and **Policy 4**.

Figure 15: Non-designated heritage assets



Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Policy 4:
Non-designated heritage assets

The following features are designated as non-designated heritage assets:

- **NDHA 1 The Millenium Sign**
- **NDHA 2 Westington Streetlamp**
- **NDHA 3 High Street Stamp Box**
- **NDHA 4 St Catharine's postbox**
- **NDHA 5 Westington postbox**
- **NDHA 6 High Street postbox**
- **NDHA 7 Scuttlebrook**
- **NDHA 8 Town Pump**
- **NDHA 9 Cotswold Way marker**
- **NDHA 10 Broad Campden Post Box**
- **NDHA 11 Punk stone carving**
- **NDHA 12 Graham Greene plaque**
- **NDHA 13 Sundial Grevel's House**
- **NDHA 14 Sundial Dragon House/Cottage 1690**
- **NDHA 15 Sundial Sundial House**
- **NDHA 16 Sundial Cotswold House Hotel**
- **NDHA 17 Sundial Dial House**
- **NDHA 18 Sundial Green Dragons**
- **NDHA 19 Sundial Crosby House**
- **NDHA 20 Sign of the Swan Inn**
- **NDHA 21 Sign of the Lygon Arms**
- **NDHA 22 Sign outside Elsley House**
- **NDHA 23 Bootscraper King's Hotel**
- **NDHA 24 Bootscraper Baptist Church**
- **NDHA 25 Bootscraper The Martins**
- **NDHA 26 Bootscraper Trinder House**
- **NDHA 27 Bootscraper Westcote House**
- **NDHA 28 Bootscraper Ivy House**
- **NDHA 29 Bootscraper Woolstapler Hall**
- **NDHA 30 Bootscraper Dovers House**
- **NDHA 31 Bootscraper Bantam Tearooms**

Policy 5: Environment and Biodiversity Net Gain

Objectives

- **To conserve and enhance the natural setting that characterises the town**
- **To provide and / or maintain green corridors for wildlife across and around Chipping Campden Parish**
- **To meet the challenge of climate change, flooding and light pollution**

Cotswold Local Plan Policy EN8 requires development to conserve and enhance biodiversity providing net gains where possible. Proposals that reverse habitat fragmentation and promote creation, restoration and beneficial management of ecological networks, habitats and features will be permitted, particularly in areas subject to landscape-scale biodiversity initiatives. Developer contributions may be sought in this regard.

CCNDP Policy 5 supports local plan policies and local implementation of requirements under the Environment Act 2021. Under the Act, Biodiversity Net Gain regulations set out requirements for at least 10% biodiversity net gain from most developments.

The CCNDP used supporting evidence obtained from the Gloucestershire Environmental Records Centre to map habitats (see **Appendix 2**). The working party identified areas of the parish which appear to be optimum locations for achieving nature recovery and improvement (**see Figure 16 and Appendix 6**). The following types of opportunity are available in the Parish:

- Waterways (the River Cam and smaller streams and drains) which form valuable riparian habitats
- Orchards and remnants of traditional orchards
- Woodlands and hedges of all types
- Key wildlife sites identified by Gloucestershire Wildlife Trust
- Other linear natural features that function as wildlife corridors.

Gloucestershire County Council (GCC) is working with Gloucestershire Wildlife Trust (GWT) to prepare a Local Nature Recovery Strategy (LNRS) for Gloucestershire which will include Chipping Campden Parish. As the responsible authority, GCC is required to work collaboratively with other local organisations including parish councils with input encouraged from across the public, private and voluntary sectors to establish shared proposals for what action should be taken and where. The LNRS will be published in 2025.

The CCNDP identifies areas which could be optimum locations within the parish to deliver nature recovery and improvement, because either they are already important for biodiversity in their own right, provide ecological connectivity or have good potential to increase in biodiversity value or connectivity. These are based on data provided by the Gloucestershire Environmental Records Centre. It is acknowledged that the report (published in 2017) relies on data from that time and more recent data will be available, but it is considered to remain a realistic and credible representation of nature recovery and improvement potential in the area.

Local areas where nature can be enhanced

Based on this work, the areas where nature has greater chance of improvement in Chipping Campden Parish are identified in **Figure 16** and **Appendix 6.** The appendix provides detailed habitat maps describing the local baseline which is being put forward for inclusion in the Gloucestershire LNRS. This should be referred to by landowners and scheme proposers when devising schemes. This local evidence should be used alongside the LNRS when that is issued. The maps show areas of particular importance for biodiversity, either because of their existing designations, they are locally important or have potential for improvement.





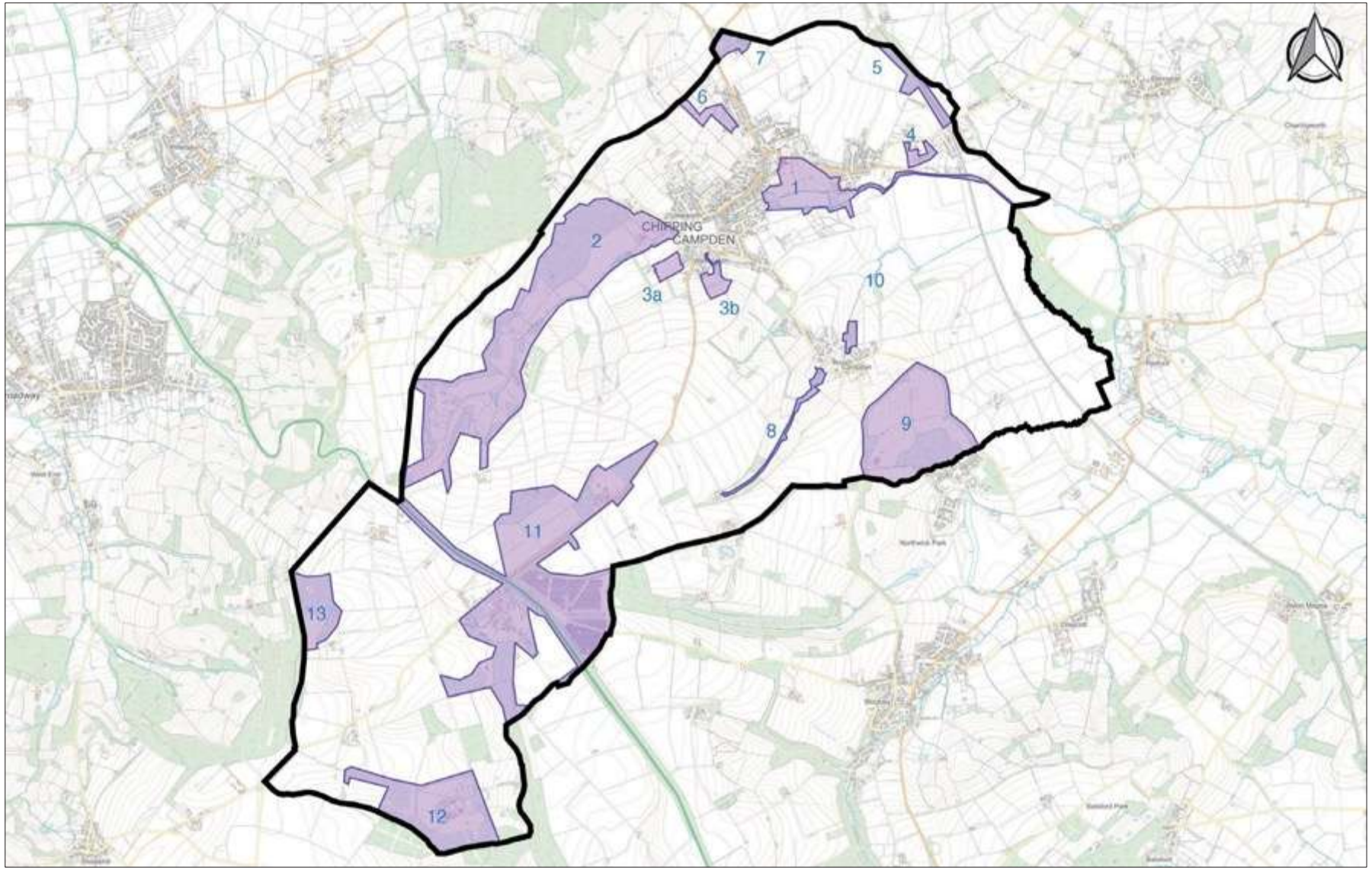


Figure 16: Nature improvement priority areas
Source: Andrea Pellegram Ltd, under OS licence AC0000808712

Opportunities and priorities for improving biodiversity

Whilst it is hoped that the Gloucestershire LNRS will include locations for local nature recovery and improvement within Chipping Campden Parish, the locations identified in Figure 16 may indicate the most ecologically meaningful local opportunities to deliver off-site bio-diversity net gain in relation to developments in the Parish which cannot meet their requirements on-site. Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each of the locations identified in **Figure 16**.

Ultimately, it is up to landowners to decide whether they want to make their land available for nature recovery and improvement initiative or to support local biodiversity net gain associated with local developments.

Additional opportunities arise with individual developments where it may be possible as part of scheme design to improve nature on site or use natural processes to manage water run off or link habitats. Preserving what is already in place, for instance open ditches should not be covered. Natural England's green infrastructure design guide will also help create nature friendly design.

Where possible, light pollution should be minimised.

It is important to note that identification as a local nature recovery or improvement area does not preclude development. Existing land use policies will remain in place. What will change however is that the identified sites are highlighted as being of particular importance with highest opportunities for nature recovery and improvement. It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund[10], agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund or similar.

Developers in Chipping Campden Parish are encouraged to approach development and the delivery of nature improvement and biodiversity net gain as follows:

- Consult the Local Nature Recovery map as a starting point to identify priorities and measures for nature recovery in Chipping Campden Parish.
- Where biodiversity net gain cannot be delivered on site, applicants are encouraged to work with Cotswold District Council to identify options for delivering off-site biodiversity net gain in Chipping Campden Parish. The following guide will be of interest:
  - Guidance on delivering Biodiversity Net Gain for planning applicants in Gloucestershire
- Where off-site biodiversity gain is proposed, this should ideally be focused on nature improvement areas shown in Figure 16 or the Gloucestershire Local Nature Recovery Map and within the parish.
- Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary.
- Only where off-site biodiversity improvements can be proven impossible to deliver within the parish should off-site and out-of-parish biodiversity improvements be considered.
- It would be helpful for planning proposals to demonstrate that landowners of sites where

nature improvement or biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.

Table 7: Existing habitat features that could be improved for the purposes of biodiversity gain and local nature improvement / recovery

Map number	NRA name	Improvement focus based on existing features
1	River Cam corridor	• Riparian habitat • Grassland • Woodland • Scheduled Monument • Traditional orchard
2	River Cam and Campden Wood	• Riparian habitat • Woodland
3	West Chipping Camden a. Leasows Farm b. Westington	• Traditional orchard
4	Dounor House	• Traditional orchard
5	Mickleton woodland	• Woodland • Riparian habitat
6	Kingcombe Lane & the Cley	• Traditional orchard • Woodland
7	Hillsdown Farm	• Traditional orchard
8	Broad Campden south	• Riparian corridor • Traditional orchard
9	Sedgecombe	• Woodland • Wildlife corridor (verges)
10	Hollybush Farm	• Woodland • Riparian habitat
11	The Gate House	• Opportunities to enhance wildlife corridors and connectivity • Woodlands
12	Hare Park Plantation	• Opportunities to enhance wildlife corridors and connectivity • Woodlands
13	Sally Beds	• Woodland • Riparian habitat







Policy 5:

Biodiversity Net Gain and Local Nature Recovery

Land identified in Table 7, Figure 16 and Appendix 6 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021.

Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows:

a. **Contact Cotswold District Council to determine whether work has been done towards the preparation of the Gloucestershire Local Nature Recovery Strategy regarding the proposal site, its relationship with the Gloucestershire Local Nature Recovery map, and seek advice on how best to deliver local nature recovery and biodiversity net gain within that context.**
b. **Where biodiversity net gain cannot be delivered on site, applicants must work with Cotswold District Council to identify ways that off-site biodiversity net gain can be delivered in Chipping Campden Parish.**
c. **Where off-site biodiversity gain is proposed, this should be focused on the nature recovery areas shown in Figure 16 or the Gloucestershire Local Nature Recovery Map.**
d. **Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary.**
e. **Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered.**

Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.

Policy 6: Local Green Spaces

Objective

- **To protect existing green spaces and to increase the provision of green spaces**

Chipping Campden's character is defined in large part by the available local green spaces that provide opportunities for the community to gather, celebrate, play and relax. The green spaces are in many forms: local amenity grassland in the town centre, historical features, places of tranquillity or for organised sporting activities.

The CCNDP is allocating the following sites as Local Green Spaces shown in **Figure 17** according to the provisions of the NPPF (December 2024). Full descriptions and detailed maps are provided in **Appendix 7**.

Some of these sites such as Bratches Allotments, Bowling Green and the Cricket Ground already have some level of protection making development challenging but not impossible. However, they are included here to provide an even greater level of protection, ensuring that they remain available to the community in the very long term.

National Planning Policy Framework policies apply for this:

106. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.	107.The Local Green Space designation should only be used where the green space is: (a) in reasonably close proximity to the community it serves; (b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and (c) local in character and is not an extensive tract of land.	108. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

Figure 17: Local Green Spaces in Chipping Campden Parish



Source: Andrea Pellegram Ltd, under OS licence AC0000808712







Policy 6:

Local Green Spaces

Land identified in Figure17, Appendix 7 and listed below is designated as Local Green Space.

1. **Berrington Road**
2. **Leysbourne**
3. **High Street**
4. **Memorial Green**
5. **Castle Gardens Play Area**
6. **Olimpick Drive Play Area**
7. **Littleworth**
8. **Westington**
9. **The Mound, Broad Campden**
10. **Court Barn/Cartwash**
11. **Recreation Ground**
12. **Bowling Green**
13. **Cricket Ground**
14. **Ernest Wilson Garden**
15. **Wold's End Orchard**
16. **Badger's Field**
17. **Calf Meadow**
18. **Allotments**
19. **The Hoo West**
20. **The Hoo East**
21. **The Cley**
22. **The Craves**

Appendices



Appendix 1. Creative Industries

Chipping Campden owes much of its beauty to the design skills of the 15th century craftsmen who built the gently-curving, honey-coloured High Street. Many appreciate Campden for just that glimpse of the past. And yet behind the golden façades, a new generation of creative individuals and businesses is thriving.

Artists, writers, graphic designers, photographers, jewellers, digital media providers and musicians are amongst the many to whom Chipping Campden is home. Further details are available on the Creative Campden website creativecampden.co.uk

Performance & Exhibition

Campden Edge
campdenedge.org
Youth Arts Fund

Campden Gallery
campdengallery.co.uk
High Street, Chipping Campden, GL55 6AG
Art Gallery

Campden Literature Festival
campdenmayfestivals.co.uk
Old Police Station, High Street, Chipping Campden, GL55 6HB
Literature Festival

Campden Music Festival
campdenmayfestivals.co.uk
Old Police Station, High Street, Chipping Campden, GL55 6HB
Concert Organiser

Campden Music Winter Season
campdenmusic.org.uk
St James' Church, Church Street, Chipping Campden
Concert Organiser

Charles Matthews
charlesmatthews.co.uk
Musician

Cidermill Theatre
cidermilltheatre.com
Chipping Campden School, Cidermill Lane, Chipping Campden, GL55 6HU
Theatre

Court Barn Museum
courtbarn.org.uk
Church Street, Chipping Campden, GL55 6JE
Arts & Crafts Museum

Gallery at the Guild
The Old Silk Mill, Sheep Street, Chipping Campden, GL55 6DS
Artists' Cooperative

Generation Jones
geoffmcarr@hotmail.com
Musician

Rachel Horton Kitchlew
rhortonkitchlew.co.uk
Musician

Andrew James Music
andrewjamesmusic.co.uk
Musician

Visual Arts

Betty Stocker
Cherry Orchard Close, Chipping Campden
Photographer

Campden Innovation Lab
gloucestershire.gov.uk/libraries/library-services/the-lab/
The Library, High Street, Chipping Campden, GL55 6AT
Creative technology support

David Birch
thegalleryattheguild.co.uk
Gallery at the Guild, Sheep Street, Chipping Campden, GL55 6DS
Artist: Teaching sessions

Geoffrey Jackson
geoffreyjackson.com
Artist

Houghton Art
jeremyhoughton.co.uk
6 High Street, Chipping Campden, GL55 6AT
Artist

Louise Goves
louisegovesillustrations.co.uk
Illustrator, Card Maker

Rachel Swallow Photography
Photographer

Simon Hanagarth Photography
simonhanagarthphotography.co.uk
5 Grafton Mews High Street, Chipping Campden
Photographer

Susan Rosenberg
rosenberg-art.com
Orchard Lawn, Broad Campden, GL55 6UU
Artist

Terry Morgan
terrymorganphotography.co.uk
42 Castle Nurseries, Chipping Campden, GL55 6NT
Photographer

Artisans and makers

Bay Tree
thebaytreeatcampden.com
High Street, Chipping Campden, GL55 6AG
Floristry

Caroline Groves
carolinegroves.com
Bespoke Shoes

Caroline Richardson
carolinejewellery.co.uk
The Old Silk Mill, Sheep Street, Chipping Campden, GL55 6DS
Jeweller

Covent Garden Academy of Flowers
academyofflowers.com
High Street, Chipping Campden, GL55 6HB
Floristry School

Harts Silversmiths
hartsilversmiths.co.uk
The Old Silk Mill, Sheep Street, Chipping Campden, GL55 6DS
Silversmiths

Lisa Drinkwater Flowers
lisadrinkwaterflowers.wordpress.com
Floristry

Mooch
moochcotswolds.co.uk
Blacksmiths House, High Street, Chipping Campden, GL55 6DR
Fabric designs

Mary Day Silks
marydaysilks.com
Gallery at the Guild, Sheep Street, Chipping Campden, GL55 6DS
Silk Artist

Niki Crew
@nikicrewart - insta
9 Catbrook, Chipping Campden, GL55 6DF
Glass Artist

Ridge & Furrow
ridgeandfurrowceramics.com
Ceramacist

Robert Welch
robertwelch.com
Lower High Street, Chipping Campden, GL55 6DY
Cutlery, Homeware Design

Sam Wilson Studio
samwilsonstudio.com
Elsley House, High Street, Chipping Campden, GL55 6HA
Homewares

Stefan Day
stefandaysilver.co.uk
Gallery at the Guild, Sheep Street, Chipping Campden, GL55 6DS
Jeweller

Digital design and publishing

Fiell Publishing
fiell.com
Barley Mow High Street GL55 6AG
Publishing

Loose Chippings
loosechippings.org
Pan's Place, Back Ends, Chipping Campden, GL55 6AU
Publishing & Design

Shire Marketing
shiremarketingspecialists.co.uk
9 The Cambrook, Chipping Campden, GL55 6AT *Marketing*

Food and Drink

Bantam Tearooms
bantamtea-rooms.co.uk
High Street, Chipping Campden, GL55 6HB
Tearooms & B&B

Campden BRI
campdenbri.co.uk
Campden BRI, Station Road, Chipping Campden, GL55 6LD
Food & drink research / science

Campden Coffee
The Old Silk Mill, Sheep Street, GL55 6DS
Coffee shop

Cotswold House Hotel
bespokehotels.com/cotswoldhouse/dining
The Cotswold House Hotel, The Square, Chipping Campden, GL55 6AN
Hotel & two restaurants

Crystal Palace Chinese Takeaway
mealmap.co.uk/crystalpalace
13 Sheep Street, Chipping Campden, GL55 6DS
Chinese takeaway

Da Luigi Bistro
daluigi.co.uk
High Street, Chipping Campden GL55 6HB
Italian restaurant

Eight Bells Inn
eightbellsinn.co.uk
Church Street, Chipping Campden, GL55 6JG
Pub, restaurant & B&B

Fillet & Bone
filletandbone.co.uk
High Street, Chipping Campden, GL55 6AT
Delicatessen, Butcher, Fishmonger

Huxley's Brasserie
cafehuxleys.co.uk
High Street, Chipping Campden, GL55 6AL
Brasserie & café

Huxley's Bakery
cafehuxleys.co.uk/bakery
High Street, Chipping Campden, GL55 6AL
Bakery & takeaway

Little Oak Vineyard
littleoakvineyard.com
Little Oak Cottage Paxford Road, Chipping Campden, GL55 6LA
Vineyard & wine producer

Lygon Arms
lygonarms.co.uk
High Street, Chipping Campden, GL55 6HB
Hotel, restaurant & pub

Maylams
find-open.co.uk/chipping-campden/maylams-1723458
High Street, Chipping Campden, GL55 6HB
Delicatessen, fine foods

Michael's Restaurant
michaelsmediterranean.co.uk
High Street, Chipping Campden, GL55 6AG
Restaurant

MorHQ
morbakery.co.uk
Unit 8 Battlebrook Drive, Campden Business Park, GL55 6JX
Bakery & breadmaking courses

The Noel Arms Hotel
bespokehotels.com/noelarmshotel/
High Street, Chipping Campden, GL55 6AT
Hotel, restaurant & pub. Folk music venue

The Red Lion Tavern
redliontavern.co.uk
Lower High Street, Chipping Campden, GL55 6AS
Pub, restaurant & B&B. Folk music venue

Toke's Food & Drink
tokesfoodanddrink.co.uk
Toke's, High Street, Chipping Campden, GL55 6AG
Delicatessen, wine shop & event caterer

Victor's
facebook.com/victorschippingcampden/
High Street, Chipping Campden, GL55 6AT
Sandwich bar & café

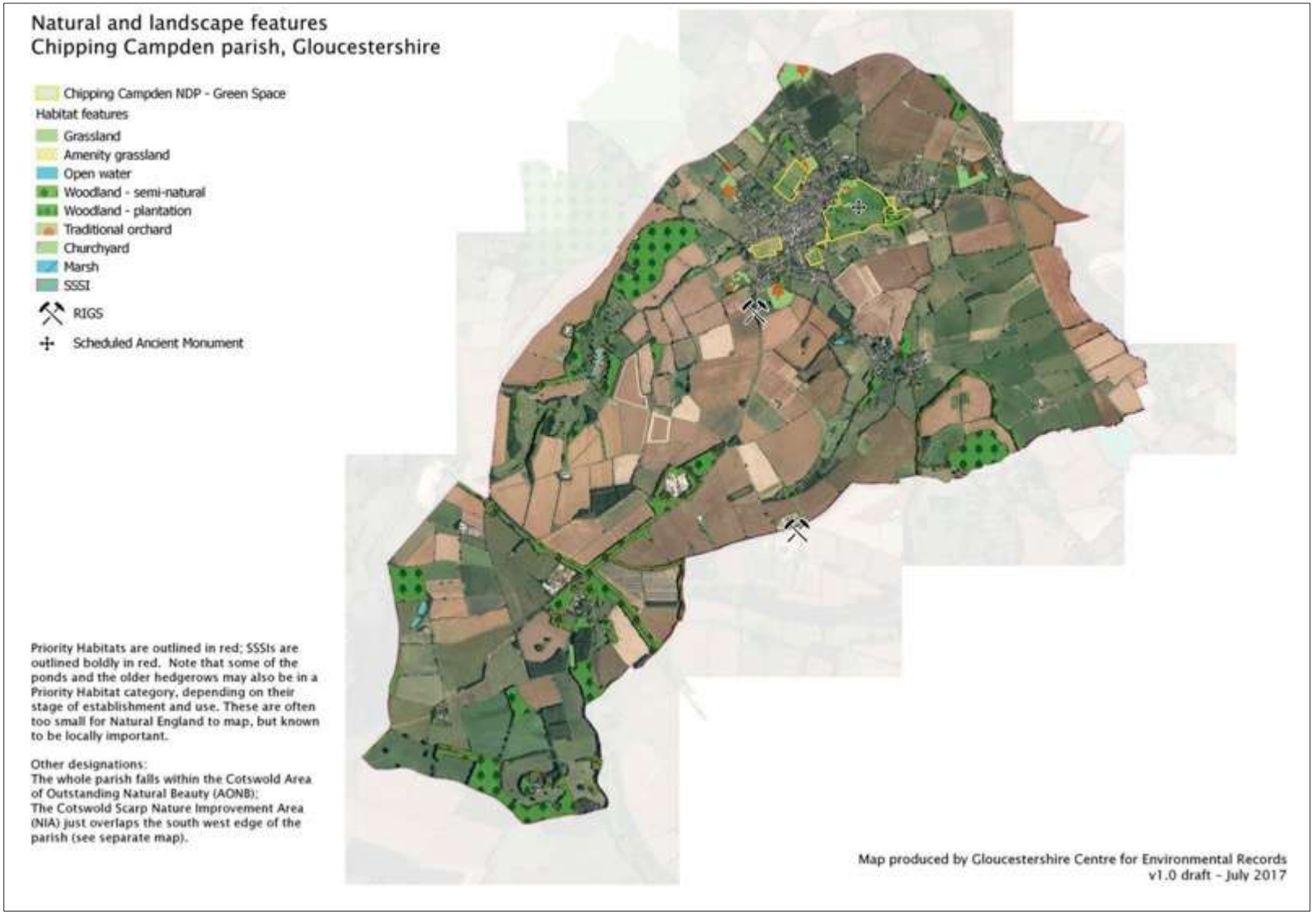
The Volunteer Inn
thevolunteerinn.net
St. Catharine's Square, Chipping Campden, GL55 6DY
Pub, Indian restaurant & B&B

Bromleys of Cotswolds
bromleysofcotswolds.co.uk
Hook House, High Street, Chipping Campden, GL55 6AT
Coffee shop

Appendix 2. Natural Environment

This data was prepared in 2017. Data on environmental features can become out of date and is therefore regularly updated. Applicants are encouraged to ensure that the data they use in the preparation of their proposals is up to date. This data is provided for illustrative purposes only.

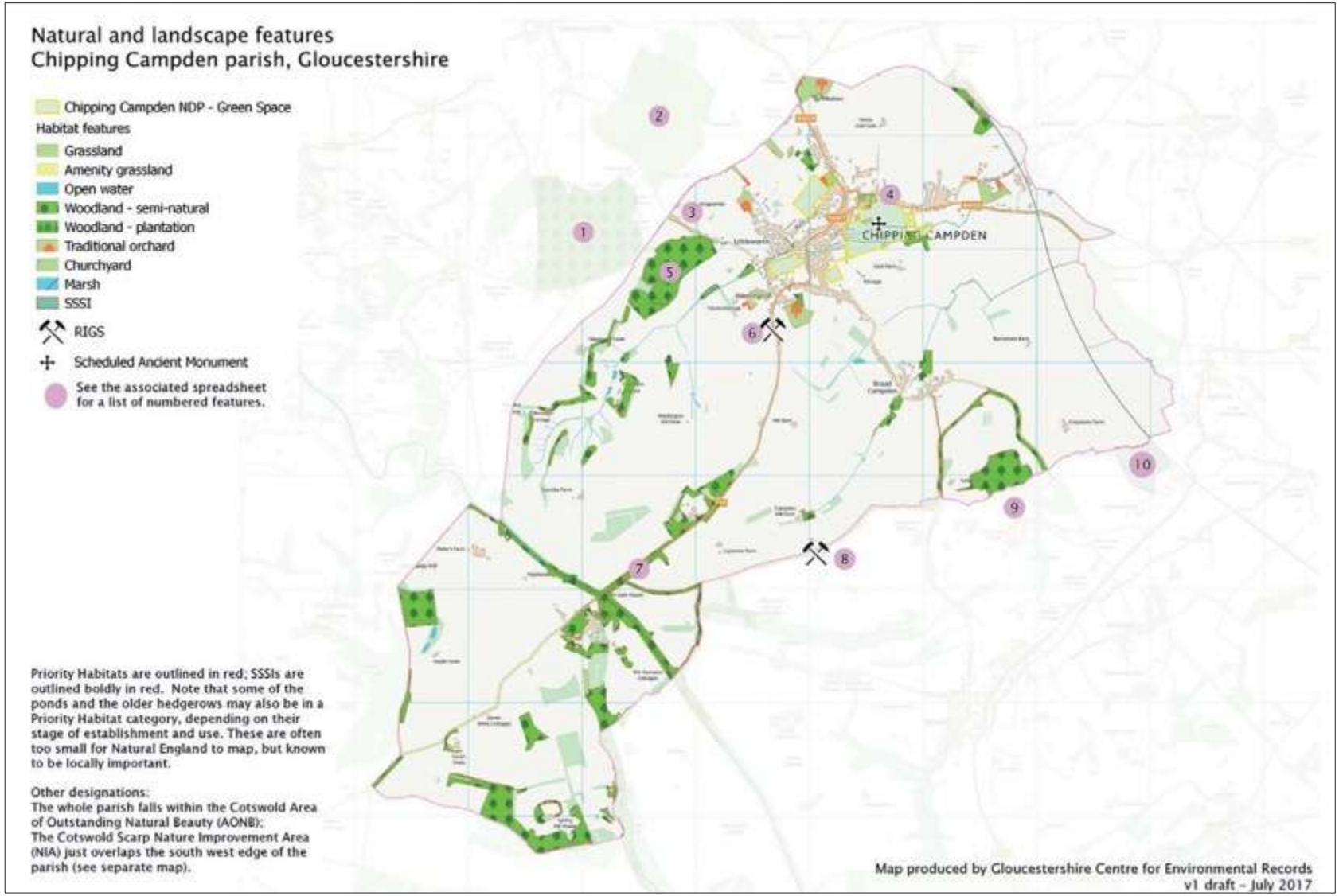
Natural and landscape features
Chipping Campden parish, Gloucestershire

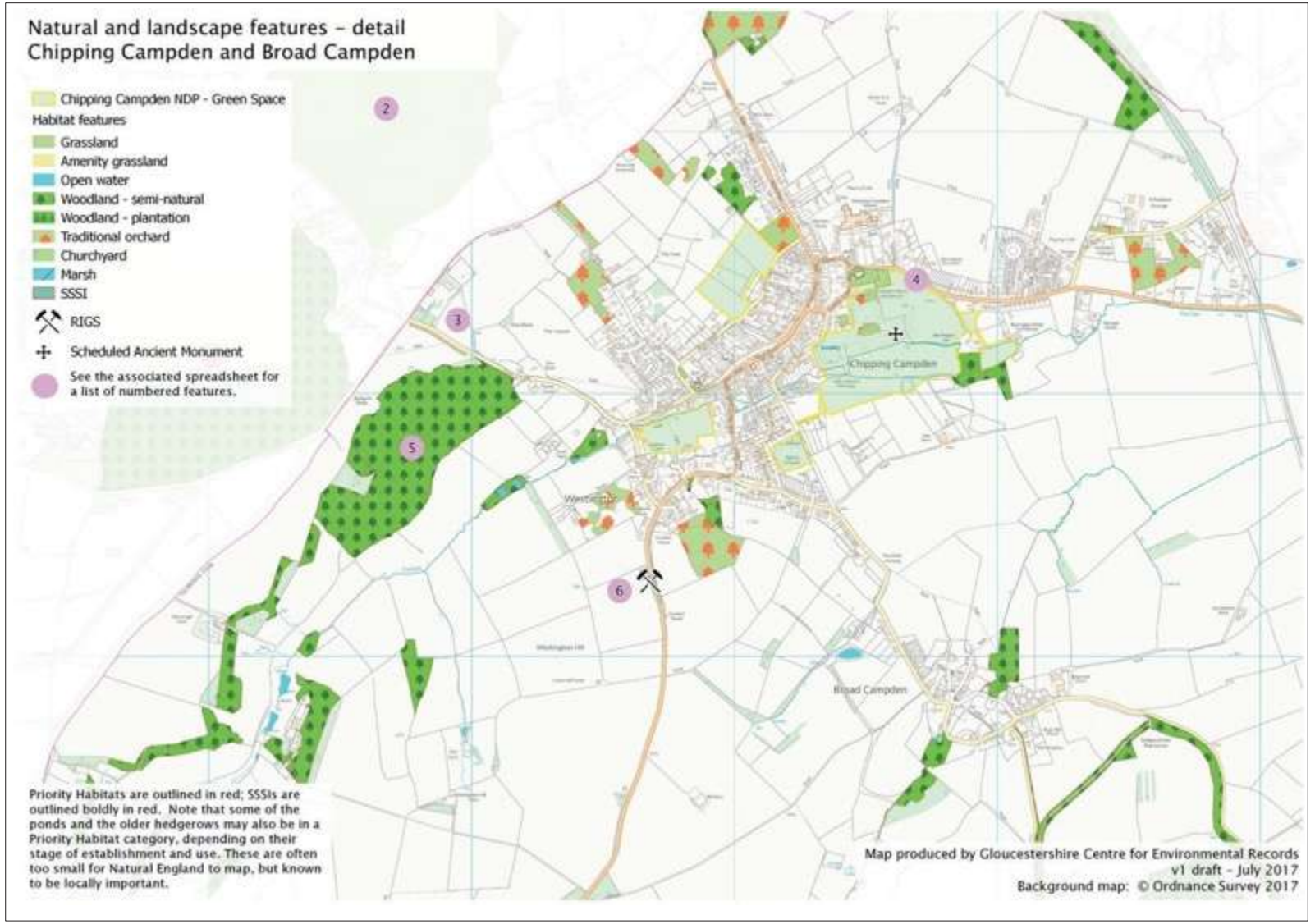


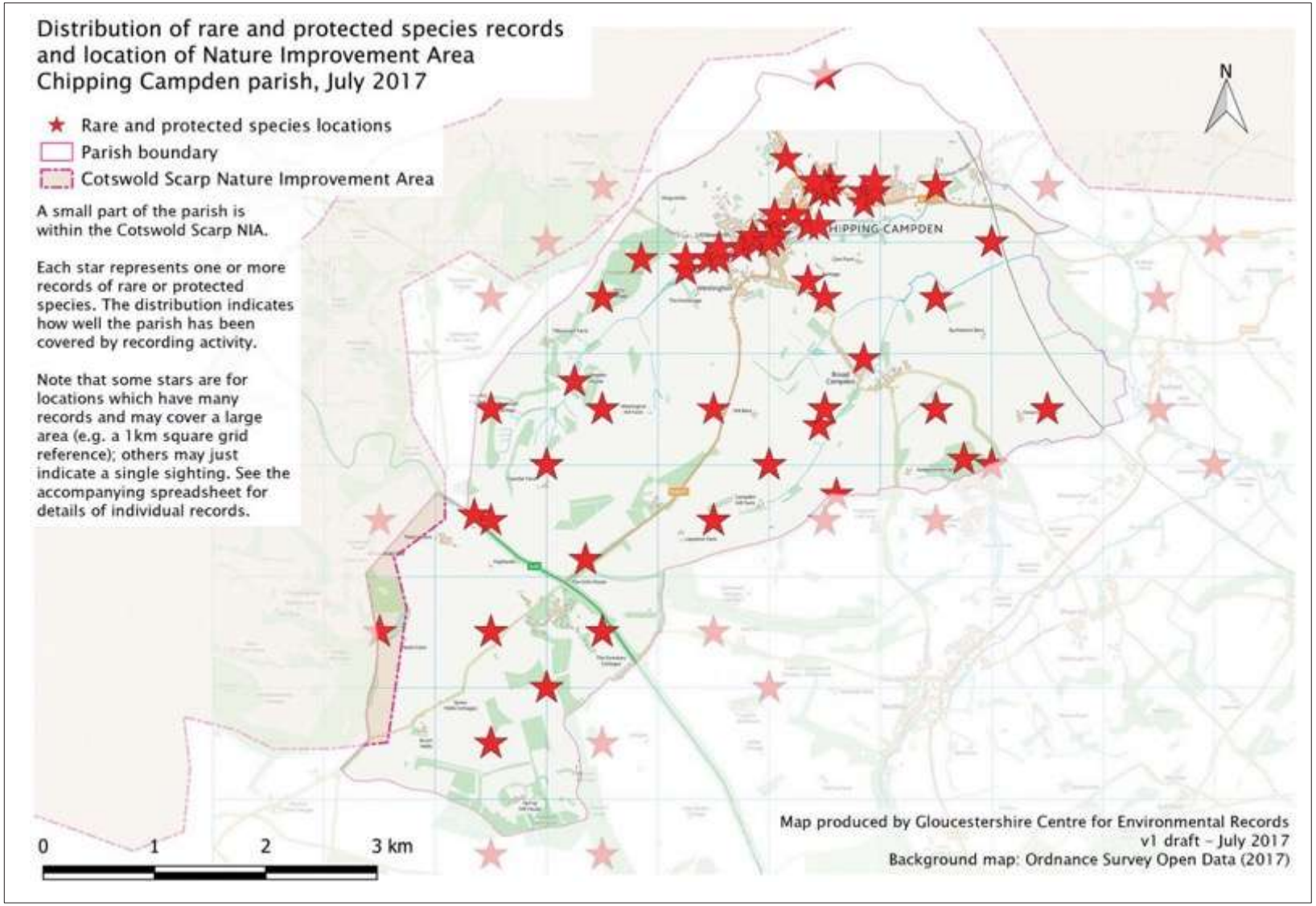
Priority Habitats are outlined in red; SSSIs are outlined boldly in red. Note that some of the ponds and the older hedgerows may also be in a Priority Habitat category, depending on their stage of establishment and use. These are often too small for Natural England to map, but known to be locally important.

Other designations:
The whole parish falls within the Cotswold Area of Outstanding Natural Beauty (AONB);
The Cotswold Scarp Nature Improvement Area (NIA) just overlaps the south west edge of the parish (see separate map).

Map produced by Gloucestershire Centre for Environmental Records
v1.0 draft - July 2017


Natural and landscape features
Chipping Campden parish, Gloucestershire
Chipping Campden NDP - Green Space
Habitat features
Grassland
Amenity grassland
Open water
Woodland - semi-natural
Woodland - plantation
Traditional orchard
Churchyard
Marsh
SSSI
RIGS
Scheduled Ancient Monument
See the associated spreadsheet for a list of numbered features.
CHIPPING CAMPDEN
1
2
3
4
5
6
7
8
9
10
Priority Habitats are outlined in red; SSSIs are outlined boldly in red. Note that some of the ponds and the older hedgerows may also be in a Priority Habitat category, depending on their stage of establishment and use. These are often too small for Natural England to map, but known to be locally important.
Other designations:
The whole parish falls within the Cotswold Area of Outstanding Natural Beauty (AONB);
The Cotswold Scarp Nature Improvement Area (NIA) just overlaps the south west edge of the parish (see separate map).
Map produced by Gloucestershire Centre for Environmental Records
v1 draft - July 2017


Natural and landscape features – detail
Chipping Campden and Broad Campden
Chipping Campden NDP - Green Space
Habitat features
Grassland
Amenity grassland
Open water
Woodland - semi-natural
Woodland - plantation
Traditional orchard
Churchyard
Marsh
SSSI
RIGS
Scheduled Ancient Monument
See the associated spreadsheet for a list of numbered features.
2
3
4
5
6
Chipping Campden
Broad Campden
Priority Habitats are outlined in red; SSSIs are outlined boldly in red. Note that some of the ponds and the older hedgerows may also be in a Priority Habitat category, depending on their stage of establishment and use. These are often too small for Natural England to map, but known to be locally important.
Map produced by Gloucestershire Centre for Environmental Records
v1 draft - July 2017
Background map: © Ordnance Survey 2017


Distribution of rare and protected species records and location of Nature Improvement Area Chipping Campden parish, July 2017
Rare and protected species locations
Parish boundary
Cotswold Scarp Nature Improvement Area
A small part of the parish is within the Cotswold Scarp NIA.
Each star represents one or more records of rare or protected species. The distribution indicates how well the parish has been covered by recording activity.
Note that some stars are for locations which have many records and may cover a large area (e.g. a 1km square grid reference); others may just indicate a single sighting. See the accompanying spreadsheet for details of individual records.
N
HIPPING CAMPDEN
0
1
2
3 km
Map produced by Gloucestershire Centre for Environmental Records
v1 draft - July 2017
Background map: Ordnance Survey Open Data (2017)

Number	Name	Type	Status	Comments	Hectares	Source
1	Weston Park KWS	Deciduous woodland	Key Wildlife Site, Priority Habitat	Ancient semi-natural broad-leaved woodland (just outside the parish boundary)	74.61987	GCER KWS layer
2	Dover's Hill KWS	Grassland	Key Wildlife Site, Priority Habitat	Large National Trust area of fields and woodland (just outside the parish boundary). Invertebrate interest.	73.68912	GCER KWS layer
3	Chipping Campden (Dyer's Lane) CRV	Grassland	Conservation Road Verge	Rank grass bank with very small population of sweet cicely, adjacent to Campden Wood KWS	0.18140	GCER CRV layer
4	Campden House	Garden, Medieval earthworks	Scheduled Ancient Monument	Campden House, formal Garden and associated Medieval cultivation earthworks.		English Heritage download
5	Campden Wood KWS	Deciduous woodland	Key Wildlife Site, Priority Habitat	Ancient semi-natural broad-leaved woodland site larger than 2 ha	26.03183	GCER KWS layer
6	Holt Quarry	Good exposure of the Cotswold Sands	RIGS	Former quarry workings now covered by graded slope of thinnish woodland		GCER RIGS layer (c/o Gloucestershire Geology Trust)
7	Chipping Campden (B4081) CRV	Grassland	Conservation Road Verge	Secondary woodland flora including c10 sweet cicely plants at the southern end of verge on the south side of the road	0.20746	GCER CRV layer
8	Stanley's Quarry	Research and all levels of education	RIGS	A large, active working quarry, exposing the Lower Freestone of the Inferior Oolite almost at its north-eastern limit. The quarry lies immediately west of the Vale of Moreton axis. The beds in the quarry are almost horizontal.		GCER RIGS layer (c/o Gloucestershire Geology Trust)
9	Sedgecombe Plantation KWS	Deciduous woodland	Key Wildlife Site, Priority Habitat	overlaps the parish boundary	16.98550	Natural England Priority Habitat Inventory v2.1 2016
10	Wellacre Quarry	SSSI	SSSI	the best exposures in Britain of part of the Lower Jurassic, Middle Lias rock succession. Rich in fossils. This is the subdivision called Luridum Subzone.	12.14909	Natural England GIS data download
10	Next to Wellacre Quarry SSSI	Deciduous woodland	Priority Habitat - also edge of SSSI		0.67436	Natural England Priority Habitat Inventory v2.1 2016



Appendix 3. Town Centre Land Uses

Table of Town Centre uses (Data gathered October 2023) showing use for ground floor and entire property unless otherwise stated. See also maps below.

High Street heading West, North side

Ivy House
C3

Grevel House
C3

St James (the Old School House) C3

The Malt House C3

Seymour House C3

Westcote House
C3

Three Gables
C3

Trinder House C3

Clifton House
C3

Tokes
Eb; Upper floor C3

Campden Art Gallery
F1

Kendal House
Ea; Upper floor C3

Dragon House Cottage
C3

Dragon House C3

Martins Cottage
Ea

Little Martins
Ea

The Martins C3

Sundial House
Green Dragon Interiors
Ea;
Upper floor C3

Moreton House
C3

Jackson Stops Ec

Michael's Restaurant
Eb; Upper floor C1

London House C3

St Annes
C3

Montrose House
C3

Cotswold House SG;
Upper floor C1

Kings Hotel Unused
- was hotel

Darby House
C3

The Firs
C3

Drury House
Ec

Dial House
C3

Babtist Church
F1

Peyton House
C3

Twine House
C3

Poppett's
C3

Green Dragon
C3

Mullion House C3

Crosby House
C3

Churchill House Ea;
Upper floor C3

Pedlar's House
Ea

Elm Tree House
C3

Not in use (front ground floor – formerly Butty's), J Gabb Solicitors at rear E

The Old Bakehouse C3

The Old Presbytery C3

High Street heading East, South Side

Plough House
C3

Robert Welch Studios Ea

Down Sheep Street, West Side, away from High Street B4081

2 Sheep Street
Draycott Books Ea;
Upper floor C3

3 Sheep Street
Ann Paul Hairdresser
Ea; Upper floor C3

4 Sheep Street
C3

5 Sheep Street
C3

6 Sheep Street
C3

7 Sheep Street
C3

The Silk Mill
F1, Ea, Eb

Sheep Street, East Side, heading towards High Street

Public Conveniences

Red Lion PH
– Folk music
venue Sui
generis

High Street heading East from Sheep Street B4081

Red Lion PH
– Folk music
venue Sui
generis

One Stop Shop
Ea

Victor's
Eb; Upper floor C3

Blacksmith's House
Mooch – Fabric design
artist Ea

Blacksmith's House
James Adcock
Cabinet maker E;
Upper floor E

Blacksmith's House
Silver Lily Jewellery
Ea

Cambrook Court - 10 units

From entrance on left Ea,
Ea, Ea, Ea, Ea

From entrance on right Eb,
Ea, Ea, Ea, Ec

Behind Campden Court Block

Joy's soft furnishings Ea,
Upper floor Ec

Peridot Digital & Post
Office
Ea, Upper floor Ec

Beyond Post Office
Storage B8

Opposite Post Office
12 garages

Continuing up High Street from Campden Court

Prior House
Art Gallery
F1; Upper floor C3

Hidden Beauty Ea;
Upper floor C3

Lisa Drinkwater Florist
Ea; Upper floor C3

The Attic
(behind LD
Florist) Ea

Grafton House
Estate Agent
Ec

Dentist (behind Grafton
House) Ec

Fillet & Bone
Ea, Eb

The Butchers flat
(behind Fillet & Bone)
C3

The Old Abattoir
(behind Fillet & Bone)
C3

Storage (behind Fillet
& Bone)
B8

Bromleys of
Cotswolds Eb

Hook House
Ea

Library
F1

Julie Sullivan
Funeral Directors E

Noel Arms Hotel –
Folk music venue
C1

Behind Noel Arms - 4 properties
C3, C3, C3, C3

Elsley House
Ea

12-14 High Street,
The Co-operative
Ea

Behind Co-op - storage
B8

Badger's Hall
C3

The Old Police Station
- front
Dandelion Ea

The Old Police Station - Tourist information, Council Office, meeting rooms, cinema
sui generis

Behind Old Police Station - toilets

Behind Old Police Station 5 properties C3, C3, C3, C3, C3,

The Guild House
Bantam Tea Rooms Eb

Da Luigi's Bistro Eb

Masonic Lodge (above Da Luigi's) Sui generis

Passageway leading to 6 properies
C3, C3, C3, C3, C3, C3,

Stuart House
Ea; Upper floor C3

Cheltenham House Hairdresser
Sui generis; Upper floor C3

The Old Grammar School
C4; Upper floor C4

Fereby House
C3

Maylams
Ea; Upper floor C3

Saxton House C3

Dover's House
C3

The Lanterns C3

Amberley House C3

Lygon Arms (main) C1

Lygon Arms (other side of passageway)
Ea

Braithwaite House (former Lloyd's Bank) C4
application permitted by CDC

Braithwaite House (other side of passage – former Tricer) C4
application permitted by CDC

Symes House
Floral art academy
F1; Upper floor C3

Woolstapler's House
C3

Woolstapler's Hall
C3

Singer House
C3

Bedfont House
C3

Woodward House
C3

Through passageway

The Coach House
C3

The Groom's Lodge
C3

Chestnut Tree Cottage
C3

Sherbourne Mews
C3

After passageway

Chestnut Tree House
C3

Pharmacy - dispensary, consulting rooms, defibrillator
Ec

Island in High Steet near Sheep Street. Clockwise from western end

Rosary Cottage
C3

Empty property being renovated

Huxley's
Eb

Bread maker / shop
Ea, Eb

Hairdressers Sui generis

Barbers Sui generis

Island adjacent to west end of car park

Cotswold Luxe
Ea

Market Square car park

Island in High Street with war memorial. From western end

Town Hall F1

Memorial Green - start of Cotswold Way

The Market Hall
National Trust


Class F
Sui Generis
Class C3 - dwellings
Class Ec - services
Class Eb - food and drink
Class Ea - retail
Town Centre Boundary
Poppetts
Green Dragon Close
Cottage
Island House
Rosary Cottage
140.5m
TCB
GP
PH
The Old
Davies Hs
LB
142.0m
Library
Hotel
Grafton House
Grafton Mews
Burgage House
House
Warland House
Cottage
El Sub Sta
PC
The Plough
Cottage
Silk Mill Cott
Rear Tree Cott
Shreelaine
Francote
B 4081
Garage
FB
FB
Path
Cross Cottage


Class F
Sui Generis
Class C3 - dwellings
Class Ec - services
Class Eb - food and drink
Class Ea - retail
Town Centre Boundary
Rodings
London House
Sundial House
Dragon Ho
Cotswold House Hotel
Montrose
Little Martins Cottage
Brewers Cottage
School
House
War Meml
Mkt
Hotel
Town
HIGH STREET
The Firs
The Old Coach House
Library
Hotel
Island House
Grafton House
Noel Court
Badgers End
Farm
Alderley
CALF'S LANE


Class F
Class C3 - dwellings
Class Ec - services
Class Eb - food and drink
Class Ea - retail
Town Centre Boundary
B 4035
Hall
Surgery
Sherborn House
Mill Cottage
Ostlers Loft
Endymion
Bedfont
GLEBE FOLD
Symes House
Seymour Cottage
House
Hotel
Dragon Ho
Ellisons Cottage
The Cottage
Little Martins Cottage
Brewers
The Old
Lygon Arms
Flag Close
Mkt
Oak
GP
Mow
P

Appendix 4. Social and community infrastructure

With a description of each asset (from the list in para 11.2.2) and an explanation of why the asset is important to the Chipping Campden community.

Allotments



Chipping Campden Allotments
The Bratches, Aston Road, Chipping Campden, GL55 6JS

Allotments

Allows for the growing of vegetables, etc. with physical, health and economic benefits for residents, plus ecological advantages.

Care Homes



Mill House Care Home
55 Sheep Street, Chipping Campden, GL55 6DR

Care home for the elderly

Provides residential care for the elderly. Allows for those who need such care to stay in the locality.



Jecca's House (Campden Home Nursing)
Jecca's House, Aston Road, Chipping Campden, GL55 6HR

Charitable organisation providing nursing care for the terminally ill.

Provides nursing care for terminally ill residents of the town and surrounding area. Allows for those who need such care to be cared for in their own home.

Churches



St James' Church
Church Street, Chipping Campden, GL55 6JG

Historic Grade 1-listed C of E "Wool" church

One of the finest historic "wool" churches in England, it is the religious hub of the community. It hosts musical events of international calibre during the Music Festival.



Campden Baptist Church
High Street, Chipping Campden, GL55 6AL

Baptist Church

An active Baptist Church, one of the hubs for the religious community of the town. Provides location for Food Bank.



St Catharine's Church
Lower High Street, Chipping Campden, GL55 6DZ

Catholic Church

An active Catholic Church, the religious hub for the Catholic community of the town.



St Michael & All Angels Church
Broad Campden, GL55 6US

C of E Church in Broad Campden

Provides regular services for the inhabitants of Broad Campden

Churches



Friends Meeting House
Meeting House Lane, Broad Campden, GL55 6US

Quaker meeting house in Broad Campden

The location for meetings of the Society of Friends (Quakers) since 1663 it is the oldest building of its kind in UK still used for this.

Defibrillators



Berrington Road Defibrillator
Berrington Road, near junction with Station Rd.

Old red telephone kiosk housing defibrillator

Gives public access to a defibrillator, which may save lives



Broad Campden Defibrillator
Broad Campden, near Bakers Arms PH

Old red telephone kiosk housing defibrillator

Gives public access to a defibrillator, which may save lives



Leisure Centre Defibrillator
Chipping Campden School, Cidermill Lane, GL55 6HU

Defibrillator

Gives public access to a defibrillator, which may save lives

Defibrillators



Pharmacy Defibrillator
Pharmacy, High Street, Chipping Campden, GL55 6HB

Defibrillator

Gives public access to a defibrillator, which may save lives



Post Office / Peridot Digital Defibrillator
2c The Cambrook, High Street, Chipping Campden, GL55 6AT

Defibrillator

Gives public access to a defibrillator, which may save lives



St Catharine's Defibrillator
St Catharine's School, Lower High Street, GL55 6DZ

Defibrillator

Gives public access to a defibrillator, which may save lives

Dentists



Today's Dental Care
Grafton Mews, Chipping Campden GL55 6BW

Dentist

Provides dental examinations and treatment.

Dentists



Ashbee Dental Care
3 Ashbee House, Battlebrook Drive, GL55 6JX

Dentist

Provides dental examinations and treatment.

Doctors' Surgeries



Chipping Campden Surgery
Back Ends, Chipping Campden, GL55 6AU

Doctors' surgery

Doctors practice providing primary healthcare to the local community

Gardens and Parks



Ernest Wilson Garden
Leysbourne, Chipping Campden, GL55 6AD

Walled garden commemorating famous Campden plant-collector

A quiet, special, rest-area with seating in the centre of the town, providing a pleasant restful ambience plus information about this plant-collector of national importance.



Wolds End Orchard
Back Ends, Chipping Campden, GL55 6HR

Community-owned and maintained ancient orchard

The last ancient orchard of the town, now community-owned and maintained. Allows residents opportunity of physical exercise, learning about fruit-growing and ecology, and positive ecological impact. Hosts events like Apple Day and community picnic.

Fire Stations



Community Fire & Rescue Station
Catbrook, Chipping Campden, GL55 6DG

Fire & Rescue Station
Defibrillator

Provides fire and rescue services for Chipping Campden and surrounding area.

Gives public access to a defibrillator, which may save lives

Meeting Rooms



Church Rooms
Church Rooms, Calf Lane, Chipping Campden, GL55 6JQ

Function Room

Used for talks, meetings, community lunches. An important community hub for the parish.



Chipping Campden Town Hall
High Street, Chipping Campden, GL55 6AT

Meeting and Function Room (Town Hall)

Used for local craft and food markets, talks, meetings for local groups and societies, rural cinema and it is where meetings of the Town Council are held. An important hub for the artistic and civic life of the parish. Also, a weekly Chipping Campden Youth Club is held here.



The Old Police Station
High Street, Chipping Campden, GL55 6HB

Meeting and Function Room

Used for talks and cinema. Meetings of the History, Art and Cinema Societies are held here. An important hub for the artistic life of the parish. Also, houses

the Council Office for the Parish.

Meeting Rooms



Broad Campden Village Hall
Hall Close, Broad Campden, GL55 6UZ

Village Hall

Provides a meeting place and a facility for events for the residents of Broad Campden



Baden Powell Centre
Recreation Ground, Catbrook, Chipping Campden, GL55 6DA

Large hut on recreation ground, for scouts and other activities

Provides a venue for the local Scouts, Beavers and Brownies. Also available for hire for children's parties etc. Alongside the Recreation ground and sports facilities – important for the health and development of the local children.

Opticians



Dr C.P.Grey, Optician
Drury House, Chipping Campden, GL55 6AL

Optician

Provides eye examinations, screening for glaucoma, macular degeneration and other eye diseases.

Play Areas



Recreation Ground Play Area
George Lane, Chipping Campden, GL55 6DA

Play Area

An extensive play area with a wide variety of play equipment carefully maintained and landscaped. Provides important outdoor exercise and play facilities for the children of the parish.



Castle Gardens Play Area
Castle Gardens, Chipping Campden, GL55 6JR

Play Area

A play area with a variety of play equipment. Provides important outdoor exercise and play facilities for the children resident at this end of the town, which is distant from the larger play area at the recreation ground or at Olimpick Drive.



Olimpick Drive Play Area
Olimpick Drive, Chipping Campden, GL55 6BL

Play Area

A play area with a variety of well-maintained play equipment. Provides important exercise and play facilities for the children resident at this end of the town, which is distant from the larger play area at the recreation ground or at Berrington Road.

Post Offices



Chipping Campden Post Office
Peridot Digital, 2c Cambrook, High Street, GL55 6AT

Post Office

Provides a range of post-office services for the inhabitants of the parish and surrounding area, including banking services.

Public Houses



The Eight Bells
21 Church Street, Chipping Campden, GL55 6JG

Public House

Provides food, wide-ranging menu, hosts functions and events. Provides B&B accommodation



The Lygon Arms Hotel
High Street, Chipping Campden, GL55 6HB

Hotel & Public House

Although a hotel, functions as a public house for locals, serving food, and hosting functions and events. Also contains a shop selling clothes, gifts, food and culinary products.



The Noel Arms Hotel
High Street, Chipping Campden, GL55 6AT

Hotel & Public House

Although a hotel, functions as a public house for locals, serving food, and hosting functions and events.



The Red Lion Tavern
Lower High Street, Chipping Campden, GL55 6AS

Public House

A public house serving food and, hosting functions and events. Provides B&B accommodation.

Public Houses



The Volunteer Inn
Lower High Street, Chipping Campden, GL55 6DY

Public House

A public house, with an Indian restaurant. Hosts functions and events, particularly with live music. Provides B&B accommodation.



The Bakers Arms
Broad Campden, GL55 6UR

Public House

A public house serving food and, hosting functions and events.



Cotswold House Hotel
The Square, Chipping Campden, GL55 6AN

Hotel with two restaurants

A Hotel with two restaurants, which is much used by local people, and also with a Spa open to the local population.

Schools



Chipping Campden School
Cidermill Lane, Chipping Campden, GL55 6HU

Secondary School

A highly regarded and very successful secondary school, serving a wide catchment area around Chipping Campden.

Schools



St James & Ebrington C of E Primary School
Pear Tree Close, Chipping Campden, GL55 6DB

Primary School

The Church of England primary school serving the parish and surrounding area



St Catharine's Catholic Primary School
Lower High Street, Chipping Campden, GL55 6DZ

Primary School

The Catholic primary school serving the parish and surrounding area

Food Shops



The Co-operative ("Co-op")
12-14 High Street, Chipping Campden, GL55 6HB

A comprehensive food shop

Supplies a wide range of food and drink items, covering all the necessities of daily living. Allows for provisioning of local residents without travelling out of town. Improves the local economy and has a positive environmental impact.



Fillet & Bone
High Street, Chipping Campden, GL55 6AT

A food shop, delicatessen, fishmonger and butcher.

Supplies a wide range of food and drink items, including delicatessen items, fresh meat and fresh fish. Allows for provisioning of local residents without travelling out of town. Improves the local economy and has a positive environmental impact. The only butcher and fishmonger in the town.

Food Shops



The One-Stop Shop
High Street, Chipping Campden, GL55 6AT

A comprehensive food shop

Supplies a wide range of food and drink items, covering all the necessities of daily living. Allows for provisioning of local residents without travelling out of town. Improves the local economy and has a positive environmental impact. Contains the only free cashpoint machine in the town.

Spas



Cotswold House Hotel Spa
Cotswold House Hotel, The Square, GL55 6AN

Spa, with a variety of associated treatments

Provides facilities for a variety of spa treatments. Allows for relaxation and revitalisation. Available to local population.

Sports Facilities



Recreation Ground
George Lane, Chipping Campden, GL55 6DA

Large green space with sports pitches and play area

Covenanted fields providing a football pitch, landscaped children's play area and picnic area. Provides outdoor space for physical recreation for residents of and visitors to the parish.



Chipping Campden Bowling Club
Station Road, Chipping Campden, GL55 6LB

Full-size bowling green with clubhouse with bar and kitchen facilities

Full sized bowling green and clubhouse with bar and other facilities for hosting functions and events. Offers opportunity for physical activity, particularly for older residents.

Sports Facilities



Chipping Campden Cricket Club
Station Road, Chipping Campden, GL55 6LB

Large cricket pitch with large pavilion

Large cricket ground supporting teams of all ages from young children up, including women's teams. Coaching provided at all levels. Large pavilion with bar and dining facilities for hosting functions and events. Allows for physical recreation for the local population.



Chipping Campden Tennis Club
Recreation Ground, George Lane, GL55 6DA

Four floodlit tennis courts with clubhouse

Provides facilities for playing tennis, along with coaching. Extensively used – 150 adult members and 70 juniors. Allows for physical recreation of local population.



The Leisure Centre
Chipping Campden School, Cidermill Lane, Chipping Campden, GL55 6HU

Leisure Centre

Provides facilities for playing tennis, a variety of indoor sports, weight-training and swimming.
Very important for the health of residents and for training for sports e.g. swimming.

Toilets



Sheep Street Public Conveniences
Sheep Street, Chipping Campden

Toilets

Male and female public conveniences. They are signposted from the high street, and given the tourism industry of the town, they are an important facility.

Toilets



Toilets at The Old Police Station
The Old Police Station courtyard, The Old Police Station, High Street, GL55 6HB

Toilets for public use

Male and female public conveniences. Given the tourism industry of the town, they are an important facility.

Theatres, Museums and Libraries



Court Barn Museum
Church Street, Chipping Campden, GL55 6JE

Museum

Museum displaying jewellery, paintings, prints, furniture and other types of creative art, together with an exhibition relating to the presence of C. Ashbee and the Arts & Crafts movement in Chipping Campden in the early part of the 20th Century. It highlights and showcases the creative heritage of the local community.



Cidermill Theatre
Chipping Campden School, Cidermill Lane, Chipping Campden, GL55 6HU

Theatre and performance venue

A modern theatre providing a venue for plays, musical performances and other types of performing art. Used by outside professional groups as well as local schoolchildren. Enriches the cultural lives of the residents of the parish and surrounding area and provides important educational opportunities for our children to study acting, musical performance and associated



activities.

The Old Silk Mill
Sheep Street, Chipping
Campden, GL55 6DS

Gallery and workshops of creative artists & café

This historically important building, which from 1902 housed the Guild of Handicrafts movement led by CR Ashbee, showcases the works of local artisans and provides workshops for them to work. It enriches the lives of inhabitants and is attractive to tourists and so also has economic value.



Theatres, Museums and Libraries



Chipping Campden Library
High Street, Chipping Campden, GL55 6AT

Library

Provides books, book search, internet facilities and photocopying for the community and Business Hub facilities.



Chipping Campden Visitor Information Centre
The Old Police Station, High Street, GL55 6HB

Visitor Information Centre

Tourism is an important industry for the town, and the Information Centre provides information for tourists and enhances their experience, which helps promote our tourism. Ticket sales, lost property, safe refuge and retail of maps, guidebooks and souvenirs.

Appendix 5. Non-designated heritage assets

With a description of each asset and an explanation of why the asset meets any of the criteria in the Cotswold Local Plan Policy EN12, Table 6 pages 156/157, e.g.

- Architectural interest
- Historic interest
- Age
- Rarity
- Aesthetic merits
- Selectivity or representativeness
- Integrity or “sense of completeness”
- Historic association
- Landmark status
- Group value

NDHA 1
The Millenium Sign



High Street,
Chipping Campden

Sign, created for Millenium Celebrations

This sign was created for Campden’s millennium celebrations. There is a metal snail crawling up the ironwork, which is the signature of the metalworker, Jeff Humpage, who created the sign. It is sought out by tourists. It thus has aesthetic interest; an historic association; and a local landmark status.

NDHA 2
Westington Street Lamp



Westington Green

Streetlamp

This streetlamp was a gift to the town by George Haines (whose descendants remain local landowners) in the late 19th Century. It is believed to have come from Westminster Bridge in London. It is thus of historic interest, and it is an attractive local landmark.

NDHA 3
High Street Stamp Box



High Street,
Chipping Campden

Period stamp dispenser

This postage stamp dispenser was installed here when Elsley House became the post office in 1967. It has an historical interest for the community and is a rare example of its type.

NDHA 4
St Catharine's postbox



High Street,
Chipping Campden

Victorian postbox

This is the earliest postbox in Chipping Campden, installed in 1895. It is of historic interest.

NDHA 5
Westington postbox



Westington,
Chipping Campden

Victorian postbox

This is the second earliest postbox in Chipping Campden, installed in 1896. It is of historic interest.

NDHA 6
High Street postbox



Elsley House, High St, Chipping Campden, GL55 6HA

Elizabethan postbox

This is a striking Elizabethan postbox on the High Street in the wall of what used to be the post-office, from 1967 to 2016. It is of historic interest and for a long time the premises were the town post-office.

NDHA 7
The Scuttlebrook



Aston Road, Chipping Campden

Open section of the Scuttlebrook (Cattlebrook)

The Scuttlebrook, named from Cattle Brook, flowed along the Leysbourne end of the High Street until it was covered in 1831. This is the only remaining open section and has historical significance for the town.

NDHA 8
Town Pump



Leysbourne,
Chipping Campden

Old water pump

The Reverend Lelend Noel had this pump installed in 1832 to provide water for the poor. It possibly is on the site of an older pump that existed in this area. It is of historic interest to the town.

NDHA 9
Cotswold Way marker



Adjacent to market square,
Chipping Campden

Stone marking start of The Cotswold Way path

This stone marks the start of the 102-mile Cotswold Way path from Chipping Campden to Bath. It was unveiled in 2014 and is of limestone with a central brass acorn motif. The wording is from the 2nd of T.S.Eliot's Quartet poems, Burnt Norton (which is nearby) which he was inspired to write on one of his many visits to Campden. This is thus of architectural, historic and landmark value to the town.

NDHA 10
Broad Campden postbox



Broad Campden GL55 6UR

George VI postbox

This is a good example of a George VI post box and has architectural and historical interest.

NDHA 11
Punk stone carving



Old School House, High St,
Chipping Campden

Stone carving

This stone carving was produced by local stone carver Ian Ashurst in 1977. It is aesthetically interesting and one of the landmarks on the High Street.

NDHA 12
Graham Greene Blue Plaque



Little Orchard Cottage, Hoo Lane, GL55 6AZ

Plaque commemorating previous resident

The novelist Graham Greene lived in Campden for 2 years from 1931-33, writing his first successful novel, Stamboul Train whilst here. The plaque commemorates the historic association with this now famous resident.

NDHA 13
Grevel House sundial



Grevel House, High Street, GL55 6AG

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. This one is on the oldest houses in the town (14th Century), but the dial itself dates from 1815.

NDHA 14
Dragon House sundial



Dragon House / Cottage, High Street, GL55 6AG

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. This one is set at an angle to show more hours of the day. It was used to set the town hall clock. Dated 1690.

NDHA 15
Sundial House sundial



Sundial House, High Street, GL55 6AG

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. This one has a vertical dial dated 1647.

NDHA 16
Cotswold House sundial



Cotswold House Hotel,
High Street, GL55 6AN

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. Richard Miles, a well-to-do local grocer built this house in 1815, but the dial is dated 1820.

NDHA 17
Dial House sundial



Dial House, High Street,
GL55 6AL

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic feature of the town. This was the home and shop of the Warner family 200 years ago. They made and mended clocks, watches and sundials. This dial would have been used to set these timepieces.

NDHA 18
Green Dragons sundial



Green Dragons,
High Street, GL55 6AL

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic/architectural feature of the town. This one has a curl at the end of the gnomon, and the hours and figures are, unusually, in relief.

NDHA 19
Crosby sundial



Crosby House,
High Street, GL55 6AL

Sundial

It is unusual for a town the size of Campden to have so many sundials, and they are a special historic/architectural feature of the town. This one is dated 1691.

NDHA 20
Sign of the Swan Inn



Maylams,
High Street, GL55 6AG

Old Pub Sign

This attractive sign once advertised the Swan Inn, located here from at least the mid 19th century, but now the building is a delicatessen. Campden has many interesting street signs, and this one is of historical and aesthetic value.

NDHA 21
Sign of the Lygon Arms



Lygon Arms Hotel,
High Street, GL55 6HB

Old Pub Sign

The Lygon Arms is the oldest coaching inn in Campden, trading continuously since the 15th century. This sign is an historic local landmark.

NDHA 22
Sign outside Elsley House



Elsley House,
High Street, GL55 6HA

Old sign designed by F L Griggs

This sign was originally designed for Keely's hardware shop by FL Griggs, associated with the Arts & Crafts movement, who moved to Campden in 1903. He was regarded as the finest etcher in the country. The sign is historically important.

NDHA 23
Boot-scraper Kings Hotel



Kings Hotel,
High Street, GL55 6AW

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 24
Boot-scraper Baptist Church



Baptist Church,
Lower High Street, GL55 6AL

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 25
Boot-scraper The Martins



The Martins,
High Street, GL55 6AG

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 26
Boot-scraper Trinder House



Trinder House,
High Street, GL55 6AG

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 27
Boot-scraper Westcote House



Westcote House,
High Street, GL55 6AG

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 28
Boot-scraper Ivy House



Ivy House,
High Street, GL55 6AG

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 29
Boot-scraper Woolstaplers



Woolstaplers Hall,
High Street, GL55 6HB

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 30
Boot-scraper Dovers House



Dovers House,
High Street, GL55 6HB

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

NDHA 31
Boot-scraper The Bantam



Bantam Tearooms,
High Street, GL55 6HB

Boot-scraper

The Campden High Street has an unusually high number old boot-scrapers, of historic and architectural interest.

Appendix 6. Local Nature Recovery Areas

1. River Cam corridor

Improvement focus

- Riparian habitat
- Grassland
- Woodland
- Scheduled Monument
- Traditional orchard



2. River Cam and Campden Wood

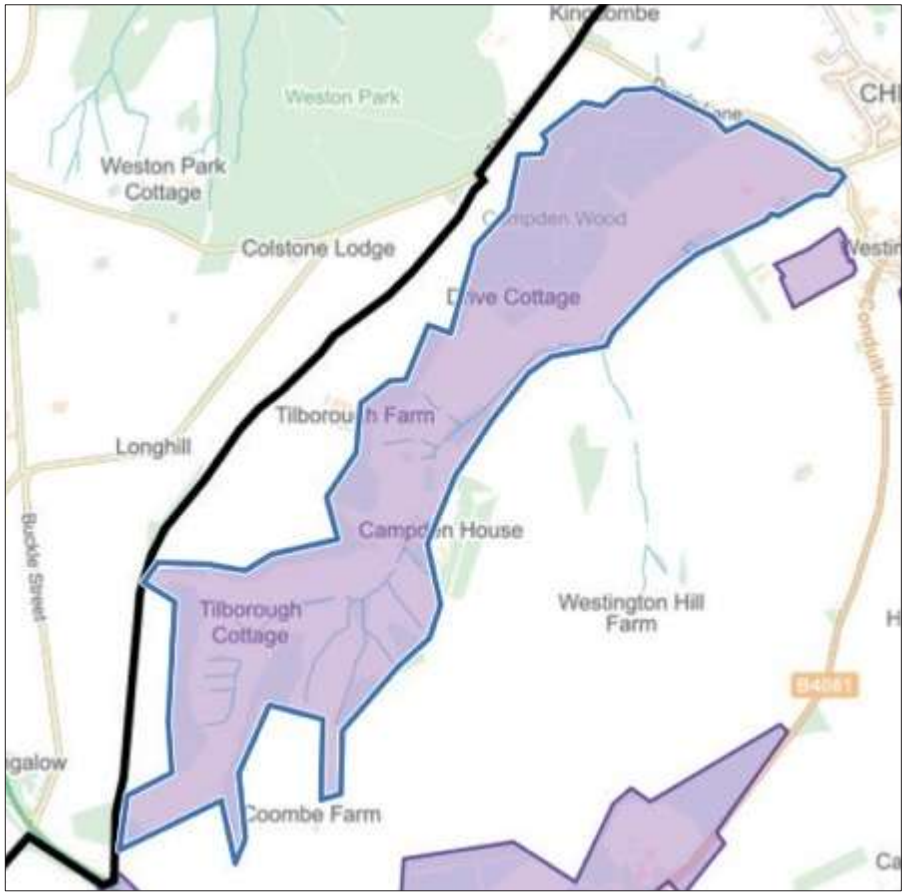
Improvement focus

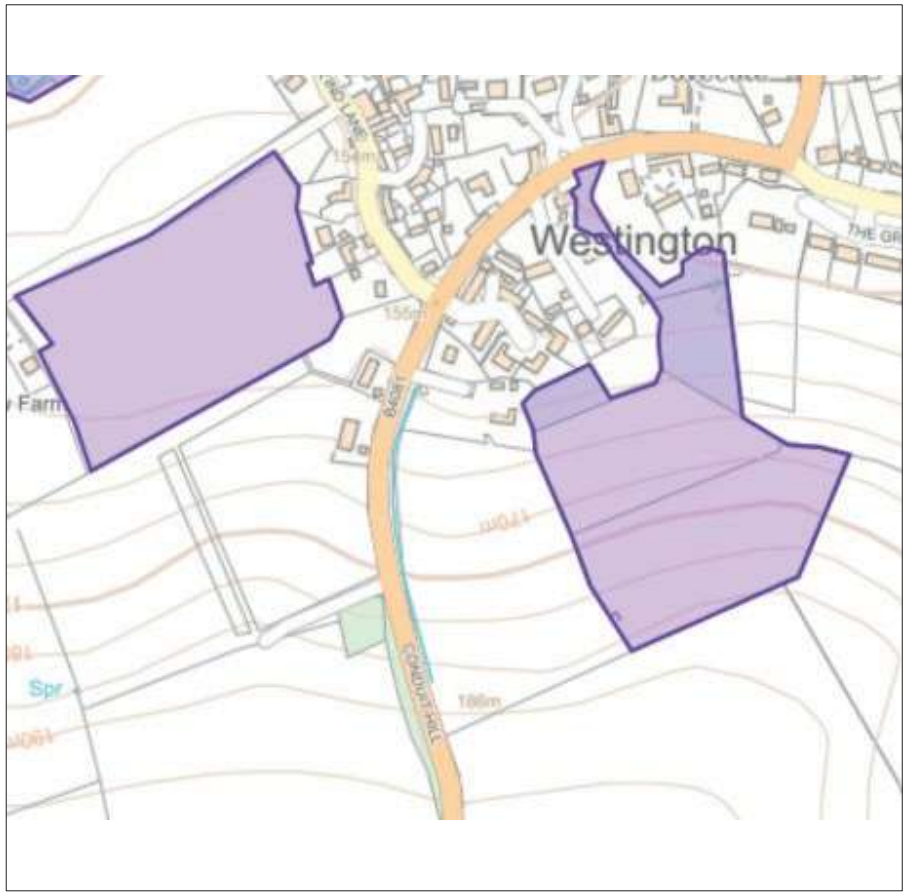
- Riparian habitat
- Woodland

3. West Chipping Campden, Leasows Farm, Westington

Improvement focus

- Former traditional orchard


Weston Park
Weston Park Cottage
Colstone Lodge
Longhill
Tilborough Cottage
Westington Hill Farm
Coombe Farm
B4081


Westington

4. Dounor House

Improvement focus

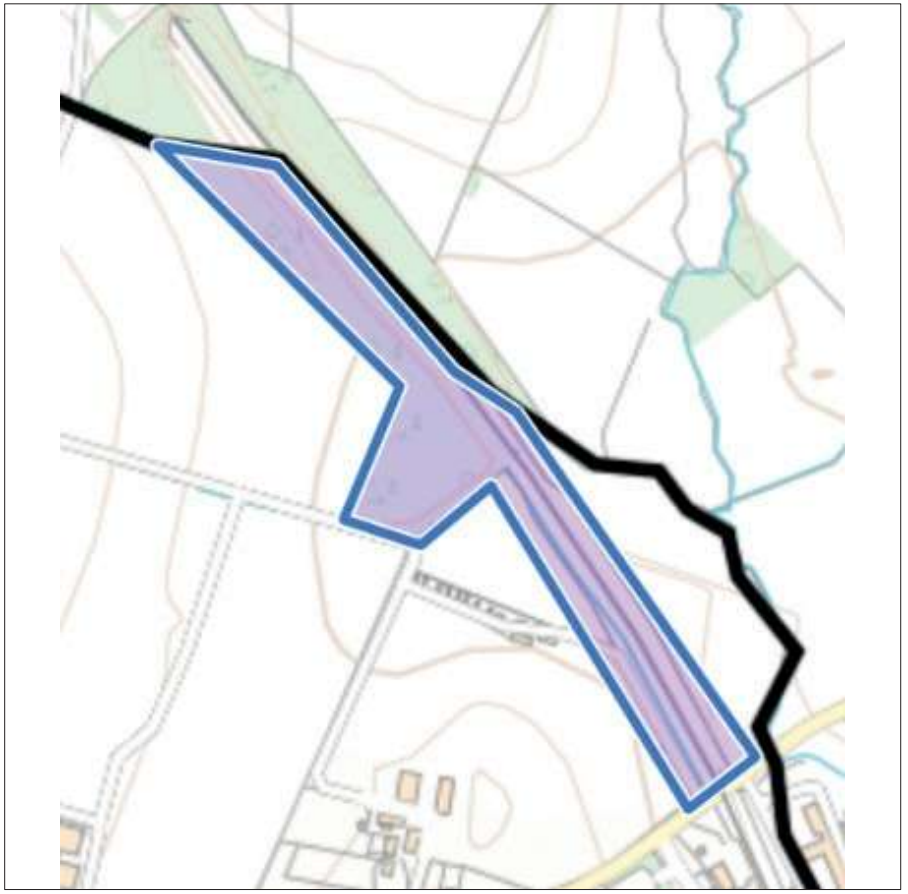
- Traditional orchard



5. Mickleton woodland

Improvement focus

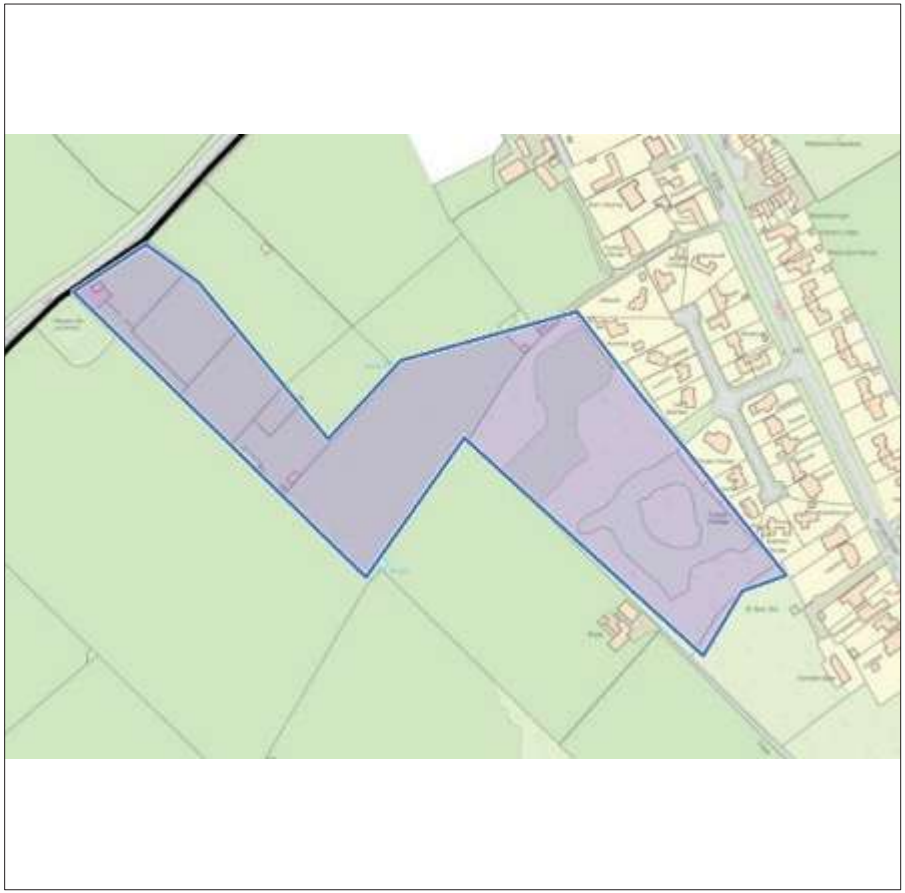
- Woodland
- Riparian habitat



6. Kingcombe Lane

Improvement focus

- Traditional orchard
- Woodland



7. Hillsdown Farm

Improvement focus

- Traditional orchard



8. Broad Campden south

Improvement focus

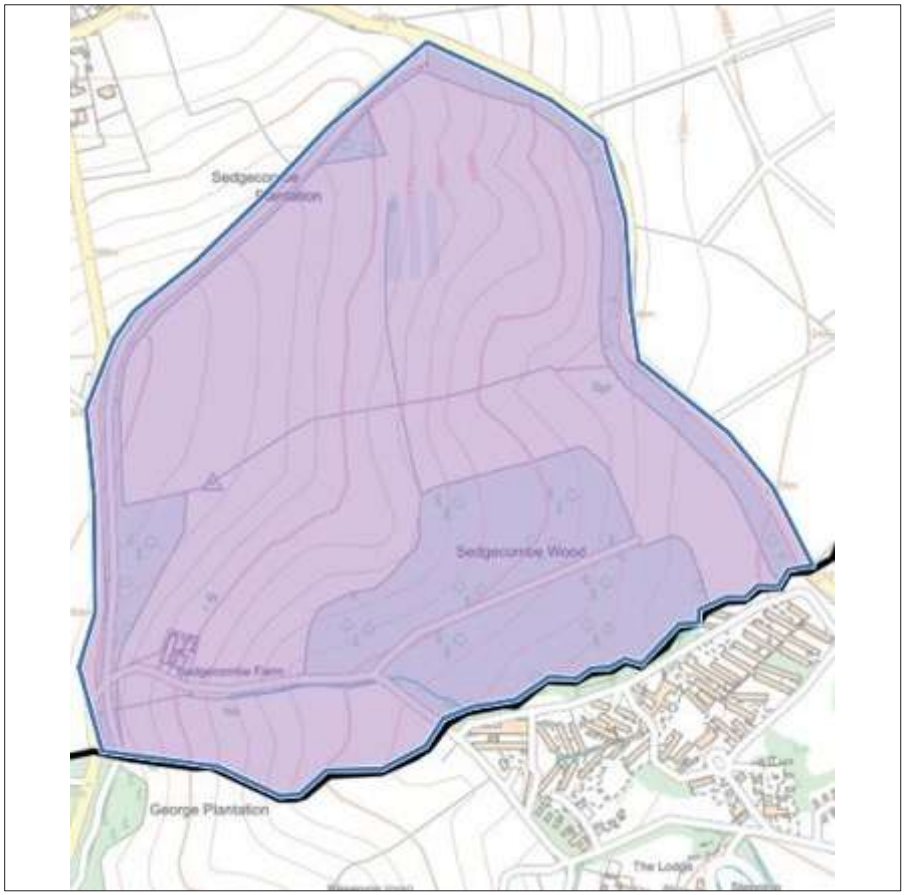
- Riparian corridor
- Traditional orchard

9. Sedgecombe

Improvement focus

- Woodland
- Wildlife corridor (verges)


Track
Track


Sedgecombe Wood
George Plantation

10. Hollybush Farm

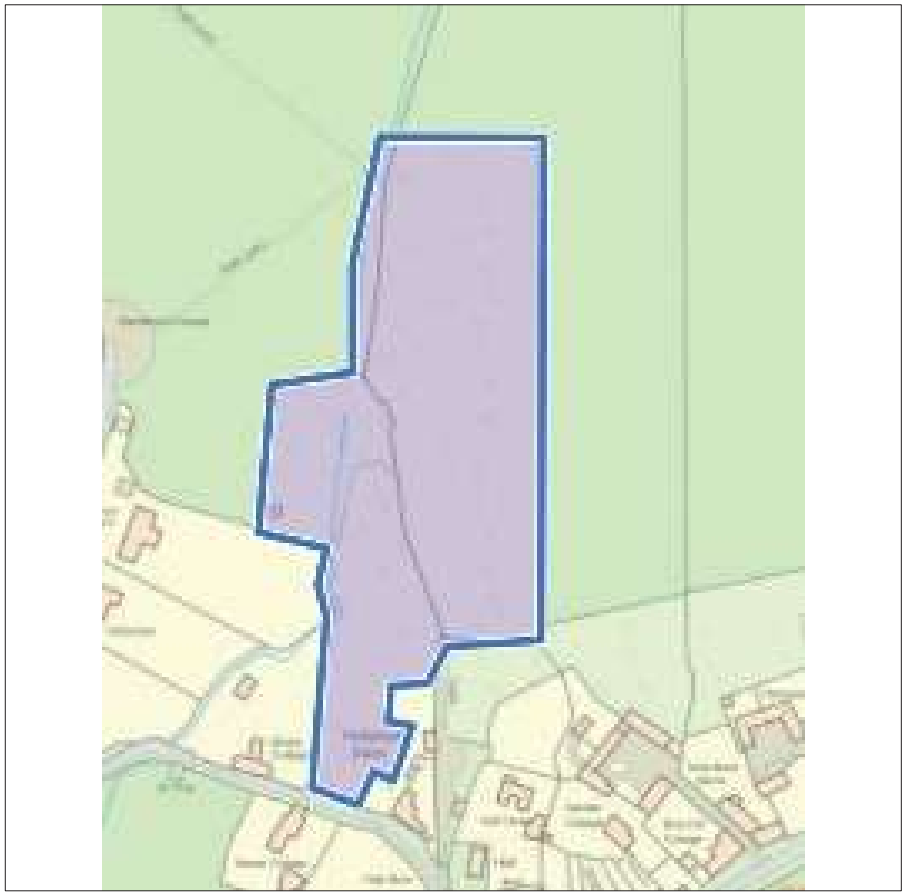
Improvement focus

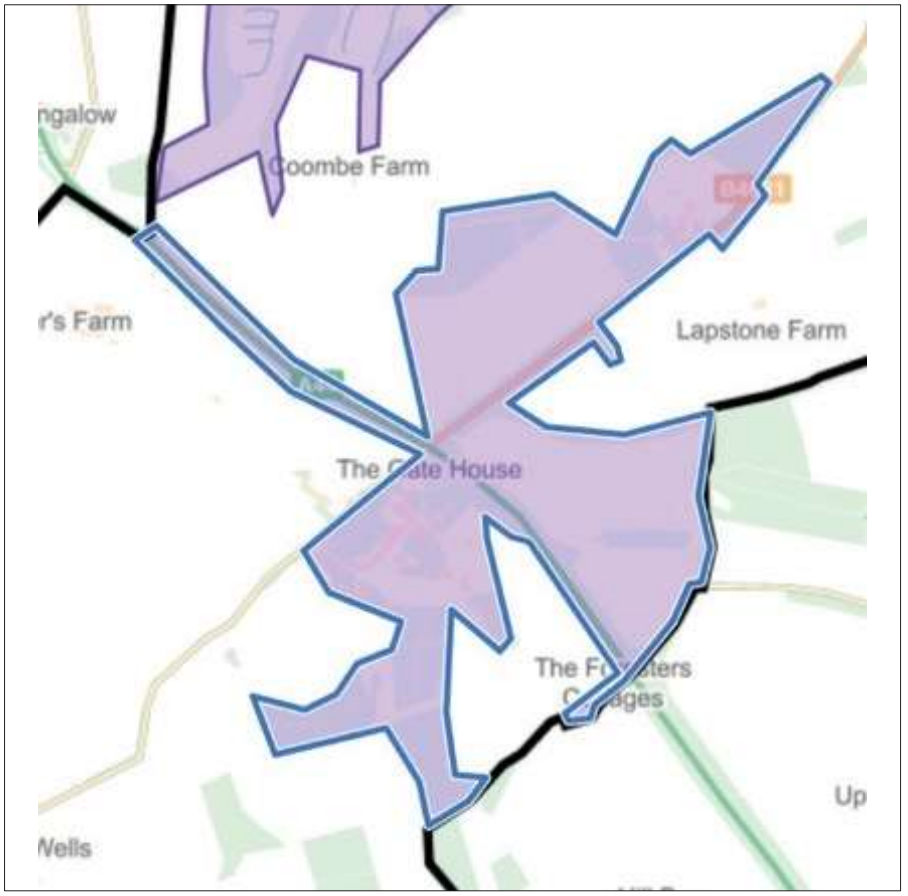
- Woodland
- Riparian corridor

11. The Gate House/ B4081/ Westington Quarry

Improvement focus

- Opportunities to enhance wildlife corridors and connectivity
- Woodlands




ngalow
Coombe Farm
r's Farm
Lapstone Farm
The Gate House
Up
Wells

12. Hare Park Plantation

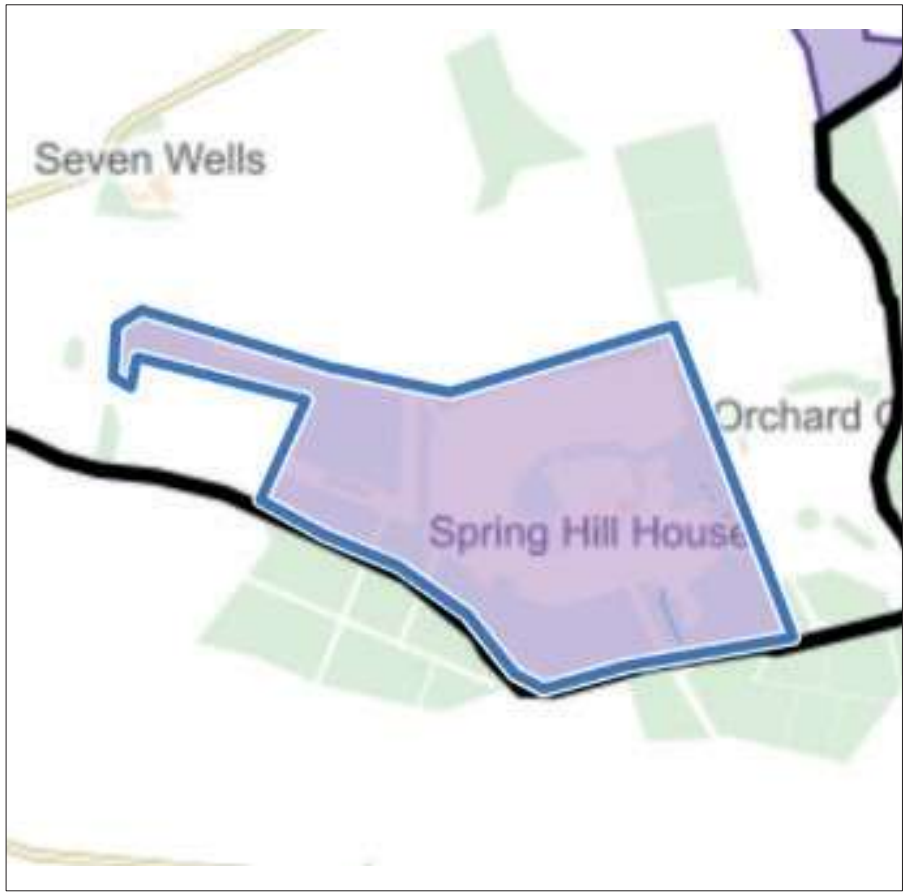
Improvement focus

- Opportunities to enhance wildlife corridors and connectivity
- Woodlands

13. Sally Beds

Improvement focus

- Woodland
- Riparian habitat


Seven Wells
Spring Hill House


Peter's
ower Barn
Farm
ill House

Appendix 7. Local Green Spaces

Local Green Space 1. Berrington Road

Berrington Road, Chipping Campden, GL55 6JA

This reasonably-sized circular area of land at the end of this quiet cul-de-sac is the only area of grass of sufficient size for children to play at this end of the town. It is of high recreational value for the local inhabitants, who have free access at all times. Use of this space provides for improved health for the local population.

Landowner:
Has the landowner already been consulted yes/no: No







Local Green Space 2. Leysbourne

Leysbourne, South side, from Church Street to Cidermill Lane, GL55 6HL

This strip of grass, freely accessible to the public, is an important part of the attractive nature of Leysbourne, leading on to the High Street, and has benches for residents and visitors to sit and admire the impressive street views. The appearance of these streets is very special, and one of the reasons why the town is much visited by tourists.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No







Local Green Space 3. High Street

High Street, North side, from Leysbourne to the Market Square, GL55 6AG

This strip of grass, freely accessible to the public, is an important part of the attractive nature of the High Street and has benches for residents and visitors to sit and admire the impressive street views. The appearance of these streets is very special, and one of the reasons why the town is much visited by tourists.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No





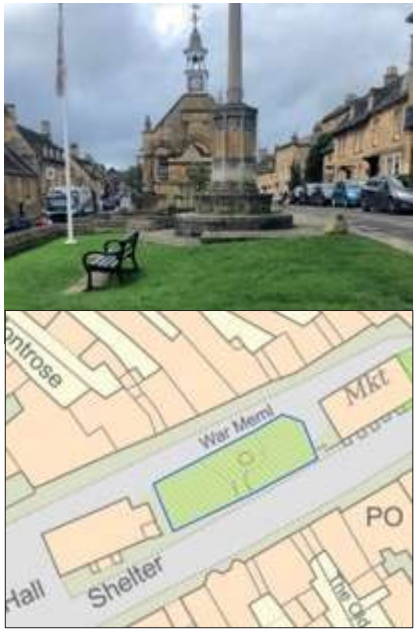


Local Green Space 4. Memorial Green

Memorial Green, High Street, Chipping Campden, GL55 6AG

This area, which contains the memorials to residents of the parish who lost their lives in the First and Second World Wars, is an important area historically and visually. It is freely accessible and provides a rest area for residents and visitors in this very central area of town between the market hall and the town hall.

Landowner: Chipping Campden Town Trust, registered Charity 203889
Has the landowner already been consulted yes/no: No



Local Green Space 5. Castle Gardens Play Area

Castle Gardens, Chipping Campden, GL55 6JR

This grassy area at the end of Castle Gardens is used as a play area for children resident at this end of the town. It has been furnished with a number of play facilities such as swings see-saws etc. and with benches for parents/carers to rest. It is an important recreational area which enriches the lives of the local residents.

Landowner: Chipping Campden Town Council
Has the landowner already been consulted yes/no: No







Local Green Space 6. Olimpick Drive Play Area

Olimpick Drive, Chipping Campden, GL55 6BL

This relatively new grassy area is used as a play area for children resident at this end of the town. It has been furnished with a number of play apparatus such as slides, see-saws etc. It is an important recreational area which enriches the lives of the local residents.

Landowner: Developers – Lagan Homes
Has the landowner already been consulted yes/no: No







Local Green Space 7. Littleworth

Grass area junction of Littleworth with Park Road, GL55 6BG

This grassy area at the junction of Littleworth with Park Road is an important part of the attractiveness of this part of the town.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No





Local Green Space 8. Westington

Land beside Woodroff House, Chipping Campden, GL55 6EG

This grassy area at the junction of Westington and Izod's Close is an important part of the attractiveness of this part of the town and provides seating for pedestrians to rest and admire the very attractive surroundings.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No





Local Green Space 9. The Mound, Broad Campden

Angel Lane, Broad Campden

This grassy area at the bottom of Angel Lane, opposite Broad Campden Church contributes to the beauty of Broad Campden. It has seating for pedestrians to rest and admire the very attractive surrounding buildings.

Landowner: Chipping Campden Town Council
Has the landowner already been consulted yes/no: No





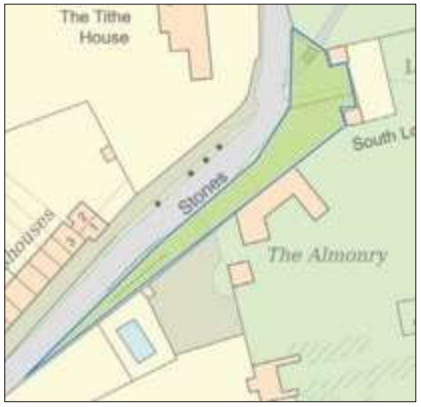
Local Green Space 10. Court Barn / Cart wash

Court Barn, Church Street, Chipping Campden GL55 6JE

This grassy area which runs from the entrance of Old Campden House, past Court Barn Museum, to the old cart wash, opposite the Almshouses, is an important part of this very beautiful part of the town, arguably one of the most picturesque areas in Chipping Campden. It is also one of the most historically important parts of the town, lying between the church, the entrance to Old Campden House, the cart-wash and the old almshouses.

Landowner: Highways Authority
Has the landowner already been consulted yes/no: No





Local Green Space 11. Recreation Ground

George Lane, Chipping Campden GL55 6DA

The Recreation Ground provides a free to use large open space for children and residents to participate in outdoor recreation and sporting events. It is also used for parish events, such as the annual Fireworks display. It has an extensive landscaped play area with well- maintained play apparatus. The “Rec” is an important area for the town, for health reasons and as a social facility.

Landowner: Chipping Campden Town Council
Has the landowner already been consulted yes/no: No







Local Green Space 12. Bowling Green

Chipping Campden Bowls, Station Road, Chipping Campden, Glos GL55 6LB

Chipping Campden Bowling Club is on the edge of the town adjacent to the Cricket Club and the housing at Castle Nurseries, 10-15 minutes' walk from the town centre. It is the visible edge of the town when approaching the east side of town along Station Road.

The bowls club (established in 1910) was previously located behind The Noel Arms in the centre of town, but this area was redeveloped many years ago. The current green and clubhouse was built due to the drive and efforts and financial support of the local community which holds the Club in high regard.

The bowling club green is one of the best in the area and the recently built clubhouse offers excellent facilities to bowling and social members in addition to visiting bowlers, spectators and guests.

The club offers year-round bowling with indoor carpet bowls being offered in the clubhouse during winter months.

The club has an inclusive membership policy and is a vital recreational facility in the town.

The clubhouse is also a social hub for residents of the town with events such as quiz and bingo nights and caters for a wide range of functions and parties.
The Club lies within the Cotswolds National Landscape.

Landowner: Chipping Campden Bowling Club
Has the landowner already been consulted yes/no:





Local Green Space 13. The Cricket Ground

Chipping Campden Cricket Club, Station Road, Chipping Campden, Glos GL55 6LB

Chipping Campden Cricket Club is on the edge of the town adjacent to the Bowling Club and the housing at Castle Nurseries, 10-15 minutes' walk from the town centre. It is the visible edge of the town when approaching from Ebrington and the Campden Business Park.

The site is 2.1 ha and lies within the Cotswolds National Landscape.

The Cricket Club was formed over 150 years ago and moved to its current site in 1972, on land that was formerly allotments as long ago as 1830. The Club built itself a new pavilion in 2022 to serve its growing membership – now over 150 juniors (who play in the CHL league) and 47 adults who play in 2 men's senior team in the Gloucestershire leagues and a lady's team who compete in tournaments during the season. The state-of-the-art facilities resulted in Chipping Campden Cricket Club being selected for the Over 60's England trials and subsequently one of 6 grounds in The Grey Ashes Series in the summer of 2023. These facilities are available for community hire.

The Cricket Club is a thriving, inclusive community club providing excellent facilities that enhance the fitness and wellbeing of the residents of the town and the enjoyment of spectators.

Landowner: Trustees of Chipping Campden Cricket Club
Has the landowner already been consulted yes/no:





Local Green Space 14. Ernest Wilson Garden

The Ernest Wilson Memorial Garden, Leysbourne, Chipping Campden, GL55 6HW

This 0.12 ha site lies within the Chipping Campden Conservation area and the Cotswolds National Landscape.

Ernest 'Chinese' Wilson (1876 - 1930) was born in Chipping Campden and became one of the great plant hunters and collectors of the early 20th Century. In 1980 the town acquired the lower part of the Old Vicarage Garden, which fronts on to the main street with the majestic tower of St James's Church to the rear. The garden was opened in 1984. 'As you walk through the gate in the high stone wall you seem to enter a secret garden, a haven of tranquility in the heart of Chipping Campden.'

This garden is enjoyed by residents and visitors alike, is open daily, and is free to visit although donations are encouraged.

Landowner: Chipping Campden Town Council
Has the landowner already been consulted yes/no:





Local Green Space 15. Wold's End Orchard

Corner Back Ends and Aston Road, Chipping Campden, Glos. GL55 6HR

The National Planning Policy Framework (2019) requires the conservation of veteran trees and their historic context. The site has a large number of veteran fruit trees, some over 150 years old thus by definition can be classed as 'ancient' given this is 'notably old for its species, some of which are rare varieties. Wolds End Orchard is Campden's last remaining traditional orchard which allows public access. It forms part of the historic environment and cultural heritage of the town and is a tribute to Campden's cider and perry making history (reference nearby Cider Mill Lane). The volunteers who maintain the site still make apple juice from its fruit. Its distinctive Broad Rigg Ridge and Furrow landscape is one of the town's last remaining examples of medieval farming methods.

The annual Wassail, a Twelfth Night tradition that has been practiced in Britain for centuries, takes place in Wolds End Orchard and has done for many years. Volunteers and visitors remark upon the feeling of tranquility of the site and how the open space and activities on offer help with feeling of positive mental health and wellbeing.

Landowner: The Campden Society (registered Charity 261665) of The Old Police Station, High Street, Chipping Campden Glos. is the beneficial owner of the site. The Land Registry registered proprietor of the site is The Official Custodian of Charities of 102 Petty France, London SW1H 9AJ on behalf of the trustees of The Campden Society.

Has the landowner already been consulted yes/no: Yes.
The Trustees and Members of the Campden Society are aware of the application to designate it as a Local Green Space and are fully supportive of this.









Local Green Space 16. Badgers Field

Badgers Field. Chipping Campden. GL55 6EU

This 0.85-hectare site is adjacent to the development at Lady Juliana's view and adjoins open farmland and has for many years been seen as a local open space.

The site is within the Cotswold National Landscape and within a 5-minute walk of the town centre.

The land is for the recreational enjoyment of the owners and all residents of the town and dog walkers.

The owners are creating half the site as a wildflower meadow and the remainder as an orchard. This is to improve biodiversity and reestablish the historical landscape of the town which has lost all but one of its heritage orchards

Landowner: Badgers Field (Chipping Campden) Management Co. Ltd. Land Registry Title GR209307
Has the landowner already been consulted yes/no: Yes.
Badgers Field (Chipping Campden) Management Co. Ltd. are fully supportive of this.

Local Green Space 17. Calf Meadow

Beyond Lady Juliana's View, Chipping Campden, GL55 6EU

This meadow provides a tranquil and well-used amenity close to the centre of the town away from roads and cars. It has various public footpaths crossing it, including the Long-Distance Heart of England Way and Diamond Way. It is part of a patchwork of three fields which make up a green walking and recreational corridor surrounding the historically and locally significant site of Old Campden House and grounds including Pool Meadow. (Scheduled Monument 1013875). The site contains a distinctive C17th vaulted stone bridge associated and listed together with Lady Juliana's Gateway (1078462) of which the field allows excellent views.

The site is adjacent to the old Town Mill, Haydon Mill, which is a C17th listed building (1078451) and one of its borders is the mill stream/ River Cam.

Landowner: Emma Defries
Has the landowner already been consulted yes/no: Yes, and no objection has been raised.






Calf Meadow

Local Green Space 18. Allotments

The Bratches, Chipping Campden GL55 6JS

The Allotments provide the opportunity for townsfolk to gain some physical exercise whilst growing their own healthy food. It is important for health and ecological reasons.

Landowner: Gloucestershire County Council
Has the landowner already been consulted yes/no: No







Local Green Space 19. The Hoo West

The part of the Hoo being land bounded to the NE by the houses / gardens along Hoo Lane, to the W and SW by Dyers Lane and the houses / gardens already built to the N and NE of Dyers Lane, to the SE by the houses/gardens off the SW side of Hoo Lane and by the houses / gardens of Littleworth, and to the NW by a line extending from the top of Hoo Lane (above the chicken sheds) along the field boundaries to Dyers Lane, below the land attached to Kingcombe.

The Hoo is an essential part of the rural environment within which the Town is set, and which gives the Town its specific character. In CDC Green Infrastructure August 2017, it is commented that the setting of the town is important to the whole of its aesthetics uniquely in that the built environment remains generally hidden in the folds of the landscape. The Cotswold Way runs up Hoo Lane from the centre of the town, and public footpath runs up Hoo Lane to the E and NE of the site and overlooks the site. Other public footpaths cross the site. The site is mostly open pasture, and forms part of the circular footpath route around the town, consistent with the CDC suggestion in the Cotswold Green Infrastructure Strategy March 2021 draft. The footpaths are used for walking, running, and dog walking.

Landowner: Peter Mackenzie
Has the landowner already been consulted yes/no: Yes. A letter of objection has been received.







Local Green Space 20. The Hoo East

Land bounded to the SW by the houses / gardens along Hoo Lane, to the SE by Back Ends and the houses / gardens already built to the N of Back Ends, to the NE by Wolds End Orchard, the Cley, and houses / gardens built to the W of Aston Road, and to the NW by a line extending from the path to the N of The Cley to Hoo Lane (above the chicken sheds).

The site is a key part of the natural setting of the Town, is extensively walked (a footpath runs through it) and is part of the wildlife corridor from The Cley westwards. The Hoo provides the skyline views looking NW from most of the town and is also highly visible from approaches to the town. It is a key part of the green landscape within which the town nestles and includes ridge and furrow features which illustrate the agricultural history of the town. It is visible from National Footpaths such as the Cotswold Way and the Monarch's Way.

The Hoo is much walked by local residents and by visitors and highly valued as being a truly rural environment within a few minutes' walk of the town centre. It is a key element of the rural setting of the town which is essential to its character.

Part of Hoo (East) was identified as an Amenity Green Space in the CDC's Green Infrastructure, Open Space and Play Space Strategy Aug 2017.

Landowner: Peter Mackenzie
Has the landowner already been consulted yes/no: Yes. A letter of objection has been received.









Local Green Space 21. The Cley

Grevel Lane, Chipping Campden GL55 6HS

This area of green space is an area of natural pasture and wild woodland, the last in the area, which occupies an elevated position. It is a notable feature on the approach to the town, providing a backdrop. It is visible to the public from the Aston Road and from the well-used footpath along the northern boundary of the site, which connects the Aston Road to the Cotswold Way National Trail. DEFRA specifically categorises the site as “Priority Habitat Inventory Deciduous Woodland” with regard to biodiversity and habitats. In addition, it is in an area categorised as “Environmentally Sensitive” and is included in the “Ground Water Vulnerability Map”. The report from the Cotswold District Council Tree Officer to a meeting of the Cotswold District Council on the 20th October 2020 in support of the TPO on the site stated inter alia “Self-seeded trees grow as a result of natural regeneration, as opposed to being planted. A tree or trees that are self-seeded in such circumstances have grown naturally and are considered worthy of protection. “The land the subject of this submission is home to an extremely wide variety of wildlife including hares, rabbits, moles, fieldmice, muntjac deer, roe deer, foxes, badgers and a wide variety of birds, some of them rare species. It serves as a vital safe haven for protected species such as Pipistrellus (common pipistrelle bat.)

Landowner: Peter Mackenzie, Mackenzie-Miller Developments Ltd.
Has the landowner already been consulted yes/no: Yes, and they have sent a letter of objection









Local Green Space 22. The Craves

South of Lower High Street & Park Lane, Chipping Campden, GL55 6DY

The site is integral to the town's identity. It has been a valued green space for centuries, with three well used public footpaths and is a unique remnant of the separation of the Norman new town of Campden from the distinct and earlier settlement of Westington.

It is a sloping field and from its high point walkers can see views over the town. The sloping site is also visible from within the town and provides a green backdrop to the historic buildings, which is a special feature not seen elsewhere. The town uses it for walking and dog walking – and paddling in the River Cam.

Six Listed buildings back onto the site from the north in Park Road and Lower High Street. One Listed building The Guild House is next to the Craves to the East. Four Listed buildings are next to or adjoin the boundary to the south.

Landowner: William and Martin Haines, Castle Farm, Station Road Chipping Campden. Gloucestershire. GL55 6JD
Has the landowner already been consulted yes/no: Yes, and they have sent a letter stating their objection.














AP
Andrea Pellegram Ltd.



This page is intentionally left blank

Basic Conditions Statement

Chipping Campden Parish Neighbourhood Development Plan to 2031

(February 2025)

Introduction

1. This Statement has been prepared by Chipping Campden Town Council (the Town Council) to accompany its submission to the local planning authority, Cotswold District Council, of the Chipping Campden Parish Neighbourhood Development Plan (the CCNDP) under Regulation 15 of The Neighbourhood Planning (General) Regulations 2012.

2. The CCNDP must meet the following requirements:

Legal matters

(1) The examiner must consider the following: -

(a) whether the draft neighbourhood development plan meets the basic conditions (see sub-paragraph (2)),

(b) whether the draft neighbourhood development plan complies with the provision made by or under sections 61E(2), 61J and 61L,

(c) whether the area for any referendum should extend beyond the neighbourhood area to which the draft neighbourhood development plan relates, and

(d) such other matters as may be prescribed.

The Basic Conditions

(2) A draft neighbourhood development plan meets the basic 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) the making of the neighbourhood development plan contributes to the achievement of sustainable development,

(c) 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),

(d) the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations, and

(e) prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.

(f) The examiner is not to consider any matter that does not fall within sub-paragraph (1) (apart from considering whether the draft neighbourhood development plan is compatible with the Convention rights).

Legal Requirements

3. The CCNDP is submitted by Chipping Campden Town Council, which, as a qualifying body, is entitled to submit a neighbourhood development plan for its own parish. The CCNDP has been prepared by CCNDP Working Group, which is overseen by the Town Council.

4. The parish of Chipping Campden has been formally designated as a Neighbourhood Area under the Neighbourhood Planning Regulations 2012 and was formally approved by Cotswold District Council on 14th February 2014. The Neighbourhood Area application by Chipping Campden Town Council and the Decision Notice issued by Cotswold District Council are attached as **Appendix 1**.

5. The CCNDP contains policies relating to the development and use of land within the neighbourhood area. Proposals relating to planning matters (the use and development of land) have been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.

6. The CCNDP identifies the period to which it relates as from the date it will be made until 2031. This relates to the Cotswold Local Plan which has a plan period ending 2031.

7. The CCNDP does not deal with County Matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

8. The CCNDP relates only to the Neighbourhood Area within Chipping Campden Parish though it makes reference to land outside the parish boundary. It does not relate to more than one neighbourhood area. There are no other neighbourhood development plans in place within the neighbourhood area.

The Basic Conditions

Having regard to national policies and advice contained in guidance issued by the Secretary of State

9. The CCNDP has been prepared having regard to national policies, in particular those set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) suite. It is contended that the CCNDP accords with the core Planning Principles at the heart of the NPPF. The NPPF was updated in December 2024 (amended 7th February 2025) and this version will be utilised in this Basic Conditions Statement.

10. **Table 1** provides a summary of how policies in the CCNDP conform to the NPPF. The NPPF paragraphs set out are those considered most relevant. The table is not intended to be an exhaustive list of all NPPF policies.

Table 1 – Meeting Basic Conditions

CCNDP Policy	NPPF December 2024 (amended 7th February 2025) References
Policy 1 – Chipping Campden Town Centre	NPPF Para: 54 in relation to control over changes of use within the town centre. 90b in relation to the definition of the town centre. 109b in relation to car parking provision. Annex 2 definition of Main town centre uses.
Policy 2 – Community Facilities and Infrastructure	NPPF Para 98, 100, 101 109, 110, 111, 128 Paragraph 98 of the NPPF says that planning policies and decisions should plan positively for the provision of community facilities to enhance the sustainability of communities and residential environments. Policy 2 identifies important community facilities and seeks to establish their use and importance, to provide appropriate policy support in accordance with Paragraph 98 (c). Paragraph 98 (d) of the NPPF says that planning policies and decisions should ensure that established shops, facilities and services are retained for the benefit of the community. Policy 2 seeks to fulfil this purpose in accordance with this and with Paragraph 98 (c) whilst recognising the limitations on this imposed by permitted development rights.
Policy 3 – Design of the Built and Natural Environment	NPPF Para. 29, 129-130, 133-135 in relation to the requirement to have regard to the Chipping Campden Design Guide. This provides a set of local design principles and guidance based on the character of the Parish. 193d in relation to the integration of opportunities to improve biodiversity through development design.
Policy 4 – Non-Designated Heritage Assets	NPPF Para 202-203, 216 and footnote 75 - Paragraph 216 of the NPPF states that non-designated heritage assets can merit consideration in planning matters, stating that 'In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Section 12 of the NPPF covers all aspects of the historic environment. Paragraph 203 states that "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment". Appendix 5 of the CCNDP sets out criteria through which Non-Designated Heritage Assets in Chipping Campden Parish have been identified.
Policy 5 – Biodiversity Net Gain and Local Nature recovery	NPPF Para187-188 and 192 in relation to the mapping and identification of identifying opportunities for local nature recovery and biodiversity net gain from developments in the parish in Appendix 6 of the CCNDP.

Policy 6 – Local Green Spaces	NPPF Paras 106-108 - Local Green Spaces have been proposed for designation in the CCNDP. A number of sites are put forward. Appendix 7 of the CCNDP explains each site meets the NPPF criteria. Policy 6 is in accordance with the NPPF which applies green belt policy principles to proposed development on Local Green Space sites.

Contributes to the achievement of sustainable development

11. The following sustainability assessment has been carried out to assess how the policies in the CCNDP aim to contribute positively to the delivery of sustainable development. The CCNDP policies aim to fulfil economic, social and environmental objectives and seek to balance them. **Table 2** summarises the various sustainability outcomes of each policy in the CCNDP.

    Table 2 – Contribution to Sustainable Development

CCNDP Policy	Economic objective	Social Objective	Environmental Objective
Policy 1 - Chipping Campden Town Centre	Supports the retention of main centre uses and addresses the potential harm from a predominance of identified land uses. Supports measures to improve access to the town centre.	Considers the wider role of the town centre in meeting tourism and everyday local needs as a service centre, meeting social objectives.	Would address traffic issues in the town centre.
Policy 2 - Community Facilities and Infrastructure	Ensuring a good network of community facilities and assets supports a well-balanced community which is an economic advantage.	It is an important aspect of sustainable development that community facilities are present and available locally. Would meet an important community objective to retain existing local facilities.	Local community facilities allow people to use their cars less in accessing key local services. Would support local availability of facilities reducing the need to travel to other towns for facilities used by the local community.
Policy 3 - Design of the Built and Natural Environment	The Design Guide provides a means through which to ensure the economic benefits derived from the high quality of built development in Chipping Campden are retained and strengthened.	Encourages a safer and more accessible town and would provide more social outdoor spaces. Supports improved relationship between new development and existing settlement character	Through effective design approaches, it supports provision of green infrastructure to improve biodiversity and reduce environmental impacts.
Policy 4 - Non-Designated Heritage Assets	Supports retention of interesting features which add to the attractiveness of the town	Provides support for local features of heritage value to local residents	
Policy 5 – Biodiversity Net Gain and Local Nature recovery	Identifies local opportunities in the parish for investment in nature recovery and biodiversity gain. Ongoing management of nature improvement sites supports jobs and local supply chains.	If realised, the potential to secure local opportunities for nature recovery and improvement would support health and well-being for local residents	Supports linked-up and improved green spaces and habitats and supports local alternatives in the town to reduce pressure on sensitive habitats.
Policy 6 – Local Green Spaces	Supports the role of local green spaces which provide a setting for the town with special resonance for visitors as well as residents, supporting the tourism economy of the town.	Supports health and well-being for local residents	Supports linked-up and improved green spaces and habitats and supports local alternatives in the town to reduce pressure on sensitive habitats.

General conformity with the strategic policies in the development plan

12. The development plan for the Chipping Campden Neighbourhood Area comprises the following development plan documents:

    a) The Cotswold District Local Plan 2011-2031
    b) Minerals Local Plan for Gloucestershire (20th March 2020)
    c) Gloucestershire Waste Local Plan (October 2004) and the Gloucestershire Waste Core Strategy (November 2012).

13. The CCNDP does not contain any policies relating to minerals and waste planning. Where development plan policies are relevant to the policies in the CCNDP, these are specifically referenced within the supporting text of the document. The CCNDP adds local detail in support of the higher tier policies and does not conflict with or undermine them.

Strategic Environmental Assessment (SEA Directive 2001/42/EC) (SEA)

Habitats Regulations Assessment (Habitats Directive 92/43/EEC) (HRA)

14. The CCNDP Working Party requested a screening opinion for SEA and HRA from Cotswold District Council. Responses from statutory consultees at the Environment Agency, Historic England and Natural England are recorded where given, and records of requests for additional confirmation from Natural England with regard to HRA is also recorded. The Screening Opinion and associated correspondence is attached as **Appendix 2**.

Human Rights Legislation

15. The CCNDP has regard to and is compatible with the fundamental rights and freedoms guaranteed under the European Convention on Human Rights. The main issues for planning in the context of human rights are: protection of property, right to respect for private and family life and prohibition of discrimination. The CCNDP complies with the requirements of the Human Rights Act 1998. All reasonable attempts were made to ensure that all Chipping Campden Parish residents, including those living outside the Neighbourhood Area but within the Parish, and all relevant stakeholders, were given the opportunity to contribute to and comment upon the CCNDP.

Appendix 1 – Designation Decision and Map showing Neighbourhood Area

This Appendix contains the Decision Notice issued by Cotswold District Council on the determination of a request for designation of the Neighbourhood Area based on the boundary of Chipping Campden Parish.

COTSWOLD DISTRICT COUNCIL

COTSWOLD DISTRICT COUNCIL PUBLIC NOTICE

Approval of the Neighbourhood Area for
Chipping Campden Parish

Neighbourhood Planning Regulations 2012

Name of approved Neighbourhood Area:
Chipping Campden Neighbourhood Area

The subject matter
In November 2013, Chipping Campden Town Council submitted a proposal to designate a Neighbourhood Area. The area proposed follows the civil parish boundaries for Chipping Campden Parish. You can view the details of the area by visiting http://www.cotswold.gov.uk/nqcontent.cfm?a_id=15269&tt=cotswold

Following the statutory consultation period, Cotswold District Council agreed to designate the area on 14th February 2014.

Designation of a Neighbourhood Area is the first formal stage in developing a Neighbourhood Plan. The neighbourhood plan is a way for the town council to help shape how their community develops over the coming years.
Contact: Neighbourhood.planning@cotswold.gov.uk

Trinity Road, Cirencester, Gloucestershire, GL7 1PX Tel: 01285 623000 Fax: 01285 623900 www.cotswold.gov.uk

COTSWOLD DISTRICT COUNCIL

Designation of Neighbourhood Area

Please note that the information provided on this form will be published on the Cotswold District Council's website. If you require clarification, please contact neighbourhood.planning@cotswold.gov.uk

1. Name of proposed Neighbourhood Area

Chipping Campden Parish

2. Parish Clerk details

Title	Mrs
First Name	Joanna
Last name	Ellis
Address 1	Old Police Station
Address 2	High St
Address 3	Chipping Campden
Address 4	
Town	Chipping Campden
County	Glos
Postcode	GL55 6HB
E-mail	townclerk@chippingcampdentowncouncil.org
Telephone	01386 841298

3. Single Point of Contact *– if different from the Clerk*

Title	
First Name	
Last name	
Address 1	
Address 2	
Address 3	
Address 4	
Town	
County	
Postcode	
E-mail	
Telephone	

We expect all official correspondence to be routed through a Single Point of Contact, to prevent misunderstandings over whether any interactions with the Council are official or personal.

3. Relevant body

Please confirm that you are a relevant body to undertake neighbourhood planning in your area.

Chipping Campden Town Council administers the Parish and as such is a relevant body.

In accordance with section 61G of the 1990 Town and Country Planning Act and Section 5C of the 2012 Neighbourhood Planning (General) Regulations 2012, only a town or parish council is able to act as the lead body for neighbourhood planning within Cotswold District. Where a proposed area includes part or whole of a neighbouring parish or parishes, the parish council can only act as lead for the neighbourhood area where the neighbouring parish council(s) have given their consent.

If your proposal includes part or whole of a neighbouring parish or parishes, please list below, and supply signed confirmation of their consent.

N/A

4. Intention of neighbourhood area

Neighbourhood Development Plan ☒

Neighbourhood Development Order ☒

Community Right to Build Order ☒

This section is a statement of intent only, and does not restrict you from developing a plan or order at a later date. However, it will be easier for the Council to determine how it can best assist you if you are able to give an indication of intent at this stage.

5. Proposed area

5.1 Please indicate below, and attach a map showing the extent of the area

Whole parish boundary ☒

Part of parish ☐

Joint with neighing parish(es) ☐

6. Please complete the following to enable us to publicise your proposal appropriately.

The boxes below will automatically expand as you type or paste in text.

6.1 (i) Please provide a short statement, setting out the background to your submission: how this proposal has come about, and what it is trying to achieve.

(ii) Please provide an explanation of why you have chosen to develop a Neighbourhood Plan, Neighbourhood Development Order or Community Right to Build.

Note: This information will help us publicise your proposal, and respond to enquiries from the wider community about your intentions.

Following on from the Way Forward report completed in 2010, Chipping Campden Town Council wishes to undertake a Neighbourhood Plan to ensure that the current and future needs of the whole Community are met over the next 20 years.

A Neighbourhood Plan will enable us to highlight preferred areas for development to meet the economic, housing and social needs of our community in a way which is sympathetic to our existing built and landscape environment.

It will also enable us to protect green open spaces which are enjoyed by our community and which would harm the landscape environment if they were to be built upon.

6.2 (i) Please provide a short statement on why the boundary described by this submission and the accompanying map is appropriate.

(ii) What has informed and been taken into account in reaching a decision on the proposed boundary?

Note: Please consider whether existing parish boundaries are appropriate for a Neighbourhood Plan, given the location of key facilities and possible development sites. Have you discussed your plans with neighbouring parishes?

It is considered that we can meet our objectives stated in 6.1 above within the Parish Boundary.

Therefore, to date, we have not discussed our plans with neighbouring parishes.

6.3 Please provide a short statement on how your proposal will fit with any other plans prepared by your community.

Note: Is your intention to replace or supplement existing plans such as Community or parish plans, village design statements etc?

In line with new government guidelines, the Neighbourhood plan for Chipping Campden will be based on central government and local government strategic objectives and will form the basis for implementing these in the most advantageous ways for Chipping Campden and its residents.

The Neighbourhood Plan process will enable us to revise and extend the research and consultation undertaken by the Way Forward Group to produce a vision for Chipping Campden which will best meet the needs of the Community.

It is uncertain at this stage whether this will involve seeking Neighbourhood Development Orders or Neighbourhood Right to Build Orders.

Informative:
While Neighbourhood Planning is designed to empower communities, and to enable them to develop policies and proposals they deem locally appropriate, Neighbourhood Plans need to be in general conformity with the Local Plan and national planning guidance.

7 Declaration

I hereby apply to designate a neighbourhood area as described on this form, the accompanying map, and any supplementary documentation I have supplied.

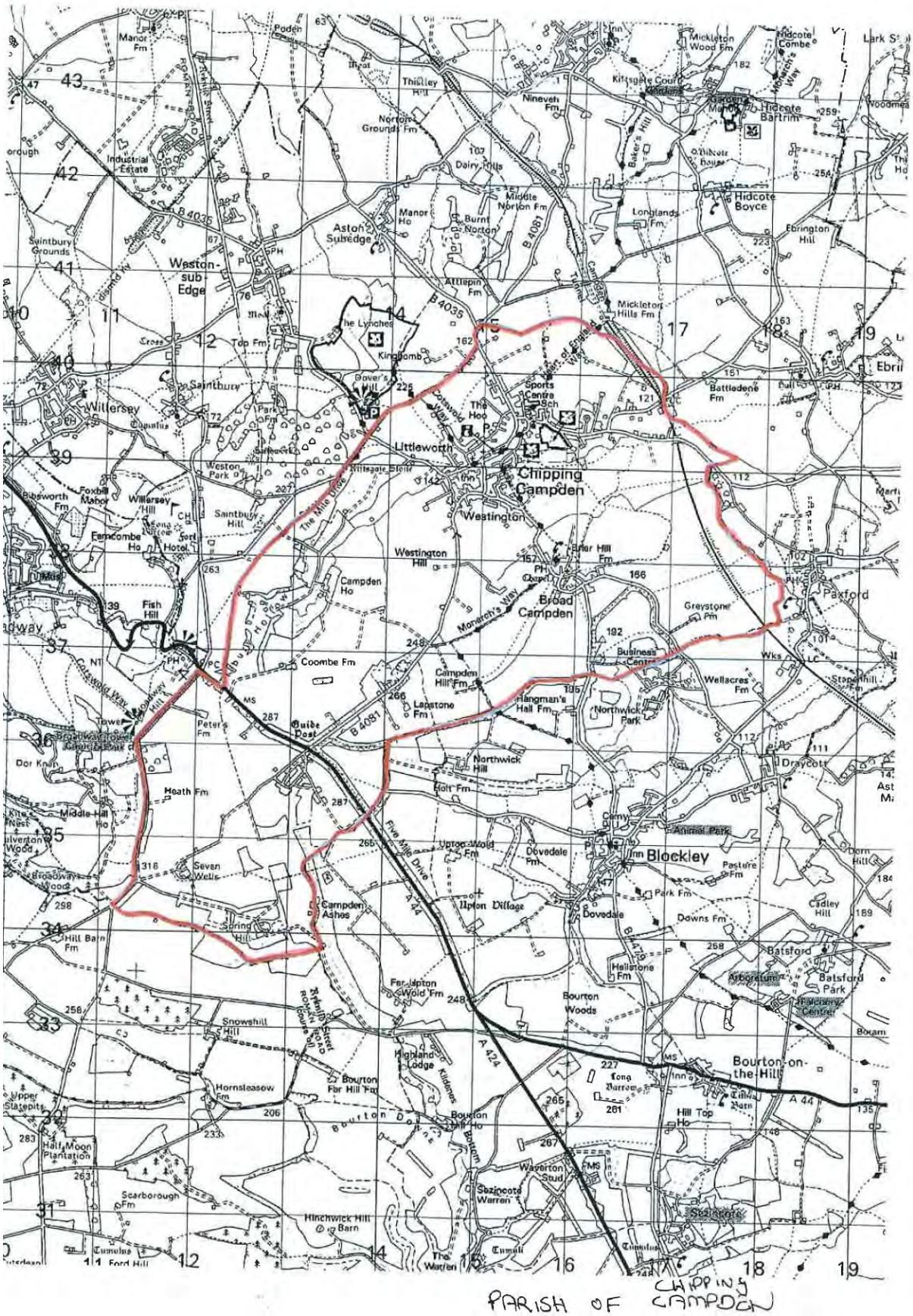
Joanna Ellis

Date:20th November 2013

Please return this form to:

Joseph Walker
Community Partnerships Officer
Cotswold District Council
Trinity Road
Cirencester,
Glos.
GL7 1PX

Email: neighbourhood.planning@cotswold.gov.uk
Telephone: 01285 623146



PARISH OF CHIPPING CAMPDEN

Appendix 2: SEA and HRA Screening Opinion

COTSWOLD DISTRICT COUNCIL

Chipping Campden
Neighbourhood Development Plan

Strategic Environmental Assessment & Habitat Regulation Assessment Screening

28 February 2024

Contents:

Conclusion

Annex A: SEA Screening

Annex B: HRA Screening

Annex C: Consultation Responses

C1 Historic England
C2a Natural England Letter
C2b Natural England Advice

Conclusion

1. In December 2023, Chipping Campden Town Council supplied a preliminary draft of their Neighbourhood Development Plan to Cotswold District Council, for the express purpose of having their proposals screened in line with the requirements of both the Strategic Environmental Assessment ('SEA') and Habitats Regulation Assessment Regulations ('HRA'.

2. Cotswold District Council commissioned Land Use Consultants Ltd ('LUC') to carry out both these assessments on their behalf. LUC provided two reports, one for each screening requirement: the SEA screening is attached as Annex A; the HRA Screening as Annex B.

3. Following review by the Council, these screening reports were provided to the statutory consultation bodies for SEA and HRA (Historic England, the Environment Agency and Natural England) for their opinion, in line with the SEA and Habitats Regulations. The 5 week consultation period ended on the 22nd February 2024. The responses provided indicated no concerns with the conclusions reached by LUC in their review (see responses in Annex C; the Environment Agency declined to comment).

4. Based on the Screening Report and taking into account responses from the statutory environmental bodies, it is determined by Cotswold District Council in accordance with SEA Regulation 9, as the 'responsible authority', that the Chipping Campden Neighbourhood Plan is unlikely to have significant environmental effects and is therefore 'screened out' i.e. that no Strategic Environmental Assessment is required.

5. In accordance with Regulation 106(1) of the Habitats Regulations, Cotswold District Council, as the 'competent authority,' does not consider that an 'appropriate assessment' under Regulation 105 is required.

6. If the issues in the Neighbourhood Plan should change then a new screening may need to be undertaken. New development proposals in Chipping Campden will be determined in line with the Development Framework, and may individually require screening for Environmental Impact Assessment (EIA) based on their type, scale and location.

Chipping Campden Neighbourhood Development Plan

SEA Screening Opinion

Cotswold District Council

Final report
Prepared by LUC
January 2024

Version	Status	Prepared	Checked	Approved	Date
1	Draft SEA Screening Report	H Ennis	K Nicholls	K Nicholls	10.01.2024
2	Final SEA Screening Report	H Ennis	K Nicholls	K Nicholls	17.01.2024

EMS566057 FS566056 OHS627041

Land Use Consultants Limited

Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

Contents

Chapter 1 2
Introduction

Chapter 2 4
SEA Screening

Scope of the Chipping Campden Neighbourhood Development Plan 4
Baseline Information 7
SEA Screening 12

References 21

Table of Tables

Table 2.1: Application of SEA Directive to the Chipping Campden Neighbourhood Development Plan 14
Table 2.2: Likely Significant Effects 15

Table of Figures

Figure 2.1: Application of the SEA Directive to Plans and Programmes 13

Chapter 1
Introduction

1.1 Chipping Campden Town Council is supporting the preparation of a Neighbourhood Development Plan, which is being prepared by a Steering Group supported by Andrea Pellegram Ltd. The entirety of the parish of Chipping Campden is included within the Cotswold National Landscape (formerly called the Cotswold Area of Outstanding Natural Beauty). The emerging Neighbourhood Development Plan covers the full extent of the electoral boundary of the Town Council, which includes the Campden Vale Ward.

1.2 LUC has been appointed by Cotswold District Council to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the Neighbourhood Development Plan. SEA may be required for a Neighbourhood Development Plan if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice Guidance (PPG) **[See reference** 1**]** clarifies that there is no legal requirement for a Neighbourhood Development Plan to be subject to SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.

1.3 Cotswold District Council has commissioned LUC to carry out SEA Screening of the Draft policies for Chipping Campden Neighbourhood Development Plan (December 2023) in order to determine whether an assessment is required under European Directive 2001/42/EC (the SEA Directive), transposed into UK law through the SEA Regulations **[See reference** 2**]**.

1.4 In October 2023 the Levelling up and Regeneration Act received royal assent, setting out detailed reforms to the planning system. Amongst other things, the Act allows for the replacement of the current SEA regime with a new

requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation.

Chapter 2
SEA Screening

Scope of the Chipping Campden Neighbourhood Development Plan

2.1 Chipping Campden Town Council approached Cotswold District Council to have the electoral boundary designated as a neighbourhood area, so the Town Council could develop a Neighbourhood Development Plan. A Steering Group, supported by Chipping Campden Town Council and Andrea Pellegram Ltd, has been involved in producing the Draft Policies for the Chipping Campden Neighbourhood Development Plan (December 2023).

2.2 The Chipping Campden Neighbourhood Development Plan seeks to address the issues identified by the local community during consultations carried out by the Town Council since 2014.

2.3 The Neighbourhood Development Plan covers the entire electoral boundary of Chipping Campden Town Council, which includes Campden Vale Ward. The Chipping Campden Neighbourhood Development Plan includes a vision for the long-term future of Chipping Campden along with 17 objectives under six themes:

- Environment and Sustainability
  - To conserve and enhance the natural environment, and encourage a wide diversity of flora and fauna.
  - To conserve and enhance the natural setting that characterises the town.
  - To provide and/or maintain green corridors for wildlife across and around Chipping Campden.

- To meet the challenge of climate change, flooding and light pollution.

- Housing
  - To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside.
  - To ensure that new housing location is consistent with the environmental objectives noted above, and is designed in accordance with the design objectives below.
- Economy
  - To protect and develop the town's economy.
  - To strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail, hospitality and other commercial offerings.
  - To improve the town's tourism offer and its attraction to tourists and visitors by improving existing facilities and introducing new ones.
  - To ensure that there is an appropriate balance between rental accommodation for tourists and that which meets the needs of residents and their families.
  - To support the development of specialist food and food-related industry and businesses.
  - To encourage start-up business.
- Design
  - To protect and enhance the area's heritage assets and its AONB location, by encouraging development and conservation projects for uses that are sympathetic to the character of Chipping Campden and its beautiful landscape setting and resisting developments for inappropriate uses, or that are unsympathetic to the character and setting of the Town.
- Facilities, Services and Amenities

  - To ensure that the community has appropriate infrastructure in terms of health services, sports/leisure facilities, amenities, public transport and green infrastructure.
  - To protect existing green spaces and to increase the provision of green spaces.
- Traffic and Transport
  - To improve facilities for car parking.
  - To improve the facilities and safety for cyclists and pedestrians.

2.4 The Neighbourhood Development Plan sets out six planning policies to realise and deliver the vision for Chipping Campden. These include:

- Policy 1: Chipping Campden town centre
- Policy 2: Social and Community infrastructure
- Policy 3: Design of the built and natural environment
- Policy 4: Non-designated heritage assets
- Policy 5: Biodiversity net gain and local nature recovery
- Policy 6: Local Green Spaces

2.5 No sites have been allocated for housing or other forms of built development within the Neighbourhood Development Plan, although various policies include criteria that will apply to any proposals for development. Policy 1 restricts change of use from residential and town centres uses to visitor accommodation within Chipping Campden town centre. The policy also supports proposals that provide extra parking at Chipping Campden School or elsewhere to alleviate congestion. in addition, the policy modifies the ‘town centre’ boundary beyond that defined in the Local Plan Policy EC7. Policy 2 identifies existing social and community infrastructure that should be protected. The policy also supports suitable land for human burial: the Cotswold Local Plan allocated land for burial but this site is no longer available, so an alternative has been sought. Policy 3 requires planning proposals to have regard to the Chipping Campden Design Guide and to be designed according to

the Building with Nature Standards Framework. Policy 5 identifies habitats that could be improved for biodiversity as part of Chipping Campden's Nature Recovery Areas and how developments could contribute to biodiversity gain. Policy 4 and 6 provide protection for non-designated heritage assets and local green space.

Baseline Information

2.6 This section summarises baseline information for the town of Chipping Campden, drawing from the information set out in the Draft Policies for the Chipping Campden Neighbourhood Development Plan.

Context

2.7 The town of Chipping Campden is located within Cotswold District and includes part of the Cotswold National Landscape. The Town Council electoral boundary, which the Neighbourhood Development Plan covers, includes Campden Vale Ward.

Biodiversity, Flora and Fauna

2.8 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within Chipping Campden, the closest being Dixton Wood SAC approximately 13.6km south-west and Bredon Hill SAC approximately 13.5km west.

2.9 There are a number of Sites of Special Scientific Interest (SSSIs) around Chipping Camden although none are within the area covered by the Neighbourhood Development Plan. These include Wellacre Quary SSSI next to the eastern boundary of Chipping Campden, Broadway Hill SSSI approximately 0.1km to the west, Campden Tunnel Gravel Pit SSSI approximately 0.2km to

the north, Hornsleasow Roughs SSSI approximately 1.3km to the south and Hornsleasow Quarry SSSI approximately 1.4km south. All are in favourable condition.

2.10 Within Cotswold District as a whole there are over 260 locally designated Key Wildlife Sites. In addition, there are 13 Nature Recovery Areas within Chipping Campden.

Population

2.11 In 2021, Chipping Campden had a population of approximately 2,288 people. The town has a higher than average population of elderly people, with 32.9% of people being over the age of 65 compared to 18.4% nationally. The number of people aged 0-15 is lower than nationally, at 12.3% compared to 17.4% across England.

2.12 Chipping Campden has a higher proportion of one and two person households compared to England as a whole and household composition is dominated by one person households (35%) and single-family households (62%). In 2019, all of Chipping Campden fell within the 20% or 30% least deprived areas in England according to the Indices of Multiple Deprivation.

Human Health

2.13 The majority of Chipping Campden's residents are in good or very good health (81.6%) with a small proportion (4.2%) in bad to very bad health. Information from the 2021 Census indicates that the proportion of the Chipping Campden population that is in very good health (42.8%) is slightly lower than the Cotswold average (50.4%) and the England average (47.5%). This may reflect the older age profile of the town.

Soil

2.14 Around Chipping Campden town the land is classified as Grade 1 or Grade 2 agricultural land. The majority of the rest of the plan area comprises of Grade 3 agricultural land. It is not known whether the Grade 3 land comprises Grade 3a which is classed as high quality, or the lower quality Grade 3b.

2.15 The soil type in and around Chipping Campden is primarily clay-enriched soils or relatively young soils or soils with little profile.

Water

2.16 While the majority of the plan area is at very low risk of fluvial and surface water flooding, there are areas of flood zone 3 and flood zone 2 associated with the River Cam which runs through Chipping Campden town. The areas of flood zone 3 cover mainly the floodplains of the River Cam which includes the majority of the centre of Chipping Campden town and small rural parts to the east of Chipping Campden town. In the face of climate change, the risk of further surface water drainage problems is likely to increase.

Air and Climatic Factors

2.17 Air Quality in the Cotswold area is generally very good. There are two Air Quality Management Areas (AQMA) within Cotswold District at Air Balloon roundabout, Birdlip and Thames Street, Lechlade, which are approximately 27.8km and 37.3km respectively from Chipping Campden. There are no AQMAs within Chipping Campden. Air quality monitoring, using a network of diffusion tubes to measure nitrogen dioxide (NO2) levels, is undertaken throughout the District. The District's air quality monitoring shows that NO2 levels during 2022 were below the National Air Quality Objective in all locations.

2.18 Climate data is not available at ward level, but within Cotswold District as a whole, reductions in overall carbon emissions of 32% were achieved between 2005 and 2021. This reduction is mostly due to progress in reducing emissions from domestic, followed by commercial with minimal progress on public sector and transport. Transport makes the largest contribution to carbon emissions in Cotswold District.

Material Assets

2.19 Chipping Campden is a relatively rural parish with limited public transport and therefore the majority of residents are reliant on private cars to travel. Two bus routes run from Chipping Campden town to Stratford-upon-Avon every two hours. There are only B roads within the plan area. However, the A44 runs along the south of Chipping Campden Parish.

2.20 The main settlements within Chipping Campden are Chipping Campden town and Broad Campden. Chipping Campden town is a small market town with a historic high street containing a variety of small shops, food and drink establishments and local services including a library. Within Chipping Campden town, there is a thriving arts and makers industry. In 2023, there were the following commercially active organisations: 15 organisations that specialised in performance and exhibition; nine “visual artists” including painters and photographers; 14 artisans and makers; and six digital designers and publishers. Broad Campden is a small hamlet that lies close to Chipping Campden town.

2.21 Due to its location within the Cotswold National Landscape, tourism is a major and growing part of Chipping Campden’s local economy. Reflecting this, there are 21 food and drink establishments in Chipping Campden town. There is also a large number of holiday cottages, B&Bs and hotels.

2.22 Due to the popularity of the Cotswold National Landscape with tourists, there is a high rate of second homes, with the majority of residential properties within Chipping Campden town centre serving as holiday homes as well. There

were 3,776 houses and flats in the District classed as second homes for council tax purposes as of October 2021. This means one in every 18 homes in Cotswold District were out of use. This issue can impact housing supply and create pressure for new development sites to be built out to meet the local housing need.

Landscape

2.23 The majority of Chipping Campden falls within the Cotswold National Landscape (formally called the Area of Outstanding Natural Beauty, or AONB).

2.24 Chipping Campden falls within National Character Area 107: Cotswolds. The Cotswolds landscape consists of a steep slopes crowned by high, open uncultivated land with increasingly wooded valleys.

Cultural Heritage

2.25 There are two Conservation Areas within Chipping Campden: Chipping Campden Conservation Area and Broad Campden Conservation Area. Chipping Campden Conservation Area covers the majority of Chipping Campden town.

2.26 Within Chipping Campden there are five Grade I, 22 Grade II* and 228 Grade II Listed Buildings. There is also one Scheduled Monument and one Park and Garden of Special Historic Interest. These include:

- Campden House formal garden and associated medieval cultivation earthwork; and
- Spring Hill House, at the southern-most part of the parish is an 18th century landscape park.

SEA Screening

2.27 An assessment has been undertaken to determine whether the Draft Policies for the Chipping Campden Neighbourhood Development Plan (December 2023) requires SEA in accordance with the SEA Regulations.

2.28 Figure 2.1 overleaf presents the flow diagram entitled 'Application of the SEA Directive to plans and programmes' which is taken from the Practical Guide to the Strategic Environmental Assessment Directive, published in September 2005. This is a useful guide when considering whether a plan should be subject to SEA (The Practical Guide has been superseded by the National Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions).

Figure 2.1: Application of the SEA Directive to Plans and Programmes

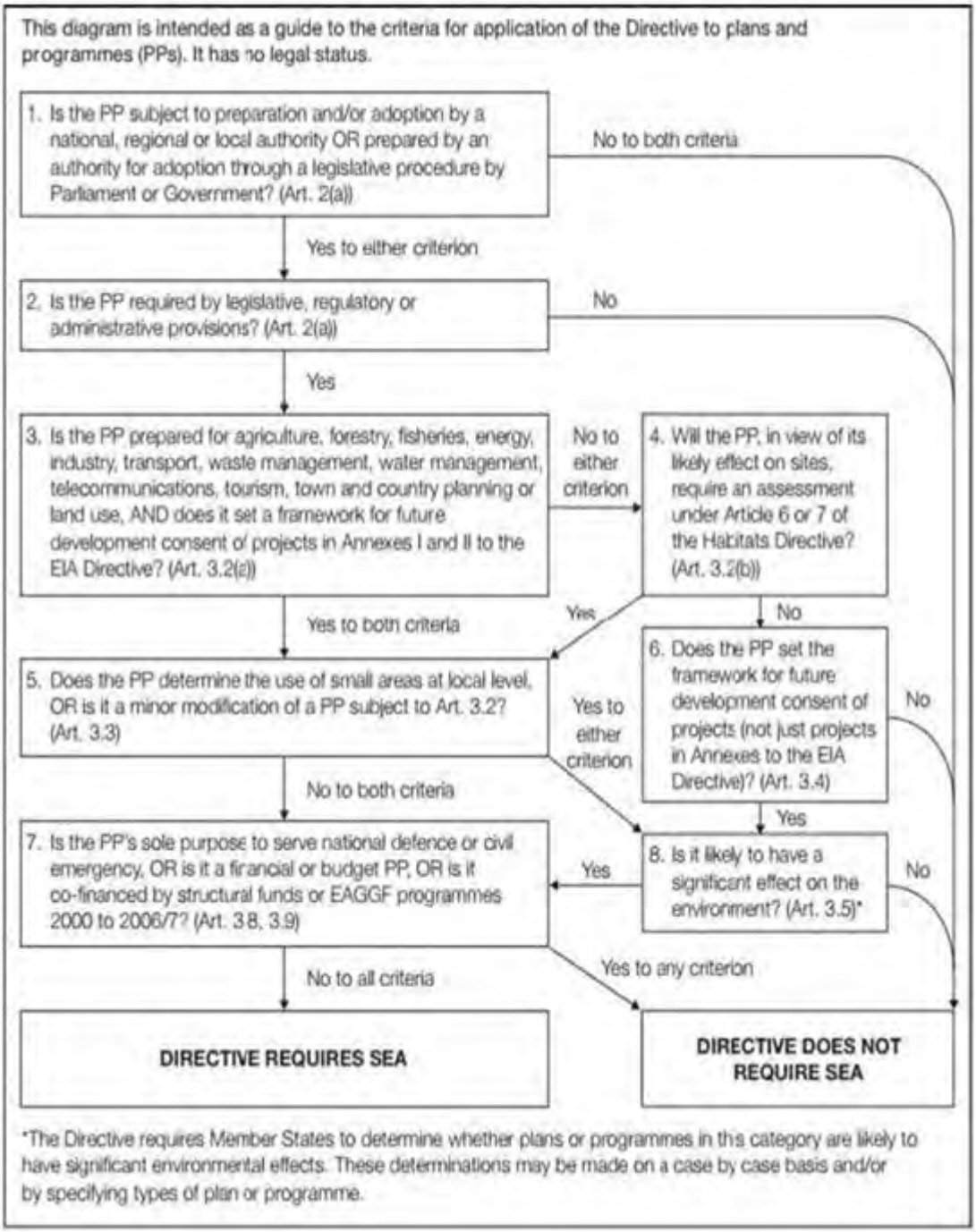


Table 2.1: Application of SEA Directive to the Chipping Campden Neighbourhood Development Plan

Stage	Yes/No	Reason
1. Is the PP (plan or programme) 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))	Yes	The Chipping Campden Neighbourhood Development Plan is being prepared under the Localism Act 2011 and will be adopted ('made') by the Local Authority (Cotswold District Council) as part of the statutory development plan. **Move to Q2.**
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The Chipping Campden Neighbourhood Development Plan is being prepared under the Localism Act 2011 and in accordance with the Neighbourhood Planning (General) Regulations 2012. However, there is no requirement to produce a Neighbourhood Development Plan; it is an optional plan. Once made it will become part of the statutory development plan. Therefore, it should continue to be screened. **Move to Q3.**
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))	Yes and No	The Chipping Campden Neighbourhood Development Plan is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive. **Move to Q4.**

Stage	Yes/No	Reason
4.Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	No	HRA screening of the Chipping Campden Neighbourhood Development Plan has identified that there are no likely significant effects on European sites and an Appropriate Assessment is not required. **No: Move to Q6.**
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)	Yes and No	The Chipping Campden Neighbourhood Development Plan does not allocate sites for development; however it includes policies against which proposals for development within the plan area will be assessed. **Move to Q8.**
8.Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Table 2.2. **SEA IS NOT REQUIRED.**

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of the plans and programmes, having regard, in particular, to:	N/A.
1. 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.	Once made, the Chipping Campden Neighbourhood Development Plan will become part of the statutory development plan and will guide the delivery of development in Chipping Campden, including in terms of design. The Chipping Campden Neighbourhood Development Plan does not allocate sites for residential or other forms of development. Policy 2 supports suitable land for human burial: the Cotswold Local Plan had allocated land for

SEA Requirement	Comments
	burial but this is no longer available, so an alternative has been sought. The Cotswold District Local Plan 2011-2031 (adopted in August 2018) allocates new development sites in Chipping Campden through Policy S16. These include one housing development site, one established employment site, one allocated employment development site, a burial ground site, public car park and coach car park and new open space. The adopted Local Plan is set to deliver 9,671 dwellings over the Local Plan period. In addition, it is expected that a further 233 homes will be released to the market resulting from the net increase in bedrooms in communal accommodation developments over the plan period. In total, the updated housing need aims to deliver 9,904 dwellings. The delivery of 9,904 dwellings will be delivered over the Local Plan period and will provide more homes than the housing need. Therefore, the housing land supply is capable of fully delivering the updated housing need. The emerging Cotswold District Local Plan Partial Update Regulation 18 'Issues and Options' was consulted on between 4th February and 20th March 2022. It is at an early stage in its preparation and does not yet set out information about housing figures.
2. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The Chipping Campden Neighbourhood Development Plan has to be in general conformity with the local strategic framework (the adopted Cotswold District Local Plan 2011-2031 (2018) and the emerging Cotswold District Local Plan Partial Update). The Chipping Campden Neighbourhood Development Plan must also have regard to the National Planning Policy Framework. The Chipping Campden Neighbourhood Development Plan does not have influence over other plans. Once made, the Chipping

SEA Requirement	Comments
	Campden Neighbourhood Development Plan will form part of the statutory development plan for Chipping Campden and will be used in conjunction with the Cotswold District Local Plan 2011-2031 and the emerging Cotswold District Local Plan Partial Update (once adopted) to determine planning applications.
3. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	One of the Basic Conditions which the Neighbourhood Development Plan must meet is to contribute to sustainable development.
4. Environmental problems relevant to the plan or programme.	Baseline information relating to the plan area was described earlier in this chapter. Key issues of relevance to the Neighbourhood Development Plan are the presence of the Cotswold National Landscape, local biodiversity assets and the variety of designated heritage assets.
5. 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).	N/A.
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	N/A.
6. The probability, duration, frequency and reversibility of the effects.	The Chipping Campden Neighbourhood Development Plan does not allocate sites for housing or other forms of development. The Chipping Campden Neighbourhood Development Plan covers the period up to 2031. Effects of the Chipping Campden Neighbourhood Development Plan are expected to be indirect (due to not allocating sites) but long-term and permanent.

SEA Requirement	Comments
7. The cumulative nature of the effects.	Cumulative effects could result from the Chipping Campden Neighbourhood Development Plan in combination with development that takes place in the surrounding towns and villages, although the Chipping Campden Neighbourhood Development Plan does not allocate sites for housing or other forms of development. As the emerging Cotswold District Local Plan Partial Update is still at an early stage in its development, it is not yet possible to assess with certainty the amount and location of development that may result from the Plan within and close to Chipping Campden. The Cotswold District Local Plan 2011-2031 (adopted August 2018) allocates a number of new development sites in Chipping Campden, as detailed in row 1 above.
8. The transboundary nature of the effects.	The Neighbourhood Development Plan focuses on Chipping Campden only. Transboundary effects under the SEA Regulations refers transboundary effects on other EU Member States; therefore they are not relevant to the Neighbourhood Development Plan.
9. The risks to human health or the environment (e.g. due to accidents).	There are no anticipated risks to human health or the environment from the Chipping Campden Neighbourhood Development Plan.
10. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The Chipping Campden Neighbourhood Development Plan covers all of Chipping Campden. The population of the town was estimated to be around 2,288 people as of 2021.
11. The value and vulnerability of the area likely to be affected due to: ■ Special natural characteristics or cultural heritage;	The plan area falls within the Cotswold National Landscape. There are a number of SSSIs within 3km and numerous designated heritage features within the plan area.

SEA Requirement	Comments
■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use.	
12. The effects on areas or landscapes which have a recognised national, Community or international protection status.	The plan area falls within the Cotswold National Landscape.

SEA Screening Conclusion

2.29 A screening assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the Chipping Campden Neighbourhood Development Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.30 The Chipping Campden Neighbourhood Development Plan sets out a vision and planning policies to shape development in Chipping Campden up to 2031 and decision makers will need to consider the criteria of these policies when determining future applications in Chipping Campden. However, it does not directly impact on land use through the allocation of sites for housing or other forms of development.

2.31 On this basis, it is therefore considered that the Chipping Campden Neighbourhood Development Plan is unlikely to have significant environmental effects and that full SEA is therefore not required.

Next Steps

2.32 This SEA Screening Report will be sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) and will be reviewed as appropriate in light of any comments received.

LUC

January 2024

References

1 Available at: Department for Levelling Up, Housing and Communities (2016, updated 2023) Planning practice guidance

2 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

Report produced by LUC

Bristol
12th Floor, Colston Tower, Colston Street, Bristol BS1 4XE
0117 929 1997
bristol@landuse.co.uk

Cardiff
16A, 15th Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 032 9006
cardiff@landuse.co.uk

Edinburgh
Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 202 1616
edinburgh@landuse.co.uk

Glasgow
37 Otago Street, Glasgow G12 8JJ
0141 334 9595
glasgow@landuse.co.uk

London
250 Waterloo Road, London SE1 8RD
020 7383 5784
london@landuse.co.uk

Manchester
6th Floor, 55 King Street, Manchester M2 4LQ
0161 537 5960
manchester@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment
Development Planning / Urban Design & Masterplanning
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation

Chipping Campden Neighbourhood Development Plan

Habitats Regulations Assessment Screening Report

Cotswold District Council

Final report
Prepared by LUC
January 2024

Version	Status	Prepared	Checked	Approved	Date
1	Draft HRA Screening Report	H Ennis	K Sydney	D Green	12.01.2024
2	Draft HRA Screening Report	H Ennis	K Sydney	D Green	17.01.2024











Land Use Consultants Limited
Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

Contents

Chapter 1 1
Introduction

Stages of HRA 1
Previous HRA Work 4
Structure of this Report 5

Chapter 2 6
Chipping Campden Neighbourhood Development Plan

Vision 6
Objectives 6
Policies 8

Chapter 3 9
HRA Screening Methodology

Identifying European Sites that may be Affected and their Conservation Objectives 10
Assessment of 'Likely Significant Effects' of the Plan 11
In-combination Effects 12
Types of Impact 14

Chapter 4 15
Screening Assessment

Screening of Impact Pathways 15

HRA Screening of Policies 18

Chapter 5 21
Assessment Conclusion

Summary of HRA Screening 21

Appendix A 23
Relevant Legislation and Case Law

Appendix B 31
Map of European Sites within 15km of the Chipping Campden Neighbourhood Development Plan Area

Appendix C 33
Attributes of European Sites

References 38

Table of Figures

Figure B.1: European sites within 15km of Chipping Campden Neighbourhood Development Plan area 32

Chapter 1
Introduction

1.1 LUC has been commissioned by Cotswold District Council to carry out Habitats Regulations Assessment (HRA) Screening of the Chipping Campden Neighbourhood Development Plan (hereafter referred to as the 'Neighbourhood Plan'. This HRA report assesses the impacts of the Draft policies in the December 2023 version of the Neighbourhood Plan and considers whether further, more detailed, assessment will be required as part of a HRA Appropriate Assessment.

1.2 HRA considers the effect of a development plan on Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites – collectively referred to as 'European sites' (see Appendix A for further information on the legislative context).

1.3 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or a whole development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features'. Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of HRA

1.4 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the European site in question.

1.5 LUC has been commissioned by the Council to carry out HRA work on the Council's behalf, and the outputs will be reported to and considered by the Council, as the competent authority, before adopting the Plan.

Typical Stages

1.6 Below summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance documents **[See reference** 1**]** **[See reference** 2**]** **[See reference** 3**]**.

1.7 This report focusses on Stage 1 (Screening).

Stage 1: HRA Screening

Task

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.
- Identification of potentially affected European sites and their conservation objectives **[See reference** 4**]**.
- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures **[See reference** 5**]**.

Outcome

- Where effects are unlikely, prepare a 'finding of no significant effect report'.
- Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

Stage 2: Appropriate Assessment (where Stage 1 does not rule out likely significant effects)

Task

- Information gathering (development plan and European Sites **[See reference 6]**).
- Impact prediction.
- Evaluation of development plan impacts in view of conservation objectives of European sites.
- Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced ('mitigation').

Outcome

- Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures.
- If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation

Task

- Identify 'imperative reasons of overriding public interest' (IROPI).

- Demonstrate no alternatives exist.
- Identify potential compensatory measures.

Outcome

- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.8 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Previous HRA Work

1.9 The Neighbourhood Plan is a new plan and has not previously been subject to HRA. However, HRA work has been undertaken for the Cotswold District Local Plan.

1.10 The Local Plan was adopted in 2018 and the HRA of the Local Plan was prepared by LUC in 2017. LUC is currently undertaking the HRA of the emerging revisions to the Local Plan. The Regulation 18 'Issues and Options' consultation took place in February and March 2023. LUC prepared a HRA Scoping Report, which was published as part of the Regulation 18 Consultation. Information from the Local Plan HRAs has informed the HRA of the Chipping Campden Neighbourhood Development Plan, where relevant.

Structure of this Report

1.11 This chapter (Chapter 1) described the background to the production of the Neighbourhood Plan and the requirement to undertake HRA. The remainder of the report is structured as follows:

- Chapter 2: Chipping Campden Neighbourhood Development Plan summarises the content of the plan, which is the subject of this report.
- Chapter 3: Method sets out the approach used, and the specific tasks undertaken during the screening stage of the HRA.
- Chapter 4: Screening assessment describes the findings of the screening stage of the HRA.
- Chapter 5: Conclusions and next steps summarises the HRA conclusions for the Chipping Campden Neighbourhood Development Plan and describes the next steps to be undertaken.

1.12 The information in the main body of the report is supported by the following appendices:

- Appendix A provides details of relevant legislation and case law.
- Appendix B presents a map showing the European sites within 15km of the Chipping Campden Neighbourhood Development Plan Area.
- Appendix C sets out information about the European sites that are considered in the HRA.

Chapter 2

Chipping Campden Neighbourhood Development Plan

Vision

2.1 The overarching vision for Chipping Campden by the end of the Neighbourhood Development Plan period in 2031 is:

> A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings. A society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area.

Objectives

2.2 The overarching vision is supported by a series of objectives within six themes. The objectives for the Chipping Campden Neighbourhood Development Plan are as follows:

- Environment and Sustainability
  - To conserve and enhance the natural environment, and encourage a wide diversity of flora and fauna.
  - To conserve and enhance the natural setting that characterises the town.

- To provide and/or maintain green corridors for wildlife across and around Chipping Campden.
- To meet the challenge of climate change, flooding and light pollution.

- Housing
  - To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside.
  - To ensure that new housing location is consistent with the environmental objectives noted above, and is designed in accordance with the design objectives below.
- Economy
  - To protect and develop the town's economy.
  - To strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail, hospitality and other commercial offerings.
  - To improve the town's tourism offer and its attraction to tourists and visitors by improving existing facilities and introducing new ones.
  - To ensure that there is an appropriate balance between rental accommodation for tourists and that which meets the needs of residents and their families.
  - To support the development of specialist food and food-related industry and businesses.
  - To encourage start-up business.
- Design
  - To protect and enhance the area's heritage assets and its AONB location, by encouraging development and conservation projects for uses that are sympathetic to the character of Chipping Campden and its beautiful landscape setting and resisting developments for

inappropriate uses, or that are unsympathetic to the character and setting of the Town.

- Facilities, Services and Amenities
  - To ensure that the community has appropriate infrastructure in terms of health services, sports/leisure facilities, amenities, public transport and green infrastructure.
  - To protect existing green spaces and to increase the provision of green spaces.
- Traffic and Transport
  - To improve facilities for car parking.
  - To improve the facilities and safety for cyclists and pedestrians.

Policies

2.3 The policies within the Chipping Campden Neighbourhood Development Plan are listed below. New development provided for within the Chipping Campden Neighbourhood Development Plan is expected to be in line with the Cotswold Local Plan, and no development sites are allocated within the Chipping Campden Neighbourhood Development Plan. There are a total of six policies within the Chipping Campden Neighbourhood Development Plan:

- Policy 1: Chipping Campden town centre
- Policy 2: Social and Community infrastructure
- Policy 3: Design of the built and natural environment
- Policy 4: Non-designated heritage assets
- Policy 5: Biodiversity net gain and local nature recovery
- Policy 6: Local Green Spaces

Chapter 3

HRA Screening Methodology

3.1 HRA Screening of the Chipping Campden Neighbourhood Development Plan has been undertaken in line with current available guidance and sought to meet the requirements of the Habitats Regulations. The tasks that were undertaken during the screening stage of the HRA are described in detail below; and the conclusions reached are provided in Chapter 4. Relevant legislation and case law is described in Appendix A.

3.2 The purpose of the screening stage is to:

- Identify all aspects of the plan which would have no effect on a European site, so that that they can be eliminated from further consideration in respect of this and other plans.
- Identify all aspects of the plan which would not be likely to have a significant effect on a European site (i.e. would have some effect because of links/connectivity, but which are not significant), and which therefore do not require 'Appropriate Assessment'. These effects are considered in relation to the plan both alone and in combination with other aspects of the same plan or other plans or projects.
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require Appropriate Assessment.

Identifying European Sites that may be Affected and their Conservation Objectives

3.3 In order to initiate the search of European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the area covered by the plan, and other sites that may be affected beyond this area.

3.4 A distance of 15km from the boundary of the plan area is typically used in the first instance to identify European sites with the potential to be affected by the proposals within a development plan. Consideration is then given to whether any more distant European sites may be connected to the plan area via effects pathways, for example through hydrological links or recreational visits by residents. The 15km distance has been agreed with Natural England for HRAs elsewhere and is considered precautionary. All European sites within 15km have been assessed in this HRA.

3.5 The assessment also takes into account areas that may be functionally linked to the European sites. The term ‘functional linkage’ is used to refer to the role or ‘function’ that land beyond the boundary of a European site might fulfil in terms of supporting the species populations for which the site was designated or classified. Such an area is therefore ‘linked’ to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

3.6 While the boundary of a European site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that

may conceivably be used by the species **[See reference 7]**. HRA therefore considers whether any European sites make use of functionally linked habitats, and the impacts that could affect those habitats.

3.7 Two European sites are within 15km of the Chipping Campden Neighbourhood Development Plan area:

- Bredon Hill SAC (13.5km west); and
- Dixton Wood SAC (13.4km south-west).

3.8 These sites are shown on the figure in Appendix B. Detailed information about each European site is provided in Appendix C, described with reference to Standard Data Forms for the SPAs and SACs, and Natural England's Site Improvement Plans **[See reference 8]**. Natural England's conservation objectives **[See reference 9]** for the SPAs and SACs have also been reviewed.

3.9 None of the sites with 15km of the Neighbourhood Development Plan area has qualifying features that require functionally linked habitat (i.e. mobile species such as bats or birds). No other European sites beyond 15km from the parish boundary are considered to be linked to the Plan area.

Assessment of 'Likely Significant Effects' of the Plan

3.10 As required under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 **[See reference 10]** (as amended) (the 'Habitats Regulations'), an assessment has been undertaken of the 'likely significant effects' of the Plan. The assessment has been prepared in order to identify which policies would be likely to have a significant effect on European sites. The screening assessment has been conducted without taking mitigation into account, in accordance with the 'People over Wind' judgment (see Appendix A).

3.11 A risk-based approach, involving the application of the precautionary principle, has been adopted in the assessment, such that a conclusion of 'no significant effect' has only been reached where it is considered unlikely, based on current knowledge and the information available, that a policy would have a significant effect on a European site.

3.12 Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan (see Appendix A).

3.13 A screening assessment has been prepared, to document consideration of the potential for likely significant effects resulting from each policy in the Chipping Campden Neighbourhood Development Plan. A summary of the findings of this assessment is provided in Chapter 4.

In-combination Effects

3.14 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where "a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site". Therefore, the Screening assessment must consider whether any impacts identified from the Neighbourhood Development Plan may combine with other plans or projects to give rise to significant effects in-combination.

3.15 Where the Neighbourhood Development Plan is likely to have an effect on its own e.g. due to water pollution (due to impact pathways being present) but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be the same types of effect from other plans or projects that could combine with the Neighbourhood Development Plan to produce a significant effect. If so, this likely significant effect (e.g. water pollution) arising from the Neighbourhood Development Plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if water pollution would

have an adverse effect on integrity of the relevant European site. Where the screening assessment concludes that there is no impact pathway between development proposed in the Neighbourhood Development Plan and the conditions necessary to maintain qualifying features of a European site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. Where the screening assessment concludes that likely significant effects from the Neighbourhood Development Plan alone cannot be ruled out, this potential effect is carried forward for more detailed consideration (including of in-combination effects) at the Appropriate Assessment stage and no consideration of in-combination effects is necessary at the Screening stage. This approach accords with current guidance contained in the HRA Handbook **[See reference** 11**]**.

3.16 The in-combination assessment will focus on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor, for example, if impacts could arise as a result of changes to a waterway, then planned growth in local authorities along that waterway will be considered. Where relevant, any strategic projects in the area that could have in-combination effects with the Neighbourhood Development Plan will also be identified and reviewed.

3.17 The HRA Handbook suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge;
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;
- Projects authorised but not yet started;
- Projects started but not yet completed;
- Known projects that do not require external authorisation;
- Proposals in adopted plans; and
- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

Types of Impact

3.18 Where a development plan results in new development or activities, the HRA considers the impact pathways that could result in a likely significant effects. These impacts typically include:

- Physical loss or damage to habitat;
- Non-physical disturbance (noise, vibration and light pollution);
- Non-toxic contamination;
- Air pollution;
- Recreation pressure; and
- Changes to water quantity or quality.

Chapter 4

Screening Assessment

4.1 As described in the Chapter 3, a screening assessment has been carried out in order to identify the likely significant effects of the plan. The detailed screening assessment, which sets out the decision-making process used for this assessment can be found below.

Screening of Impact Pathways

4.2 Only Bredon Hill SAC and Dixton Wood SAC are within 15km of the Neighbourhood Plan area. This section considers potential impact pathways in relation to those two sites.

Physical Loss or Damage to Habitat

4.3 Physical loss or damage to habitat will only occur where development is within the boundaries of a European site, or its functionally linked land. There are no European sites within the Plan area and functionally linked land is not relevant to the sites within 15km. Therefore, there is no impact pathway for physical loss or damage to habitat and this impact has not been assessed in the HRA Screening.

Non-physical Disturbance

4.4 Non-physical disturbance is most likely to be significant within a distance of 500 metres from a European site. There are no European sites or functionally linked land within 500m of the Plan area; therefore there is no impact pathway

for non-physical disturbance and this impact has not been assessed in the HRA Screening.

Non-toxic Contamination

4.5 Non-toxic contamination can include the creation of dust and is most likely to be significant if development takes place within 500m of a European site with qualifying features sensitive to these disturbances. There are no European sites or functionally linked land within 500m of the Plan area; therefore there is no impact pathway for non-toxic contamination and this impact has not been assessed in the HRA Screening.

Air Pollution

4.6 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. In terms of vehicle traffic, nitrogen oxides (NOx, i.e. NO and NO2) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.

4.7 Based on the Highways England Design Manual for Road and Bridges (DMRB) LA 105 Air quality **[See reference** 12**]** (which sets out the requirements for assessing and reporting the effects of highway projects on air quality), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

4.8 The two European sites within 15km of the Plan area are sensitive to air pollution (see Appendix C). However, neither Dixton Wood SAC or Bredon Hill SAC are within 200m of an A road or a motorway. Therefore, there is no impact

pathway for air pollution and this impact has not been assessed in the HRA Screening.

Recreation Pressure

4.9 Recreation activities and human presence can result in significant effects on European sites. European sites with qualifying bird species are likely to be particularly susceptible to recreational disturbances, for example from walking, dog walking, angling, and illegal use of off-road vehicles and motorbikes. Recreation can also physically damage habitat as a result of trampling, fire or vandalism and also through erosion associated with terrestrial activities.

4.10 The two European sites within 15km of the Plan area have habitats that are sensitive to recreation pressure (see Appendix C); therefore recreation pressure has been considered within the HRA Screening.

4.11 Each European site will typically have a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys and the findings are therefore typically specific to each European site (and often to specific areas within a European site). There is currently no visitor surveys for Dixton Wood SAC and Bredon Hill SAC. Therefore, using a precautionary approach and based on the findings of the Monitor of Engagement with the Natural Environment (MENE) survey **[See reference** 13**]**, a ZOI of 8km has been applied to all non-coastal European sites where a ZOI derived from visitor surveys is not available. The 8km ZOI derived from the MENE data relates to the distance of '3 to 5 miles' that 75% of visitors from Cotswold District travel to reach a natural environment. ZOIs are typically based on the distance that 75% of visitors travel from; therefore, 8km is deemed appropriate to use as a precautionary ZOI in this assessment. ZOIs for the three European sites within 15km of the Plan area have been established through visitor survey work and are as follows:

- Dixton Wood SAC: 8km

- Bredon Hill SAC: 8km

4.12 Both Dixton Wood SAC and Bredon Hill SAC are beyond 8km from Chipping Campden parish boundary. Recreation impacts are therefore screened out of this HRA.

Changes to Water Quality or Quantity

4.13 An increase in demand for water abstraction and treatment resulting from the growth can result in changes in hydrology at European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, this could result in likely significant effects, for example, due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions.

4.14 Dixton Wood SAC and Bredon Hill SAC both contain moist soils which support the Violet click beetle, a qualifying feature of both sites. However, there are no abstraction licenses impacting Dixton Wood SAC and there are no other hydrological connectivity **[See reference** 14**]**. In addition, Bredon Hill SAC does not overlay the same aquifers as the plan area and there are no other hydrological connectivity. Therefore, the potential for hydrological impacts on Dixton Wood SAC and Bredon Hill SAC has been screened out.

HRA Screening of Policies

Policies with the Potential for Likely Significant Effects

4.15 This section provides an explanation of the HRA Screening conclusions reached in this HRA, in relation to each policy. The following categories are used:

- Screened out – Due to distance thresholds/lack of sensitivities of qualifying features as discussed in this chapter.
- No likely significant effects – As impact of Chipping Campden Neighbourhood Development Plan is unlikely to be significant on its own or in combination.

Policy 1: Chipping Campden Town Centre

4.16 This policy provides details of the use that will be acceptable within the town centre. It results in the following:

- Modifies the 'town centre' boundary beyond that defined in Local Plan Policy EC7;
- Withdraws Local Plan allocated sites 'Wold's End Orchard' (Policy S16);
- Supports a new car park (100 spaces); and
- Discourages the conversion of residential accommodation to tourist accommodation, where possible.

4.17 Although the policy influences the location that specific uses would occur, it will not itself result in new development. This policy will not result in likely significant effects.

Policy 2: Social and Community Infrastructure

4.18 This policy identifies existing social and community infrastructure that should be protected (through Local Plan Policy INF2 and EC8). The policy also supports suitable land for human burial: the Local Plan allocated land for burial but this is no longer available, so an alternative will be sought. Therefore, although this policy influences the location that specific uses would occur, it will not itself result in new development. This policy will not result in likely significant effects.

Policy 3: Design of the Built and Natural Environment

4.19 This policy defines design standards and guidance relevant to developments in Chipping Campden but it will not result in new development. This policy has been screened out.

Policy 4: Non-designated Heritage Assets

4.20 This policy identified features that are non-designated heritage assets and therefore does not result in new development/activities. This policy has been screened out.

Policy 5: Biodiversity Net Gain and Local Nature Recovery

4.21 This policy identifies habitats that could be improved for biodiversity as part of Chipping Campden's Local Nature Recovery Areas, and sets out how developments can contribute to biodiversity gain. This policy will not result in new development/activities. This policy has been screened out.

Policy 6: Local Green Spaces

4.22 This policy designates 22 existing sites as local green space; but not result in new development/activities. This policy has been screened out.

Chapter 5

Assessment Conclusion

5.1 At the Screening stage of HRA, no likely significant effects are predicted on European sites, either alone or in combination with other policies and proposals.

Summary of HRA Screening

5.2 The HRA Screening has not identified any likely significant effects that will require Appropriate Assessment, either for the Neighbourhood Plan alone or in combination with other plans or projects.

5.3 Most policies have been screened out as they will not result in new development/activities and there are no impact pathways.

5.4 There are potential impact pathways for air pollution and recreation pressure, but the policies will not increase development relevant to these impacts so they have been screened out.

5.5 Policies 1 and 2 will influence the locations in which specific uses are acceptable, but will not themselves result in new development; therefore they will not result in likely significant effects.

Next Steps

5.6 An Appropriate Assessment is not required for the Chipping Campden Neighbourhood Development Plan as none of the policies will directly result in new built development and likely significant effects from the plan can therefore be ruled out.

5.7 HRA is an iterative process and as such, this assessment should be updated if any relevant, newly available evidence or comments from key consultees are received prior to the plan being finalised. This report should be subject to consultation with Natural England to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making.

LUC

January 2024

Appendix A

Relevant Legislation and Case Law

Legislation

The Requirement to Undertake Habitats Regulations Assessment of Development Plans

A.1 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 **[See reference** 15**]**; the currently applicable version is the Habitats Regulations 2017, as amended **[See reference** 16**]**. When preparing a development plan, the Council is therefore required by law to carry out an HRA. The Council can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by the Council as the 'competent authority'. The Council will consider this work and would usually only progress a Plan if it considers that the Plan will not adversely affect the integrity **[See reference** 17**]** of any 'European site', as defined below (the exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated). The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance **[See reference** 18**]** (PPG).

A.2 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but since 1 January 2021 are protected in the UK by the Habitats Regulations 20172 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make

reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive **[See reference** 19**]**) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Before EU exit day, designation of SACs also had regard to the coherence of the 'Natura 2000' network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'national site network'.
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive **[See reference** 20**]**), and for regularly occurring migratory species not listed in Annex I.

A.3 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites **[See reference** 21**]** and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper **[See reference** 22**]** on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refer to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

A.4 Although Ramsar sites do not form part of the new national site network, Government guidance **[See reference** 23**]** states that:

> "Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- proposed SACs
- potential SPAs
- Ramsar sites – wetlands of international importance (both listed and proposed)
- areas secured as sites compensating for damage to a European site."

A.5 Furthermore, the NPPF **[See reference** 24**]** and practice guidance **[See reference** 25**]** currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

A.6 For simplicity, this report uses the term 'European site' to refer to all types of designated site for which Government guidance **[See reference** 26**]** requires an HRA.

Requirements of the Habitats Regulations

A.7 In assessing the effects of a Local Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed if necessary by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects (the 'Significance Test'). If yes, proceed to Step 3.

- [Steps 1 and 2 are undertaken as part of Stage 1: HRA Screening.]

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.
  - [This step is undertaken during Stage 2: Appropriate Assessment.]
- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a European site.
  - [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process.]
- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI).
  - [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation.]

Case Law

A.8 This HRA has been prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

A.9 The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an

Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

> "Article 6(3)… must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.

A.10 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Local Plan could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

A.11 This HRA also considers the Holohan v An Bord Pleanala (November 2018) judgement which stated that:

> Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

A.12 In undertaking this HRA, LUC has considered the potential for effects on species and habitats, including those not listed as qualifying features, to result

in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has also been considered in this HRA.

A.13 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat have been considered in the HRA, in line with the High Court judgment in RSPB and others v Secretary of State and London Ashford Airport Ltd [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

> "There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied… that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice."

A.14 In addition to this, the HRA takes into consideration the 'Wealden' judgement from the CJEU.

A.15 Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority

(2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

A.16 In light of this judgement, the HRA therefore considers traffic growth based on the effects of development from the Local Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

A.17 The HRA also takes into account the Grace and Sweetman (July 2018) judgement from the CJEU which stated that:

> "There is a distinction to be drawn between protective measures forming part of a project and intended avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project."
>
> "As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future."
>
> "A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is "sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area."

> "Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are "imperative reasons of overriding public interest"."

A.18 The Appropriate Assessment of the Local Plan therefore only considers the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

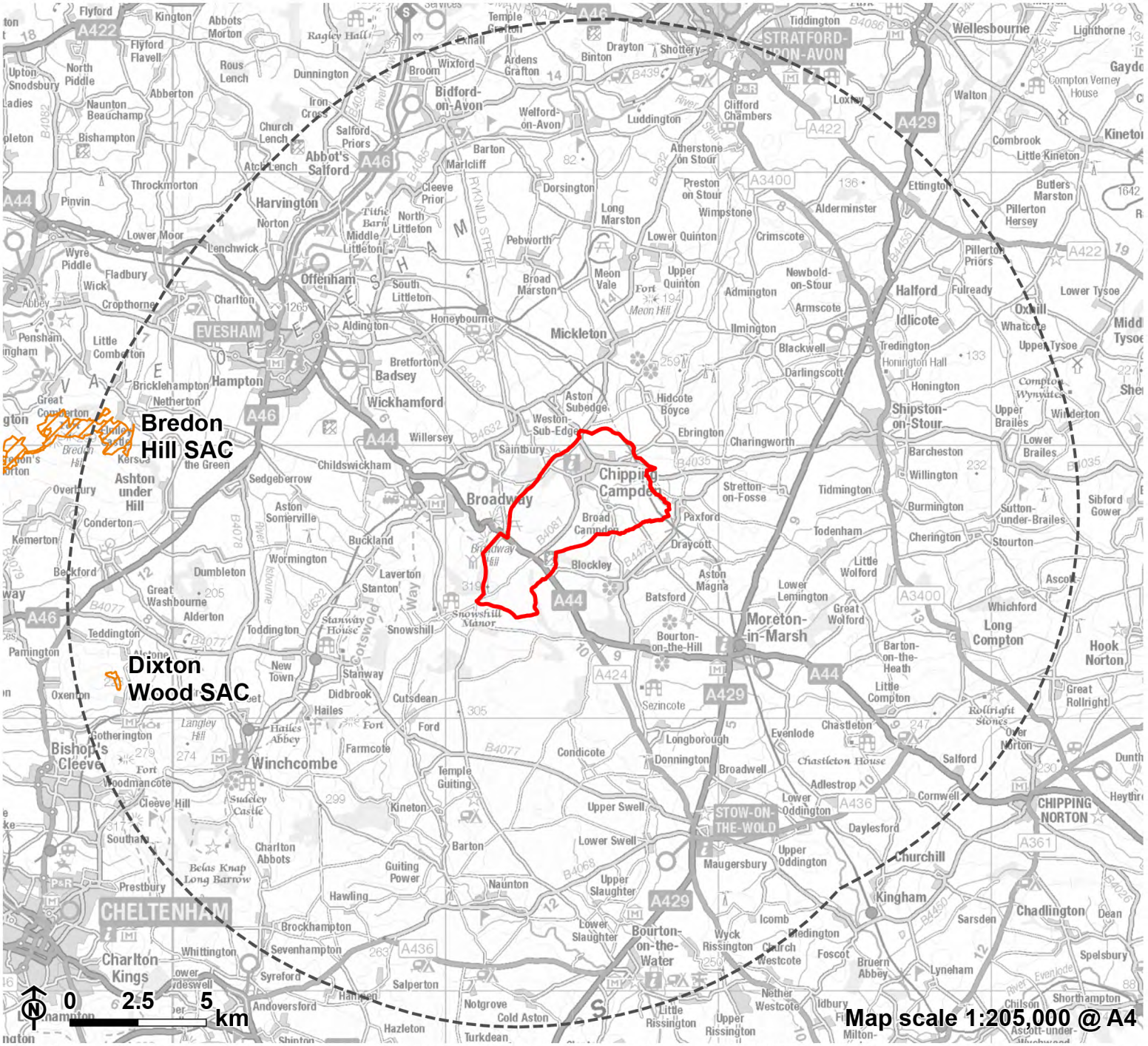
Appendix B

Map of European Sites within 15km of the Chipping Campden Neighbourhood Development Plan Area

Chipping Campden
HRA
Cotswold District
Council

LUC

Figure B.1: European sites within 15km of the Chipping Campden Neighbourhood Development Plan area



Chipping Campden Parish Boundary

15km buffer

Special Area of Conservation (SAC)

Map scale 1:205,000 @ A4

Contains Ordnance Survey data © Crown copyright and database right 2024

11703_ChippingCampden_HRA_Figures/Figure B.1 11/01/2024 EB:brown_i

Appendix C

Attributes of European Sites

C.1 This appendix contains information on the European sites scoped into the HRA. Site areas and designated features are drawn from SAC and SPA Standard Data Forms and Ramsar Site Information Sheets **[See reference** 27**]**. The overviews of sites and their locations are drawn from Natural England's Site Improvement Plans **[See reference** 28**]**. Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs **[See reference** 29**]**.

Dixton Wood SAC

C.2 Violet click beetle *Limoniscus violaceus* was discovered at Dixton Wood in 1998 and it has been found at the site on a single occasion subsequently. It is a small site with large number of ancient ash Fraxinus excelsior pollards, and supports a rich fauna of scarce invertebrate species associated with decaying timber on ancient trees.

Qualifying Features

- 1079 Violet click beetle; *Limoniscus violaceus*

Conservation Objectives

C.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species;

- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Site Improvement Plan **[See reference** 30**]**: Pressures, Threats and Related Development

1. Changes in Species Distributions – Because of its rarity and highly specialised ecology associated with decaying wood and leaf litter in tree cavities, specialist involvement is required for survey, monitoring and the provision of detailed habitat management advice.

2. Forestry and Woodland Management – The beetle depends on the production of humid wood mould where it lives for part of its life cycle within decaying trees; this is typically found in veteran trees where they show signs of rot. The amount of suitable and available wood mould in the SAC is unknown. The lack of succession in veteran cohorts is an issue and it make the need for extending the life of the existing veteran trees even more important.

3. Disease – Ash dieback disease Chalara fraxinea is a potential threat to the site. The Violet click beetle population at Dixton Wood is thought only to use ash trees.

Non-qualifying Habitats and Species upon which the Qualifying Habitats and/or Species Depend on

- Violet click beetle

- Habitat preferences – Ancient and veteran trees.
- Diet – Wood mould.

Bredon Hills SAC

C.4 Bredon Hill is an outlier of the Cotswolds with remnants of wood pasture and many veteran trees. Their dead wood supports one of the three known populations of the Violet click beetle *Limoniscus violaceus*, in the UK.

Qualifying Features

- 1079 Violet click beetle; *Limoniscus violaceus*

Conservation Objectives

C.5 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Site Improvement Plan **[See reference** 31**]**: Pressures, Threats and Related Development

1. Forestry and Woodland Management – The lack of succession in veteran tree cohorts is an issue, as current planting will only benefit the beetles after about 400 years and it is uncertain how long tree surgery will prolong the veterans' lives. The beetle depends on the production of humid wood mould within decaying trees and the amount of available wood mould in the SAC is unknown.

2. Feature Location/Extent/Condition Unknown – There is a current lack of information on the distribution across the site of the rare and secretive Violet click beetle.

3. Disease – Ash die-back caused by the Chalara fraxinea fungus threatens the large number of current veteran ash trees and their replacements on which the Violet click beetle depends. Whilst the beetle is known to use other species elsewhere (eg Windsor), ash dominates the trees on Bredon Hill. The scale of this impact on the persistence and continuity of wood mould is uncertain and is likely to be beyond human control.

4. Air Pollution: impact of atmospheric nitrogen deposition – Nitrogen deposition exceeds site relevant critical loads. This site is sensitive to nitrogen deposition.

5. Climate Change – The likelihood of increased violent storm events and the viability of ash in a changed environment threatens the veteran ash trees on which the beetle depends.

Non-qualifying Habitats and Species upon which the Qualifying Habitats and/or Species Depend on

- Violet click beetle
  - Habitat preferences – Ancient and veteran trees.
  - Diet – Wood mould.

References

1 Available at: UK Government Planning Practice Guidance

2 European Commission (2001) Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC

3 Available at: The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document

4 Available at: Conservation objectives are published by Natural England for SACs and SPAs

5 In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.

6 In addition to European site citations and conservation objectives, key information sources for understanding factors contributing to the integrity of European sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England

7 Chapman, C. & Tyldesley, D. (2016) Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects – a review of authoritative decisions. Natural England Commissioned Reports, Number 207.

8 Available at: Obtained from the Natural England website

9 Available at: Natural England (undated) Conservation Objectives for European Sites

10 SI No. 2017/2012

11 David Tyldesley and Associates (undated) The HRA Handbook (Section A3) – a subscription based online guidance document

12 Available at: National Highways (2019) Design Manual for Roads and Bridges, LA 105 Air quality

13 Available at: Natural England (2020) Monitoring Engagement with the Natural Environment, MENE Visit data Year 1 to 10 filtered by resident local authority (Cotswold) and distance travelled (q8)

14 Available at: Natural England (2018) Supplementary advice on conserving and restoring site features: Dixton Woods SAC

15 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

16 The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).

17 The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)

18 Available at: https://www.gov.uk/guidance/appropriate-assessment

19 Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive')

20 Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')

21 Available at: The network of protected areas identified by the EU

22 Available at: https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017

23 Available at: Defra and Natural England (2021) Guidance - Habitats regulations assessments: protecting a European site

24 Available 1t: NPPF para 187

25 Available at: The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document

26 Available at: Defra and Natural England (2021) Guidance - Habitats regulations assessments: protecting a European site

27 Available at: JNCC (2019) UK Protected Area Datasets for Download

28 Available at: Natural England (2014-2015) Site Improvement Plans: East of England

29 Available at: Natural England (undated) Conservation Objectives for European Sites

30 Available at: Natural England - Site Improvement Plan: Dixton Wood

31 Available at: Natural England – Site Improvement Plan: Bredon Hills

Report produced by LUC

Bristol
12th Floor, Beacon Tower, Colston Street, Bristol BS1 4XE
0117 929 1997
bristol@landuse.co.uk

Cardiff
16A, 15th Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 032 9006
cardiff@landuse.co.uk

Edinburgh
Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 202 1616
edinburgh@landuse.co.uk

Glasgow
37 Otago Street, Glasgow G12 8JJ
0141 334 9595
glasgow@landuse.co.uk

London
250 Waterloo Road, London SE1 8RD
020 7383 5784
london@landuse.co.uk

Manchester
6th Floor, 55 King Street, Manchester M2 4LQ
0161 537 5960
manchester@landuse.co.uk

Sheffield
32 Eyre Street, Sheffield, S1 4QZ
0114 392 2366
sheffield@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment / Transport Planning
Development Planning / Urban Design & Masterplanning / Arboriculture
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation

Joseph Walker

From: Stuart, David <David.Stuart@HistoricEngland.org.uk>
Sent: 15 February 2024 14:04
To: Neighbourhood Planning
Subject: Chipping Campden Neighbourhood Development Plan: SEA and HRA Screening opinions

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from david.stuart@historicengland.org.uk. Learn why this is important

Dear Joseph

Thank you for your consultation on the SEA Screening for the emerging Chipping Campden neighbourhood Plan.

This would appear to be our first involvement in the preparation of this plan and we welcome the opportunity this also provides to identify and highlight any issues of interest to us.

That interest tends to focus on where Plans advocate the allocation of sites for development. We note that the Chipping Campden Plan does not propose to allocate sites, and there are no other issues raised by other policies upon which we wish to comment or envisage wishing to do so at future consultation stages.

On this basis we therefore have no objection to the view that a full SEA is not required. We are happy to leave providing a view on the need for an HRA to the relevant agencies.

Kind regards

David

David Stuart | Historic Places Adviser

I now work only 2 days a week, usually Tuesdays and Wednesdays

Historic England | South West
1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ
Direct Line: 0117 975 0680 | Mobile: 0797 924 0316
https://historicengland.org.uk/southwest



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
Follow us: Facebook | Twitter | Instagram Sign up to our newsletter

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full privacy policy for more information.

From: Neighbourhood Planning <Neighbourhood.Planning@cotswold.gov.uk>
Sent: 17 January 2024 15:12

To: 'Planning_THM@environment-agency.gov.uk' <Planning_THM@environment-agency.gov.uk>; 'consultations@naturalengland.org.uk' <consultations@naturalengland.org.uk>; Stuart, David <David.Stuart@HistoricEngland.org.uk>
Cc: 'Robert.NIBLETT@gloucestershire.gov.uk' <Robert.NIBLETT@gloucestershire.gov.uk>
Subject: Chipping Campden Neighbourhood Development Plan: SEA and HRA Screening opinions

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please find attached two screening reports on whether the Draft **Chipping Campden Neighbourhood Plan** might have significant environmental effects and therefore require a full SEA or HRA.

Please also find attached the draft plan.

As you are aware, we are required to consult with the environmental assessment bodies and as such, we are seeking your advice on this matter. It is likely we will include your response with the statement of reasons, as to why (if this is the case) a SEA/HRA was not required, which is then submitted to the Examiner.

A response is due within 5 weeks, by 12:00 noon on **22nd February**

I would be grateful if you could also acknowledge receipt of this email. If you have any queries please feel free to contact me.

Regards,

Joseph Walker

Publica is a company wholly owned by Cotswold District Council, Forest of Dean District Council, West Oxfordshire District Council and Cheltenham Borough Council to deliver local services on their behalf.

The content of this email and any related emails do not constitute a legally binding agreement and we do not accept service of court proceedings or any other formal notices by email unless specifically agreed by us in writing.

Recipients should be aware that all e-mails and attachments sent and received by Publica on behalf of West Oxfordshire, Cotswold and/or Forest of Dean District Council may be accessible to others in the Council for business or litigation purposes, and/or disclosed to a third party under the Freedom of Information or Data Protection Legislation.

Date: 30 January 2024
Our ref: 463928
Your ref: Chipping Campden Neighbourhood Plan

Joseph Walker
Cotswold District Council

BY EMAIL ONLY
Neighbourhood.Planning@cotswold.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Joseph Walker,

Cotswold District Council - Chipping Campden Neighbourhood Plan - SEA & HRA Screening Consultation

Thank you for your consultation on the above dated 17 January 2024which was received by Natural England on 17 January 2024

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.

Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)

It is Natural England's advice, on the basis of the material supplied with the consultation, that:

- **significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,**
- **significant effects on Habitats sites[1], either alone or in combination, are unlikely.**

The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the Planning Practice Guidance. This identifies three triggers that may require the production of an SEA:

- 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 may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

[1] Habitats sites are those referred to in the National Planning Policy Framework (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites".

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require an SEA. Further information is included in Natural England's standing advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Cotswold National Landscapes

The proposed development is for a site within or close to a nationally designated landscape namely the Cotswolds AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Green Infrastructure

Natural England's Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional

and national scales.

Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

GI mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Please send any new consultations, or further information on this consultation to consultations@naturalengland.org.uk

Yours sincerely

Holly Marlow

Holly Marlow
Planning for a Better Environment – West Midlands Team

Annex A –Natural England general advice

Protected Landscapes
Paragraph 182 of the National Planning Policy Framework (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes
Paragraph 180 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Biodiversity duty
The local planning authority has a duty to conserve and enhance biodiversity as part of its decision making. Further information is available here.

Designated nature conservation sites
Paragraphs 186-188 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites. Both the direct and indirect impacts of the development should be considered. A Habitats Regulations Assessment is needed where there is a likely significant effect on a habitats site and Natural England must be consulted on 'appropriate assessments'. Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via Impact Risk Zones or as standard or bespoke consultation responses.

Protected Species
Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases.

Local sites and priority habitats and species
The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 180, 181 and 185 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre,

wildlife trust, geoconservation groups or recording societies. Emerging Local Nature Recovery Strategies may also provide further useful information.

Priority habitats and species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk.

Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Biodiversity and wider environmental gains
Development should provide net gains for biodiversity in line with the NPPF paragraphs 180(d), 185 and 186. It is anticipated that major development (defined in the NPPF glossary) will be required by law to deliver a biodiversity gain of at least 10% from early 2024 and that this requirement is expected to be extended to smaller scale development in spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

Further information on the timetable for mandatory biodiversity net gain can be found here. Further information on biodiversity net gain, including draft Planning Practice Guidance, can be found here.

The statutory Biodiversity Metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites, the Small Sites Metric may be used. This is a simplified version of the Biodiversity Metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 186 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 74, 108, 124, 180, 181 and 186). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the Biodiversity Metric and is available as a beta test version.

Further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain can be found in government Planning Practice Guidance for the natural environment.

Ancient woodland, ancient and veteran trees
The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 180 and 181). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further

information is contained in GOV.UK guidance Agricultural Land Classification information is available on the Magic website and the Data.Gov.uk website

Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, separate guidance on soil protection for site restoration and aftercare is available on Gov.uk website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying *Good Practice Guide for Handling Soils in Mineral Workings*.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure
Natural England's Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

GI mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails
Paragraphs 104 and 180 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Further information is set out in Planning Practice Guidance on the natural environment

CHIPPING CAMPDEN PARISH NEIGHBOURHOOD PLAN

CONSULTATION REPORT

FEBRUARY 2025

(Version of 27 FEBRUARY: APL.CCampden.101.C)

Introduction

1. The Chipping Campden Neighbourhood Development Plan (CCNDP) process formally began with an application by Chipping Campden Town Council (CCTC) for designation of a Neighbourhood Area based on the Parish boundary on 20th November 2013. This was approved by Cotswold District Council (CDC) on 14th February, 2014.

2. A Neighbourhood Development Plan Working Party (NDPWP) was established by the Town Council, consisting of Councillors and volunteers from the community. It co-ordinated a number of activities to raise awareness about the Neighbourhood Development Plan and to develop an understanding of local community priorities and concerns that it should address.

3. The Regulation 14 Draft CCNDP on which this report is based was published for consultation between 8th April to 22nd May 2024.

Structure of the Consultation Report

4. The first part of this report details **engagement undertaken prior publication of the Regulation 14** Draft Neighbourhood Development Plan. Several appendices provide further information.

5. The second part of the consultation report provides details of the consultation arrangements provided for the Regulation 14 consultations.

6. The final part of the consultation report provides an **assessment of consultation responses** including clarifications to address comments, references to plan amendments to address comments, and other points in response to comments.

Engagement Prior to Regulation 14 Consultation

7. Following designation of the Chipping Campden Neighbourhood Area in February 2014 and the establishment of the NDPWP to oversee the development of the Neighbourhood Development Plan (NDP), a number of engagement activities were undertaken as summarised below.

    a) "Your town needs you" letter sent to all parish households 5.11.2013
    b) NDP survey sent to all households in parish 20.11.2013
    c) Survey on CDC SHLAA proposals sent to all households 15.3.2014
    d) Public exhibition of CDC SHLAA sites 19.3.2014
    e) Drop-in event regarding parking 2.6.2014
    f) Meeting with residents to form CCNDP team 10.7.2014
    g) Draft proposals for business strategy sent to all local businesses 29.8.2014
    h) Discussions with Campden Business Forum Sept-Dec 2014
    i) Survey of proposed housing development sites sent to all households Jan 2015
    j) Public exhibition of CDC Local Plan 17.2.2015
    k) Public meeting to discussed town's response to Local Plan 17.2.2015
    l) Meeting with CDC Highways 27.4.2015
    m) Meetings with various local landowners 30.8.2014-22.9.2015
    n) Drop-in event for townsfolk to give feedback on CCNDP proposals 5.3.2016 and 12.3.2016
    o) Meeting with CPRE regarding environmental considerations for CCNDP 13.4.2016
    p) Meeting with Principal of Chipping Campden Academy to discuss future secondary school provision 2.5.2016
    q) Invitation to local primary schools to discuss future primary school provision 3.5.2016
    r) Draft Regulation 14 CCNDP published on town council website 20.3.2017
    s) Public exhibition in town hall of CCNDP and supporting documents 21.4.2017
    t) Letters to all household regarding LGS proposals 30.9.2017
    u) Letters to landowners regarding LGS proposals 30.9.2017
    v) LGS proposals placed on Campden Hub 1.10.2017
    w) Parking Survey. CC Business Forum 2017
    x) CDC discussion re CCNDP proposals 16.8.2022 & 23.9.2022
    y) Meeting with Campden Society 1.9.2022
    z) Councillors and volunteers delivered approximately 1,500 CCNDP questionnaires to households on 6th October 2022
    aa) Letter to all households seeking ideas for Local Green Space designations.
    bb) CDC confirmation Design Guide accepted 6.12.2022
    cc) Consultation with Cotswold District Council September/October 2023
    dd) Parking Survey. CC Town Council November 2023 delivered to each household

2017 Consultation on Regulation 14 Draft CCNDP and aftermath

8. From the above, it is noted that significant consultation and engagement was undertaken to develop a draft CCNDP in 2017. This was a forward-looking document which sought to address a wide range of social and economic issues relating to the future of Chipping Campden Parish. A response to the draft from CDC called into question the approach being taken to the extent that further work on CCNDP was halted for a considerable time. COVID-19 Pandemic had a further impact in the ability to progress work on the CCNDP.

9. From around 2021, a number of working parties were formed to consider how a CCNDP for Chipping Campden Parish could again be progressed and given changed circumstance following the pandemic, this was done through the working parties for the most part.

10. From the CCTC's perspective, the Draft CCNDP that has been produced has sought to avoid the areas which were the subject of criticism from CDC, namely active approaches to housing and employment development.

Informal consultation with Cotswold District Council Officers in 2022 and further development of the CCNDP in 2022-24

11. The Town Council undertook an informal dialogue with Cotswold District Council Officers over the draft CCNDP in August and September 2022. This resulted in further significant comments and the appointment of new consultants to assist in preparing a draft CCNDP using available evidence to support draft policies. With support from CCTC and its working group, this resulted in a focus on the town centre, social and community infrastructure, design, non-designated heritage assets, local nature recovery and local green spaces. Other matters would be referred to as aspirations where possible.

Letters to owners to Local Green Spaces sent in November 2022

12. Following an exercise to ask the public for nominations for Local Green Space designation, a number of proposed Local Green Spaces were identified. Letters outlining the proposals were sent to Landowners between September and November 2022. Where responses were received these were taken into consideration and later recorded in the appendix to the CCNDP detailing Local Green Space Sites published at Regulation 14 Consultation.

Regulation 14 Consultation Arrangements and Results

13. The Regulation 14 consultation was undertaken between 8th April and 22nd May 2024, a period in excess of six weeks, which satisfied the statutory requirement to run the consultation for at least six weeks. CCTC advise that the following methods of consultation were undertaken:

    a) The draft CCNDP and supporting documents were published on the Chipping Campden Town Council website.

    b) Paper copies of the CCNDP were printed and available to view at locations around Chipping Campden, including Chipping Campden Library and the Visitor Information Centre at the Old Police Station. Copies were posted to residents on request free of charge.

    c) A CCNDP Response Form was delivered to each household as an attachment to the Chipping Campden Bulletin.

    d) The Chipping Campden Bulletin also contained articles about the CCNDP in March, April and May 2024.

    e) An online CCNDP Survey was live throughout the consultation period via the Town Council website. The survey was also available in paper-form to allow completion a paper copy of the CCNDP Survey. This was circulated in accordance with c) above.

    f) A drop-in event was held during the consultation period to promote awareness of and response to the CCNDP proposals. This took place in the Town Hall on Friday, 10th May 2024 between 10am and 2pm.

    g) Request for comments from Statutory and other relevant consultees was made.

    h) Letters to Landowners with regard to Local Green Space Proposals.

NDP Survey/Response Form

14. The Survey questions referred to in d) are set out on the response form referred to in c) above and this is included below.

Andrea Pellegram Ltd.

CHIPPING CAMPDEN NEIGHBOURHOOD DEVELOPMENT PLAN RESPONSE FORM

Neighbourhood planning gives communities the power to prepare a shared development vision for their area. This neighbourhood plan seeks to shape, direct and help to deliver sustainable development by influencing the planning policies and decisions made by Cotswold District Council.

Neighbourhood plans must be in general conformity with local plan policies and can amplify the planning decision-making framework.

This neighbourhood plan will help ensure that planning proposals take account of Chipping Campden's circumstances and needs.

Decisions about planning applications must conform with policies in the Development Plan. In Chipping Campden, this means that planning decisions must pay heed to the policies in this neighbourhood plan when adopted ("made") and in the Cotswold District Local Plan.

The plan has been prepared by a Steering group of Town Councillors and has had input from members of the public and local businesses.

WE WANT YOUR VIEWS ON THE DRAFT POLICIES IN THE PLAN SO THAT WE KNOW THAT WE ARE SUBMITTING OUR FINAL PROPOSAL TO COTSWOLD DISTRICT COUNCIL IN LINE WITH OUR COMMUNITY'S EXPECTATIONS.

Please look at a copy of the plan and the response form by clicking News | Chipping Campden Town Council (chippingcampden-tc.gov.uk) **If you wish to have a paper copy, please call 01386 841298 or email deputyclerk@chippingcampden-tc.gov.uk and we will send you a copy in the post. Hard copy responses should be sent to: Deputy Clerk, Old Police Station, High Street, Chipping Campden, Gloucestershire, GL55 6HB.**

The consultation runs from 8 APRIL TO 22 MAY 2024.

1. Do you agree with the **Vision for Chipping Campden** (given below)?

If not, what alternative wording can you suggest? (box below)

"A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings. A society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area."

2 Do you agree with the wording of Policy 1 (given below) and its supporting text and evidence?
If not, what alternative wording would you propose?

Policy 1: Chipping Campden Town Centre

1. The information in Appendix 3 in this plan should be the baseline for the Local Plan Policy EC8, and there will be a presumption that town centre uses (Class E, Sui Generic and all forms of visitor accommodation) will be retained.
2. The Key Centre Boundary is extended as shown in Figure 13.
3. Where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre.

3 Do you agree with the wording of Policy 2 (given below) and its supporting text and evidence?
If not, what alternative wording would you propose?

Policy 2: Social and community infrastructure

1. The infrastructure identified in Table 6 and Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8.
2. The provision of suitable land for human burial will be supported.

Andrea Pellegram Ltd.

4 Do you agree with the wording of Policy 3 (given below) and its supporting text and evidence?
If not, what alternative wording would you propose?

Policy 3: Design of the built and natural environment

Planning proposals, particularly those with Design and Access Statements, should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed according to the Building with Nature Standards Framework.

5 Do you agree with the wording of Policy 4 (given below) and its supporting text and evidence?
If not, what alternative wording would you propose?

Policy 4: The following features are designated as non-designated heritage assets:

NDHA1 The Millennium Sign
NDHA2 Westington Streetlamp
NDHA3. High Street Stamp Box
NDHA4 St Catharine's postbox
NDHA5 Westington postbox
NDHA6 High Street postbox
NDHA7 Scuttlebrook
NDHA8 Town Pump
NDHA9 Cotswold Way marker
NDHA10 Broad Campden Post Box
NDHA11 Punk stone carving
NDHA12 Graham Greene plaque
NDHA13 Sundial Gravel House
NDHA14 Sundial Dragon House/Cottage 1690
NDHA15 Sundial Sundial House
NDHA16 Sundial Cotswold House Hotel
NDHA17 Sundial Dial House
NDHA18 Sundial Green Dragons
NDHA19 Sundial Crosby House
NDHA20 Sign of the Swan Inn
NDHA21 Sign of the Lygon Arms
NDHA22 Sign outside Elsley House
NDHA23 Bootscraper Kings Hotel
NDHA24 Bootscraper Baptist Church
NDHA25 Bootscraper The Martins
NDHA26 Bootscraper Trinder House
NDHA27 Bootscraper Westcote House
NDHA28 Bootscraper Ivy House
NDHA29 Bootscraper Woolstapler Hall

6 Do you agree with the wording of Policy 5 (given below) and its supporting text and evidence?
If not, what alternative wording would you propose?

Policy 5: Biodiversity net gain and Local Nature Recovery

Land identified in Table 7, Figure 15 and Appendix 7 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021.
Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows:
a. Contact Cotswold District Council to determine whether work has been done towards the preparation of the Gloucestershire Local Nature Recovery Strategy regarding the proposal site, its relationship with the Gloucestershire Local Nature Recovery map, and seek advised on how best to deliver local nature recovery and biodiversity net gain within that context.
b. Where biodiversity net gain cannot be delivered on site, applicants must work with Cotswold District Council to identify ways that off-site biodiversity net gain can be delivered in Chipping Campden Parish.
c. Where off-site biodiversity gain is proposed, this should be focussed on the nature recovery areas shown in Figure 15 or the Gloucestershire Local Nature Recovery Map.
d. Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary.
e. Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered.
f. Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.

Andrea Pellegram Ltd.

7 Do you agree with the wording of Policy 6 (given below) and its supporting text and evidence? If not, what alternative wording would you propose?

Policy 6: Local Green Spaces

Land identified in Figure 16, Appendix 7 and listed below is designated as local green space.

1. Berrington Road
2. Leysbourne
3. High Street
4. Memorial Green
5. Castle Gardens Play Area
6. Olimpick Drive Play Area
7. Littleworth
8. Westington
9. The Mound, Broad Campden
10. Court Barn/Cartwash
11. Recreation Ground
12. Bowling Green
13. Cricket Ground
14. Ernest Wilson Garden
15. Wold's End Orchard
16. Badger's Field
17. Calf Meadow
18. Allotments
19. The Hoo West
20. The Hoo East
21. The Cley
22. The Craves

8 Are there any land use planning matters that were not covered in the plan that you think should have been? Can you please describe what you believe was missing or in need of correction?

9 Please give your name and address. (This is for administrative purposes only and will be in confidence)

Letters to Landowners on Local Green Space Proposals

15. Alongside the methods used above to consult on the draft CCNDP, individual letters of consultation were sent to landowners of land proposed for Local Green Space designation for a second time (additionally to the 2022 consultation letters). Sample text from the letter is set out below.

The Town Clerk,
Chipping Campden Town Council,
The Old Police Station,
High Street,
Chipping Campden,
GL55 6HB

April 18, 2024

Dear [redacted]

Public consultation Chipping Campden Neighbourhood Development Plan.

Chipping Campden Town Council is the body responsible for the preparing the Neighbourhood Development Plan (NDP) for Chipping Campden Parish. Government guidance in the National Planning Policy Framework includes a requirement that NDPs should give local people an opportunity to comment on its content.

The Chipping Campden Neighbourhood Development Plan 2023 – 2031 Regulation 14 draft Version 2024 has been submitted for Pubic Consultation and is available:

1. On the Chipping Campden Town council website – www.chippingcampden-tc.gov.uk Planning/Neighbourhood Plan as either a high or low resolution pdf.
2. Hard copy can be viewed:
    a. At the Chipping Campden Library
    b. At the Visitor Information Centre in The Old Police Station.

Local Green Spaces (LGS)

Sites that have significant importance to their local community have been considered for inclusion in the NDP by designating them as 'Local Green Spaces'. You have a site that is being considered for inclusion.

You will find the current designation of sites in Appendix 8 Local Green Spaces starting at page 131.

Along with previous comments you may have made the community, there is a further opportunity for you to comment through the Public Consultation Process from 8 April to 22 May 2024. Any comments received will be considered in creating the "final" draft of the NDP which then goes to Cotswold District Council (CDC) for approval.

If CDC approves the final draft NDP, it will then go to an external examiner who will check it to ensure that it complies with government legislation. If the examiner is satisfied that it does, the community will have an opportunity to vote in a Referendum as to whether to accept or not-accept the NDP.

If the majority approves the plan, it will be adopted, and must be referenced when planning decisions are considered.

Should you have any queries please do not hesitate to contact me.

I look forward to hearing from you.

Yours sincerely,

Consultation with Statutory Consultees

16. The Statutory other consultees specifically consulted on the Regulation 14 Draft is set out below.

	Contact
'a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority'	**x**
Worcestershire	nhp@worcestershire.gov.uk
Stratford-on-Avon	planning.policy@stratford-dc.gov.uk
Wychavon	planning@wychavon.gov.uk
Cheltenham	enquiries@cheltenham.gov.uk
Tewkesbury Borough Council	PlanningPolicyEnquiries@tewkesbury.gov.uk
Cotswold	Joseph.walker@cotswold.gov.uk
Warwickshire	planningstrategy@warwickshire.gov.uk
Glos County Council	robert.niblett@gloucestershire.gov.uk
Blockley	parishclerk@blockley.org.uk
Willersey	clerk@willerseyparishcouncil.org.uk
Aston Sub Edge	billorgan@hotmail.co.uk
Weston Sub Edge	wseparishclerk@gmail.com
Mickleton	clerk@mickletonparishcouncil.co.uk
Ebrington	clerk@ebringtonparish.org.uk
Snowshill Parish Meeting	snowshillparish@gmail.com
Broadway (Wychavon)	clerk@broadwayparishcouncil.org
Public bodies and utilities	
Clinical commissioning Group	GLCCG.enquiries@nhs.net
National Grid	nationalgrid.uk@avisonyoung.com
National Gas	nationalgas.uk@avisonyoung.com
Network Rail	townplanningwestern@networkrail.co.uk
Police	Mark.Murphy@gloucestershire.pnn.police.uk
Natural England	consultations@naturalengland.org.uk
Historic England	David.Stuart@HistoricEngland.org.uk
Environment Agency	planning-wallingford@environment-agency.gov.uk
Local Nature Partnership	info@gloucestershirewildlifetrust.co.uk
Cotswolds AONB	John.mills@cotswoldsaonb.org.uk
Thames Water	thameswaterplanningpolicy@thameswater.co.uk
Severn Trent	GrowthDevelopment@severntrent.co.uk
Elected Members	
Gloucestershire County Council	lynden.stowe@gloucestershire.gov.uk
CDC	tom.stowe@cotswold.gov.uk
CDC	Gina.blomefield@cotswold.gov.uk
Local residents and local businesses	
Owners of sites proposed as Local Green Space	See Landowner Letters on LGS proposals
Local residents	All residents
Community Groups	The Campden Society

Assessment of Regulation 14 Consultation Comments

17. This part of the Consultation Report summarises the responses made to the CCNDP where these raise a criticism and/or request a change to the CCNDP or its supporting documents. All consultation responses submitted as emails, letter and reports are included in full at **Appendix A**.

18. An initial working draft review of consultation comments from all sources was prepared by Andrea Pellegram Ltd and provided to CCTC for review and discussion, in late July 2024. This contained recommended changes to text and policies and other matters for consideration to address comments raised in the Regulation 14 Consultation.

19. A draft working review of online survey responses was provided for review and discussion in late September 2024, once access to these had been achieved. CCTC published this paper on its website as Annex 5, for reasons of transparency.

20. CCTC considered the draft review of consultation responses in January 2025. A CCTC meeting on 28 January 2025 resolved to accept recommended changes to supporting text unless directly supporting changes to policy. It further resolved that no changes to policies in the draft plan would be accepted. The sections below take into account and reflect this decision.

Assessment of Paper Survey Responses

21. 10 hard copy surveys were received on the draft CCNDP. Responses did not answer every question in some cases. The survey analysis was undertaken first (and separately) from online survey responses, owing to initial issues in accessing the online survey. The paper survey response comments are set out below and comments from the Town Council are set out alongside.

22. Four responses used the form to indicate that a separate submission letter had been submitted. These are addressed separately below.

QUESTION 1: VISION

Response ID	Comments	CCTC Response
1	yes	
2	I agree with the policy	
3		
4	There should be mention of affordable rented housing	Reference to 'accessible housing for all residents' encompasses affordable housing.
5	I believe the paragraph above would benefit from an introductory sentence indicating that it is the ideas the town is working towards.	Not required. There is already a preceding sentence which says the following '*Our vision for Chipping Campden, often*

		described as "The Jewel of the Cotswolds", is that it will continue to be:'
6	Yes agree	
7	The vision statement should include the opportunities and facilities for children and young people. New housing development should be small scale so as not to severely change the character of the town.	The vision already refers to *'realise the potential of our young people'* With regard to the scale of new housing, the Vision looks ahead to the future at broad outcomes whilst matters relating to the scale of new housing are more about detailed implementation and so are not appropriate for the Vision.
8		
9	I would add a few words bout "preserving" or "protecting" its beauty	With regard to the beauty of the area, this is already referred to in the Vision
10	Separate letter	Addressed separately

QUESTION 2: TOWN CENTRE

Response ID	**Comments**	**CCTC Response**
1	Half – I think we need a survey of accommodation – how many second homes (rarely live in as far as I can tell near me). Air BnB/Holiday lets, long term rented and lived in , ownership lived in. Do we know these? There are too many empty houses!	Paragraphs 69-77 addresses this issue. The town centre policy was supported by a community-led survey of town centre uses.
2	I agree with the policy	
3	x	
4	No. 4 – it is essential for the future to provide extra parking – this problem has been discussed for many years and the only viable proposition is to urgently pursue the new access road to CC school with school car parking thus freeing up the present school car park for daily use.	Paragraph 78-88, Table 5 and Policy 1 address this issue.
5	Perhaps 'allowed' could be replaced by 'considered'.	This wording change is not supported. Planning applications must be considered in any event following which they can be

		allowed (consented) or refused.
6	Re. 3: agree and would add "where there is demonstrated need for additional visitor accommodation" so many holiday cottages stand empty even in the summer season.	Whilst the issue is acknowledged and the CCNDP has examined some of the dimensions to the problem, the wording cannot be support because this would go beyond requirements in strategic policies and there is insufficient local evidence supporting the CCNDP to be able to apply a restriction on new supply based on lack of need.
7	Why was Point 4 not included in this response form? Extra car parking at Chipping Campden schools should NOT be supported if the approved allocation of 76 houses on the field behind Aston Road is exceeded and more quality agricultural land will be taken.	Not clear that a planning consent for housing in the location specified is directly relevant to whether car parking capacity is provided to capacity issues for the town centre and the school.
8	No changes of use must be given in the boundary and extended boundary.	Policy 1 is supported by evidence set out in paragraphs 55-68 of the CCNDP, shown in Figure 13. This supports the proposals to extend the key centre boundary and this is retained.
9	x	
10	Separate letter	Addressed separately.

QUESTION 3: SOCIAL AND COMMUNITY INFRASTRUCTURE

Response ID	**Comments**	**CCTC Response**
1	Appendix 4: under Baptist Church should you mention Food Bank currently? Appendix 3: Between Elm Tree House and Old Bake House are Gabb solicitors – property not really empty – plans in to become private and entrance to solicitors	If the Food Bank is hosted within the Baptist Church site then it is covered by reference to the Baptist Church.

		Appendix 3 comment Gabb is on first floor.
2	I agree with the policy	
3	x	
4	Policy 2 – we should support the move of the doctor's surgery to Aston Road and also in line the possibility of a larger primary school on the Aston Road which would greatly help the morning congestion in Cherry Orchard/Pear Tree close/Calf Lane.	Noted. The CCNDP has not sought to identify land for new health centre facilities or for a new primary school. There is insufficient evidence to set a positive policy for the suggestion made.
5	yes	
6	Yes agree	
7	agree	
8	What page is table 6 on?	At the time of writing, Table 6 is page 44
9		
10	Separate letter	Addressed Separately

QUESTION 4: DESIGN OF THE BUILT AND NATURAL ENVIRONMENT

Response ID	**Comments**	**CCTC Response**
1	yes	
2	I agree with the policy	
3	x	
4	Any new build or renovation to property should retain the open design on to the streets – property should not be allowed to fence in any garden areas if privacy is needed vegetation – shrubs should be used.	Policy 3 requires planning proposals to have regard to the Chipping Campden Design Guide, identifies characteristic features and design features which should be considered in the design of new development, relevant to each character area.
5	yes	
6	...paid CLOSE regard to... ...and should have energy savings measures	Noted. 'paid regard' is sufficient. The design guide addresses the scope the sustainable building design within a context of

	...and should aim to exceed the minimum requirements (not just meet them).	conservation area, listed building and scheduled monument constraints. The Future Homes Standards is operational fully from this year and it sets standards for all new development.
7	agree	
8	Chipping Campden has had a ???? intelligent artistic and enterprising people it should have the courage to build architectural designed housing not houses designed by builders. The problem with ??? it is too conservative in its designs.	Noted. The policy 3 on design is supported by an externally produced technical design guide.
9	x	
10	Separate letter	

QUESTION 5: NON DESIGNATED HERITAGE ASSETS

Response ID	**Comments**	**CCTC Response**
1	NHA9 – Have you listed water pumps Kings Langbourne? Installed by Cotswold Wardens. Woodchip from second Quartet a visit to which inspired him. East Coker – first is B*** North (?). NSHA 13Grevel not Gravel.	CCTC have resolved not to add further candidate NDHA structures and sites to Policy 4.
2	I agree with the policy	
3	x	
4	yes	
5	Agree with the list	
6	Agree	
7	yes	
8	x	
9	x	
10	Separate letter	

QUESTION 6: BIODIVERSITY AND LOCAL NATURE RECOVERY

Response ID	**Comments**	**CCTC Response**
1	yes	

2	I agree with the policy	
3	x	
4	x	
5	yes	
6	agree	
7	Agree	
8	Trees instead of small houses and big cars	Section 4.2 of the design guide addresses street tree planting.
9	x	
10	Separate letter	

QUESTION 7: LOCAL GREEN SPACES

Response ID	Comments	CCTC Response
1	Appendix 8: Space 8 Woodrofte House spelt with an E? Woodroffe? Himself was with the E Space 14 Wilson garden opened in 1984 not 1994. Space 15: I don't know the term Broad Rigg Ridge and Furrow?	Noted.
2	I agree with the policy	
3	x	
4	Should the Local Green Spaces be separated to those which enhance the street scene and are not suitable for any development. No 2,3,4,8,9.10 these areas are used for sports and recreation 11,12,13 areas of special interest, 14,15 the remining areas could come under greatest threat of development – no 19, 20, 21 and therefore should be identified with more protection.	LGS proposals must meet criteria set out in paragraphs 106-108 of the NPPF and the resulting policy applying is the same for all LGS – that is to apply green belt policies. There can be no variation in the way the NPPF applies this. If different protections are required linked to use and value, then alternative designations should be sought.
5	...below to be designated after agreement with the landowners.	Noted.
6	Yes, agree with all the listed above and wording	
7	22 the Craves should be considered for some development	The Town Council does not support this suggestion.
8	yes	

9	Are we intending to mention the land between Lagan "Jubilee Fields" development and Kingcombe House (along the right as one ascents Byers Lane), i.e. oppose any development here? PS the Hoo should be protected at all costs – all of it.	The Town Council is not considering to extend the list of proposed Local Green Spaces.
10	Have not given their agreement on inclusion of Badgers Fields MD01 No objection in principle to the parcel of land in question being designated as OGS (open green space). ....[seeking to plant as a wildflower meadow]	Noted. The Town Council is has resolved to progress its proposal for the designation of all Local Green Spaces consulted on at Regulation 14.

QUESTION 8: ANYTHING ELSE

Response ID	Comments	CCTC Response
1	As written earlier, how many/ratio to full time residential (second homes, Airbnb/holiday lets, rented long term/residents, empty) Pavement parking? Especially near Huxbys Baptist Church Appendix 1: Katie's Café is gone Well done and thank you!!	Some work has been undertaken to examine the presence of holiday accommodation and private dwellings in Chipping Campden town centre. This is discussed I support of policy 1 of the CCNDP.
2	The Cley should be protected	Noted.
3	x	
4	The green spaces around the town are very important and should be retained as over the years many have disappeared for development. Although the plan justifies the reason for all the identified open space is the wording/justification strong enough for the areas most in danger of development like the Craves and the Hoo and the Cley.	Noted. The Town Council is has resolved to progress its proposal for the designation of all Local Green Spaces consulted on at Regulation 14. The key test that will be applied is whether each LGS site fulfils NPPF criteria for designation.
5	no	
6	x	
7	Figure 8 Page 44: (community aspirations) the track that runs behind the houses on Aston Road adjacent to the field is INCORRECT and should extend further to include No's 6 and 7. We do not feel that the Neighbourhood Plan's aspirations has taken fully into consideration the numerous impacts that a new school car park will have on the town. • A larger housing estate – probably in the region of 926 houses and the additional strain on our infrastructure.	Noted. Figure 8 does not show a track. The Town Council provides its views and comments to CDC on matters relating to significant planning applications and ongoing tree preservation order matters.

	• The loss of further agricultural land. • The loss of some of the trees/avenue on Aston Road • Highly visible large development which will change the character of the town.	
8	Parking facilities must be made for residents only in town centre and for residents with no off street parking. Noise should be reduced from builders and traffic. Hospital to be moved nearer Purchased properties must be lived in and cannot be sold for profit before two years.	Residents-only parking in the town centre would act against the promotion of a healthy town centre which relies on visitors. There is no hospital in Chipping Campden. Builders operate under planning conditions which may address hours of operation and construction methods which may address noise. Other matters raised are beyond the scope of the CCNDP.
9		
10		

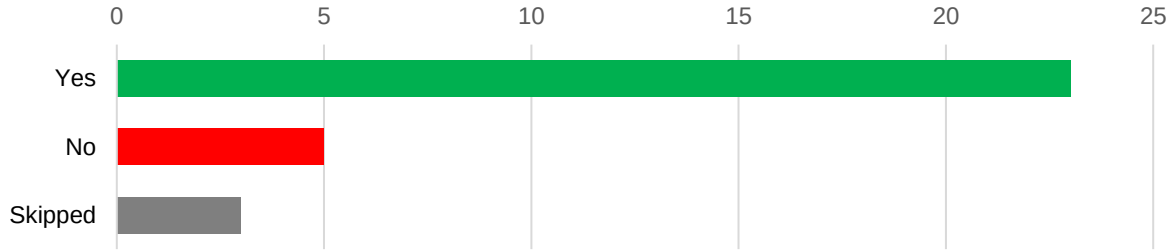
Assessment of Online Survey Responses

23. The online survey formed one of the various methods used to undertake public consultation on the draft CCNDP. This section refers to those responses received online. Some responders also submitted the same information via email addressed to the Town Council. There is therefore duplication and where the responses were already considered prior to assessment of the online survey responses (as emailed responses) they are not addressed in this section.

24. 31 completed online surveys were received between 9th of April 2024 and 22nd May 2024, with the detail of the responses varying among the 8 questions asked and between respondents. This report summarises the responses to each question and identifies actions or amendments for the CCNDP.

Question 1 – Plan Vision

"Do you agree with the Vision for Chipping Campden? If not, what alternative wording can you suggest? A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings. A society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area."

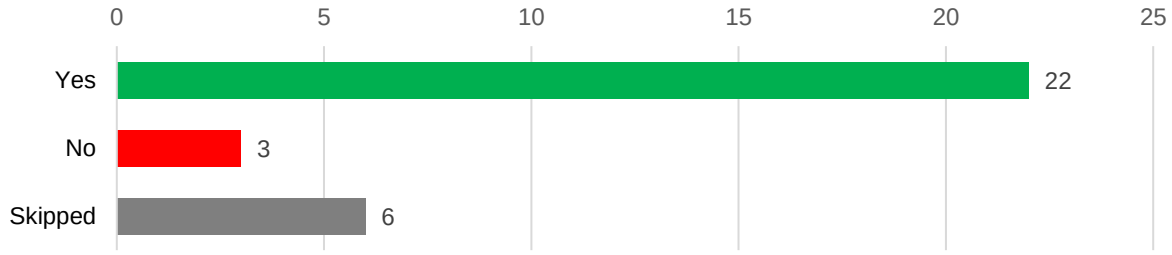


#	Comment	Outputs
1	*A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its historic buildings and natural surroundings. A society working together to provide fulfilling activities for all our residents, realise the potential of our young people, develop local businesses, and provide financially rewarding work. ~~and fulfilling activities for all our residents and amenities for all visitors to the area.~~ A community that welcomes visitors while protecting and enhancing the area's heritage assets and its AONB location.*	The vision has been amended and includes reference to the Cotswold National Landscape and the historic environment.
2	Would like to see the inclusion of reference to housing. Perhaps: *...A society working together to realise the potential of our young people, to develop our businesses, to ensure an equitable housing policy for all the residents of the town, and to provide financially rewarding work...*	The Vision refers to accessible housing for all residents.
3	The first part of this paragraph is a statement rather than a VISION from which objectives can be formed to influence development in the future: the CCNDP will form part of the statutory development plan. Even the wording of the second sentence implies a statement rather than a VISION for the future. This needs to be reworded to form a coherent VISION for development in the future. The current wording is not fit for purpose. Suggested rewording: *We are a vibrant community, renowned for creativity, culture, and commerce, in an area prised for its beautiful buildings and natural surroundings. Our/the aim of the CCNDP is to support our young people, develop businesses, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area.*	Vision wording revised to make clear that the vision provides a clear aim.
4	I fully support the vision which neatly encapsulates physical attributes, community and business. Creativity, culture and commerce are a large part of what makes Campden different to most other small Cotswold settlements. According to the RSA, nationally creative industries are growing at one and a half times the whole economy. Campden should be part of that.	No action to take.
5	Chipping Campden: A Community and Town for everyone.	No action to take.
6	No comments to make	No action to take.

7	Happy with the wording of the Vision for Chipping Campden. Perhaps "rural" could be added to the "vibrant community" as the town is in the centre of many farms and sheep farming plays an important part of the life of the town - both historically and currently.	Vision wording revised
8	I have read and re-read this Vision statement. "Vibrant" I do not feel is the appropriate word we should be using here but instead replace with perhaps 'flourishing' or perhaps 'living' to reflect that the Town is very alive and active throughout the 12 months of the year and not a community of second homes and airbnb dwellings that does not have a soul or a community feel.	Vision wording revised
9	'A vibrant and safe community .....'	Not accepted in the first sentence of the Vision., but safe is referred to later on
10	"~~A vibrant community~~ Chipping Campden is renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings. Like all towns and cities, Chipping Campden has been affected by shopping trends, the economy and Covid. In order to counterbalance these difficulties, we need to protect and enhance our retail High Street and resist the trend of allowing change of use of commercial properties to residential, and reduce the impact of second/holiday homes and Air BnB's. A society working together to ~~realise the potential of our young people,~~ to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area.	Some of these suggestions are too detailed for a broad vision and also cannot be actioned because they refer to permitted development.

Question 2 – Policy 1 (Chipping Campden Town Centre)

"Do you agree with the wording of Policy 1 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 1: Chipping Campden Town Centre.1. The information in Appendix 3 in this plan should be the baseline for the Local Plan Policy EC8, and there will be a presumption that town centre uses (Class E, Sui Generic and all forms of visitor accommodation) will be retained.2. The Key Centre Boundary is extended as shown in Figure 13.3. Where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre.4. Proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported."



	Comment	Response
1	Absolutely NO more short-term holiday homes needed in Campden. There is great need for sustainable parking in Campden. I therefore support the proposals to provide parking at The School or other appropriate site.	Short term holiday-lets do not currently require planning permission and therefore cannot be controlled by the CCNDP.
2	We support the extension of the Town Centre boundary as proposed in the draft CCNDP. However, we are also of the view that the boundary should be extended at the other end of Town (the figure on page 97 of the CCNDP) to include the part of what is known as Cutts Yard that is not currently included, i.e. the garage building. In our view, it would be incoherent to include two separated parts of Cutts Yard but not the central connecting part. While we agree that accommodation close to or within the Town Centre well adapted for the use of the elderly would be an advantage, we do not agree that conversion of upper floors of commercial Town Centre premises is likely to provide such suitable accommodation for the elderly. While the locations concerned are obviously ideal, the accesses to the upper floors of what are almost all if not all listed buildings do not lend themselves to being suitably adapted for the use of the elderly. We agree that visitor trade is important in supporting the mix and range of facilities in the Town Centre. Further, the CCNDP notes on p52 that many of the residential use Town Centre properties are short term let (e.g. Air BnB), and that if the number of such properties is allowed to grow too far (in our view, any further than the current level), that would have a very negative impact on the vitality of the Town Centre, to the detriment of the residents and visitors alike. We also note that the data on pg31 highlights the lack of privately rented accommodation (long-term lets) compared to the national average. We strongly support the suggestion made in the CCNDP that the creation of new non-services visitor accommodation throughout the area covered by the CCNDP_ (i.e. not just in the Town Centre) should	Many of the well-considered suggestions in this response are beyond the scope of what an CCNDP can achieve within available resources. It may be that a future review of the CCNDP can address some of the complex issues raised but at this stage (post-Reg. 14) there is no evidence to respond to many of these complex points and to do so would introduce significant delay to a CCNDP timetable that has already spanned many years. Regrettably, no changes are made in the interest of getting the CCNDP adopted in a timely manner. Support for change to town centre boundary noted but

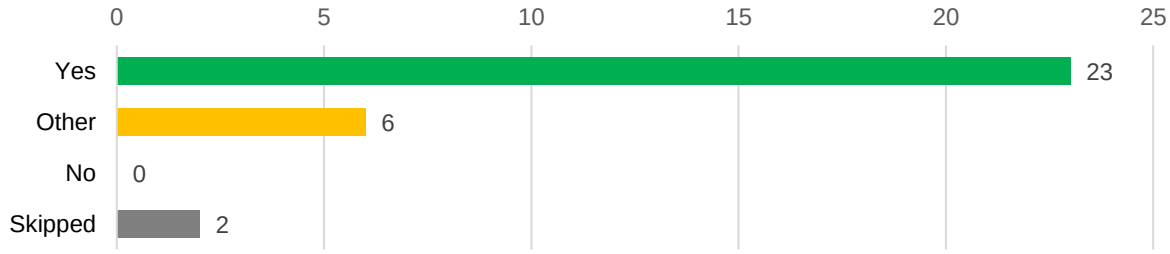
	be resisted. In the above context particularly, but also relevant to Policy 2, one important reference point for judging the appropriateness of a change of use application is the impact on the vibrancy (or also "vitality") of the High Street (or also "Town Centre"). Judging that impact is highly subjective unless some appropriate criteria are established. Nonetheless, short-term lets are likely to remain vacant for parts of the year. Vibrancy, in our view, should be considered throughout the year. As noted in our comments on Policy 2, in our view all applications for a change of use away from a Town Centre use should be resisted; all such changes diminish the vitality and vibrancy of the Town Centre. As noted in the draft CCNDP, it is not possible to draw strong conclusions from the results of the Parking Survey. We support the principle of finding out what are the views of residents in relation to parking. However, in our view, the process would be more successful and usable if it was in the context of the development of a wider strategy covering both transport (public and private), an active travel policy and parking in the neighbourhood. Further, the draft CCNDP suggests that the Town needs a new car park for cars and coaches. The great majority of visitors do not arrive by coach, and it is not clear that it would be positive for the Town if the number that do so were to increase. Coach visitors do not remain in the town for more than a few hours and do not generally use hospitality venues and the economic benefit to the town is much less than visitors who stay overnight. We strongly support the move towards changing the existing school car park to one for general public use, while acknowledging that this will only happen in the context of the wider Aston Road development going ahead. If this does go ahead, and the provision of a new Town car park is combined with some restriction on High Street parking (e.g. short term and residents only), it is essential that particular provision is made for those who work in the various commercial and retail premises in the Town Centre to be able to use the new public car park either free of charge or at heavily discounted rates (e.g. an annual easily affordable pass).	suggested further extension to include Cutts Yard is not included because there is insufficient justification. Proposes that short-term lets beyond the scope of the CCNDP because not supported by national policy though may negatively impact the vitality of the Town Centre. A vibrant town centre will rely on its use by local people to support their daily requirements and activities, whilst also providing facilities which encourage daytrip or longer stay tourists. In both cases, a strong town centre with a mix of commercial uses is important. Criticism of the parking survey results, suggesting the need for a wider transport strategy.
3	Rewording of point 3 suggested to be less restrictive (more flexible to respond to a changing market) and be in general conformity with Local Plan Policy EC8: Where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre. Where a change of use is proposed, evidence must be submitted to demonstrate that the property has been marketed for at least 12 months and that the use is no longer viable.	Suggests rewording to point 3 to be more flexible and requiring marketing evidence before change of use.
4	I agree with Policy EC8	No action.
5	With reference to Point 3. above, the definition of 'vibrancy' should include the diversity of properties - to include a full mix of retail and leisure (including restaurants, coffee shops, pubs etc.)	A vibrant town centre will rely on its use by local people to support their daily requirements and activities, whilst also providing facilities which encourage daytrip or longer stay tourists. In both cases, a strong town centre with a mix of commercial uses is important.

6	I support the extension but wonder if it should be further extended to include some key locations that remain outside the newly defined town centre boundary; e.g. the Cider mill Theatre, St James' Church, Court Barn Museum. Policy 1.3 (change of use) is very important but misses a crucial point regarding the vibrancy of the town: i.e. conversion of commercial premises to residential. An additional policy should be included along the lines of "Proposals resulting in the loss of space for economic activity will be opposed in order to protect and enhance the town's economy." I would like to see this applied throughout the town and not just the town centre. The vibrancy of the town centre is very subjective and difficult to define satisfactorily. A good attempt is made with the six objectives under Economy on page 14 but vibrancy also includes a good mix of residential and commercial. It is important that neither dominates. I fully agree with Policy 1.4 to support the new school car park but suggest the policy is re-worded "Proposals to create a new school car park at the back of the school and make over the use of the existing school car park for the use of the public will be supported" The parking survey on page 59 does not provide clear evidence of views over charging in the new public car park. My view is that it should be free (or as a minimum a significantly reduced charge) to all residents of the town and employees of businesses in the town (with an upper limit to the number of the latter related to their total number of employees) in order to preserve the attraction of working and living in the town. Businesses will find it more difficult to recruit staff if parking becomes more difficult or expensive. I appreciate that the cost of the new access road is substantial but I would like to see the road extended at least as far as the Haines pack house so that their HGVs can be kept out of the town centre. Surely the financial gain to GCC from the development could and should be used to facilitate this infrastructure improvement in Chipping Campden so as to protect the historic town centre from damage caused by HGVs, to reduce traffic congestion and to maintain a pleasant environment for residents, businesses and visitors. A vision for Cutts Yard should be included. This is a key town centre location and may well be developed,. My suggestion would be a mix of retail, commercial and residential, utilising Cam Brook as a feature.	Such a wide extension would be difficult to support and likely to be objected to by the planning authority.
7	In para 3 remove "vibrancy of the" so it reads .... 'there will be no harm to the town centre'.	A vibrant town centre will rely on its use by local people to support their daily requirements and activities, whilst also providing facilities which encourage daytrip or longer stay tourists. In both cases, a strong town centre with a mix of commercial uses is important.
8	The Local Plan Policy EC8 should give greater emphasis towards ensuring from a planning perspective that we retain the full mix of services expected in a Market Town. Consequently, as well as the range of businesses discussed, we would wish to see stronger support given by the Town Council and the Planning Authority towards retaining vital services within the Town centre for the residents of Chipping Campden. Included in this list, should be retaining the GP Practice in the Centre. It is	Strong advocacy for retaining services like the GP surgery in the town centre to maintain vibrancy and accessibility, especially considering the ageing population. This

	important, particularly given the age demographics of the town shown on Page 29, that access to the GP surgery can be readily accessible without recourse to having to drive there. If key services such as the GP surgery are re-sited towards a distant field on the edge of the town, other services will move also. The current local pharmacy for example will likely close as a result and the centre of Chipping Campden will gradually lose its heart and vibrancy and cease to feel like a town centre. If the Cherry Tree Close primary school is cramped, such that the Council supports moving this to the Bratches, Aston Road site ; the present Cherry Tree Close site would seem a more central location to sensibly develop a new GP Practice. The proposals for a public car park at the existing Chipping Campden School car park, with a new site for the School car park as described on Page 58 seem sensible. However it is wrong to conflate this 'solution' with seemingly blind acceptance for a new 'out of town' GP practice. These are two separate planning issues and should be considered separately for the reasons given above.	falls under Point 1 of Policy 1.
9	We agree with the wording of Policy 1.	No action
10	yes, subject to comment above re use of the word-vibrancy. This must not become a Stratford upon Avon where the interests of tourists come before those of residents and all investment is geared towards supporting visitors (at the expense sometimes of locals)	A vibrant town centre will rely on its use by local people to support their daily requirements and activities, whilst also providing facilities which encourage daytrip or longer stay tourists. In both cases, a strong town centre with a mix of commercial uses is important.
11	Drop the word 'centre' in Part 4, to read '..... congestion in the Town will be supported'. The Town Centre is a defined area in the Plan and does not include some of the most heavily congested areas around the School, particularly Station Road and Church Street with unsafe and inconsiderate parking by students, staff and parents.	The policy is focused on the town centre and not the town as a whole.

Question 3 – Policy 2 (Social and Community Infrastructure)

"Do you agree with the wording of Policy 2 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 2: Social and community infrastructure1. The infrastructure identified in Table 6 and Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8.2. The provision of suitable land for human burial will be supported.



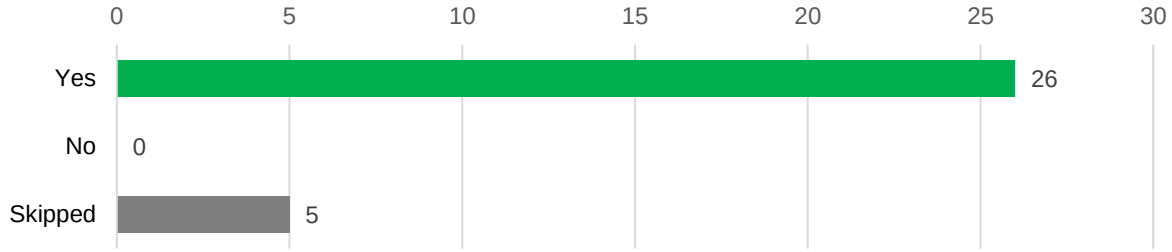
#	Comment	Response
1	Why are shops other than food shops not on here. We need to keep our commercial properties and they should not become residential. I do support the provision of suitable land for human burial - even better would be a local Woodland Burial site.	The aspiration to protect shops is addressed by Policy 1.
2	We support both elements of the Policy as stated on page 65. Further, while we note that there are limitations in planning law on the change of use from commercial/retail to residential, the enforcement of the relevant provisions has been variable, and in our view too lenient in some cases. In our view, such changes should be resisted more strongly than is reflected in the current legal provisions, i.e. that such changes should be wholly exceptional. We recognise that this impacts the balance between the rights of individual property owners and those of the residents and other users of the neighbourhood where such property is located. That balance is not immutable – for instance, the restrictions applied to listed buildings also limit the rights of individual property owners in the interests of a wider constituency. It is appropriate in a historic town such as Chipping Campden to interfere with the balance that might apply at law. We note that the presumption under Local Plan EC8 is that it is not appropriate to move the Doctor's Surgery away from the Town Centre (recognising that the current Surgery is not within the Town Centre as defined but is close by). We are concerned that there seems to be a presumption that a new Surgery would be part of the Aston Road development plan, although the advantages of such a move have not in our view been demonstrated to outweigh the disadvantages, in particular in relation to how patients access the Surgery. The CCNDP notes an aspiration to relocate St James's Primary School to a site off the Bratches. If that goes	Support for the policy noted. The CCNDP cannot have a commitment to reopening the railway station. This is already addressed in Table 3. Sustainable transport links are not included in Table 6 and Appendix 4 because they are transport infrastructure which is generally considered to be separate from social infrastructure. The CCNDP did not have a policy on sustainable transport because this was not identified as important in community consultation and it therefore has not gathered supporting evidence. Though the evidence on litter bins is welcome, it will not be included because they are not subject to planning control. No new reference will be made to a potential route for a northern link road because this should be dealt with under the local transport plan and not the CCNDP.

	ahead, the vacated current school site would seem a better location for a new Surgery, being large enough and more central to the Town. Noting that the site of St James is probably Diocesan property and will therefore be subject to the constraints of disposal under Diocesan governance regarding gaining the maximum values of the asset. The re-opening of the Train Station is noted as an aspiration and supported by the Town Council and is supported by the Campden Society. We note however that the reference to such re-opening is not included in the proposed revisions to the Local Plan. This is an example of the in our view disingenuous separation of the CCNDP and the Local Transport Plan; we acknowledge this is a matter not in the power of the Town Council to rectify. However, if it is possible in the context of the regulations around the CCNDP to include more about the transport needs of the community, especially in the context of the move towards zero carbon, we would strongly urge that such comment should be included. The case for re-opening a train station at the old site outside Chipping Campden is strengthening and should perhaps be better reflected in this section under a Public Transport heading on Page 62 alongside bus- stops. It should also feature as a separate section under Public Transport in Appendix 4. The development of a railway station, and the land around this could provide a real opportunity to the economic and social development of our market town. Greater emphasis should be given in the CCNDP document for the planning and development of public transport services. There is little reference here to public transport links. There is some reference to this in the Community Concerns/Aspirations section (pages 39-42), but these are omitted in Table 6 and Appendix 4. The CCNDP shows a photograph of the Hedgehog bus (a volunteer-led initiative) but fails to make any reference to the current commercial public transport bus services franchises. Nor is there any reference to the need to preserve and provide appropriate bus stop facilities within the town centre. These need to be provided and be accessible within Chipping Campden, particularly given that we are all expected to see less reliance on private car usage. The following items should be added to Table 8: • bus-stops • public footpaths • EV charging points, or potential EV charging point sites • litter bins • amenity spaces such as areas of green space such as verges, patches of green space and grassed roundabouts In addition, the potential route for a northern link road bypassing the town should also be noted so that any planned land use which prevented this potential should be rejected.	
3	I agree with the infrastructure set out in Table 6 supported by Appendix 4.	No action.

4	Table 6 refers simply to “Shops” whereas Appendix 4 refers to “Food Shops”. In my opinion ALL businesses listed in Appendices 1 and 3 whether food or other should be included. Please see also my comments on Policy 1.3 (change of use).	Policy 1 protects all non-community-use class E premises.
5	Our comments given above in relation to Policy 1 are also pertinent here. We are surprised that there is little reference here to public transport links. There are some references to this in the Community Concerns/Aspirations section (pages 39-42), but these are omitted in Table 6 and Appendix 4. You show a photograph of the Hedgehog bus (a volunteer-led initiative) but fail to make any reference to the current commercial public transport bus services. Nor is there any reference to the need to preserve and provide appropriate bus stop facilities within the town centre. These need to be provided and accessible within Chipping Campden, particularly given that we are all expected to see less reliance on private car usage. Similarly, although our train station no longer currently exists, thanks to the short-sighted Mr Beeching of the 1960’s; the case for re-opening a train station at the old site outside Chipping Campden is strengthening and should perhaps be better reflected in this section under a Public Transport heading on Page 62 alongside Bus-stops. It should also feature as a separate section under Public Transport in Appendix 4. The development of a railway station, and the land around this could provide a real opportunity to the economic and social development of our market town. Greater emphasis should be given in this document for the planning and development of public transport services.	Sustainable transport links are not included in Table 6 and Appendix 4 because they are transport infrastructure which is generally considered to be separate from social infrastructure and is not listed in INF2. The CCNDP did not have a policy on sustainable transport because this was not identified as important in community consultation and it therefore has no supporting evidence. The CCNDP cannot have a commitment to reopening the railway station. This is already addressed in Table 3.
6	I agree with point 1 above but not point 2 - with land at a premium, using space for a burial site for an outmoded, unsanitary ritual for human disposal does not make sense. A garden with perhaps memorial plaques {following dispersal of ashes} would provide a more pleasant, easily maintained place of remembrance for loved ones.	The comments are noted however it is important that we recognise the need for space to address the burial customs of residents of Chipping Campden Parish. Additional burial land has been identified as a need for the community given that the land that was allocated in the Local Plan is no longer available for this use.

Question 4 – Policy 3 (Design of the Built and Natural Environment)

"Do you agree with the wording of Policy 3 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 3: Design of the built and natural environment. Planning proposals, particularly those with Design and Access Statements, should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed according to the Building with Nature Standards Framework.

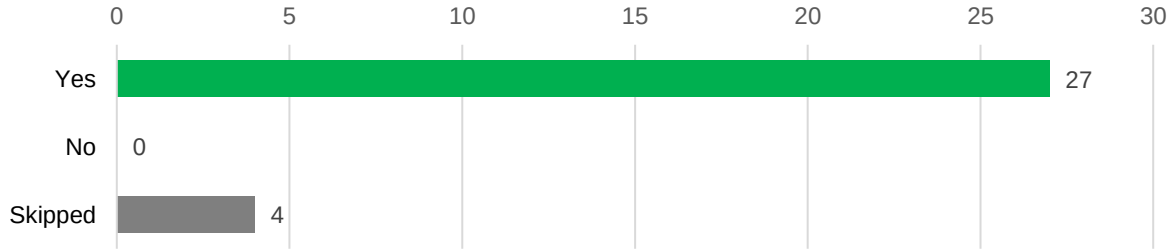


#	Comment	Outputs
1	Perhaps it should be made mandatory that new properties have some form of rainwater harvesting. It is simple technology. Solar panels should be incorporated on the right properties. Solar panels on industrial buildings should be encouraged.	These are not architectural features and therefore would be outside the remit of Policy 3. This is addressed in the Cotswold Design Guide which is part of the Local Plan. The Future Homes Standard is becoming fully operational in 2025 and this will provide a clear framework within Building Regulations for improvements in sustainable construction and operation.
2	TCS agree that planning proposals should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed in accordance with the Building and Nature Standards Framework. However, we do not think that the draft design guide is fit for purpose and should be substantially redrafted, preferably by an Architect / Urban Planner who is familiar with the vernacular of the Cotswolds. The generic sections of the current draft design guide have been substantially cut and pasted from the National Design Guide and need to demonstrate a less boiler plate approach. TCS have commented in detail on the draft Design Guide and we attached the table of comments to our emailed response to the draft CCNDP.	Comments on the guide were shared with AECOM who took them into account and then issued a final version of the Design Guide.
3	The "Building with Nature Standards Framework" and the principles for high quality green infrastructure are of critical importance.	Comments noted.
4	It is critically important that the principles set out in the Cotswold Design Code are accepted and incorporated in the Chipping Campden Design Code, particularly with reference to the principles for high quality green infrastructure.	Noted.

5	I think the Design Guide is an excellent document and it is good that it forms part of the Neighbourhood Plan As evidenced by Para 4.1 (page 28), I like the fact that it is not too prescriptive and allows for some variations, although I suppose that calls into question its enforceability. What happens if a developer ignores large parts of it? Para 4.1 is correct in my view; developments should not consist of pastiches of traditional Cotswold buildings. New buildings should sit comfortably in their surroundings, acknowledging local traditions but allowing for contemporary interpretations. In view of the fact that the Design Guide is not too prescriptive, I think that the wording of Policy 3 could replace the words "paid regard to" with the words "complied with". I am apprehensive about Para 4.2 emphasising pedestrian over cars. Whilst a noble aim, cars are essential in a rural location such as Chipping Campden. It might be preferable to include some of my additional suggestions for Policy 5 in the Design Guide as well as in a revamped Policy 5.	It would be a matter for the decision-maker to decide if any given proposal is within conformity with the Chipping Campden Design Guide, Cotswold Design Code and Historic and Green Infrastructure Design Requirements as a whole. The comment to change policy language from 'paid regard' to 'complied with' may not be suitable as the design guide is ultimately 'guidance'. It is a matter for the decision-maker as to whether a proposal is in conformity with the surrounding environment and the Design Guide should be a tool for developers to demonstrate this to decision-makers.
6	No comments to make	No actions.
7	I think development of housing and access road to school as well as surgery off the Aston Road is a sensible initiative and needs to be progressed soonest. The surgery will be a very needy asset to improve the community. Traffic calming measures will be required on the Aston Road to manage increased volumes of cars Housing for first time buyers/affordable should be based around those persons with connections to the Town via family or association	These comments are not relevant to Policy 3 as the Design Guide concerns the architectural design of planning proposals. In addition, this suggestion would require a site allocation in the CCNDP.

Question 5 – Policy 4 (Non-Designated Heritage Assets)

"Do you agree with the wording of Policy 4 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 4: The following features are designated as non-designated heritage assets:NDHA1 The Millennium SignNDHA2 Westington StreetlampNDHA3. High Street Stamp BoxNDHA4 St Catharine's postboxNDHA5 Westington postboxNDHA6 High Street postboxNDHA7 ScuttlebrookNDHA8 Town PumpNDHA9 Cotswold Way markerNDHA10 Broad Campden Post BoxNDHA11 Punk stone carvingNDHA12 Graham Greene plaqueNDHA13 Sundial Gravel HouseNDHA14 Sundial Dragon House/Cottage 1690NDHA15 Sundial, Sundial HouseNDHA16 Sundial Cotswold House HotelNDHA17 Sundial Dial House NDHA18 Sundial Green DragonsNDHA19 Sundial Crosby HouseNDHA20 Sign of the Swan InnNDHA21 Sign of the Lygon ArmsNDHA22 Sign outside Elsley HouseNDHA23 Bootscraper Kings HotelNDHA24 Bootscraper Baptist ChurchNDHA25 Bootscraper The MartinsNDHA26 Bootscraper Trinder HouseNDHA27 Bootscraper Westcote HouseNDHA28 Bootscraper Ivy HouseNDHA29 Bootscraper Woolstapler HallNDHA30 Bootscraper Dovers HouseNDHA31 Bootscraper Bantam Tearooms

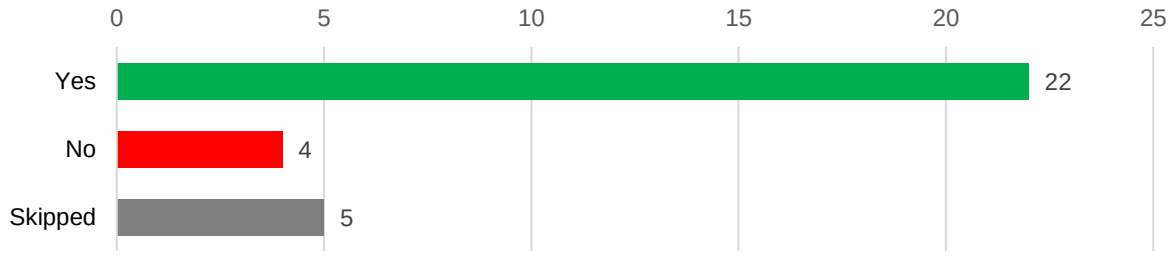


#	Comment	Outputs
1	I would add the boot scraper at Pavement Cottage in Park Road and the 'Cloud hedge' or Bakers hedge on Westington Corner at the top of Sheep street.	Additional non designated heritage assets were suggested for inclusion. CCTC has resolved not to include further suggested NDHA proposals. Cloud Hedge: This cannot be included because it is not a structure or fixture.
2	I find this list rather odd and I think that other items could be included, particularly the Eric Gill sculpture on the wall of the Presbytery. I'm glad that the awful bee carving on Woolstaplers Hall is not included.	Additional non designated heritage assets were suggested for inclusion. CCTC has resolved not to include further suggested NDHA proposals.
3	We concur with the items listed and we note that there is no clear definition of what constitutes a heritage asset. We suggest the TC draws up a Local Heritage List following Historic England Advice Note 7 or similar. The TCS also suggests that the TC have a watching brief on any contemporary and new installations that may qualify. Here is a list of other Non-Designated Heritage Assets which we feel contribute to the unique character of the town which we would like added. This list includes already identified and numbered NDHAs where useful. Street Furniture and Environment. 1. Boot Scrapers (already nominated). 2. Shop Signs and decorative ironwork are an important part of the town's character and tradition. Apart from the 3 signs listed, many others	Additional non designated heritage assets were suggested for inclusion. CCTC has resolved not to include further suggested NDHA proposals.

	should be included, for example, The Sparlings; Saxon House; the Kettle; the Bistro at the Cotswold House. Also the iron railings with "Humpage Snail" detail at the Town Hall and Maylam's. 4. Fire Insurance plates at Grevel House, the Silk Mill, and the Martins. 5. House lanterns, for example, along Leysbourne and outside Woolstaplers' House. 6. Brown plaques e.g. Ernest Wilson; Frank & Adeline Mottershead; FLM Griggs. 7. TCS have carried out a survey of Litter Bins and written a report which we attach to this response. We suggest that from her on in all new litter bins are of one specification as proposed and that these should then become heritage assets as well as those that currently conform to this specification. 8. The cloud hedging at Westington (Pike Cottage; Old Westington Farm; Woodroffe Cottage.) 9. The Gazebo on the Recreation Ground, (minus the timber post with plaque attached, adjacent to it, which is a hazard.) Historic Water Supply. 1. The pumps along the High Street (one already nominated). 2. The wells in the gardens of the High Street. 3. The ScuttleBrook Pool (already nominated). 4. The Cider mill Lane Trough. 5. The Trough at Rose Cottage, Westington. (The other trough at Westington is Listed.) Traditional Stone Stiles 1. Stone Slab Stiles a) Dyer's Lane / Upper Leasows b) Blind Lane / The Craves c) The Mile Drive North d) The Mile Drive South e) Buckle Street f) Briar Hill Farm, Broad Campden 2. Stone Step Stiles a) Station Rd / The Coneygree 3. Stone Animal Stiles a) Buckle Street / The Bank Wood - tbc NB All Stone Stile data taken from CPRE Stone Stiles project.	
4	I have no comments to make.	No actions
5	No comments to make	No actions
6	Subject to the owners' permission, could the kettle hanging outside Kettle House in Leysbourne be added to the list of non-designated heritage assets?	Additional non designated heritage assets were suggested for inclusion. CCTC has resolved not to include further suggested NDHA proposals.

Question 6 – Policy 5 (BNG and LNR)

"Do you agree with the wording of Policy 5 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 5: Biodiversity net gain and Local Nature Recovery. Land identified in Table 7, Figure 15 and Appendix 7 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021.Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows: a. Contact Cotswold District Council to determine whether work has been done towards the preparation of the Gloucestershire Local Nature Recovery Strategy regarding the proposal site, its relationship with the Gloucestershire Local Nature Recovery map, and seek advised on how best to deliver local nature recovery and biodiversity net gain within that context. b. Where biodiversity net gain cannot be delivered on site, applicants must work with Cotswold District Council to identify ways that off-site biodiversity net gain can be delivered in Chipping Campden Parish. c. Where off-site biodiversity gain is proposed, this should be focussed on the nature recovery areas shown in Figure 15 or the Gloucestershire Local Nature Recovery Map. d. Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary. e. Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered. f. Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.



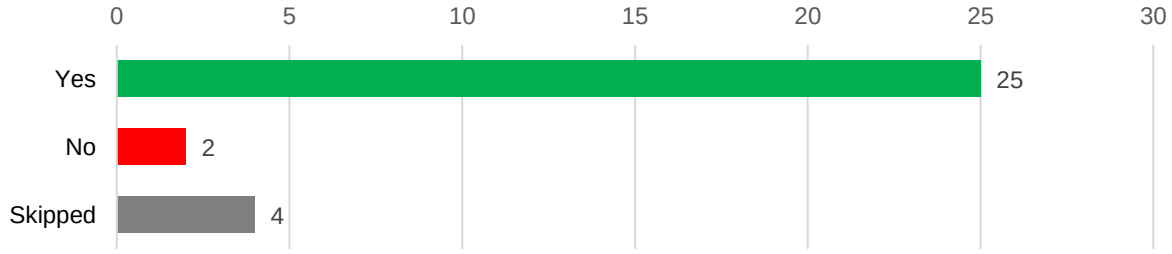
#	Comment	Outputs
1	See accompanying representation sent over email on 22nd May 2024 on behalf of the Campden Estate for further details.	Addressed Separately
2	I am very concerned about the lack of official checks on proposals when they have been passed. How can we have guarantees that developments follow their approved plans.	This matter is beyond the scope of the CCNDP.
3	1. We agree with the wording of Policy 5 but would add further detail. We suggest that the list of target sites suitable for biodiversity net gain complied by GWT should be supplemented with local knowledge noting opportunities for BNG in the town's natural setting including the management of grass verges and nominated Local Green Spaces; and that the LNRAs should be linked into wildlife corridors, if possible, e.g. Areas 1 & 2 should be linked along the water course of the Cam. 2. We suggest	It will be difficult to link areas 1 and 2 because the Cam runs through the built-up area and there are existing constraints that might make nature improvement there impossible. Management of grass verges is outside planning control.

	further detail is added to this Policy (cross referencing with the Design Code and Building with Nature/Climate Resilient Water Management) addressing the mitigation of increasing Flood Risk in the town due to rainfall intensity due to the Climate Emergency. Any new development which doesn't fully address – and future proof – this increasing risk (including management of waste water) should be opposed. We also suggest that the importance of the remaining open ditches in the town is noted and that these should not be covered. In addition, the contribution of the nominated LGS to the town's natural flood management should be noted. 3. We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature) addressing Light Pollution in the town to the effect that any new development should guarantee it doesn't increase this pollution but instead conserves and enhances the town's natural setting and biodiversity. 4. We suggest that the guidance is given a more practical focus. For example, ref point 2 a clear commitment not to build on flood plains or in areas where there is a known flooding risk. 5. We note that there are no designated Gloucestershire Wildlife Trust Wildlife Sites within the list on Table 7. GWT notes 850 Local Wildlife sites on their website and we would hope that Chipping Campden could be a part of that.	Suggested introduction of new policy wording on flooding is not being taken forward because this is a matter for CDC and GCC to address (and they would do a better job). Reference to natural flood management, design and light pollution has been included in a new paragraph. Reference is already made to the Gloucestershire local nature recovery strategy.
4	This policy only duplicates legislative requirements.	DEFRA guidance states that the priorities identified by every local nature recovery strategy should reflect local circumstances, including the most important issues to local people and organisations. The CCNDP sets out these local priorities.
5	I agree wholeheartedly with the objectives set out here. The reference to 'Kingcombe Lane' in Table 7 and Appendix 6 should instead say 'Kingcome Lane and The Cley'	This is amended within the CCNDP and appendices.
6	I agree with both the broad and the specific objectives set out here. I agree with the Local Recovery Areas identified. However, the entry in Table 7 and Appendix 6 headed '6. Kingcome Lane' should more correctly be headed 'Kingcome Lane and The Cley'.	This is amended within the CCNDP and appendices.
7	In my view, this section is not sufficiently comprehensive and should be re-titled "Environment and Sustainability" and thus the policy should be broadened to include at least the following important points: In line with Cotswold Conservation Board Position Statement on Dark Skies and Artificial Light, proposals which cannot demonstrate a need for external lighting (and where a need exists do not limit to a minimum lighting intensity and duration) will be opposed. Any proposals for development that do not avoid areas identified as at risk of flooding or increase the level of flood risk will be opposed. Specific mention should be made about the Olimpick Drive development where	These comments are not relevant to the Policy. The CCNDP did not have a policy on these aspirations because this was not identified as important in community consultation.

	flooding has taken place despite it being passed for development. Three key views are shown on page 27 but there are many more iconic views within Campden (e.g. The High Street) which are worthy of protection. The section on Sustainable Development on page 48 makes no mention of solar panels, recycling etc. These are important topics that deserve inclusion and I would like to see a policy along the following lines included in the CCNDP: Only planning applications which incorporate energy efficiency, other sustainability and environmental protection and flood mitigation provisions will be supported. In line with CPRE recommendations: Solar PV or thermal panels on suitably orientated roofs should be a standard expectation for all new buildings, including homes. Conversions and major external changes to existing buildings should require full planning permission (in other words, removing permitted development rights) unless they bring the building up to the Future Homes Standard or equivalent. Planning permission should not be granted for commercial or public car parking spaces unless they also provide solar energy generation.	
8	This part does read more as an exercise for planners and conservation officers to justify their existence, rather than having any discernible benefit to the residents of Chipping Campden. We do wonder where much of this so-called 'green' agenda sits against the need to build affordable houses. Much of it seems overly academic and distracts from the real problem that we simply are not building enough housing stock. It would be better if the guidance here was briefer and more practically focused. For example a clear commitment not to build on flood plains or in areas where there is a known flooding risk.	The Policy is intended to create target locations for Biodiversity Net Gain which is now a mandatory requirement for all future development proposals. Developments which support the environmental objectives are more likely to be supported locally. Affordable Housing is irrelevant to Policy 5. A policy framework is in place at national level to control development in relation to flood risk.
9	This policy needs loosening to make it less restrictive and more likely that landowners will be encouraged to adopt biodiversity principles.	The identified sites are highlighted as being of particular importance with highest opportunities for nature recovery and improvement, though on-site BNG will be encouraged first in accordance with the BNG hierarchy. In relation to the proposal to provide less restrictive policy wording, CCTC has resolved not to accept changes to policy wording in the draft CCNDP.
10	Unique habitats, e.g. traditional orchards and mixed woodland/pasture should be exempt from off-site and out-of-parish biodiversity offsetting, as they are impossible to replicate. Sites where obligate species exist, e.g. those sites that have Ash trees on should be afforded greater protections, due to the risk of the obligate species becoming extinct.	This level of detail is beyond the scope of a CCNDP and will be addressed at planning application stage based on local and up to date ecological evidence.

Question 7 – Policy 6 (Local Green Spaces)

"Do you agree with the wording of Policy 6 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 6: Local Green Spaces Land identified in Figure 16, Appendix 7 and listed below is designated as local green space.1. Berrington Road2. Leysbourne3. High Street4. Memorial Green5. Castle Gardens Play Area6. Olimpick Drive Play Area7. Littleworth8. Westington9. The Mound, Broad Campden10. Court Barn/Cartwash11. Recreation Ground12. Bowling Green13. Cricket Ground14. Ernest Wilson Garden15. Wold's End Orchard16. Badger's Field17. Calf Meadow18. Allotments19. The Hoo West20. The Hoo East21. The Cley22. The Craves



#	Comment	Outputs
1	And I would add The Green on Catbrook.	The site was not included and the landowners have not been consulted and it is therefore not possible to consider it for LGS at this time.
2	To include land adjacent to George Lane that was in the original proposal. This meadow adjoins open farmland and the access to George lane. For many years the meadow has seen as a local open space, providing a tranquil and well-used amenity and all residents/visitors and dog walkers. The footpath provides access the town centre and Coneygree. It's a green walking and recreational corridor to various public footpaths including the Long-Distance Heart of England Way and Diamond Way.	The site was not included and the landowners have not been consulted and it is therefore not possible to consider it for LGS at this time.
3	We support the inclusion of all the Local Green Spaces included in the draft CCNDP. However, we had suggested previously that the two sites at the Sheppey should be included. The Sheppey and adjacent land demarcate the separation between Chipping Campden and Broad Campden. The land to the west of Catbrook has an almost continuous line of linear development but the land to the east including the Sheppey provides the rural separation between the two settlements. We think that it is essential to include this land as a Local Green Space to protect that demarcation.	The site was previously considered not to meet the criteria for LGS. However, the site was not included and the landowners have not been consulted and it is therefore not possible to consider it for LGS at this time..
4	As a resident in Grevel Lane I would like to support the inclusion of 'The Cley' as a designated green space. Reiterating the points raised within the Neighbourhood plan, this valuable space of natural pasture and wild woodland is the last in the area, visible on the approach to town and providing a backdrop to the Aston Road. It is a priority habitat with regard to biodiversity and the wildlife habitats. We have viewed badgers, foxes, rabbits and muntjacs and an array of birds within the area, waking each	Noted.

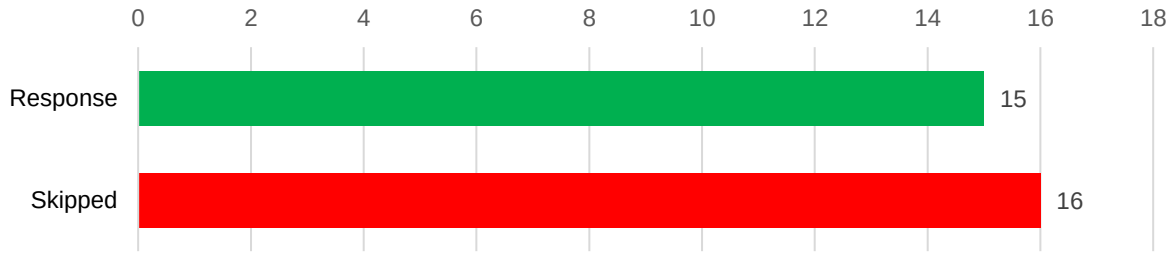
	morning to birdsong. It would be devastating to lose such an area of natural beauty in the town of Chipping Campden.	
5	Policy 6 - list number 22. The Craves should not be included for the reasons previous outlined in landowner's response to CCTC letter dated 30 September 2022. A copy of this letter is reproduced below. It is noted that Policy 6 now identifies the extent of the land in the draft allocation which was a point previously raised in the above-mentioned landowner's response (copy below). It is considered the site assessment at Appendix 8 over inflates the contribution/importance of the site and neglects to recognise that this land is not local in character and most importantly, represents an extensive tract of land (para 106, NPPF) in an attempt to preclude future development regardless of the land owner's intentions. This is not the purpose of a LGS designation. The land is productive agricultural land measuring 7 acres in size and is only perceivable from either within the land or from outside the settlement at a higher land level at Kingcombe Lane. Contrary to the views expressed in site assessment at Appendix 8 most people are not aware of this land. For the reasons given, draft allocation no 22 'The Craves' is contrary to requirements set out in paragraph 106 of the NPPF and should be removed from draft Policy 6. Copy of landowner's response dated 20th October 2022: FAO Victoria Bates – Deputy Town Clerk Chipping Campden Town Council Old Police Station High Street Chipping Campden GL55 6HB 20th October 2022 Proposed designation of site ref no. MD05 'The Craves' as Local Green Space in the Chipping Campden Neighbourhood Development Plan Dear Victoria Bates I write further to your letter dated 30th September 2022 on behalf of the landowners, William and Martin Haines, to OBJECT to the proposed designation of the agricultural field known as 'The Craves' as Local Green Space (LGS) in the draft Chipping Campden Neighbourhood Development Plan (CCNDP). Firstly, the plan included in your letter notifying of the proposed LGS designation does not identify the land or its area referenced as site no. MD05. This should be clearly shown, for example, by a red line or similar outlining the extent of the area. It is therefore unclear what land is proposed to be designated as LGS under reference MD05. Further, no assessment of the site in justification of why this land is of particular importance to the local community has been provided (paragraph 101 of the NPPF). Paragraph 102 of the NPPF sets criteria for the designation of Local Green Space which states: "designation should only be used where the green space is a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land." The owners do not consider the land known as the Craves (albeit not explicitly defined) meets any of the designation criteria set out in Paragraph 102 of the NPPF, and as such, designation as LGS would be inappropriate and contrary to national planning policy. In regard to local importance, it is accepted that a footpath	Site 22 is The Craves. The land parcel does not meet the threshold of a large tract of land. This has been considered in case law. It is understood to be considerable larger, at around 25Ha, if considered as a stand-alone factor affecting the designation of a Local Green Space. The Regulation 14 version of the CCNDP Local Green Spaces Appendix 8 contains an entry for site 22 The Craves. An explanation is provided as to the historic significance, the use by the public and the contribution the site makes to the setting of the town which was prepared by CCTC. CCTC wishes to maintain this proposed designation. Appendix 8 also contains accurate site outlines for each proposed local green space. It acknowledges the previous objections that habe been made to the proposal for designation. Notwithstanding these objections, CCTC has resolved to maintain NDP proposals to designate these sites as Local Green Spaces.

	crosses the field (Footpath 15) and there are two headland footpaths that run partially along the northern (Footpath 14) and southern (Footpath 16) boundaries but this is not reason enough for this land to be of particular importance or demonstrably special to the local community (paragraphs 101 and 102 of the NPPF) and as such, designated as LGS. The NPPG is clear that "Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation." (Paragraph: 018 Reference ID: 37-018-20140306: Revision date: 06 03 2014). In addition, the NPPG states "There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land." (Paragraph: 015 Reference ID: 37-015-20140306: Revision date: 06 03 2014). The total area of the field known as the Craves amounts to 7 acres. When considered against the immediate local context this amounts to an area of considerable size, a large area or extensive tract of land which would fail to comply with the designation criteria set out in Paragraph 102 of the NPPF. Although this land lies within the form of the settlement and not adjacent to the settlement where a LGS designation might be likened to a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.' [Paragraph: 015 Reference ID: 37-015-20140306; Revision date: 06 03 2014]. Equally, a blanket designation of the land known as the Craves would not be consistent with or appropriate as a 'back door' approach to protect this land as a strategic gap by any other name. Following this representation, if the inclusion of site reference MD05 is taken forward into the Regulation 14 Draft of the CCNDP the landowner wishes to be notified and will be making further representations throughout the process to object as the designation of site MD05 does not have regard to national policies and to advice contained in guidance issued by the Secretary of State.	
6	I agree with this list of Local Green Spaces. In particular I would especially wish to support Item 21 The Cley. This is the last piece of wild woodland in Chipping Campden and is worthy of protection for many reasons. If it were developed, the absence of this parcel of woodland would impact significantly in the environment and would be missed by the wider population of Campden.	
7	The Cley This area should be protected for wildlife and the woodland. So many small woodland areas are being destroyed and wildlife forced to flee or worse, be killed in the process of development. Having moved to the area recently and backing on to The Cley I can see what damage a housing development would bring to this small oasis for wildlife on the edge of Chipping Campden.	

8	I agree with preserving the above Local Green Spaces and in particular, would like to express my strong support for maintaining the green space named "21. The Cley". This area is not only a vital habitat for local wildlife but it also plays a crucial role in mitigating flood risks in our community. Wildlife benefits: The Cley provides essential resources such as food, shelter, and breeding ground thereby supporting biodiversity and ecological balance. Some of the wildlife we have observed there over the last few months include bats, deer, rabbits, hedgehogs, foxes, a plethora of wild birds and a variety of insects. Flood risk reduction: The Cley helps manage and control excess water runoff, preventing it from overwhelming drainage systems and causing floods. In a time when climate change is increasing the frequency and severity of weather events, maintaining a green space is more important than ever for the safety and well-being of our community. Therefore, I urge you to please consider the environmental and safety benefits of preserving this green space.	
9	I agree with this list of Local Green Spaces (as set out in Appendix 8). I would particularly wish to emphasise the importance of the description of Local Green Space 21 -The Clay on page 145 of the draft plan. This sets out very succinctly the reasons why this should be accepted as a Local Green Space.,	
10	These green spaces are all integral to both the character of Chipping Campden and in achieving the important goals for the environment and sustainability. They are valued as providing the rural setting for the town to the benefit of both residential and commercial properties. I am not an expert in Neighbourhood Planning but I hope that the evidence for each of the 22 Green Spaces has been drafted in accordance with guidance so as to ensure that they are granted.	
11	Page 141 of the document about green spaces and specifically Badgers Field (Local Green space 16). It is silent as to whether the owners have been contacted and whether we have objected. As shareholders in the Management Company of Lady Juliana's View we collectively own this local green space. We can confirm that the Directors of the Management Company had been contacted about designating this as a green space area. As shareholders, we have discussed the proposed designation, and collectively we raised no objections and support its designation. Having read the Draft CCNDP I raised this discrepancy with the Directors of our Management Company. I am informed that they did write to advise the Town Council Clerk on 13.10.2022 of our support for this designation. This omission should therefore be corrected in the final plan.	This has now been reflected in the appendix entry.
12	Areas as identified should be kept in perpetuity as green space and not be the subject of planning application and appeal and pressure to give way to support development of inappropriate property and of poor design/build quality. We have already seen local examples of dormitory towns that are soul less and that create social problems	Noted.

Question 8 – Other Matters

"Are there any land use planning matters that were not covered in the plan that you think should have been? Can you please describe what you believe was missing or in need of correction?



#	Comment	Response
1	Not necessarily land use but the inclusion of a vibrant and active folk culture should be included. The Campden Morris Dancers alive and active within the town for hundreds of years no longer exclusively a male preserve. The annual Wassail in early January is a fixed feature of the local folk tradition and though somewhat intermittent now the Campden Mummers have been active for over 100 years and for over 45 years there has been a regular Folk session which has migrated from the Bakers Arms to the Red Lion and is now firmly established on the third Tuesday of each month in the Noel Arms.	Reference added in music and literature section.
2	As above, planning approval must be supported by checks on implementation.	Not relevant to the neighbourhood plan.
3	It is not clear whether existing farm land is protected as agricultural use only or ear marked for potential development.	Land cannot be protected in that way through a neighbourhood plan. Local plan policies on development in the countryside are relevant.
4	Well done with producing this document which celebrates Campden and will be of historic interest in years to come . It is very good; however I have the following comments. Page 25. Encouraging growth of the BRI: No mention about the resultant increase in traffic (traffic jams) around Cider mill Lane Page 25. Music: Lots about the Music Festival but no mention of Campden Morris. The side has existed since the 1700's and one of the only four traditional Cotswold sides that have an unbroken history (i.e. the continuous support of Campden 'townsfolk') and a unique tradition and therefore of national importance. Page 45. Primary School(s) It is not that I am entirely opposed to the idea (the diocese may decide to close St Catherine's and a larger school would be needed) but this section is misleading and unclear. Define 'the current two sites'. Is this referring to St James' School and Ebrington School, or St James & Ebrington and St Catherine's? If the latter, why is the presumption that St Catherine's would move to the St James' site and not the other	Regarding the BRI, any expansion of the park would be subject to a wide array of technical studies which ensure it will be appropriate for the town, including with respect to transport. Reference added to Campden Morris under Music & Literature. Table 3 of the CCNDP refers to the St James & Ebrington Primary School (singular). The reference in Table 3 to future school provision relays concerns and aspirations that have emerged during the development of the CCNDP and is not a policy proposal.

	way round? Why isn't St Catherine's mentioned? There is also no mention of the adjacent nursery - some parents drop off preschool and school children. " Page 9. 3.5.2016 - Invitation to local primary schools to discuss future primary school provision". I presume this means that this policy has been developed without any discussion with the two primary schools. If so, without professional input, how can you support the statement 'children's outcomes' would be 'improved' by creating a large school? In my experience primary aged school children thrive in a smaller setting. The teachers at the secondary school will be able to tell you about the difference between the Campden children and those coming, for example, from the larger school at Moreton. St James' is already has the resources of a 'big' school as it is a multi-site federation school combining Cold Aston, Swell, Longborough, Campden and Ebrington). You really need to engage with the schools to see what they think about the idea of combining and whether they think that this would be in the best interests of the children. The "chaotic narrow streets" - Only one parent parked in Catbrook today and made the 3-minute walk to St James'. If it was really a problem the school could be encourage the parents to form their own one-way system. The biggest problem is when parents from 3 schools, workers for Campden BRI and the timing of the fortnightly bin collection coincide. How many parents drive their children to school now and how many walk? The proposed school is not a central location and, I suspect, will require almost every primary aged children to be transported by car to school. A map showing where children live would be helpful when considering schools and play provision (what is there in Berrington Road and Littleworth?). Sports Centre - lovely idea. Given the age structure of the town how much research has been done into finding out what spaces/facilities older people need? Men in Sheds - a ladies equivalent - a community centre? Perhaps I missed it. What is proposed for Cutt's Yard? This would be a good location for the Coop with parking.	
5	The draft CCNDP does comment that there is a lack of social housing that needs to be addressed. It also notes that a large proportion of the properties built over the most recent 5-year period have been larger (4+ bedrooms), with many being under-occupied per the most recent census. Drawing a distinction between market demand and need, the data indicates that more larger and fewer smaller dwellings have been built than have been needed. We note in this connection the direction of travel indicated by the proposed revisions to the Local Plan, i.e. that while acknowledging that the market demand for larger dwellings in the North Cotswolds generally is high, the focus on the building of new dwellings should nevertheless be on meeting need rather than market demand. In that context, and in our view consistent with the requirement that the CCNDP should support sustainable development, we would like to see	The comment suggests that there should be a new policy on affordable housing. No evidence has been prepared for this though it might be a useful policy. It is suggested that rather than introduce a lengthy delay in progressing the CCNDP, that this matter could rather be addressed in the review of the local plan or a review of the CCNDP. The comment suggests inclusion of a site at Aston Road as an allocation. However, no evidence has been prepared for a site allocation and this major change would require the plan

	a positive endorsement of the principle of building > 100 dwellings off Aston Road, subject to conditions. These should include: • the size and tenancy of the proposed dwellings • A firm commitment to design excellence not just compliance with the Design Guide. • Urban Planning that includes shared green spaces that are well thought through and include and benefit the whole development. • We proposed that GCC enter into a development agreement with a developer in order to retain control of the design until the development is complete. This is known to have commercial benefit as it raises the standard of design and build. • Zero carbon development, including solar panels and ground source pumps) • active flood risk management and SUDS • Focus on Active Travel in the development • Biodiversity Net Gain measures including minimising light pollution. • All public areas of the development to be adopted by GCC (and not retained by the developer) as part of the planning consent. As part of the TCS response to the consultation on the draft CCNDP we include the letter that TCS wrote to GCC in response to the consultation on the Aston the proposed. In relation to the nature and tenancy of new residential building, we would suggest, consistent with the proposed revisions to the Local Plan, that: • Any new building outside the existing Development Boundary should be 100% affordable • Any new building development of more than 10 dwellings should include 40% (calculated on the basis of gross internal area) either First Homes or homes for social rent • Viability Statements justifying non-compliance with the above should only be accepted in cases where there have been very significant and unforeseeable changes in the relevant circumstances. We understand that may mean that the relevant land is worth less than was thought, or possibly less than a Developer paid for it – that is part of a developer's risk. TCS would like to see an end to the inequitable reliance by both local councils and developers in setting up management companies for new developments. New residents are effectively forced into business relationships with their neighbours to pay for services that they already pay for in their community charge taxes. For example, the failure by the Local Authority to adopt new roads built, to pay for street lighting and other maintenance charges such as for the maintenance of green spaces. It is an inequitable situation between the services residents receive outside such developments and those within new developments when both pay the same level of Council Tax. Ultimately, if councils want new development and new housing to happen, the concomitant costs of the public services that arise from such developments needs to be factored in to Local Authority finances.	to repeat Regulation 14 consultation. It is suggested that rather than introduce a lengthy delay in progressing he CCNDP, that this matter could rather be addressed in the review of the local plan or a review of the CCNDP. The response suggests a number of major amendments to plan policy but no supporting evidence has been submitted. Again, this would require a significant revision of the CCNDP and a significant delay. It is suggested that rather than introduce a lengthy delay in progressing he CCNDP, that this matter could rather be addressed in the review of the local plan or a review of the CCNDP. The comments on the matter of management companies for large developments is not relevant because the CCNDP is not allocating land for housing.
6	A policy on housing need, type and location is lacking and should be included. Whilst there is no requirement for a CCNDP to contain policies on housing it is ill-advised for the CCNDP to be silent on this matter for the following reasons: It is plainly clear from consultation that local people want to influence the	The comment suggests that there should be a new policy on housing mix. No evidence has been prepared for this though it might be a useful policy. It is suggested that rather than

	type and location of new housing. Many local families and young (economically active) people cannot stay or move in the area because property prices are unaffordable, and the range of existing housing type acts perpetuates this issue. This is evident by an ageing population above the national average and a woeful unmet affordable housing need. Chipping Campden's is essentially becoming a retirement village. This is directly contrary to the Vision of the CCNDP which seeks to maintain a vibrant community to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents... and fails to fulfil the objective identified in the CC CCNDP To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside. The lack of housing policy fails to recognise or act upon the above the above as well as the national housing crisis, the NPPF requirement to significantly boost the supply of new homes, the fact that the 5-Year housing land supply figure is a minimum requirement, Chipping Campden is identified as a 'Principal Settlement' (Local Plan Policy DS1) wherein the needs of new housing and employment land for the District will be focused, and the District has an unmet affordable housing need. Lastly, this failure to address the matter of housing places sole reliance on strategic policies to meet housing need up until 2031. Information gathered from consultation highlights 'housing' as a key issue for local people. Therefore, it is reasonable to state that the approach taken by the draft CC CCNDP to housing (or rather lack of) is not in general conformity with strategic policies, the NPPF nor reflects the views of residents. A CCNDP should be an evidence-based document which it fails to be in regard to housing.	introduce a lengthy delay in progressing he CCNDP, that this matter could rather be addressed in the review of the local plan or a review of the CCNDP.
7	I agree with the Community Aspirations set out in Section 4.	Noted.
8	Many congratulations to those involved under the leadership of Councillor Mark Benson on producing the Neighbourhood Plan. It is a great achievement. In addition to the comments above, I have the following suggestions: 8.1 Structure of Plan Some simple re-ordering of the pages to bring together all the relevant parts of the plan under one of the stated objectives set out on pages 14 and 15 would make it easier to understand what actions are needed to achieve each objective. e.g.: Environment & Sustainability Include Pages 26-28; 48-49; 72-78 Housing Include Pages 33-36 Economy Include pages 23-25; 50-57; 60 (bullets 1-3) Design Include pages 66-71 Facilities, Services & Amenities Include pages 61-65; 79-82 Traffic & Transport Include pages 58-59; 60 (bullet 4) Pages 29-32 and 46-47 would be included under Context. Pages 37-44 would be split over the relevant objectives Each of the objectives would thus become its own "chapter" and each chapter would list: Objectives, Concerns & Aspirations, Policies, Evidence and Supporting Text. I could easily prepare a	To completely reorganise the plan as suggested would constitute a major revision and it might then become necessary to repeat Regulation 14 consultation. Suggestion will not be taken forward. However, these suggestions could be addressed in a review of the CCNDP. 8.2 The following text has been added to the Objectives supporting text: Where it is not within the power or resources of the town council itself to achieve this objective, it will encourage and support to the best of its ability all efforts by public bodies, commercial entities, individuals and others to achieve the objective.

	rough draft of how this might look. I think it would make the CCNDP much more user-friendly and meaningful. 8.2 Points not covered in the draft As stated I say in my response to question regarding Vision, I fully support the Vision but the actions needed to achieve that vision are not always clear. The objectives on pages 14 and 15 are excellent and provide some good indicators for achieving the vision but these are not always followed through in the rest of the CCNDP. Some of the objectives are left hanging without any policy or action to address them. For instance, what specifically needs to be done to achieve the objectives for Environment & Sustainability or Housing? I understand that some points of importance to the town are not included in the draft because they are outside the remit of the Town Council. If so perhaps this could be overcome with a policy such as "Where it is not within the power or resources of the town council itself to achieve this objective, it will encourage and support to the best of its ability all efforts by public bodies, commercial entities, individuals and others to achieve the objective." Bearing in mind the above, in my view, the following points should be added to the relevant chapter: 8.3 Environment and Sustainability Please see comments in response to Question 6, Policy 5 above. 8.4 Housing I find the plan remarkably light on housing considering this could have a major impact on the unique character of the town. In my view I think the following points should be included: There is no mention of the development boundary needing adjustment to take account of the developments outside it that have already been approved. This is important so as not to establish a precedent for developments outside the boundary. Support for opportunities to provide residential accommodation above commercial premises, either new builds or existing properties. When considering planning applications consider "local need" not "commercial demand". The latter is likely to be higher due to Campden being an attractive place to live or have a second home. This should apply to both affordable and open-market applications. In the past Campden has in effect provided houses for people who work elsewhere and has thus been meeting the needs of other areas. This over-building should be corrected. Identify suitable and unsuitable sites - even if only in broad terms. All significant new building developments in the town should: Be contemporaneous with infrastructure improvements to reduce congestion and strain on existing facilities; Enhance the historic significance of the town; Safeguard and enhance its status as a small working market town and ensure it does not become a dormitory, a retirement town or a theme-park tourist attraction, Be part of an overall strategy rather than piecemeal; Include restrictive covenants to avoid a proliferation of holiday lets/second homes. 8.5 Economy Previous drafts contained a number of "projects" which are no longer included and Campden Business Forum drew up a Plan for Campden in 2015/16 that included several projects, and identified six key sectors to enhance the town's	Whether or not to include policies on housing is a matter for local choice in the creation of a CCNDP based on the priorities identified through consultation and engagement. In the case of CCNDP, it does not address housing need, housing size or type, the development boundary or employment site proposals. It is suggested that a future review of the CCNDP should consider doing so.

	economy - Culture & Creative Industries; Hospitality & Tourism; Food; Education & Research; Retail; Entrepreneurship. Inclusion of these in the CCNDP would help with achieving the vision and the objectives under Economy. The CCNDP should include support for measures to create employment opportunities within the parish for residents of new, additional dwellings. The CCNDP should identify areas where employment could be encouraged e.g. the area around Campden BRI; small clean and quiet units within any large new housing developments (likely to be offices and nothing noisy); Live/Work units etc. One of the problems with retail in Campden is the relatively small size of most retail premises. Support should be given to proposals for amalgamation of premises to provide larger retail units attracting sustainable retailers. Support for the relocation of the two primary schools to a site adjoining Chipping Campden School to create an Education and Learning campus which could be broadened out to include adult courses which would enhance the town's economy. The existing primary school sites could be developed and provide additional car parking at the west of the town. 8.6 Design Please see comments in response to Question 4, Policy 3 above. 8.7 Facilities, Services & Amenities Please see comments in 8.1 Structure of Plan and response to Question 3, Policy 2 above. 8.8 Traffic and Transport There is text relating to the new school car park but I can't find anything that addresses HGVs or Signage where the Town Council submitted proposals to GCC. I think reference should be made to this submission it should be an objective to support GCC in its implementation. The Community Aspiration for a new railway station could be a two-edged sword. Whilst in theory a station for Campden could bring benefits, it could also create overwhelming pressure on housing and potentially a huge increase in new housing developments in much the same way as in Honeybourne and Moreton-in-Marsh. In addition, according to Google Maps, the site of the station would be half an hour's walk from the town centre and residents are likely to drive or take a bus to the station. If they are to do that, they might as well go to Moreton-in-Marsh or Honeybourne, thus negating a large part of any benefit to residents. 8.9 CIL Monies The fact that greater CIL grants should follow adoption of the CCNDP is to be welcomed but I would like to see indicators for appropriate uses for any future CIL monies received so that they have the support of the town as evidenced in the public consultation - rather than face the possibility of a rushed decision when they are available? This (alongside the projects proposed under Economy above) could also provide some positive and specific examples of how the vision for the town is to be achieved. 8.10 Strength of CCNDP The text in Foreword and Acknowledgements (page 5) suggests that the CCNDP has few teeth which I think downgrades its value. Whilst the third paragraph may be factually true, I understand that planners MUST take account of CCNDPs and can only go against them in extreme circumstances - and if they do go against them they have to have very good reasons for doing so	

	and must make those reasons public. I think the above wording would be preferable to the existing para 3 on page 5 and possibly include on page 5 a phrase such as "All planning applications will be assessed against this CCNDP." We seem to be setting off on the wrong foot to say that we don't expect our plan to have much effect.	
9	Yes. There is a glaring omission in not redrawing the Development Boundary of Chipping Campden, otherwise the proposals for Aston Road for example will not be allowed. I suggest that the Development Boundary should be redrawn to include within it ALL existing properties, all sites with extant planning permission, and the proposed development of Aston Road, but excluding the proposed Local Green Spaces which can appear as 'islands' within the Development Boundary.	The redrawing of a development boundary will require significant justification and agreement with the local planning authority. This would be a major change to the CCNDP and would require repeat consultation under Regulation 14. This would introduce a significant delay. Suggest that this is addressed in a review of the CCNDP or through the Cotswold Local Plan which is under review.
10	We would also like to see an end to the inequitable reliance on local councils and developers setting up management companies so that new residents are forced into business relationships with their neighbours to pay for services that they already pay for in their Community charge taxes, eq. failure by councils to adopt the new road, pay for street lighting and other maintenance charges. It is an inequitable situation when one compare the services other residents outside such developments receive having paid the same level of community charge. It is surely a matter of time before such arrangements are challenged. Ultimately if councils want new development and new housing to happen they should be prepared to pay for the communal services that arise from these; safe in the knowledge that the new residents will pay their equal share of the community charges arising from their residency.	The issue of whether management companies are appointed to manage public areas within large developments , or whether responsibility rests with the Town Council, is an important one. The CCNDP has not specifically considered this issue – CCTC will consider further this matter if and when applications come forward and there is an opportunity to engage with developers and respond to planning application proposals to CDC.
11	We would like more affordable housing to be included in any future developments. We see this as crucial to maintain our existing range of shops, restaurants and services. We also feel that the rural land surrounding the town needs to be preserved so there is plenty of pasture for the sheep and horses and arable needs required by our farmers. Finally a HUGE thank you to everyone who has been involved in producing this excellent document. A lot of time and effort which is much appreciated.	Affordable housing requirements (in terms of the proportion to be provided in developments) are set in accordance with Cotswold Local Plan policies. Future Local Plans will set out a proposed approach to the allocation of land for housing and employment. A future review of the CCNDP would be able to provide local evidence to support policies to address local housing needs in a targeted way.
12	In terms of sustainability, should we install a wind turbine on the hill behind Back Ends? if we made that three wind turbines we could possibly heat every building in Chipping Campden The owner of Glyndebourne installed a wind turbine on the hill above and has been able to provide enough electricity to power	CCNDP has not proposed to allocate sites or develop policies in support of wind turbine development. A future review of the CCNDP could examine

	the whole site plus 14 EV charging points (BBC Co.UK. The Power of Glyndebourne, 31 July 2023, still available online)	this if there is local community support for it.
13	No.	No action.
14	Private gardens are also important green spaces. Some comments should be made about their contribution to nature and biodiversity, and the impact of unsympathetic development of private gardens	There is separate planning policy within the NPPF which ensures that residential gardens are not overdeveloped (NPPF Paragraph 128). The CC Design Guide also reinforces this notion.
15	In respect of social housing - these developments should be given greater protection to ensure that younger local people can stay in Campden. Whilst some houses have Covenants in place, Housing Associations are routinely ignoring them, therefore it should be a prerequisite, before a Housing Association is appointed, that ALL Covenants are registered with the Land Registry, to ensure they are enforceable.	A future review of the CCNDP would be able to set a local (parish) connections requirement access to affordable housing. This would be supported with evidence of local housing need from a Housing Needs Assessment which would need to be undertaken for the parish.

Other Resident, Landowner and Developer Responses Received

25. A number of responses were received from residents in the form of emails and letters, which have been anonymised and due to their length, summarised. These are detailed in the table below alongside a response. The full responses are available separately to this report.

Other Resident, Landowner and Developer Comments	**Response**
Northwick Estate	
The response raises concerns regarding whether it is appropriate for the CCNDP to identify land for LRNRS and BNG.	Different concerns were raised by the LPA and the CCNDP was amended accordingly. The text is now modified to indicate that the areas identified (which the LPA supported in principle) are those which are considered optimum or ecologically-meaningful for nature recovery and improvement. Text acknowledges that landowners can decide whether or not to make their land available for this purpose. The policy requirement is for developers to consider these locations as part of the process and to demonstrate active consideration, in a hierarchy of approaches similar to that laid out in regulations. The identification of locations in Figure 16 is advisory and does not require landowners to take any action. It does however provide landowners with enhanced options to improve nature on their land for which funding is, and might in future be, available. It is argued that the approach taken in the CCNDP is consistent with the provision of local detail to support

Other Resident, Landowner and Developer Comments	Response
	LPA engagement in the development of LNRS and delivery of BNG, in accordance with planning practice guidance. PPG Paragraph: 048 Reference ID: 8-048-20250219 says 'Local Nature Recovery Strategies will identify areas where habitat creation, restoration or enhancement would be most beneficial for nature recovery and wider environmental outcomes. They can play a critical role in supporting offsite gains to be delivered in a way that maximises biodiversity benefits, when these are required to achieve a development's biodiversity gain objective. This can help to support bigger and more joined-up areas in which our wildlife can thrive. Local Nature Recovery Strategies are designed to promote the delivery of offsite biodiversity gain in the right places, where offsite provision is needed to meet the biodiversity gain condition for a development and it cannot be met in full through onsite habitat enhancements. Local planning authorities have an important role in preparing the Local Nature Recovery Strategy for their area to help identify suitable offsite biodiversity gain sites. The Local Nature Recovery Strategy can be used as a key source of information e.g. regarding strategic approaches to off-site biodiversity net gain delivery and connections to existing habitat, when local planning authorities are carrying out their functions in respect of Biodiversity Net Gain. As part of this the biodiversity hierarchy will need to be considered; the Biodiversity Net Gain planning practice guidance sets out further information on this.
The response also raises concerns about the accuracy of the data supporting the text and policy.	The data is drawn from a report issued by Gloucestershire Environmental Records Centre, included as a supporting document to the CCNDP. CCNDP text has been added to acknowledge that this report is from 2017 and so more recent data will be available. There are insufficient resources to update this information an annual basis. CCTC's view is that the data and report remain a useful picture of where the best opportunities may be to improve nature within the Parish. The policy requirement is for applicants to demonstrate active consideration of local locations identified in meeting BNG requirements where this cannot be achieved on site.
Morgan Elliot Planning representing Mackenzie Miller Homes	
The letter is promoting a site for housing development. The site is also being promoted through the local plan review.	The CCNDP is not allocating land for housing and the respondent is encouraged to continue to address this matter through the local plan review.

Other Resident, Landowner and Developer Comments	Response
	The land area under promotion does not conflict with LGS or NDHA proposals in the CCNDP. The proposer may wish to address the Town Council directly to discuss this specific proposal to determine how it may assist in delivering community aspirations. However, the site is outside the development boundary and may therefore not be supported by the town council or community. The response is well researched and will undoubtedly provide the Town Council with insights into the town's sub-regional role.
Morgan Elliot Planning representing owners of Westington Quarry (Campden House Estate)	
The representation states that the text is not clear whether the areas identified in Figure 15 are of existing ecological value or as areas to provide green corridors between areas of ecological value (2.1). The response has requested that land be deleted from the Figure and the appendix but has not stated why these sites are not good locations for nature recovery and improvement. The respondent asked for Policy 5 to be deleted in its entirety.	The text now makes it clearer what the basis for the identification of locations is and how they might play a role in delivering nature recovery and improvement in the parish. Whilst there is a request to delete land identified, CCTC has decided not to do this on the basis that the locations identified as optimum or most ecologically significant locations for nature recovery and improvement. It acknowledges data limitations (the age of the data) but reaches the broad conclusion that the locations identified are likely to remain those with the most potential. It is also acknowledged that it is up to landowners what they do with their land with respect to nature initiatives. It clearly states that development is not precluded by the CCNDP on these points. The policy requires that applicant demonstrate that they have actively considered/sought use of local locations identified where their BNG obligations cannot be met on site. As set out above in relation to the Northwick Estate response, CCTC believe that the CCNDP approach is consistent with PPG in providing local detail to contribute to LNRS development and BNG implementation.
The response raises concern regarding text wording.	The response from the LPA has led to significant changes being made to the text of the CCNDP and it is hoped that this will allay the concerns raised in this representation. The text and policy wording should assist landowners in the identified areas to create BNG opportunities and plans for their sites (including by putting them on the BNG register). The policy is means to be supportive of this aim.

Other Resident, Landowner and Developer Comments	Response
The respondent also raised concerns that the data in support of the CCNDP was from 2017 and therefore likely to be out of date.	The Northwick Estate and CDC raised a similar concern and an acknowledgement has been added to the CCNDP text as follows, *'These are based on data provided by the Gloucestershire Environmental Records Centre. It is acknowledged that the report (published in 2017) relies on data from that time and more recent data will be available, but it is considered to remain a realistic and credible representation of nature recovery and improvement potential in the area.'* The CCNDP must be based on evidence and the qualifying body secured evidence in 2017. Given the nature of the information and the lack of significant change since 2017, the data in the report is considered sufficient to allow locations to be identified as potentially optimum for local nature recovery and improvement. It is acknowledged that landowners have freedom to act in accordance with their own objectives and that the identification of the locations does not preclude development. The LRNS will add significant detail. The requirement is to show active consideration of the use of these locations where BNG obligations cannot be met onsite, to provide the best opportunity to promote for the parish BNG benefits required from developments in the parish.
Carter Jonas on behalf of the Trustees of Spring Hill Estate	
This response raises similar concerns to that of the owners of Westington Quarry with regard to identification of locations for local nature recovery and improvement.	Refer to response above
Brodie Planning Associates on behalf of William and Martin Haines	
Q1: Criticism of how the vision is worded which is deemed to be a statement rather than a vision.	No other respondents have raised this concern so it would appear that they understood the text to be a "vision" as titled. No changes made.
Q2: Suggest additional wording to Clause 3 of policy 1.	Cotswold Local Plan Policy EC8 already requires marketing of properties prior to determination of proposals for a change of use away from town centre main uses.
Q6 – the respondent claims that Policy 5 only repeats existing policy. This is not true and there is a specific local element.	Policy 5 relates to Local Nature Recovery and biodiversity Net Gain. CCTC consider that there is a clear requirement expressed in the policy based on local evidence.
Q7: objects to the inclusion of site 22 as a local green space because it represents an extensive tract of land in an attempt to preclude future	Site 22 is The Craves. The land parcel does not meet the threshold of a large tract of land. This has been considered in case law. It is understood to be

Other Resident, Landowner and Developer Comments	Response
development regardless of the landowners intentions. The land is agricultural land measuring 7 acres in size.	considerable larger, at around 25Ha, if considered as a stand-alone factor affecting the designation of a Local Green Space. Appendix 2 contains an entry for The Craves. An explanation is provided as to how this space meets the criteria which is in the historic significance, the use by the public and the contribution the site makes to the setting of the town. CCTC wishes to maintain this proposed designation.
Q8 – The respondent considers that the CCNDP should contain a policy on housing need and type. It however acknowledges that there is no requirement to do this.	The CCNDP does not allocate land for housing nor promote or anticipate housing development. This is left to the local plan to manage at a strategic level. In addition, the qualifying body does not have evidence (such as a housing needs assessment) to support a policy on housing need and type and does not wish to have a significant delay to produce such evidence when the local plan can address this.
SF Planning Ltd on behalf of the owners of lant off Aston Road, Broad Campden	
The representation is promoting a site for housing development. This site is being promoted though the local plan review.	The CCNDP is not allocating land for housing and the respondent is encouraged to continue to address this matter through the local plan review. The proposer may wish to address the Town Council directly to discuss this specific proposal to determine how it may assist in delivering community aspirations.
A separate concern was raised regarding the number and extent of local green spaces proposed as a constraint to growth. No site-specific representations were made	Noted. Each Local Green Space proposal is supported with evidence of how they meet the criteria set out in the NPPF.
SF Planning on behalf of the landowners of Springhill Industrial Estate	
The representation is promoting a site for employment development. This site is being promoted though the local plan review. The representation makes the case that the CCNDP should address and protect employment sites outside the town centre.	In relation to employment, the CCNDP focuses on the town centre not as allocations (which is proposed here) but to manage existing development over specific matters (retention of town centre uses, extent of the town centre boundary, short term holiday lets, support for additional parking) and not to allocate or protect land for employment use. Though this is possible to do in an CCNDP, consultation did not identify this as a priority.
The representation also mentions in para. 12 that the client owns some of the land identified for local nature recovery. Safety issues on the quarry face may make nature recovery difficult.	This is a long-term policy and the use of the land may change over the longer term. The policy is not directive or restrictive and so the identification of this location's potential in the CCNDP will be retained.
Morgan Elliot Planning on behalf of Pete Mackenzie	

Other Resident, Landowner and Developer Comments	Response
The representation related to proposed local green spaces 20 and 21. With regard to LGS20 The Hoo East, the ownership details regarding the site are incorrect and Mr McKenzie does not own the full extent of the site. With regard to LGS21 The Cley the land ownership details regarding the site area also incorrect. The representation from the landowner sets out justification why the sites do not meet the tests for LGS set out in the NPPF. The evidence is compelling and the sites will be removed. The LPA also objected to the inclusion of site 20 because it was an extensive tract of land.	Noted. With regard to the question of whether these sites form extensive tracts of land, it is understood that this may not be the case, purely considering their size. The two sites are divided from each other by Hoo Lane and a wide strip of development and are considered by CCTC to be of different character and are therefore different sites providing different benefits and having different significance to the local community. The value/significance of the spaces is explained in site entries for site 20 and site 21 in Appendix 6 which were prepared by CCTC. In other respects, CCTC have reviewed the comments received and have resolved not to delete these sites and maintain their proposals for designation for the reasons set out in the appendix.
The Campden Society	
Question 1 – vision Vision - Yes, TCS agree with the vision statement entirely but we would like to see the inclusion of reference to housing. So perhaps: A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings. A society working together to realise the potential of our young people, to develop our businesses, to ensure an equitable housing policy for all the residents of the town, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area.	The Vision wording has been amended. Reference to 'accessible housing for all residents' encompasses affordable housing.
Policy 1 - Town Centre We support the extension of the Town Centre boundary as proposed in the draft CCNDP. However, we are also of the view that the boundary should be extended at the other end of Town (the figure on page 97 of the CCNDP) to include the part of what is known as Cutts Yard that is not currently included, i.e. the garage building. In our view, it would be incoherent to include two separated parts of Cutts Yard but not the central connecting part. While we agree that accommodation close to or within the Town Centre well adapted for the use of the elderly would be an advantage, we do not agree that conversion of upper floors of commercial Town Centre premises is likely to provide such	Town Centre boundary is not changed further because there is insufficient justification. Policy 1 does not address flats above shops. Whilst the need to sustain the town centre all year round is discussed the supporting text (as a change) this does not require specific reference in Policy 1.

Other Resident, Landowner and Developer Comments	Response
suitable accommodation for the elderly. While the locations concerned are obviously ideal, the accesses to the upper floors of what are almost all if not all listed buildings do not lend themselves to being suitably adapted for the use of the elderly. We agree that visitor trade is important in supporting the mix and range of facilities in the Town Centre. Further, the CCNDP notes on p52 that many of the residential use Town Centre properties are short term let (e.g. Air BnB), and that if the number of such properties is allowed to grow too far (in our view, any further than the current level), that would have a very negative impact on the vitality of the Town Centre, to the detriment of the residents and visitors alike. We also note that the data on pg31 highlights the lack of privately rented accommodation (long-term lets) compared to the national average. We strongly support the suggestion made in the CCNDP that the creation of new non-services visitor accommodation throughout the area covered by the CCNDP_ (i.e. not just in the Town Centre) should be resisted. In the above context particularly, but also relevant to Policy 2, one important reference point for judging the appropriateness of a change of use application is the impact on the vibrancy (or also "vitality") of the High Street (or also "Town Centre"). Judging that impact is highly subjective unless some appropriate criteria are established. Nonetheless, short-term lets are likely to remain vacant for parts of the year. Vibrancy, in our view, should be considered throughout the year. As noted in our comments on Policy 2, in our view all applications for a change of use away from a Town Centre use should be resisted; all such changes diminish the vitality and vibrancy of the Town Centre. As noted in the draft CCNDP, it is not possible to draw strong conclusions from the results of the Parking Survey. We support the principle of finding out what are the views of residents in relation to parking. However, in our view, the process would be more successful and usable if it was in the context of the development of a wider strategy covering both transport (public and private), an active travel policy and parking in the neighbourhood. Further, the draft CCNDP suggests that the Town needs a new car park for cars and coaches. The great majority of visitors do	

Other Resident, Landowner and Developer Comments	Response
not arrive by coach, and it is not clear that it would be positive for the Town if the number that do so were to increase. Coach visitors do not remain in the town for more than a few hours and do not generally use hospitality venues and the economic benefit to the town is much less than visitors who stay overnight. We strongly support the move towards changing the existing school car park to one for general public use, while acknowledging that this will only happen in the context of the wider Aston Road development going ahead. If this does go ahead, and the provision of a new Town car park is combined with some restriction on High Street parking (e.g. short term and residents only), it is essential that particular provision is made for those who work in the various commercial and retail premises in the Town Centre to be able to use the new public car park either free of charge or at heavily discounted rates (e.g. an annual easily affordable pass).	
Policy 2 - social and community infrastructure We support both elements of the Policy as stated on page 65. Further, while we note that there are limitations in planning law on the change of use from commercial/retail to residential, the enforcement of the relevant provisions has been variable, and in our view too lenient in some cases. In our view, such changes should be resisted more strongly than is reflected in the current legal provisions, i.e. that such changes should be wholly exceptional. We recognise that this impacts the balance between the rights of individual property owners and those of the residents and other users of the neighbourhood where such property is located. That balance is not immutable – for instance, the restrictions applied to listed buildings also limit the rights of individual property owners in the interests of a wider constituency. It is appropriate in a historic town such as Chipping Campden to interfere with the balance that might apply at law. We note that the presumption under Local Plan EC8 is that it is not appropriate to move the Doctor's Surgery away from the Town Centre (recognising that the current Surgery is not within the Town Centre as defined but is close by). We are concerned that there seems to be a	Support for the policy is noted. The health practice is considered to be a Commercial Use in planning use class terms. The practice itself manages its property requirements operating in a commercial context. The CCNDP cannot have a commitment to reopening the railway station. This is already addressed in Table 3. Sustainable transport links are not included in Table 6 and Appendix 4 because they are transport infrastructure which is generally considered to be separate from social infrastructure. The CCNDP did not have a policy on sustainable transport. Though the evidence on litter bins is welcome, new micro-infrastructure will be included in the Table as this will take away the intended focus on more significant community infrastructure. No new reference will be made to a potential route for a northern link road because this should be dealt with under the local transport plan and not the CCNDP.

Other Resident, Landowner and Developer Comments	Response
presumption that a new Surgery would be part of the Aston Road development plan, although the advantages of such a move have not in our view been demonstrated to outweigh the disadvantages, in particular in relation to how patients access the Surgery. The CCNDP notes an aspiration to relocate St James's Primary School to a site off the Bratches. If that goes ahead, the vacated current school site would seem a better location for a new Surgery, being large enough and more central to the Town. Noting that the site of St James is probably Diocesan property and will therefore be subject to the constraints of disposal under Diocesan governance regarding gaining the maximum values of the asset. The re-opening of the Train Station is noted as an aspiration and supported by the Town Council and is supported by the Campden Society. We note however that the reference to such re-opening is not included in the proposed revisions to the Local Plan. This is an example of the in our view disingenuous separation of the CCNDP and the Local Transport Plan; we acknowledge this is a matter not in the power of the Town Council to rectify. However, if it is possible in the context of the regulations around the CCNDP to include more about the transport needs of the community, especially in the context of the move towards zero carbon, we would strongly urge that such comment should be included. The case for re-opening a train station at the old site outside Chipping Campden is strengthening and should perhaps be better reflected in this section under a Public Transport heading on Page 62 alongside bus- stops. It should also feature as a separate section under Public Transport in Appendix 4. The development of a railway station, and the land around this could provide a real opportunity to the economic and social development of our market town. Greater emphasis should be given in the CCNDP document for the planning and development of public transport services. There is little reference here to public transport links. There is some reference to this in the Community Concerns/Aspirations section (pages 39-42), but these are omitted in Table 6 and Appendix 4. The CCNDP shows a photograph of the Hedgehog bus (a volunteer-led initiative) but fails	

Other Resident, Landowner and Developer Comments	Response
to make any reference to the current commercial public transport bus services franchises. Nor is there any reference to the need to preserve and provide appropriate bus stop facilities within the town centre. These need to be provided and be accessible within Chipping Campden, particularly given that we are all expected to see less reliance on private car usage. The following items should be added to Table 8: • bus-stops • public footpaths • EV charging points, or potential EV charging point sites • litter bins • amenity spaces such as areas of green space such as verges, patches of green space and grassed roundabouts In addition, the potential route for a northern link road bypassing the town should also be noted so that any planned land use which prevented this potential should be rejected.	
Policy 3 – design of the built environment TCS agree that planning proposals should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed in accordance with the Building and Nature Standards Framework. However, we do not think that the draft design guide is fit for purpose and should be substantially redrafted, preferably by an Architect / Urban Planner who is familiar with the vernacular of the Cotswolds. The generic sections of the current draft design guide have been substantially cut and pasted from the National Design Guide and need to demonstrate a less boiler plate approach. TCS have commented in detail on the draft Design Guide and we attached the table of comments to this response to the draft CCNDP.	Support for the policy is noted. Comments from the Campden Society on the Draft Design Guide were passed to AECOM who took them into account in finalising the guide in later 2024.
Policy 4 – non designated heritage assets We concur with the items listed and we note that there is no clear definition of what constitutes a heritage asset. We suggest the TC draws up a Local Heritage List following Historic England Advice Note 7 or similar. The TCS also suggests that the TC	The NDHA List was drawn up with reference to the Cotswold Local Plan Policy EN12 and Table 6 page 156/157). This is explained in the CCNDP text. Local volunteers nominated the features included in the list.

Other Resident, Landowner and Developer Comments	Response
have a watching brief on any contemporary and new installations that may qualify. Here is a list of other Non-Designated Heritage Assets which we feel contribute to the unique character of the town which we would like added. This list includes already identified and numbered NDHAs where useful. Street Furniture and Environment. 1. Boot Scrapers (already nominated). 2. Shop Signs and decorative ironwork are an important part of the town's character and tradition. Apart from the 3 signs listed, many others should be included, for example, The Sparlings; Saxon House; the Kettle; the Bistro at the Cotswold House. Also the iron railings with "Humpage Snail" detail at the Town Hall and Maylam's. 4. Fire Insurance plates at Grevel House, the Silk Mill, and the Martins. 5. House lanterns, for example, along Leysbourne and outside Woolstaplers' House. 6. Brown plaques e.g. Ernest Wilson; Frank & Adeline Mottershead; FLM Griggs. 7. TCS have carried out a survey of Litter Bins and written a report which we attach to this response. We suggest that from her on in all new litter bins are of one specification as proposed and that these should then become heritage assets as well as those that currently conform to this specification. 8. The cloud hedging at Westington (Pike Cottage; Old Westington Farm; Woodroffe Cottage.) 9. The Gazebo on the Recreation Ground, (minus the timber post with plaque attached, adjacent to it, which is a hazard.) Historic Water Supply. 1. The pumps along the High Street (one already nominated). 2. The wells in the gardens of the High Street. 3. The ScuttleBrook Pool (already nominated). 4. The Cider mill Lane Trough. 5. The Trough at Rose Cottage, Westington. (The other trough at Westington is Listed.)	CCTC has resolved not to accept further nominations through the CCNDP process for NDHA that would require a change to Policy 4.

Other Resident, Landowner and Developer Comments	Response
Traditional Stone Stiles 1. Stone Slab Stiles a) Dyer's Lane / Upper Leasows b) Blind Lane / The Craves c) The Mile Drive North d) The Mile Drive South e) Buckle Street f) Briar Hill Farm, Broad Campden 2. Stone Step Stiles a) Station Rd / The Coneygree 3. Stone Animal Stiles a) Buckle Street / The Bank Wood - tbc NB All Stone Stile data taken from CPRE Stone Stiles project.	
Policy 5 – biodiversity net gain and local nature recovery We agree with the wording of Policy 5 but would add further detail. We suggest that the list of target sites suitable for biodiversity net gain complied by GWT should be supplemented with local knowledge noting opportunities for BNG in the town's natural setting including the management of grass verges and nominated Local Green Spaces; and that the LNRAs should be linked into wildlife corridors, if possible, e.g. Areas 1 & 2 should be linked along the water course of the Cam. We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature/Climate Resilient Water Management) addressing the mitigation of increasing Flood Risk in the town due to rainfall intensity due to the Climate Emergency. Any new development which doesn't fully address – and future proof - this increasing risk (including management of waste water) should be opposed. We also suggest that the importance of the remaining open ditches in the town is noted and that these should not be covered. In addition, the contribution of the nominated LGS to the town's natural flood management should be noted.	Suggestions for a more detailed and integrated approach to the identification of locations and options for nature recovery and improvement in Chipping Campden Parish linked to improved resilience and a higher quality environment in public areas is noted and this can be taken forward within the framework of the current policy. Better and more informed approaches over time can be published to augment the information already held and be used to advise and guide developers and authorities. Reference to natural flood management, design and light pollution has been included in a new paragraph. Reference is already made to the Gloucestershire local nature recovery strategy. Regarding building on floodplains, there is a clear national policy framework for this area which is strategic in nature and beyond the competence of the CCNDP.

Other Resident, Landowner and Developer Comments	Response
We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature) addressing Light Pollution in the town to the effect that any new development should guarantee it doesn't increase this pollution but instead conserves and enhances the town's natural setting and biodiversity. We suggest that the guidance is given a more practical focus. For example, ref point 2 a clear commitment not to build on flood plains or in areas where there is a known flooding risk. We note that there are no designated Gloucestershire Wildlife Trust Wildlife Sites within the list on Table 7. GWT notes 850 Local Wildlife sites on their website and we would hope that Chipping Campden could be a part of that.	
Question 6 – Local Green Spaces Policy 6 - We support the inclusion of all the Local Green Spaces included in the draft CCNDP. However, we had suggested previously that the two sites at the Sheppey should be included. The Sheppey and adjacent land demarcate the separation between Chipping Campden and Broad Campden. The land to the west of Catbrook has an almost continuous line of linear development but the land to the east including the Sheppey provides the rural separation between the two settlements. We think that it is essential to include this land as a Local Green Space to protect that demarcation.	The new site has not be considered given the lack of information.
Question 8 – anything else	Various typographical errors have been amended where justified.
The comment suggests inclusion of a site at Aston Road as an allocation.	No evidence has been prepared for a site allocation and this major change would require the plan to repeat Regulation 14 consultation. It is suggested that rather than introduce a lengthy delay in progressing he CCNDP, that this matter could rather be addressed in the review of the local plan or a review of the CCNDP.
The response suggests a number of major amendments to local plan policy	No supporting evidence has been submitted. This would require a significant revision of the CCNDP and a significant delay. It is suggested that rather than introduce a lengthy delay in progressing he CCNDP, that this matter could rather be addressed in the review of the local plan or a review of the CCNDP.
The comments on the matter of management companies for large developments is not relevant	The issue of whether management companies are appointed to manage public areas within large developments , or whether responsibility rests with the

Other Resident, Landowner and Developer Comments	Response
because the CCNDP is not allocating land for housing.	Town Council, is an important one. The CCNDP has not specifically considered this issue – CCTC will consider further this matter if and when applications come forward and there is an opportunity to engage with developers and respond to planning application proposals to CDC.
The comment suggests that there should be a new policy on affordable housing.	No evidence has been prepared for this though it might be a useful policy. It is suggested that rather than introduce a lengthy delay in progressing he CCNDP, that this matter could rather be addressed in the review of the local plan or a review of the CCNDP.
Response From Resident (JK)	
Refer to the full response for details of the comments made.	A number of points are raised: Planning documents usually contain illustrations and photos to aid understanding. No changes. The CCNDP is not linked to the town council's website and cannot make changes to the website. The CCNDP is NOT intended to be based on The Way Forward. The 2017 Regulation 14 consultation resulted in a considerable pause in work and then a redrafting which was then shared with the local planning authority in 2023. The comments were so critical that the qualifying body decided to bring in new professional and a new approach was taken forward based on policies for which some evidence has been prepared. The regulations have been followed to date. The regulations are silent on how many (abandoned) Regulation 14 consultations there may be. However, to reach Regulation 15/16 stage, a Regulation 14 consultation must have been carried out. That is the current exercise. The plan does not make policies on parking (which is for the Local Transport Plan to address) or social housing (which is being left to the local plan to address and for which there is no requirement for a CCNDP to address). The qualifying body is indeed Chipping Campden Town Council and not Andrea Pellegram. The plan is not unlawfully made (it is not made yet and will not be until an Examiner has determined that it meets its basic conditions). The qualifying body did not instruct Andrea Pellegram Ltd. to refer to The Way Forward which is now out of date. Street clutter is not something that requires planning permission and is therefore difficult to control with planning policies.

Other Resident, Landowner and Developer Comments	Response
	Parking cannot be addressed in a CCNDP and this is a matter for the Highways Authority through its Local Transport Plan, parking standards and other mechanism not relating to town planning legislation. Advertising may be included in a neighbourhood plan and this matter is left to the Design Guide and the local plan to resolve. A suggested new streetscape policy is suggested but this is too restrictive and would be almost impossible to enforce since most of the items listed do not require planning permission for their placement and are temporary in nature. This policy would not meet basic conditions and cannot therefore be included. The employment of a tree specialist by the planning authority is not a matter for the CCNDP. The CCNDP is not a place to address tree preservation orders. There are local plan policies that protect hedges. A CCNDP may contain polices on replacement trees and species however this work has not been done (no evidence) and there is also the question of which trees are now appropriate in the face of climate change. Since the evidence has not been prepared, there can be no robust policy that will meet basic conditions. This topic might be suitable for a review of the neighbourhood plan. The design guide offers considerable advice on green infrastructure and boundary treatments. Parking is not something that a neighbourhood plan can address – this is a matter for the highways authority. There was no evidence available for visitor numbers and this would have required a survey. There were no resources for this to the approach was to look at advertised Airbnb and similar accommodation as a way to illustrate the development patterns. The CCNDP cannot restrict long stay vehicles. Evidence was not gathered in the form of a call for sites and site allocation for a new car park. To do so would introduce a significant delay. The Town Council has not offered the recreation ground as a location for parking so this could not be addressed in a policy. The CCNDPD cannot set Traffic Regulation Orders to control coaches. The CCNDP does not have evidence on which areas should be predominantly residential nor does it allocate land for housing.

Other Resident, Landowner and Developer Comments	Response
	Matters of building design to meet the challenges of climate change are left to the local plan to address. Planning policies cannot easily regulate which sort of person occupies a specific building nor encourage people to move. The plan does not allocate land for housing and cannot therefore provide bungalows.
Response from Resident JC	
The response suggests the additional designation of NDHAs comprised of water pumps and memorial plaques	CCTC has resolved not to accept further nominations through the CCNDP process for NDHA that would require a change to Policy 4.
Response from Resident AC	
In relation to Policy 1, the response seeks a further extension of the town centre boundary to include e.g. the Cider mill Theatre, St James' Church, Court Barn Museum. An additional policy is suggested - along the lines of "Proposals resulting in the loss of space for economic activity will be opposed in order to protect and enhance the town's economy." I would like to see this applied throughout the town and not just the town centre. Changes to clause 4 of Policy 1 are suggested as follows - "Proposals to create a new school car park at the back of the school and make over the use of the existing school car park for the use of the public will be supported" The response suggests a Vision for Cutts Yard should be included. In relation to Policy 5 suggests widening the policy to include dark skies, key views, flood resilience and sustainable buildings. In relation to other matters, the response suggests a revision to the development boundary is needed and support for flats above shops, employment opportunities and HGV routes.	Suggestion that the town centre be extended even farther will not be included because of concerns raised by the LPA that it was to be extended to include the pharmacy. The proposal to add a new clause forbidding residential conversions cannot be included because it is permitted development. Did not reword policy 1.4 as suggested because it was overly restrictive and existing wording is more flexible. The actual design of any new car park would need to be negotiated with a planning application was prepared/considered and since this is not an allocation but only a "supportive" policy, it would not be appropriate to set requirements for a development that might not occur. Suggestion that all shops should be included but not all shops are necessary for day to day requirements and therefore do not have protection under permitted development rights. That is why they are not included. Pedestrians take precedence in planning over cars in national policy so this will be retained. Regarding suggested changes to Policy 5 on local nature recovery to include a broader range of subject matter, this would not be possible. Based on the suggestions there would be a need for new policies dark skies, flooding/resilience, key views and vistas and sustainable buildings. Supporting work has not been done to address these matters and would result in a further delay to the preparation of the CCNDP. All of Campden is beautiful so it would not be possible to set out all the views. The most important views have been identified.

Other Resident, Landowner and Developer Comments	Response
	The CCNDP does not include policies on energy efficiency and building to anticipate climate change because this is a matter already dealt with in the local plan, and because of the very sensitive historic environment constraints in the parish, would be difficult to comprehensively address in a policy without significant evidence gathering and agreement with Historic England and the planning authority. This is simply more than the CCNDP resources can withstand. NDPs are not empowered to remove permitted development rights. The resources are not available to reorder the entire plan – no other responders have suggested this. The section on community aspirations and concerns is what the CCNDP cannot address. Evidence was not gathered on housing and no allocation was made. To introduce this major change at this point would require a complete "re-do". It would be better to revisit this matter when the CCNDP is reviewed. The CCNDP did not allocate land for employment because this was already done by the local plan. The location of primary schools is outside the control of the plan and this must first be instigated by the Education Authority (GCC). It is unlikely that the CCNDP will lead to a significant increase in CIL funding because it is unlikely that there will be significant amounts of new development in the parish.

Responses from Statutory Consultees

26. The list of statutory consultees who were consulted on the Regulation 14 CCNDP is included at **Appendix B**. The following responses were received from Statutory Consultees (not including Cotswold District Council, which is in a separate table). Comments in response are set out in the table below.

Statutory Consultee Comments	Response
Thames Water	
The response is general (i.e. not specific to Chipping Campden and presumes that development will create demand for water and waste water infrastructure.	The CCNDP does not propose major development. The response does not therefore appear to be particularly relevant and no changes have been made as a result
Historic England	

Statutory Consultee Comments	Response
Confirmed that there were no significant issues upon which they wish to comment. Support expressed for Policy 3 and the Design Guide. Other advice on what might be done in addition was provided.	Suggestions were not actions because the qualifying body wishes to avoid any future delays.
Natural England	
No specific comments were offered. Appendix 1 off the response highlighted possible inclusion of environmental evidence that could be provided.	In the opinion of the qualifying body, environmental evidence has been included in the CCNDP.
Gloucestershire County Council	
Archaeology comments a) The CCNDP is criticised because it does not summarise all designated and undesignated heritage assets. b) There is a suggestion for policy 4 to refer to the historic environment and should make clear that all heritage assets should be protected. Education comments a) The response states that the plan contains proposals for additional housing. . b) The response points out that no decision has been made on whether a new primary school would be justified. Public Health comments The response suggests that there should be a new policy on active travel and encouraging more exercise. The response also suggests that there should be a housing policy (tenure and mix). Minerals and Waste - No comments	Heritage - The CCNDP does indeed show all the listed buildings, scheduled monuments and sets out non-designated heritage assets so the comment seems to be unfounded. I should be noted that Historic England did not raise these concerns. Local Plan and NPPF policies provide protection for heritage assets and do not require repeating in the CCNDP. Reference to the HER has been added to the supporting text of Policy 3. Education - The CCNDP does not contain proposals for additional housing. In relation to a new school, the response is noted but the community aspirations section is only that – community aspirations and no site allocations. No change is made as a result. Public Health - Added reference to wellbeing to the vision. Active Travel and Exercise - Though this is something that some CCNDPs may cover, in this instance, this was not a matter that was raised in public consultation as necessary for inclusion. There is no supporting evidence for this and no appetite to delay the plan to prepare a new policy that was not raised as important by the community. Housing - Again, though this is a common CCNDP policy, in this instance, and since the CCNDP does not encourage or allocate housing development, this will be left to the strategic policies of the local plan to address. No housing needs assessment has been undertaken and to do so would introduce at least a 9 month delay in the progress of the CCNDP. Though these suggestions are well intentioned and suitable for some CCNDPs, there is currently no evidence or appetite to support the evidence gathering to generate new policies on sustainable transport, healthy lifestyles or housing mix.

Response from Cotswold District Council

27. A detailed response was received from Cotswold District Council and this is set out in the table below as it was received (in full) along with a response to the comments made.

Cotswold District Council Comments	Response
CDC acknowledges the work that has been put in by the team behind this Plan and commend the team on a well presented and attractive document, which should engage residents and other stakeholders. The following comments, observations and suggested amendments have been written to try to identify either points which may not meet the Basic Conditions against which the CCNDP will be assessed, or where the wording used may be open to interpretation during the development management process. We hope these suggestions will enhance the policies and the plan and assist in moving in forward to submission and examination.	Noted.
p.14, Objectives, Environment and Sustainability. The second objective here - 'to conserve and enhance the natural setting that characterises the town' feels like it would be equally applicable to the village of Broad Campden. We would suggest a light touch review to ensure the wording is inclusive of the two settlements/parish hinterland where applicable.	Objectives have been amended to apply to the whole parish where relevant.
Picking up on this, we commend the summary information pp20-22 celebrating the distinction between the village and the town.	Noted
p.15 and beyond, reference to Cotswold Area of Outstanding Natural Beauty. The Cotswolds AONB is now formally referred to as the Cotswold National Landscape – so this paragraph and subsequent references should be updated for clarity.	References have been updated to reflect the new terminology of Cotswold National Landscape.
p.19 fig 2, p.21 fig 3, p.22 fig 4 – noting that there is explanation in the supporting text, it would be useful if a key could be added to these maps to enhance comprehension.	A key has been added.
Pp19-20 The reference to historic "features of Chipping Campden" actually refers to designated heritage assets – listed buildings, SAMs, Con Areas and the like. 'Features' is a word usually used to refer to parts of assets e.g. 'the windows form a significant feature of the listed building', so we'd suggest a rewording. This section does not cover non- designated heritage assets – some brief reflection on the positive impact of such could round out the pen picture of the town, and provide a neat 'hook' in this introduction to the focus of policy 4.	Reference has been changed to 'nationally designated heritage assets.
p.26 Final paragraph, correctly states – 'There are no special designations such as sites of scientific interest in the parish though they are immediately outside.' However, we note that there are some key wildlife sites within the parish – perhaps these could be referenced to enhance this section. Alternatively, the text could be adjusted to note that there are no nationally designated sites.	Reference to nationally designated sites included.
p.34 First paragraph, suggests that development on greenfield land is a consequence of poor use of previously developed land (PDL). We question the validity of this statement – the simple fact is that there is a limited supply of PDL within the neighbourhood area and the wider district– and much of the	Reference to lack of available PDL has been included.

Cotswold District Council Comments	Response
land that might be considered PDL does not sit in comfortable proximity to existing settlements (for example old airfields).	
p.44 Figure 8. We'd recommend a legend for this map, to be clear that these points are intended to be indicative, rather than allocative, in nature.	Legend has been added.
Policy 1: Chipping Campden Town Centre p.52, final paragraph, and clause one of the policy states that appendix 3 should be considered as a 'baseline' for Local Plan Policy EC8. We're unclear what this means in practice - where and for what purpose does Policy EC8 use a baseline?	Clause 5 of policy EC8 seeks to resist the loss of town/key centre uses according to need and subject to marketing requirements. Appendix 3 provides a survey baseline of town centre uses which can be used for reference and updated periodically to support determination of planning applications which seek to remove town/key centre main uses
p.56 Paragraph 6. The wording rather infers that Local Plan policy drives permitted development rights, rather than these rights being directed by national regulation.	Appropriate references are made to the source of PDRs throughout.
p.57, Paragraph 1 notes correctly that movement between short-term lets and principal residential use is not subject to planning control, but it may be worth noting that Government consulted last year of introducing a new use class, and recently in February issued a press release suggesting this would be taken forward. We may not see further movement on this within the formative period of the neighbourhood plan, but can expect to see progress certainly within the plan period, so a reference might be useful - Short-term lets rules to protect communities and keep homes available - GOV.UK (www.gov.uk)	Noted.
p.57, paragraph 2, final sentence. We'd suggest avoiding imperative language outside of policies - this sentence is phrased to provide direction, but doesn't have weight outside of a policy.	This has been amended to address the comment.
p.60 Policy 1, Clause 2. The adopted Local Plan Key Centre boundary has been tested through an examination in public and has been found to be justified and 'sound'. Whilst, in principle, an alteration to the town centre boundary could be made by an CCNDP, it is incorrect for Policy 1 to say that the boundary is not justified. Annex 2 of the NPPF (December 2023) provides the following definition of a town centre and main town centre uses: *Town centre: Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.*	Reference has been changed to refer to inconsistency of boundary with main uses and functionality. It is an important objective of the CCNDP to maintain a town centre which has capacity to develop main uses to support Chipping Campden as an important service centre and driver of economic growth through tourism. In that context, it is important to set the mapped extent the key centre boundary to allow for future main use development

Cotswold District Council Comments	Response
Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres. (added emphasis) *Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)* Note, main town centre uses do not include C3 dwellings. We're sympathetic to the case to protect the pharmacy. However, the pharmacy appears to be the only main town centre use within the proposed boundary extension. What's more, the pharmacy is detached from the existing town centre boundary by a number of properties in residential use and is around 80 metres from the nearest main town centre use. Grevel House, although listed, is in residential use. The recent Cotswold District Local Plan Regulation 18 consultation included a proposal to alter the Chipping Campden Key Centre boundary in the same general area that the CCNDP seeks to change the boundary (see map below). This was to incorporate Lloyds Bank and the whole of the Lygon Arms building. However, we note that planning permission was granted on 6th December 2023 to convert and extend the former Lloyds Bank building to create five dwellings (ref: 23/02678/FUL). This now adds to the number of residential properties between the core of main town centre uses and the pharmacy.  The pharmacy is classified as social and community infrastructure, as defined by Policy 2 below. It is also classified as social and community infrastructure in accordance with Local Plan Policy INF2. It therefore already has some policy protection from changes of use to alternative uses, which is the reason for extending town centre boundary.	and prevent a one-way ticket to a much-reduced centre.

Cotswold District Council Comments	Response
In summary, we do not consider the proposed extension to the town centre boundary to be consistent with the NPPF definition of a town centre. The town centre boundary must reflect the extent of the town centre that is predominantly occupied by main town centre uses. However, the proposed boundary includes a high proportion of residential uses.	
p.60 Policy 1, Clause 3. We understand the ambition, but we wonder how the test in the clause would be interpreted. How does allowing visitor accommodation damage 'vibrancy'? Visitor accommodation could easily be argued to be more vibrant than residential! We wonder whether a workable alternative might be along the lines of policies seeking to prevent overconcentration of Houses of Multiple Occupation (HMOs). There are quite a few examples, principally from university towns - Cirencester CCNDP has presented a policy at a recent Regulation 14 consultation you might wish to consider. On a point of detail, visitor accommodation, in the form of hotels, is considered already as a town centre use As observed at p.57, the planning regime currently does not currently recognise short term lets as a use class, so a rather narrow reading of 'visitor accommodation' may need to be taken. It is difficult to draft policy to take account of changes yet to come, but it may be worth expanding on the reference here either in the policy or supporting text to be clear that short term lets should be read into the definition if they are recognised as a new use class – see DLUHC press release 19 Feb 2024 - https://www.gov.uk/government/news/short-term- lets-rules-to-protect-communities-and-keep-homes-available.	Reference to use class changes (potential) has been added to text. Text has also been amended to ensure that it is clear that the focus is on Short Term Holiday Lets. Agree that Hotels are not in the same category and are a main use in key centres so would not be discouraged. Not clear how HMO policy would be used in the context of short-term holiday lets. With regard to Policy 1, Clause 3 wording in relation to 'visitor accommodation', CCTC has resolved not to accept changes to the current proposals in the policy, because main town centre uses referred to in the NPPF Annex 2 mention only hotels and the concern is related to short term holiday lets.
p.60 Policy 1, clause 4. What does 'to alleviate congestion' add to the policy? It is unclear from the current wording whether this applies to the school site and 'elsewhere', or to 'elsewhere' only. We suggestion deletion of this wording - congestion and parking capacity are two disparate issues – and providing parking may well attract traffic movement and increase, not decrease congestion.	NDP text sets out the context for clause 4 and the potential for different ways to address the provision of parking to address school parking and town centre parking capacity issues.
p.62. Table 6. The removal or installation of defibrillators isn't generally going to require a planning determination, so planning policy will rarely be an effective tool to retain these facilities. We note that the emerging Local Plan policy SD4 (3) as drafted looks to introduce a requirement on major developments to install defibrillators. Elsewhere in the table, a number of shops are identified, and a private spa facility. The nature of the commercial offer at these locations could change substantially without requiring development consent – the table can exist at a	Noted.

Cotswold District Council Comments	Response
statement of current fact, but please be aware the policy will not prevent loss of these facilities where development consent is not required.	
Policy 2: Social and community infrastructure. p.65 We support the identification of assets that could be considered under INF2. However, a number of the assets would not require development consent for the community benefit to be lost/changed. Commercial properties with a current use considered to be of community value could easily change to another commercial use - dentist, post office, Co-op, optician. It may be helpful to reflect this fully in supporting text, to manage community expectations. Please explain how this list is pertinent to EC8.	Text has been added to clarify the position with regard to defibrillators and activities within commercial sites, not requiring planning permission to change use. The current text makes clear that the EC8 would be relevant in the context of changes of use involving sites which do not meet criteria in relation to essential shops, and in relation to Listed Buildings and the Conservation Area within the Key Centre where permitted development rights are suspended.
p.65 Policy 2: Social and community Infrastructure, clause 2. What are the criteria for suitability? We already recognise this as a legitimate land use, so how does this affect any decisions? Perhaps consider - proximity to the town - to enable active travel - parking and road access, to improve access, tranquillity, retention of tree cover.	Additional criteria have been added to the section on burial plots.
p.66 Building with Nature is a benchmark for green infrastructure rather than biodiversity net gain and therefore its use will not necessarily assist in delivering BNG. It should also be noted that there is now a national GI framework prepared by Natural England, with its own design guidance. https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/ Design%20Gui de%20-%20Green%20Infrastructure%20Framework.pdf	Noted
Policy 3: Design of the built and natural environment. p.68, The intention is sound, but the wording is unclear when this requirement actually applies - we would suggest 'Planning Proposals requiring D&A…' or similar. Building with Nature is a great initiative but it is a commercial product and therefore should not be the only alternative is deciding whether GI is well-designed. Suggest change in wording to - *'Planning…and should be designed in accordance with Natural England's Green Infrastructure Planning and Design Guide and the Building with Nature standards or equivalent.'*	In relation policy 3, CCTC has resolved not to accept changes to the current proposals in the policy.
Policy 4: Non-designated Heritage Assets. p.69 The text refers to features and also assets – normally features are part of an asset. While there is no reason why some of these smaller objects such as post boxes cannot be defined as assets (designated or non-designated), it is	A new Figure 15 has been inserted to show the location of NDHA.

Cotswold District Council Comments	Response
more problematic when you get down to those small features that form part of a wider building or asset, such as a boot scraper as these have no planning control. It is somewhat confusing that the CCNDP sets out a list of criteria for NDHAs, but also refers to the criteria in the Local Plan. it would provide more consistency and robustness if the CCNDP simply used the Local Plan criteria. p.71 CDC welcomes the inclusion of an NDHA policy – it is a great way to celebrate local assets, and to seek to give them appropriate recognition in any planning determinations. However we note a lot of the features singled out are fixtures on buildings which have heritage listing already, and thus cannot be NDHAs. This means that those features /fittings are already protected by the listing - important fixtures and fittings will require LBC for their removal – as the plan recognises at p.56. This is already a higher degree of protection that an NDHA policy can confer. In addition, some modern assets have been included such as the Millennium sign and the Cotswold Way marker. Although obviously of great community importance they cannot really be considered as a NDHA. We can't see how the Plan can directly offer more protection to already listed assets, beyond their existing statutory listing, and the design guide which should help protect the wider setting, but the evidence base, cataloguing the sundials and boot scrapers could sit in the Plan to highlight these unusual features, telling the unique story of Chipping Campden, and raising awareness amongst owners and the general public that they are listed and thus protected. On that point, we commend the clear and visually appealing information shared at Appendix 6. We encourage you to provide a location map for these assets/features. This will enable all parties and particularly the LPA to be sure that these NDHAs are fully taken into account in the planning process. If they are features of non-listed buildings (and therefore not covered by the LBC regime), the removal of some of these features e.g. a boot scraper, would not be development and therefore their removal would not form part of the planning process. It may be appropriate to put those building forward as NDHAs, and identify those features specifically – it would go to the justification of their inclusion as NDHAs, and explain the particular features most worthy of preservation where possible. It would be useful to make an addition to the text that states that additional NDHAs may be identified in the future, for example through the planning process.	Text has been added to clarify features and assets. CCTC believe it is important to identify small features as NDHA that are potentially vulnerable to loss without approval. With regard to the proposed list of NDHA, CCTC therefore wishes to maintain the current proposals.
p.72 This will have to be updated to reflect the implementation of the Environment Act and also ongoing work on the Gloucestershire Local Nature recovery Strategy. The text states that 10% BNG applies to all development – this is not strictly correct, there are several exemptions, for example householder applications. The text is slightly confusing in places – is the CCNDP providing information that is being fed into the countywide LNRS or putting forward a nature recovery strategy of its own? There are already nature recovery plans for the Cotswolds National Landscape and the Cotswold Water Park, so there is no	Suggested text changes have been included alongside other amendments to address the points raised.

Cotswold District Council Comments	Response
reason why a parish level nature recovery plan is not appropriate, noting that it should definitely feed into the county-wide work. We suggest it would be better not to call it a 'nature recovery strategy' as that may create confusion with the county level work. There is a lot of detail here, for example it may not be necessary to mention the national guidance particularly given its focus on local nature recovery strategies rather than local nature recovery per se. We suggest some changes to the text below: The Environment Act also introduced Local Nature Recovery Strategies (LNRS). These ~~National guidance on local nature recovery (LNR) was issued by DEFRA on 23 March 2023 and continues to be provided in advice notes and other materials. Local nature recovery strategies~~ are a nationwide system of spatial strategies to help reverse the decline of biodiversity. ~~There will be approximately 50 strategy areas covering the whole of England with no gaps or overlaps. Preparation of each strategy will be locally led by a 'responsible authority', in this case~~ Gloucestershire County Council (GCC), as the "responsible authority" is preparing the Gloucestershire LNRS, and has commissioned the Gloucestershire Local Nature Partnership to assist with this work. ~~will be working with Gloucestershire Wildlife Trust (GWT) and the Gloucestershire Environmental Records Centre to deliver the LNR for Chipping Campden~~. As the responsible authority, GCC ~~will be~~ is required to work collaboratively with other local organisations including parish councils with input encouraged from across the public, private and voluntary sectors to establish shared proposals for what action should be taken and where. ~~In this case,~~ the CCNDP is setting out a series of sites (fig 15), which are the optimum locations within the parish to deliver nature recovery, because either they are already important for biodiversity in their own right, for their ecological connectivity function or because they have good potential to increase in biodiversity value or connectivity. These are based on data provided by the Gloucestershire Wildlife Trust. (appendix 7) a ~~local land use strategy for inclusion in the wider LNR~~ ~~strategy when that is prepared. Section 106 of the Environment Act 2021 requires that all local nature recovery strategies must contain a statement of biodiversity priorities and local habitat map and lists what both must include. In this case, the LNR strategy has not been prepared and in anticipation, the Town Council has commissioned the Gloucestershire Wildlife Trust, to prepare maps of habitats and ecological data for local input into the preparation of the LNR, probably as part of the local habitat map for Gloucestershire. The~~	-

Cotswold District Council Comments	Response
~~Environment Act 2021 requires that all~~ ~~statements of biodiversity priorities set out: • a description of the strategy area and its biodiversity • a description of the opportunities for recovering or enhancing biodiversity in the strategy areas • the priorities for recovering or enhancing biodiversity • proposals as to potential measures relating to those priorities The~~ ~~strategy area The strategy area is the neighbourhood area.~~ Appendix 7 provides detailed habitat maps describing the local baseline which is being put forward for inclusion ~~may be included~~ in the ~~LNR strategy for~~ Gloucestershire LNRS. ~~The maps show areas of particular importance for biodiversity, either because of their existing designations, they are locally important or have potential for improvement. Figure 15 shows potential areas of importance.~~	
p.74 paragraph 4. It is not clear if the map at fig 15 is simply showing all the areas that are included within the relevant appendix. Might be helpful to distinguish between areas that are of existing ecological value and those that would be suitable for enhancement.	Text clarified to make clear this is all the sites which are addressed in Appendix 7 cross referenced to existing habitats identified in Appendix 2.
p.75 paragraph 1. It is not clear why there is a reference to planning permission - It is not necessary at the application stage (or at determination of the application) for the applicant to be completely clear where they will deliver their BNG –they can simply say that it will be delivered off site, although the LPA are encouraging applicants to provide as much information as possible. BNG delivery will not be limited to the Gloucestershire Nature and Climate Fund. These paragraphs need re-working to make them clearer. Is the CCNDP the appropriate place to set out areas that the local community want to put forward for inclusion in the county wide LNRS? It is very valuable information but we wonder whether it should be in the CCNDP – given that it needs to be taken forward through other avenues. We suggest re-wording: Opportunities and priorities for recovering and enhancing biodiversity Not only should the sites identified on figure 15 be included within the Gloucestershire LNRS but they also provide the most ecologically meaningful local locations for any off-site Biodiversity net gain that arises from development within the Parish to be located. ~~DEFRA advice is that some changes in land use or management may require a separate consent before they can be undertaken, such as planning permission. Responsible authorities do not need the relevant consents to be in place before including areas that could become of particular importance in their local habitat map. It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed to be finally determined at planning application stage, when the details of a specific proposal can be fully explored. DEFRA guidance states that the priorities~~	Text amendments have been incorporated and added to address the points raised.

Cotswold District Council Comments	Response
~~identified by every local nature recovery strategy should reflect local circumstances, including the most important issues to local people and organisations. The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy. Figure 15 and the more detailed evidence in Appendix 2 and Appendix 7 shows that there are already existing habitats that could benefit from protection and improvement, marked 1-13.~~ Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each of the locations identified in fig 15.~~area~~. It is important to note that identification as a local nature recovery area on figure 15 does not preclude development. Existing land use policies will remain in place. The delivery of off-site BNG at these nature recovery areas could be via the Gloucestershire Nature and Climate Fund or other mechanisms. However there are also other sources of funding that could support nature recovery, for example ~~What will change however is that the identified sites will be put forward as local nature recovery strategy options. It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund1 ,~~ agri-environment schemes ~~or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund.~~	
p.78. Policy 5: Environment and Biodiversity Net Gain Noting the extensive comment on the Reasoned Justification, please be assured that we welcome the ambition in this policy - and the intention to wrestle with this issue. We haven't had other CCNDPs in our area pick this up this extent, so we're keen to help you make the most of this. The first section of the policy as drafted is not a land use policy, as it is simply stating that these areas will be put forward as suggestions for inclusion in the county wide LNRS – and indeed they may or may not be included in the final LNRS, dependent on a range of evidence. It is also important to bear in mind that even where areas are identified in the LNRS they are not necessarily where off-site BNG will happen. They are likely to affect the BNG scores by providing strategic significance multipliers but that does not force the BNG to those locations. Strategic significance multipliers for Gloucestershire are set out in our BNG guidance - https://www.cotswold.gov.uk/planning-and-building/wildlife-and-biodiversity/biodiversity-net-gain-bng/ That said, we aren't convinced that it is within the legal purview of a neighbourhood plan to designate land as a Local Nature Recovery area - these areas will be designated in the Local Nature Recovery Strategy – if that is what they end up being called in the strategy, which isn't a district level planning function. That document should take account of parish views and the evidence base, so we think the evidence and intention can absolutely be presented in the CCNDP, but we aren't convinced that this clause can go forward as policy. 'Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows:	CCTC has resolved not to accept changes to the current proposals in the policy.

Cotswold District Council Comments	Response
(a) Contact Cotswold District Council to determine whether work has been done towards the preparation of the Gloucestershire Local Nature Recovery Strategy regarding the proposal site, its relationship with the Gloucestershire Local Nature Recovery map, and seek advice on how best to deliver local nature recovery and biodiversity net gain within that context.' This is not policy, so much as explanatory text. A Local Planning Authority could not refuse an application because the applicant had not done this. We'd suggest you move this to the supporting text. (b) Where biodiversity net gain cannot be delivered on site, applicants must work with Cotswold District Council to identify ways that off-site biodiversity net gain can be delivered in Chipping Campden Parish. We suggest a rewording, to make sure this is a test to be satisfied at the time of planning determination – something along the lines of "Where BNG cannot be delivered on the development site, off-site BNG should be delivered within Chipping Campden Parish unless sufficient justification is provided to show that this is not possible." There is a risk that this policy will not meet the Government guidance, as the BNG metric already includes a factor for proximity to the development site. This point notwithstanding, we believe it is an appropriate policy issue for an CCNDP, and we have tried to emphasise this issue in the Local Plan Reg. 18 consultation biodiversity policies - Off-site BNG should be delivered in locations that contribute to the Gloucestershire Nature Recovery Network and that are as close to the development site as possible. (c) Where off-site biodiversity gain is proposed, this should be focused on the nature recovery areas shown in Figure 15 or the Gloucestershire Local Nature Recovery Map. Perhaps absorb this into the policy above – "Where BNG cannot be delivered on the development site, off-site BNG should be delivered within the Chipping Campden Local Nature Recovery Areas as the first option or elsewhere within Chipping Campden Parish or in locations that contribute to the Gloucestershire Local Nature Recovery Strategy unless sufficient justification is provided to show that this is not possible. (d) Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary. That is not required as it forms part of the legal requirements for BNG anyway (e) Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered. That is implicit – BNG is a requirement, and the policy already stresses the preference for 'on-site' or local and is also covered in the clauses above.	

Cotswold District Council Comments	Response
(f) Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery. That is not required, you cannot deliver off-site BNG unless the landowner is partner to that process so this clause is not necessary.	
Policy 6: Local Green Spaces p.82, and Appendix 8. This is a relatively large number of sites, which collectively may be considered to almost encircle the town and constrain growth - which may undermine the process. We note that a number of sites are already subject to constraints making development challenging - for example development on the Bratches Allotments, Bowling Green and Cricket pitch would require alternative provision to be made, so amenity is protected already. You may wish to consider and articulate the extent to which these sites are demonstrably special, beyond this amenity value. Sites 19 and 20, individually and together are large tracts of land on the periphery of the town, without extensive formal access rights, and subdivided by a number of field boundaries. NPPF para 106 c) requires that an LGS is 'local in character and is not an extensive tract of land'. Typically, sites which are primarily agricultural in nature require a strong justification to meet the NPPF criteria. Please see Planning Practice Guidance, Paragraph: 011 Reference ID: 37-011-20140306 and Paragraph: 015 Reference ID: 37-015- 20140306, https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public- rights-of-way-and-local-green-space. We would strongly encourage you to ensure site owners are aware of these proposal – the onus is upon the qualifying body to consult with the site owners – and examiners have upon occasion sought confirmation of this. Paragraph: 019 Reference ID: 37-019-20140306 https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of- way-and-local-green-space There are a few sites where ownership appears uncertain - predominantly these are the smaller verges and informal public open space. We do not object to their inclusion but note that given their important function within the townscape/conservation areas, there's little risk to these sites from development.	Comments made in relation to Consultation with Landowners – Consultation with landowners of land proposed for LGS designation is set out as a separate section of this consultation report. Comments in relation to the additional value to the community of sites already subject to some protection for their amenity value - Whilst the sites referred to have some protection related to their current use, NPPF and Local Plan policies would allow for these to end subject to tests on the need for that provision, the availability of alternatives or the potential for replacement in another location. The LGS 'additional' value is in the openness of the sites *combined with* their use, such that, for example, people do not need to be playing or watching cricket to value and enjoy (and have a community resonance with) the cricket ground as a set piece of open land. In this context CCTC wishes to maintain the relevant proposals for LGS designation. See PPG Paragraph: 013 Reference ID: 37-013-20140306 Comment on smaller parcels of incidental land – Noted. Comments on Large Tract of Land – PPG does not specify a limit on the area of land which can be designated for LGS.

Cotswold District Council Comments	Response
	However, it is understood that planning case law has determined this to be about 25ha. Neither site 16Ha) nor site 20 (18Ha) reach this limit. Appendix 6 describes the features of each site and explains the context for wishing to designate the sites as LGS. In this context, CCTC has resolved not sustain its proposals.
Appendix 2 These maps are not easy to read even when zoomed. The maps are dated 2017 - information of this type is being constantly updated so it is highly likely that if this map was requested again that it would be different. Noting the challenge of trying to reference data that is regular updated, one option might be to acknowledge that the map is likely to be out of date / become outdated, and to be clear that the data will change over time.	Acknowledgement of the date of publication and potential for newer information to be available has been included where Appendix 2 is mentioned in the CCNDP.
Chipping Campden Design Guide p.5. We note that the Design Guide references MHCLG as the sponsoring Government department. MHCLG was rebranded as DLUHC, the Department for Levelling Up, Homes and Communities in 2021.	
p.9. The national design guide is no longer a draft. We would expect to see reference to the National GI Framework prepared by Natural England, with its own design guidance. https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design%20Gui de%20-%20Green%20Infrastructure%20Framework.pdf We encourage you to add web references for all this documents to make access easier.	
p.13. As per our comment on the main CCNDP document, please change AONB references to National Landscape. The design guide seems very focused on architectural design, rather than landscape/ecological etc design.	
p.43. We would encourage some consideration of decarbonisation as well as energy efficiency.	
p.40. We wonder if the photos are all meant to be exemplars, or simply examples of particular design features – e.g. the stone mullion windows in the photo on this page are not great. There are other examples where the images do not show necessarily show great design but are illustrative. Perhaps there is some scope to reflect this nuance in the picture referencing, to encourage developers to respond to context and the direction of the design guide, and improve on current practice, rather than replicate the acceptable.	

Appendix A:

Regulation 14 (2024) Consultation Responses

STATUTORY CONSULTEES

Respondents

1. Thames Water
2. Historic England
3. Natural England
4. Gloucestershire County Council

David Wilson
E: david.wilson@thamewater.co.uk
M: +44 (0) 7747 647031

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

Chipping Campden Town Council

Issued via email: clerk1@chippingcampden-tc.gov.uk

15 May 2024

West Oxfordshire – Chipping Campden Neighbourhood Plan

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for West Oxfordshire and are hence a **"specific consultation body"** in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

General Water and Wastewater Infrastructure Comments

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: "*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for… infrastructure for waste management, water supply, wastewater…*"

Paragraph 11 states: "*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*
a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

Paragraph 28 relates to non-strategic policies and states: "*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure…*"

Paragraph 26 of the revised NPPF goes on to state: *"Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production*

of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary…."

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *"Adequate water and wastewater infrastructure is needed to support sustainable development"* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity

In light of the above comments and Government guidance we agree that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Sustainable Development - Water Efficiency/Sustainable Design

We support the reference to water efficiency, but consider that this needs to be strengthened to ensure best results.

The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future

pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
https://www.thameswater.co.uk/Be-water-smart

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:
"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."

Comments in Relation to Flood Risk and Sustainable Drainage Systems

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to

reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan "***It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding***."

Site Allocations

There are no new allocations in the draft Neighbourhood Plan and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What water supply requirements are required on and off site
- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated

Upgrades to the Thames Water infrastructure should not be underestimated. It can take 18 months to 3 years or local upgrades, 3-5 years for more strategic ones and up to 10 years for Sewage treatment works.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,

David Wilson
Thames Water Property Town Planner

Historic England

From: "Stuart, David" <David.Stuart@HistoricEngland.org.uk>
Sent: Thursday, 30 May, 2024 5:04pm
To: "clerk1@chippingcampden-tc.gov.uk" <clerk1@chippingcampden-tc.gov.uk>
Cc: "Neighbourhood Planning" <Neighbourhood.Planning@cotswold.gov.uk>
Subject: Chipping Campden Neighbourhood Plan - Regulation 14 consultation

Dear Dawn

I write following up your exchange of communication with my colleague Stephen Miles below.

The recently ended consultation on the draft Neighbourhood Plan for Chipping Campden came to our attention a short while ago and so we sought to enquire whether this was an exercise which we needed to be formally involved in.

Having looked at the Plan's website we note that although not specifically referred to as a Regulation 14 consultation, reference is made to the pre-submission stage which the Plan has reached, and that comments made will be used to revise the Plan as appropriate prior to its submission to Cotswold District Council for Examination.

It is for the relevant community to exercise discretion in determining whether the interests of Historic England are likely to be affected by the policies and proposals which the Plan aspires to, and to decide whether or not to consult us accordingly. At the same time, our experience has shown that Examiners can sometimes be a little twitchy on learning that the statutory agencies have not been consulted at the formal consultation stages in a Plan's preparation, and have been known to ask for us to be consulted during the Examination process, obviously causing undesirable extra work and delay.

In the case of the Chipping Campden Plan, we did have sight of an advanced draft of the Plan as part of the District Council's consultation on the associated SEA Screening in February this year. At that time we identified that there were no headline issues which we wished to flag up, nor were there likely to be matters upon which we would be likely to wish to comment on assuming the Plan went forward essentially unchanged.

Having now considered the version of the Plan which formed the basis of the recent consultation I can confirm that there are indeed no significant issues associated with the Plan upon which we wish to comment. We note its limited schedule of policies but that these are ably developed and supported by a detailed understanding of the town and its context, and especially its unique historic character.

We are therefore pleased to observe the complimentary production of the Design Code referred to in Policy 3 on Design and again in Appendix 5. This should help enormously in ensuring that new development does conserve and enhance the town's unique townscape, the desirability of which is highlighted on p38 which sets out issues which earlier community consultation identified.

That feedback also identified the need for a Community Design Statement. It is not clear whether the Design Code recently produced is meant to address this need entirely. P38 also refers to the importance of the townscape not being spoiled by inappropriate uses which can affect the area's attraction to tourists and damage the local economy. There may therefore be an opportunity to consider whether there are other local issues, such as public realm design and management for example, which could also benefit from locally informed and tailored policy or guidance.

In the context of the Neighbourhood Plan this of course is a matter entirely for the discretion of your community.

Otherwise, we would only want to congratulate your community on its Plan, and wish it well in the subsequent stages to getting it made.

Kind regards

David

David Stuart | Historic Places Adviser

I now work only 2 days a week, usually Tuesdays and Wednesdays

Historic England | South West
1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ
Direct Line: 0117 975 0680 | Mobile: 0797 924 0316
https://historicengland.org.uk/southwest



Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
Follow us: Facebook | Twitter | Instagram. Sign up to our newsletter.

Date: 20 May 2024
Our ref: 472459
Your ref: Chipping Camden Neighbourhood Plan

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Chipping Campden Town Council

BY EMAIL ONLY
Clerk1@chippgcamden-tc.gov.uk

Dear Sir/Madam

Chipping Campden Neighbourhood Plan - Regulation 14 Consultation

Thank you for your consultation on the above dated 06 April 2024.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here[2]. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here[3].

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic[4] website and also from the LandIS website[5], which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework[6] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[7] sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

[1] http://magic.defra.gov.uk/
[2] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[3] https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making
[4] http://magic.defra.gov.uk/
[5] http://www.landis.org.uk/index.cfm
[6] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[7] http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here[8]), such as Sites of Special Scientific Interest or Ancient woodland[9]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here [10]) or protected species. To help you do this, Natural England has produced advice here[11] to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land [12].

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance[13]).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

[8] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[9] https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences
[10] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[11] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals
[12] https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land
[13] https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory Biodiversity Metric and is available as a beta test version.

Gloucestershire COUNTY COUNCIL

To: Chipping Campden Town Council

Economy, Environment and Infrastructure
Shire Hall
Westgate Street
Gloucester, GL1 2TG

Email: Asra.Bala@gloucestershire.gov.uk
Phone: 07422541595

Our Ref: **Your Ref:** ABCCNDP **Date:** 20/05/2024

Dear Sir/Madam,

Chipping Campden Neighbourhood Development Plan

Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following officer comments to make.

Archaeology comments:

The Chipping Campden Neighbourhood Development Plan should follow guidance as set by Historic England guidance on the Historic Environment and Neighbourhood Planning https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/. We recommend that a more comprehensive section is incorporated on the Historic Environment using the HER data as a baseline which includes a summary of all the designated and non-designated heritage assets (including those with archaeological interest). The HER team can provide more information and maps if required and can be contacted at her@gloucestershire.gov.uk.

In particular, we suggest Policy 4 should refer to the Historic Environment and make clear that the policy should refer to protection and enhancement of all heritage assets and not just the non-designated ones which have been identified in policy 4. It should make clear the hierarchy of protection for the historic environment i.e. those nationally protected such as the listed buildings mentioned but also Scheduled Monument titled "Campden House, formal Garden and associated Medieval cultivation earthworks" (National Heritage List for England no. 1013875) and the Grade II registered Park and Garden "Spring Hill House" (National Heritage List for England no. 1000896). It should recognise that archaeological remains can also be regarded as heritage assets.

Education Comments:

The NDP contains proposals for additional housing in Chipping Campden. A site has been reserved for a new primary school as part of the development to meet the additional demand forecast from new residents. The Community Aspirations section 4d on page 43 of the NDP refers to a 'Replacement Primary School'. However, no decision has been considered by GCC at this stage on whether any new school

would replace existing schools or would be provided in addition to them. Any future decision on this matter would depend upon the total expected demand for school places from new development in the area, and whether funding contributions from the housing developments would be sufficient to re-provide existing school places as well as providing additional places at the new site.

Public Health Comments:

The Public Health and Communities Team at Gloucestershire County Council welcomes the opportunity to comment on the Chipping Campden Neighbourhood Development Plan (the Plan) and the draft policies, on matters specific to the health and wellbeing of residents that live, work, and take their enjoyment in the area.

Reflecting on the Plan's consultation processes over the course of the last 10 years (2013-2023), it is worth noting that all plan-makers have experienced significant changes during this time that have had a profound impact on shaping our local communities in Gloucestershire. In acknowledging this, the wider determinants of health, such as economic development, employment, and our built and natural environment are brought ever-more into focus, and place-making affords an opportunity for a 'right first time' approach to embed primary interventions to improve health and well-being into planning and neighbourhood development.

In response to this, we would welcome a more specific reference to 'health and wellbeing' within the Plan's vision and objectives. Whilst objectives around the challenges of environment, housing, transport and the economy imply that these themes have an impact in supporting good health, an explicit focus on this throughout the Plan would raise the profile and highlight the importance of healthy place-making. Plan makers may be aware that the Cotswold Local Plan has recently been consulted on and it may be of benefit to plan-makers to draw links to this plan and in particular the focus on embedding health and well-being across policy making. This is apparent in policies H4 Specialist Accommodation for Older People, INF7 Green Infrastructure, and INF3 Sustainable Transport within the Cotswold Local Plan.

In response to Policy 1 we note the desire from residents to improve facilities for car parking and to also improve facilities and safety for cyclists and pedestrians. We would emphasise a well-know message concerning wider determinants of health, - it has been estimated that socio-economic and physical environments determine 60% of health outcomes[1] and transport systems and the wider built environment across the plan area will play a crucial role in either promoting or hindering physical activity. As a nation we are around 20% less active now than in the 1960s. If the current trend continues, we will be 35% less active by 2030. The health benefits of physical activity are well understood and can reduce your chance of type two diabetes (up to 40%), cardiovascular disease (35%) and joint and back pain (25%) Physical activity guidelines: UK Chief Medical Officers' report - GOV.UK (www.gov.uk) For further information on help to get communities and individuals more active, please see We Can Move - Inspiring People To Get Active - Health and Wellbeing. We Can Move is a social movement of people committed to getting Gloucestershire physically active. Organisations, community groups, activity providers and individuals work together to help others get active. Providing the operational and physical improvements to the

infrastructure for new schools and workplaces that reduce speeds and potential conflicts with motor vehicle traffic, and establish safer and fully accessible crossings, walkways, trails and bikeways, provides the opportunity to get people out of the car, improve their health and aid the push towards net zero.

Furthermore, the propensity to walk and cycle has the potential to contribute to an improving picture of air quality across the plan area. Air pollution has negative effects on health throughout the life course, from pre-birth to old age. The plan should look to set out purposeful policies based around sustainability that should contribute to improving the air we breathe. This could include exploring infrastructure for electric cars within the plan area. Our children are especially vulnerable to dirty air. There is a strong link between air pollution and the worsening of asthma symptoms, and it also plays a part in causing asthma in some. Among children with asthma, those exposed to higher levels of air pollution suffer more frequent chronic respiratory symptoms. Research has shown that nursery and primary school children can be exposed to as much as 30% more pollution as a result of being smaller and closer to exhaust fumes when walking along busy roads, compared to adults[2]. Designing-in the 'habit for movement', drives further co-benefits to health including, reduced non-communicable diseases burden (cardiovascular and respiratory disease), injuries, and better mental health.

We welcome the Plan's intent to ensure community access to health services, sports and leisure facilities, amenities and green infrastructure. Policies 5 & 6 highlight the local nature recovery areas, local green spaces, play areas, gardens and parks and allotments within the Plan area. Again, with such valuable assets, specific reference to both the physical and mental health benefits of these facilities and community infrastructure should be detailed. Giving consideration to high quality green and blue infrastructure across all stages of plan-making and development will support the improvement of health and wellbeing and build a sense of community and place. We encourage plan makers, if they are unfamiliar, to consider the incorporation of the Building with Nature Framework - Planners — Building with Nature. The Office for Heath Improvement and Disparities (OHID), Active Travel England and Sport England have produced an update of the Active Design guidance - Active Design | Sport England This guidance will support plan policies, structure and assist with developing master plans, pre-application discussions and support the wider public health, climate and biodiversity discussions. The National_design_guide.pdf (publishing.service.gov.uk) and the National Model Design Code and Guidance Notes for Design Codes illustrate how well-designed places that are healthy, greener, enduring and successful can be achieved in practice.

Noting the Plan's objectives concerning housing supply, it would be strengthened further by acknowledging the changing needs of housing over a life course and ensuring that mix and tenure of housing provision will provide high standards of affordable, accessible dwellings, and that accessibility to the local facilities is a primary consideration. The importance of accessible housing design cannot be overstated - impacting individuals with disabilities and health challenges, but also the wider systems in society including adult social care and the NHS. Improving and maintaining the health of older adults is a strong social responsibility and the Chief Medical Officer's annual report 2023; Health in an aging society Chief Medical Officer's annual report 2023: health in an ageing society - GOV.UK (www.gov.uk)

underlines the geography of older age in the UK. The report makes it clear that the increase in an aging population will be in our rural and semi-rural areas. This should be a key area of focus for plan makers in the Cotswolds. The district has seen the 2nd highest population growth out of Gloucestershire's six districts and has the highest % of 65+ year olds (out of Gloucestershire's 6 districts) 2021 Census (gloucestershire.gov.uk). In addition, the Plan is clear that the shortage in available social housing needs to be addressed. It is worth noting that evidence suggests that 54 % of social housing tenants have a long term disability nationally, HOUSING-ASSOCIATIONS-AND-HOME-ADAPTATIONS-small.pdf (foundations.uk.com). Only 9% of housing nationally has 4 basic features of accessibility 2018-19_EHS_Adaptations_and_Accessability_Fact_Sheet.pdf (publishing.service.gov.uk).

Staying with housing, the plan cites that *'household composition is dominated by one person households (35%)'* and although the general health of occupants is good (83% in either good health or very good health (Census 2021 www.ons.gov.uk/visualisations/customprofiles/build), social isolation and loneliness can affect older people in particular, and is harmful to heath. The Cotswold Local Plan captures the challenges in this area - *'research shows the effects of loneliness/isolation increases the risk of high blood pressure, being more prone to depression, and leads to a 64% increased chance of developing clinical dementia. Social isolation causes 43% of social referrals in South Cotswolds'* (SD4 (5a.4.20). Plan makers may wish, if not already, to familiarise themselves with the 2022 Director of Public Health annual Report for Gloucestershire; *No person is an island; Social connections in Gloucestershire* annual-public-health-report-2022_23.pdf (gloucestershire.gov.uk). The report highlights both the power of social connections but also the challenges, many of which are experienced by those living in rural areas across Gloucestershire. Crucially, it sharpens a focus on the work being done to tackle social isolation and the responsibility we all share in supporting those most in need. Using national studies, it was calculated that around 6,000 older people in Gloucestershire feel lonely always or often. This also underlines the importance of considering how communities create opportunities for social connections across the life course. A local survey reveals that 5% of social care service users aged 65+ had little social contact with people and felt isolated, and a further 15% had some social contact but not enough Summary (gloucestershire.gov.uk).

Minerals & Waste Comments:

M&W officers have reviewed the consultation information and have no further comments to make.

If you have any questions on the matters discussed above or require any further information, please do not hesitate to contact me. We look forward to future engagement on this Plan.

Yours faithfully,
Asra Bala

Business Apprentice (Planning)
Economy & Strategic Planning

LANDOWNERS

Respondents

1. Northwick Estate
2. Morgan Elliot Planning representing Mackenize Miller Homes
3. Morgan Elliot Planning representing owners of Westington Quarry
4. Carter Jonas on behalf of the Trustees of Spring Hill Estate
5. Brodie Planning Associates on behalf of William and Martin Haines
6. SF Planning Ltd on behalf of on behalf of the owners of land off Aston Road, Broad Campden, GL55 6WB
7. SPF Planning Ltd on behalf of landowner interests at Springhill Industrial Estate
8. Morgan Elliot Planning for Pete Mackenzie

NORTHWICK ESTATE

UPTON WOLD
MORETON-IN-MARSH
GLOUCESTERSHIRE
GL56 9TR

Telephone: 01386 700667

22 May 2024

Representation to the Chipping Campden Neighbourhood Development Plan ("CCNDP")

This representation is submitted by Northwick Estate, Upton Wold, Moreton, Glos, GL56 9TR. The estate owners have lived full time on the estate for over 50 years and are generally supportive of the contents of the CCNDP. However, we are deeply concerned by and object to the degree to which the CCNDP document seeks to identify sites for Local Nature Recovery Strategies ("LNRS") and sites for Biodiversity Net Gain ("BNG"). We do not believe that this is appropriate document for identifying sites for LNRS or 'receptor' sites for BNG. In our view, it is Gloucestershire County Council ("GCC") who are the responsible authority for preparing the LNRS.

The authors also list in the consultation section "meetings with various landowners 30.8.2014 – 22.9.2015". We are not aware of any approach or meeting having taken place and therefore object to the inclusion of Northwick Estate land in the LNRS as a misrepresentation until there has been direct and formal engagement after which the implications can be determined.

BNG has become a valuable income stream for rural estates in future years as other support payments fall away and developers or others need to demonstrate BNG as part of the conditionality to planning. This is a complex and immature market with long term commitments required. We are concerned by the influence the CCNDP will have as a statutory development plan document in the market for BNG units and believe that it is not a suitable vehicle to identify such sites. We therefore believe the mention of BNG should be removed from the CCNDP since it is a strategic policy at the national planning level and under the Environment Act 2021, the Town & Country Planning Act 1990 and associated regulations and guidance it is not appropriate for neighbourhood plans to include strategic land use strategy or policies.

Appendix 2 on page 91 identifies "rare and protected species locations" but lacks any detail as to what these actually are or precisely where they can or have been found. An additional note states that they could be anywhere within a 1km square grid and may also represent a single siting identified up to seven years ago. We think the red stars on the map are therefore fairly meaningless and should be removed.

I hope these points are clear so the plan can be amended accordingly.

Yours faithfully,

James Kenyon

James Kenyon
Estate Manager

Morgan Elliot Planning representing Mackenzie Miller Homes

morganelliot planning

22 May 2024

Chipping Campden Town Council
Old Police Station
High Street
Chipping Campden,
Glos.
GL55 6HB

Sent via email: clerk1@chippingcampden-tc.gov.uk

Dear Sir/Madam

Response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 14 consultation – Land at Chipping Campden.

This representation has been prepared by Morgan Elliot Planning on behalf of our client Mackenize Miller Homes in response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 14 consultation that is running from 8th April to 22nd May 2024.

This representation relates to the site known as Land at Chipping Campden. **Appendix 1** includes a site location plan depicting the exact extent of the site. The site is being actively promoted by Mackenzie Miller Developments Ltd and a design team that holds unique experience in delivering strategic development that has a strong community focus.

Before delving in, Mackenzie Miller Developments Ltd and the design team would be delighted to come and present the proposals to the Town Council and Neighbourhood Plan Group at your earliest convenience.

It is also worth noting that the Site is currently being promoted through the Cotswold Local Plan Review with the submission demonstrating alignment to Scenario 6 (New strategic sites – one or more new strategic sites at principal settlement/s) and Scenario 7 (Focus growth on transport nodes).

The Site

It is recognised that Chipping Campden acts as one of the service centres for the north of the Cotswolds. The town therefore influences a large rural hinterland and many outlying villages have become dependent on the services and facilities that the town provides.

We perceive that the town does, however, have its own inherent and perennial problems that restrict its sustainable growth and prosperity. This community-focused opportunity is aimed at tackling these issues by identifying these problems and addressing these issues with facilities and services support and bolsters the town. Our proposals are mainly driven by the sensitive natural and historic environment that brings the town its inherent charm, the relatively limited transport infrastructure in the north of the district, the lowest proportion of economically active people within the district, an ageing population, and the limited provision of employment opportunities for the younger generation.

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS
office@morganelliot.co.uk • www.morganelliot.co.uk
Registered in England 14455430

The Site is located to the northeast of Chipping Campden, very close to some of the primary facilities that the town provides, including the employment areas, and Chipping Campden School and has good access to the High Street area. Of particular note is the railway line that runs through the northeast boundary to the site.

The site falls within the Cotswolds National Landscape. Access to the site is achieved off Station Road and the B4035.

The site consists of 4 parcels, centred around Whaddon Grange Farm.

- Parcel 1 is the largest parcel and is located north of Station Road, on the eastern outskirts of Chipping Campden aligning with the residential development at Lavender Drive and New Barrels Pitch. The southern boundary is defined by development to the north of Station Road and the B4035. To the northeast, the boundary is defined by the railway line. The northern/ northwestern boundary is defined by a hedged field boundary. The use within the site is predominantly pasture and farm buildings/storage.

- Parcel 2 is found to the east of the railway line and comprises a small area of pastureland. This area would help deliver a rail station, as part of a future planned stage to this development.

- Parcel 3 is a small triangular parcel that lies between Station Road and the B4035 on the eastern approach to the town. The site is currently used for grazing and is being considered as a linear extension to the current alignment along the road.

- Parcel 4 is found directly south of the B4035. The main access to the site is proposed from Station Road utilising existing access points

Response to the emerging Neighbourhood Plan consultation

The draft Neighbourhood Plan highlights data points outlined in the Census 2021 data. The Neighbourhood Plan and Census Data have directly informed the ingredients that are to be delivered at the site.

Whilst the town remains 'a most beautiful place', the very assets that created its beauty also act as constraints to future growth and as a consequence, the limited amount of growth that has occurred has been developed primarily to support a growing population and consequently making the town inherently less sustainable and more expensive.

The town also has a relatively constrained transport infrastructure which compounds the problem of achieving more sustainable growth and limits the attractiveness of the town to both commercial and employment businesses, to the detriment of the local population.

We would like to work with the Neighbourhood Plan Group to develop the opportunity to address the following concerns:

1. High House Prices;
2. Need for affordable, social, bungalows and assisted living;
3. Enhancement of the beautiful landscape;
4. Traffic, parking and congestion;
5. Expansion of Campden Business Park with new knowledge-intensive employment;
6. New School Carpark;
7. New railway station;

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS
office@morganelliot.co.uk • www.morganelliot.co.uk
Registered in England 14455430

8. New Primary School;
9. New Health Centre; and
10. Indoor Sports Facility.

The matters outlined below have directly informed our early development of the site's opportunity:

Population

Chipping Campden has a modest population of 2,377. However, 45% of the population of the town are in their retirement years at ages of 60 and over. Only 38% are between the ages of 20 and 59 and are deemed to be economically active.

The proportion of people aged 60+ compared to other demographics, represents an unbalanced population mix that has the propensity to create an unbalanced community, with fewer services and facilities and employment opportunities to support a younger more economically active population.

Households

The 2021 Census Data reports that there are 1,139 households in the Chipping Campden parish. 62% of these households are occupied by adults aged 65+.

Equally, the census also shows that out of all the households in Chipping Campden, 55% are under-occupied with 2 or more spare bedrooms, normally occupied by two adults whose children have left the household. Unsurprisingly many in this position find it difficult to downsize due to the lack of available and suitable properties in the town which has consequently led to an increase in house prices.

To address this problem any new development needs to ensure there is a mix of new housing centred around new local employment opportunities to support and nurture young businesses. New housing should have the ability to allow the older generation to downsize and thereby freeing up larger houses for younger families. Equally any new housing stock needs to provide a range of affordable housing to ensure that those that need it most have access to good quality affordable housing in the town that will support local job opportunities.

Stagnation in the housing market can arise due to various factors, and it can have significant implications for both homeowners and the broader economy. The higher house prices and lack of available homes within Chipping Campden have undoubtedly caused a stagnant market, making property unattainable for the younger, economically active, population.

Affordability

Over the last year, properties in Chipping Campden had an overall average sale price of £977,681. The majority of sales in Chipping Campden during the last year were detached properties, selling for an average price of £1,158,833. Semi-detached properties sold for an average of £811,625, with terraced properties fetching £927,583. Overall, sold prices in Chipping Campden over the last year were 40% up on the previous year and 31% up on the 2021 peak of £746,064.

The average salary in the Cotswolds is £29,579; making ones dream of owning their own homes in Chipping Campden unattainable.

The figures presented above highlight the opportunity for a range of new house types in Chipping Campden that will improve the social cohesion of the town.

Employment

In 2015, Chipping Campden boasted the highest employment density ratio in the district. A ratio of 1.7 signifies ample employment opportunities, a key factor in driving sustainable growth. Settlements with a ratio close to 1:1 are considered to represent balanced settlements in terms of the number of jobs for economically active people.

Those with higher ratios are likely to attract workers from surrounding settlements. However, a total of 1,057 (44.5%) people are not currently employed. This is reflective of the retirement-age population within Chipping Campden.

This also suggests that people who work in Chipping Campden are likely to commute to Chipping Campden for work and cannot afford to live in the town.

Retail

Serving as a 'Town Centre' within the district, Chipping Campden hosts a number of retail units. However, the "One Stop" and "the Co-operative" serve as limited convenience food stores and certainly do not provide the range and choice of goods that would be expected in a town of this stature.

For a weekly shop, most residents currently travel to Moreton in-Marsh (co-op and Aldi), Stow-on-the-Wold (Tesco) or Evesham for supermarkets (Tesco, Morrisons, M&S Simply Food, Waitrose and Lidl). Both Moreton-in-Marsh and Evesham are a 30 and 40-minute two-way drive journey, respectively.

In order to create a degree of self-containment within Chipping Campden it is considered that any new growth in the Town should provide a new supermarket for local residents. This would reduce the number of leaked trips to surrounding towns and help Chipping Campden become a more sustainable settlement.

Education

The existing secondary school is restricted to growth opportunities by being ransomed beyond each of its boundaries. The school is also expending a significant amount annually on energy running costs.

This has increased the demand for more efficient school buildings. There is also growing pressure to accept more children, and in turn, gain more funding.

Whilst the school is a standalone benefit for the town, it is presenting the town with challenges in relation to travel.

Currently, Aston Road draws to a standstill during peak pick-up and drop-off times which impacts the historic core and the overall experience of Chipping Campden.

There are a number of surrounding towns and villages that provide coaches to the school for their pupils. Shipston-on Stour is one location that sends several coaches to Chipping Campden; which has a profound impact on the Town and the historic core. It's considered that a relief road, that avoids the need to enter the centre of Chipping Campden Conservation Area, can be provided via station road.

Any new development within Chipping Campden should therefore ensure that there is suitable parking and expansion room for the school, with a more convenient access being provided to the school that does not necessitate traffic running through the town centre.

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS
office@morganelliot.co.uk + www.morganelliot.co.uk
Registered in England 14455430

In turn, through the provision of expanded school parking, there is an opportunity for the existing parking to be made available to residents, employees and visitors to Chipping Campden. Whilst the school's intentions fall outside of our control, our development will provide parking to help facilitate this less car-dominated street scene.

Potential for Change

Despite facing the challenge of an ageing population, Chipping Campden has the ability provide greater opportunities for all its residents and to enhance its role as a service centre for the north Cotswolds.

The strategic role of Chipping Campden, and the limited growth that the town has experienced over the years, has resulted in many people commuting into the Town for work and education.

The school's status and location has only exacerbated this issue by being an attractive education centre for surrounding towns, creating a considerable amount of in-commuting to this facility at peak times and creating congestion on the historic road networks into the town.

There are currently limited opportunities for a younger demographic to live and work in Chipping Campden. This is predominantly due to housing that is not affordable, limited knowledge-intensive work opportunities and a disconnect from the wider Cotswolds.

Nevertheless, the employment ratio suggests promising prospects for new development opportunities that result in a drastic reduction of inward and outward travel for facilities, services and employment.

Our Vision

Our vision is to seamlessly connect to the existing built-up area without detriment to the historic character and beauty of the town and its setting. The aim is to place facilities and features on the doorstep of the existing community; making people less likely to travel outside of Chipping Campden for day-to-day services and facilities.

The identity and rural character will be retained through careful master planning and open spaces. The site will help support the transition to a low-carbon future through the delivery of a range of measures which will enhance the sustainability of the development, ensuring it is resilient to the future impacts of climate change and reducing carbon emissions.

Active and low-carbon travel will be at the heart of the design, and safe routes for recreation will encourage healthy lifestyles and space for social interaction. Buildings will be beautiful, efficient and sustainable. The legacy will be a strong, thriving and inclusive community which protects and enhances the area's unique environment.

The opportunity available has the potential to deliver a Sustainable Urban Extension that will deliver a number of benefits. These can be summaries below:

1. **A Sustainable Community** - The emerging development framework can deliver the foundations for a healthy, safe and sustainable place to live, work and visit that promotes social cohesion.

2. **Site Connectivity** - The site can positively integrate with the existing edge of Chipping Campden via a range of connections, pedestrian and cycle routes, established recreational spaces and green corridors.

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS
office@morganelliot.co.uk + www.morganelliot.co.uk
Registered in England 14455430

3. **Natural Place -** A successful masterplan can be delivered that does not impact sensitive landscape and habitat areas. At least 10% BNG can be delivered with the potential to deliver further gains on-site.

4. **Meeting the Challenge of Climate Change** - Embracing the challenges faced from a strategic level down to a detailed level in order to deliver a resilient, successful and enduring mixed-use development.

To achieve this, the development will deliver:

- A walkable community with active travel routes to existing and proposed facilities and services;
- Housing for local people, including bungalows to allow downsizing to occur, assisted living for those who need assistance as well as affordable housing for the local population;
- Land and infrastructure to help facilitate a new railway station for Chipping Campden;
- An expansion of employment land;
- A new primary school;
- Sports pitches for use of the secondary and new primary school;
- A School Drop off location position away from the centre of Chipping Campden;
- New parking for the existing Secondary School.
- Community hub;
- A Supermarket;
- A network of Green Infrastructure inc. Country Park and Public Open Space; A Multi-Use Games Area
- A mixed-use area (inc. potential for a new medical centre; and
- Biodiversity net gains.

Conclusions

Overall, the plan is currently being developed and remains flexible. We would like to work with the Neighbourhood Plan Group and other stakeholders to ensure the opportunities within the development continue to be aligned with the needs of the community.

We would be delighted to come and present the opportunities to the Neighbourhood Plan Group.

In the meantime, I trust this representation will be considered as the emerging Neighbourhood Plan progresses.

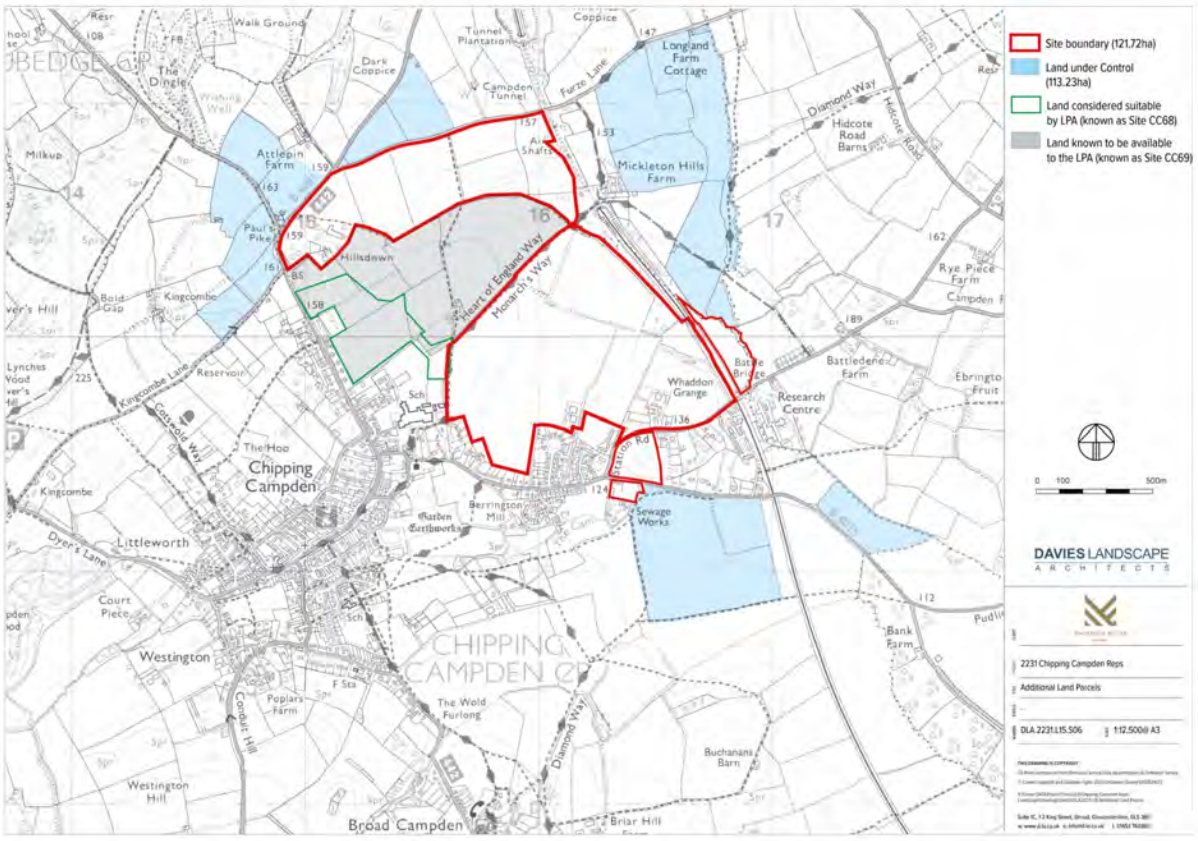
Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS
office@morganelliot.co.uk • www.morganelliot.co.uk
Registered in England 14455430

Yours Sincerely,



Grant Baylis BSc (Hons), MSc, MRTPI, BwN Assessor
Morgan Elliot Planning
grantbaylis@morganelliot.co.uk

Enclosed:
- *Appendix 1 – Land Availability Plan*


Site boundary (121.72ha)
Land under Control (113.23ha)
Land considered suitable by LPA (known as Site CC68)
Land known to be available to the LPA (known as Site CC69)
0 100 500m
DAVIES LANDSCAPE ARCHITECTS
2231 Chipping Campden Reps
Additional Land Parcels
DLA 2231.L15.506
1:12,500@ A3
Chipping Campden
Broad Campden
Westington
Littleworth
Longland Farm Cottage
Mickleton Hills Farm
Hidcote Road Barns
Rye Piece Farm
Battledene Farm
Research Centre
Whaddon Grange
Hillsdown
Attlepin Farm
Bank Farm
Buchanans Barn
Heart of England Way
Monarch's Way
Cotswold Way
Diamond Way

Representations to the Chipping Campden Neighbourhood Plan

Regulation 14 Consultation

1 Introduction

1.1 The following representation is submitted on behalf of the Campden House Estate ('the Estate') which extends to 677 hectares. The Estate lies wholly within the administrative area of Cotswold District Council and four parishes (Chipping Campden, Weston-Subedge, Willersey and Saintbury). Mr Thomas Smith is the owner and resides on the Estate.

1.2 The Estate commends the work that has been undertaken by the team preparing the Chipping Campden Neighbourhood Development Plan 2023-2031 (CCNDP) and in general are supportive of its contents. In particular, the Estate supports the recovery of biodiverse areas and BNG as a principle.

1.3 However, they are concerned by and object to the scope of Policy 5 and associated Figure15 (page 74) and Table 7 (page76), Key Diagram (page 10), Appendix 2: Natural Environment (page 88, 89 and 91), Appendix 7: Local Nature Recovery Areas (11 The Gate House/B4081/Westington Quarry (page 129) and 12 Hare Park Plantation (page 130)).

2 Local Nature Recovery Strategies (LNRS)

2.1 It is not clear from the map at Figure 15 (page 74) and Appendix 2 (2 River Cam and Campden Wood (page 125), 3a Leasows Farm (page 125) and 11 The Gate House/B4081/Westington Quarry (page 129)) whether the areas identified are of existing ecological value or are areas identified to provide green corridors between areas of ecological value.

2.2 The first paragraph on page 73 of the CCNDP states, "*the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared.*" The Estate is concerned by this approach especially when read in conjunction with page 75 of the CCNDP as it conflates the purposes of local nature recovery strategies (LNRS) and development plan documents.

2.3 In the first paragraph on page 75 of the CCNDP it states, "*It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed*". The CCNDP goes on to state in the second paragraph on page 75 that, "*DEFRA guidance states that the priorities identified by every local nature recovery strategy should reflect local circumstances, including the most important issues to local people and organisations. The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy.*" However, we contend for the reasons explained in the following paragraphs that the CCNDP is not the appropriate document for identifying sites for Local Nature Recovery Strategies or 'receptor' sites for Biodiversity Net Gain.

2.4 Section 104 of the Environment Act 2021 sets out the requirement for LNRS to cover the whole of England. DEFRA has identified 50 strategy areas where a LNRS is required and have allocated Gloucestershire County Council (GCC) as the responsible authority[1] for preparing the LNRS in the area that includes the parish of Chipping Campden. National guidance is contained in the Local Nature Recovery Strategy Statutory Guidance, DEFRA March 2023.

2.5 Page 9 of the CCNDP identifies in summary form those groups that the team behind the preparation of CCNDP has consulted. It includes, "*Meetings with various local landowners 30.8.2014-22.9.2015*", however the Estate is not aware of engagement from the CCNDP team that identified land within the Estate for inclusion in the LNRS.

2.6 Paragraph 89 of the 2023 DEFRA guidance states, "*If the responsible authority knows that a landowner opposes a potential measure on their land and is very unlikely to choose to carry it out, it would be better to explore alternatives or include other more suitable measures before public consultation. This is particularly important if they propose a location due to its potential to join up areas of habitat to create a wider network. If objections from landowners only become clear at public consultation, the responsible authority should try to accommodate their views where this does not undermine the coherence and ambition of the strategy as a whole.*"

[1] Appointed by the Secretary of State to oversee the preparation of the LNRS in an area as set out by Section 105 of the Environment Act 2021.

Classification L2 - Business Data

2.7 Until GCC as the responsible authority for the LNRS has engaged with the Estate we are unable to assess the implications of being identified within a LNRS. Therefore, we object to the inclusion of the Estate's land in the LNRS.

2.8 Additionally, the Estate is concerned by what appears to be an imposed merging of the roles of the LNRS and the market for BNG units, without meaningful engagement with and commitment from the land managers whose land has been identified in Figure15 (page 74) and Table 7 (page 76), Key Diagram (page 10), Appendix 2: Natural Environment (pages 88, 89 and 91), Appendix 7: Local Nature Recovery Areas (2 River Cam and Campden Wood (page 125), 3a Leasows Farm (page 125) and 11 The Gate House/B4081/Westington Quarry (page 129)) of the CCNDP.

3 **Biodiversity Net Gain (BNG)**

3.1 Separate from the LNRS, biodiversity net gain (BNG) is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). It is recognised that the CCNDP was drafted prior to the Department for Levelling Up, Housing and Communities (DLUHC) publishing a new Planning Practice Guidance (PPG) section on how councils and developers can demonstrate BNG (https://www.gov.uk/guidance/biodiversity-net-gain). The PPG section on BNG was published on 14 February 2024 with the latest of subsequent updates dated 1 May 2024.

3.2 Except for certain categories of development, developers must deliver 10% BNG in respect of their development sites. If developers cannot achieve BNG on their own sites, they will have to make off-site gains by using off-site biodiversity units; thus, creating a market in BNG units. As a 'land manager' defined by the guidance, the Estate can choose whether to identify areas of land for the purpose of BNG and to sell BNG units to developers. In order to sell BNG units, there are several steps that land managers need to abide by. One of these steps is to register the BNG units as a biodiversity gain site on a public national biodiversity gain sites register. Selling in the BNG market is a choice for land managers and needs to be considered alongside the wider objectives and operational requirements of the estate. Therefore, the Estate considers it misleading for the CCNDP to identify 'nature recovery priority areas' and refer to them in the way it has on pages 73 and 75, Table 7 and Appendix 2 and Appendix 7.

3.3 In the final paragraph on page 75 of the CCNDP it states, "*It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund[2], agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gains contributions, probably managed through the Nature and Climate Fund.*" It appears from the Gloucestershire Nature and Climate Fund (GNCF) website that it is a not-for-profit organisation established to support landowners, developers and local planning authorities through the biodiversity net gain process. However, this is only one of the three types of options available to land managers to sell BNG units. The Estate is concerned by the influence the CCNDP will have as a statuary development plan document in the market for BNG units. Additionally, developers requiring off-site BNG units would, with reference to Figure 15 of the CCNDP, expect to find the corresponding sites on the national biodiversity gain sites register.

3.4 Before land managers can register a gain site, they must have a legal agreement. This could be a planning obligation with a local authority or a conservation covenant with a responsible body. The legal agreement must secure habitat enhancement and maintenance for at least 30 years. It details the habitat works being committed to and the outcomes to be achieved. The procedures and processes governing BNG are complex and whilst the sentiment to improve ecological outcomes by those behind the CCNDP should be commended, including BNG in the CCNDP is unnecessary and inserts confusion for landowners and developers.

3.5 The third paragraph on page 75 of the CCNDP states, "*Figure 15 and the more detailed evidence in Appendix 2 and Appendix 7 shows that there are already existing habitats that could benefit from protection and improvement, marked 1-13. Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each area.*" However, Appendix 2 (page 91) does not provide detail of the "rare and protected species locations" ie what the rare/protected species are. It is also noted that the data is from July 2017. The Chartered Institute of Ecology and Environmental Management (CIEEM) Advice Note on the Lifespan of Ecological Reports and Surveys, 2019 advises that data that is more than three years old is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated. The Key on the map on page 89 of the CCNDP is confusing in it reference to "Chipping Campden NDP – Green Space Habitat Features" and "Appendix 8: Local Green Spaces".

[2] GNCF – Gloucestershire Nature + Climate Fund (www.glosncf.com)

To avoid confusion, we suggest that the description on the Key and the layer on the map at page 89 are deleted.

3.6 It is clear from the Environment Act 2021, the Town & Country Planning Act 1990 and associated regulations and guidance that it is not appropriate for neighbourhood plans to include strategic land use strategy or policies. BNG is strategic policy.

4 Amendments

3.7 The Estate considers that the following suggested amendments will assist in moving forward to submission and examination of the CCNDP. The Estate supports the recovery of biodiverse areas and BNG as a principle, but suggests that this is worked through with GCC and that further justification is provided as to why these areas have been deemed suitable as LNRAs.

3.8 Delete the last sentence of the first paragraph and the first and last sentences of the last paragraph on page 73:
~~"In this case, the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared."~~
~~"The strategy area is the neighbourhood area."~~
~~"Figure 15 shows potential areas of importance."~~

3.9 Amend the second sentence of the last paragraph on page 73 as follows:
"Appendix ~~7~~ 2 provides detailed habitat maps . . . ."

3.10 Delete land within the Estate from areas 2, 3a and 11 on Figure 15 (page 74), Table 7 and Appendix 7 (detail 2 and 3a on page 125 and detail 11 on page 129) and the Key Diagram (page 10).

3.11 Delete the last sentence of the first paragraph on page 75:
~~"It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed to be finally determined at the planning application stage, when details of a specific proposal can be fully explored."~~

3.12 Delete the last sentence of the second paragraph on page 75:
~~"The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy."~~

3.13 Delete the penultimate and last sentences from the last paragraph on page 75:
~~"It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund , agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund."~~

3.14 Delete Policy 5 in its entirety.

3.15 If Chipping Campden Town Council wishes to put forward the areas identified in Figure 15 and Appendix 7 to GCC, there is a separate process for doing so.

3.16 Delete "Chipping Campden NDP – Green Space Habitat features" on the Key and the layer on the map at page 89 (part of Appendix 2).

3.17 Number the red star symbols on the map at page 91 (part of Appendix 2) and provide table listing the protected species associated with each red star. If no supporting information as to the precise location, the associated species and manner in which the evidence was obtained can be proved then we request that the red start symbols be removed as it would not be appropriate to retain them under such circumstances.

Carter Jonas on behalf of the Trustees of Spring Hill Estate

Carter Jonas

Mayfield House
256 Banbury Road
Oxford
OX2 7DE
T: 01865 511444
F: 01865 310653

Your ref:
Our ref: MAC/csw

FAO Council Clerk
Chipping Campden Town Council
Old Police Station
High Street
Chipping Campden
Gloucestershire
GL55 6HB

21st May 2024

Dear Sir/Madam

CHIPPING CAMPDEN NEIGHBOURHOOD DEVELOPMENT PLAN REPRESENTATIONS
REPRESENTATIONS TO THE CHIPPING CAMPDEN NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION

1 **Introduction**

1.1 The following representation is submitted on behalf of the Trustees of Spring Hill Estate. Carter Jonas is Estate Managers for the Spring Hill Estate which extends to 1,805.47 acres (730.64 hectares). The estate extends across two district council administrative areas (Cotswold District Council and Tewkesbury District Council) and four parishes (Blockley, Chipping Campden, Snowshill and a relatively small part of the estate in Bourton-on-the-Hill). The family for whom the Trust was set up use the Estate extensively and enjoy being part of the local community.

1.2 The Trustees commend the work that has been undertaken by the team preparing the Chipping Campden Neighbourhood Development Plan 2023-2031 (CCNDP) and in general are supportive of its contents. However, they are concerned by and object to the scope of Policy 5 and associated Figure15 (page 74) and Table 7 (page76), Key Diagram (page 10), Appendix 2: Natural Environment (page 88, 89 and 91), Appendix 7: Local Nature Recovery Areas (11 The Gate House/B4081/Westington Quarry (page 129) and 12 Hare Park Plantation (page 130)).

2 **Local Nature Recovery Strategies (LNRS)**

2.1 It is not clear from the map at Figure 15 (page 74) and Appendix 2 (11 The Gate House/B4081/Westington Quarry (page 129) and 12 Hare Park Plantation (page 130)) whether the areas identified are of existing ecological value or are areas identified to provide green corridors between areas of ecological value.

2.2 The first paragraph on page 73 of the CCNDP states, "*the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared.*" The Trustees are concerned by this approach especially when read in conjunction with page 75 of the CCNDP as it conflates the purposes of local nature recovery strategies (LNRS) and development plan documents.

Offices throughout the UK | Commercial • Planning & Development • Residential • Rural | **carterjonas.co.uk**
Carter Jonas LLP is a limited liability partnership registered in England and Wales no. OC304417. Reg office One Chapel Place, London W1G 0BG. Regulated by RICS.
Classification L2 - Business Data

2.3 In the first paragraph on page 75 of the CCNDP it states, "*It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed*". The CCNDP goes on to state in the second paragraph on page 75 that, "*DEFRA guidance states that the priorities identified by every local nature recovery strategy should reflect local circumstances, including the most important issues to local people and organisations. The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy.*" However, we contend for the reasons explained in the following paragraphs that the CCNDP is not the appropriate document for identifying sites for Local Nature Recovery Strategies or 'receptor' sites for Biodiversity Net Gain.

2.4 Section 104 of the Environment Act 2021 sets out the requirement for LNRS to cover the whole of England. DEFRA has identified 50 strategy areas where a LNRS is required and have allocated Gloucestershire County Council (GCC) as the responsible authority[1] for preparing the LNRS in the area that includes the parish of Chipping Campden. National guidance is contained in the Local Nature Recovery Strategy Statutory Guidance, DEFRA March 2023.

2.5 Page 9 of the CCNDP identifies in summary form those groups that the team behind the preparation of CCNDP has consulted. It includes, "*Meetings with various local landowners 30.8.2014-22.9.2015*", however the Trustees are not aware of meaningful engagement from the CCNDP team that could be classified as identifying land within the Estate for inclusion in the LNRS.

2.6 Paragraph 89 of the 2023 DEFRA guidance states, "*If the responsible authority knows that a landowner opposes a potential measure on their land and is very unlikely to choose to carry it out, it would be better to explore alternatives or include other more suitable measures before public consultation. This is particularly important if they propose a location due to its potential to join up areas of habitat to create a wider network. If objections from landowners only become clear at public consultation, the responsible authority should try to accommodate their views where this does not undermine the coherence and ambition of the strategy as a whole.*"

2.7 Until GCC as the responsible authority for the LNRS has engaged with the Trustees of Spring Hill Estate we are unable to assess the implications of being identified within a LNRS. Therefore, we object to the inclusion of the Estate's land in the LNRS.

2.8 Additionally, the Trustees are concerned by what appears to be an imposed merging of the roles of the LNRS and the market for BNG units, without meaningful engagement with and commitment from the land managers whose land has been identified in Figure15 (page 74) and Table 7 (page 76), Key Diagram (page 10), Appendix 2: Natural Environment (pages 88, 89 and 91), Appendix 7: Local Nature Recovery Areas (11 The Gate House/B4081/Westington Quarry (page 129) and 12 Hare Park Plantation (page 130)) of the CCNDP.

3 Biodiversity Net Gain (BNG)

3.1 Separate from the LNRS, biodiversity net gain (BNG) is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). It is recognised that the CCNDP was drafted prior to the Department for Levelling Up, Housing and Communities (DLUHC) publishing a new Planning Practice Guidance (PPG) section on how councils and developers can demonstrate BNG (https://www.gov.uk/guidance/biodiversity-net-gain). The PPG section on BNG was published on 14 February 2024 with the latest of subsequent updates dated 1 May 2024.

3.2 Except for certain categories of development, developers must deliver 10% BNG in respect of their development sites. If developers cannot achieve BNG on their own sites, they will have to make off-site gains by using off-site biodiversity units; thus, creating a market in BNG units. As a 'land manager' defined by the guidance, the Spring Hill Estate can choose whether to identify areas of land for the purpose of BNG and to sell BNG units to developers. In order to sell BNG units, there are several steps that land managers need to abide by. One of these steps is to register the BNG units as a

[1] Appointed by the Secretary of State to oversee the preparation of the LNRS in an area as set out by Section 105 of the Environment Act 2021.

Classification L2 - Business Data

biodiversity gain site on a public national biodiversity gain sites register. Selling in the BNG market is a choice for land managers and needs to be considered alongside the wider objectives and operational requirements of the estate. Therefore, the Trustees consider it misleading for the CCNDP to identify 'nature recovery priority areas' and refer to them in the way it has on pages 73 and 75, Table 7 and Appendix 2 and Appendix 7.

3.3 In the final paragraph on page 75 of the CCNDP it states, "*It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund[2], agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gains contributions, probably managed through the Nature and Climate Fund.*" It appears from the Gloucestershire Nature and Climate Fund (GNCF) website that it is a not-for-profit organisation established to support landowners, developers and local planning authorities through the biodiversity net gain process. However, this is only one of the three types of options available to land managers to sell BNG units. The Trustees of Spring Hill Estate are concerned by the influence the CCNDP will have as a statuary development plan document in the market for BNG units. Additionally, developers requiring off-site BNG units would, with reference to Figure 15 of the CCNDP, expect to find the corresponding sites on the national biodiversity gain sites register.

3.4 Before land managers can register a gain site, they must have a legal agreement. This could be a planning obligation with a local authority or a conservation covenant with a responsible body. The legal agreement must secure habitat enhancement and maintenance for at least 30 years. It details the habitat works being committed to and the outcomes to be achieved. The procedures and processes governing BNG are complex and whilst the sentiment to improve ecological outcomes by those behind the CCNDP should be commended, including BNG in the CCNDP is unnecessary and inserts confusion for landowners and developers.

3.5 The third paragraph on page 75 of the CCNDP states, "*Figure 15 and the more detailed evidence in Appendix 2 and Appendix 7 shows that there are already existing habitats that could benefit from protection and improvement, marked 1-13. Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each area.*" However, Appendix 2 (page 91) does not provide detail of the "rare and protected species locations" ie what the rare/protected species are. It is also noted that the data is from July 2017. The Chartered Institute of Ecology and Environmental Management (CIEEM) Advice Note on the Lifespan of Ecological Reports and Surveys, 2019 advises that data that is more than three years old is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated. The Key on the map on page 89 of the CCNDP is confusing in it reference to "Chipping Campden NDP – Green Space Habitat Features" and "Appendix 8: Local Green Spaces". To avoid confusion, we suggest that the description on the Key and the layer on the map at page 89 are deleted.

3.6 It is clear from the Environment Act 2021, the Town & Country Planning Act 1990 and associated regulations and guidance that it is not appropriate for neighbourhood plans to include strategic land use strategy or policies. BNG is strategic policy.

4 Amendments

4.1 The Trustees consider that the following suggested amendments will assist in moving forward to submission and examination of the CCNDP.

4.2 Delete the last sentence of the first paragraph and the first and last sentences of the last paragraph on page 73:

[2] GNCF – Gloucestershire Nature + Climate Fund (www.glosncf.com)

"In this case, the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared."
"The strategy area is the neighbourhood area."
"Figure 15 shows potential areas of importance."

4.3 Amend the second sentence of the last paragraph on page 73 as follows:
"Appendix ~~7~~ 2 provides detailed habitat maps . . . ."

4.4 Delete land within the Spring Hill Estate from areas 11 and 12 on Figure 15 (page 74), Table 7 and Appendix 7 (detail 11 on page 129 and detail 12 on page 130) and the Key Diagram (page 10).

4.5 Delete the last sentence of the first paragraph on page 75:
"~~It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed to be finally determined at the planning application stage, when details of a specific proposal can be fully explored~~."

4.6 Delete the last sentence of the second paragraph on page 75:
"~~The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy.~~"

4.7 Delete the penultimate and last sentences from the last paragraph on page 75:
"~~It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund , agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund.~~"

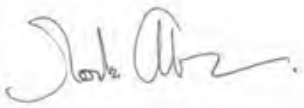
4.8 Delete Policy 5 in its entirety.

4.9 If Chipping Campden Town Council wishes to put forward the areas identified in Figure 15 and Appendix 7 to GCC, there is a separate process for doing so.

4.10 Delete "Chipping Campden NDP – Green Space Habitat features" on the Key and the layer on the map at page 89 (part of Appendix 2).

4.11 Number the red star symbols on the map at page 91 (part of Appendix 2) and provide table listing the protected species associated with each red star. If no supporting information as to the precise location, the associated species and manner in which the evidence was obtained can be proved then we request that the red star symbols be removed as it would not be appropriate to retain them under such circumstances.

Yours faithfully



Mark A Charter MRICS
Partner

E: Mark.charter@carterjonas.co.uk
T: 01865 404406
M: 07775 562067

Classification L2 - Business Data

Brodie Planning Associates on behalf of William and Martin Haines

brodie planning associates
Planning ▪ Design ▪ Development

The Stables, Manor Farm Courtyard
Southam Lane, Southam
Cheltenham, Gloucestershire
GL52 3PB

FOA Mrs Dawn Laird, Acting Town Clerk
Chipping Campden Town Council
Old Police Station,
High Street,
Chipping Campden,
Gloucestershire,
GL55 6HB

21 May 2024

Chipping Campden NDP Regulation 14 consultation from 8th April to 22nd May 2024

Dear Dawn Laird

Please find a copy of survey questions responses completed and submitted online via Survey Monkey. I have not received an acknowledge or confirmation of safe receipt to the online survey, so the following is sent to ensure participation in this consultation.

Response to Qu.1. The first part of this paragraph is a statement rather than a VISION from which objectives can be formed to influence development in the future: the NDP will form part of the statutory development plan. Even the wording of the second sentence implies a statement rather than a VISION for the future. This needs to be reworded to form a coherent VISION for development in the future. The current wording is not fit for purpose. Suggested rewording: We are a vibrant community, renowned for creativity, culture, and commerce, in an area prised for its beautiful buildings and natural surroundings. Our/the aim of the CCNDP is to support our young people, develop businesses, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area.

Response to Qu.2. Rewording of point 3 suggested to be less restrictive (more flexible to respond to a changing market) and be in general conformity with Local Plan Policy EC8: Where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will

Company No: 08601004 www.brodieplanning.co.uk 01242 898368 info@brodieplanning.co.uk

The Stables, Manor Farm Courtyard
Southam Lane, Southam
Cheltenham, Gloucestershire
GL52 3PB

be no harm to the vibrancy of the town centre. Where a change of use is proposed, evidence must be submitted to demonstrate that the property has been marketed for at least 12 months and that the use is no longer viable.

Response to Qu.3. Yes

Response to Qu.4. Yes

Response to Qu.5. Yes

Response to Qu.6. This policy only duplicates legislative requirements.

Response to Qu.7. Policy 6 - list number 22. The Craves should not be included for the reasons previous outlined in landowner's response to CCTC letter dated 30 September 2022. A copy of this letter is reproduced below.

It is noted that Policy 6 now identifies the extent of the land in the draft allocation which was a point previously raised in the above-mentioned landowner's response (copy below). It is considered the site assessment at Appendix 8 over inflates the contribution/importance of the site and neglects to recognise that this land is not local in character and most importantly, represents an extensive tract of land (para 106, NPPF) in an attempt to preclude future development regardless of the land owner's intentions. This is not the purpose of a LGS designation. The land is productive agricultural land measuring 7 acres in size and is only perceivable from either within the land or from outside the settlement at a higher land level at Kingcombe Lane. Contrary to the views expressed in site assessment at Appendix 8 most people are not aware of this land. For the reasons given, draft allocation no 22 'The Craves' is contrary to requirements set out in paragraph 106 of the NPPF and should be removed from draft Policy 6.

Copy of landowner's response dated 20th October 2022:

brodie planning associates
Planning ▪ Design ▪ Development

The Stables, Manor Farm Courtyard
Southam Lane, Southam
Cheltenham, Gloucestershire
GL52 3PB

FAO Victoria Bates – Deputy Town Clerk
Chipping Campden Town Council
Old Police Station
High Street
Chipping Campden
GL55 6HB

20th October 2022

Proposed designation of site ref no. MD05 'The Craves' as Local Green Space in the Chipping Campden Neighbourhood Development Plan

Dear Victoria Bates

I write further to your letter dated 30th September 2022 on behalf of the landowners, William and Martin Haines, to OBJECT to the proposed designation of the agricultural field known as 'The Craves' as Local Green Space (LGS) in the draft Chipping Campden Neighbourhood Development Plan (CCNDP).

Firstly, the plan included in your letter notifying of the proposed LGS designation does not identify the land or its area referenced as site no. MD05. This should be clearly shown, for example, by a red line or similar outlining the extent of the area. It is therefore unclear what land is proposed to be designated as LGS under reference MD05.

Further, no assessment of the site in justification of why this land is of particular importance to the local community has been provided (paragraph 101 of the NPPF).

Paragraph 102 of the NPPF sets criteria for the designation of Local Green Space which states: "designation should only be used where the green space is a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land."

Company No: 08601004 www.brodieplanning.co.uk 01242 898368 info@brodieplanning.co.uk

The Stables, Manor Farm Courtyard
Southam Lane, Southam
Cheltenham, Gloucestershire
GL52 3PB

The owners do not consider the land known as the Craves (albeit not explicitly defined) meets any of the designation criteria set out in Paragraph 102 of the NPPF, and as such, designation as LGS would be inappropriate and contrary to national planning policy.

In regard to local importance, it is accepted that a footpath crosses the field (Footpath 15) and there are two headland footpaths that run partially along the northern (Footpath 14) and southern (Footpath 16) boundaries but this is not reason enough for this land to be of particular importance or demonstrably special to the local community (paragraphs 101 and 102 of the NPPF) and as such, designated as LGS. The NPPG is clear that "Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation." (Paragraph: 018 Reference ID: 37-018-20140306: Revision date: 06 03 2014).

In addition, the NPPG states "There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land." (Paragraph: 015 Reference ID: 37-015-20140306: Revision date: 06 03 2014). The total area of the field known as the Craves amounts to 7 acres. When considered against the immediate local context this amounts to an area of considerable size, a large area or extensive tract of land which would fail to comply with the designation criteria set out in Paragraph 102 of the NPPF. Although this land lies within the form of the settlement and not adjacent to the settlement where a LGS designation might be likened to a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.' [Paragraph: 015 Reference ID: 37-015-20140306; Revision date: 06 03 2014]. Equally, a blanket designation of the land known as the Craves would not be consistent with or appropriate as a 'back door' approach to protect this land as a strategic gap by any other name.

Following this representation, if the inclusion of site reference MD05 is taken forward into the Regulation 14 Draft of the CCNDP the landowner wishes to be notified and will be making further representations throughout the process to object as the designation of site MD05 does not have regard to national policies and to advice contained in guidance issued by the Secretary of State.

brodie planning associates
Planning ▪ Design ▪ Development

The Stables, Manor Farm Courtyard
Southam Lane, Southam
Cheltenham, Gloucestershire
GL52 3PB

Response to Qu.8. A policy on housing need, type and location is lacking and should be included. Whilst there is no requirement for a NDP to contain policies on housing it is ill-advised for the CC NDP to be silent on this matter for the following reasons:

It is plainly clear from consultation that local people want to influence the type and location of new housing. Many local families and young (economically active) people cannot stay or move in the area because property prices are unaffordable, and the range of existing housing type acts perpetuates this issue. This is evident by an ageing population above the national average and a woeful unmet affordable housing need. Chipping Campden's is essentially becoming a retirement village. This is directly contrary to the Vision of the NDP which seeks to maintain a vibrant community to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents... and fails to fulfil the objective identified in the CC NDP To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside.

The lack of housing policy fails to recognise or act upon the above the above as well as the national housing crisis, the NPPF requirement to significantly boost the supply of new homes, the fact that the 5-Year housing land supply figure is a minimum requirement, Chipping Campden is identified as a 'Principal Settlement' (Local Plan Policy DS1) wherein the needs of new housing and employment land for the District will be focused, and the District has an unmet affordable housing need. Lastly, this failure to address the matter of housing places sole reliance on strategic policies to meet housing need up until 2031. Information gathered from consultation highlights 'housing' as a key issue for local people. Therefore, it is reasonable to state that the approach taken by the draft CC NDP to housing (or rather lack of) is not in general conformity with strategic policies, the NPPF nor reflects the views of residents. A NDP should be an evidence-based document which it fails to be in regard to housing.

Company No: 08601004 www.brodieplanning.co.uk 01242 898368 info@brodieplanning.co.uk

brodie planning associates
Planning ▪ Design ▪ Development

The Stables, Manor Farm Courtyard
Southam Lane, Southam
Cheltenham, Gloucestershire
GL52 3PB

If you be grateful if you would confirm safe receipt.

Yours sincerely



Wendy Hopkins | MRTPI
Company Director

Company No: 08601004 www.brodieplanning.co.uk 01242 898368 info@brodieplanning.co.uk

SF Planning Ltd on behalf on behalf of the owners of land off Aston Road, Broad Campden, GL55 6WB

SFPLANNING

21 May 2024

Chipping Campden Town Council,
Old Police Station,
High Street,
Chipping Campden,
Gloucestershire,
GL55 6HB

By email: *clerk1@chippingcampden-tc.gov.uk*

Dear Sirs

Chipping Campden Neighbourhood Plan – Regulation 14 consultation
Representation on behalf of the landowner interests at Land of Aston Road, Broad Campden, GL55 6WB

1. This representation is made by SF Planning Limited in response to the Chipping Campden Neighbourhood Plan consultation 2024 (the NDP document), on behalf of the owners of land off Aston Road, Broad Campden, GL55 6WB as shown edged red on the plan below. Their site falls within the neighbourhood plan area.

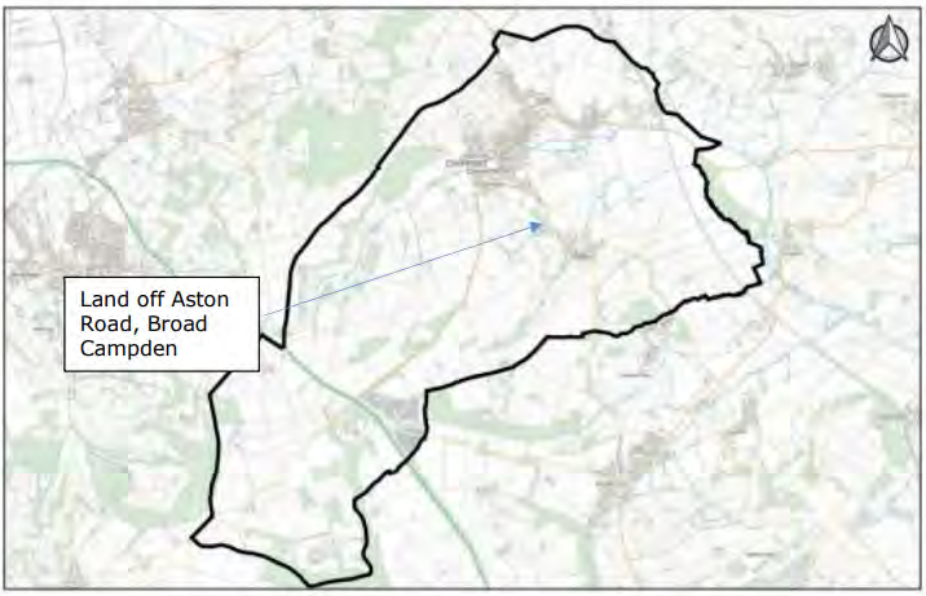


Red line plan showing the site

CHELTENHAM 12 ROYAL CRESCENT GL50 3DA T: 01242 231575
GLOUCESTER 9 COLLEGE GREEN GL1 2LX T: 01452 527997
LONDON 19 EASTBOURNE TERRACE W2 6LG T: 020 3763 8005

sfplanningltd @sfplanningltd info@sfplanning.co.uk www.sfplanning.co.uk

REGISTERED NO: ENGLAND 06114677



Extract from NDP document showing Neighbourhood area.

2. Housing provision in the NDP

2.1 Our client's land is 15 minutes' walk from Chipping Campden town centre via a well walked footpath. Chipping Campden is recognised as a principal settlement in the Cotswold District (CDC) local plan which is capable of accommodating growth. The ability of Chipping Campden to accommodate growth is especially important with such an acute affordable housing need. Page 33 of the NDP document recognises the lack of housing to meet specific needs in the neighbourhood plan area and makes a clear statement that this needs to be addressed. However, the NDP does not then go on to include policies which would boost the supply of housing (market or otherwise) or allocations for any housing sites. It is open for the Neighbourhood plan to provide additional allocations for housing even where CDC has not chosen to allocate housing in the area. There is merit in Chipping Campden understanding its specific housing need figure in more detail through discussion with CDC and seeking to allocate housing sites and include policies which support appropriately designed and located housing, proportionate to the scale of its settlements.

2.2 Our client made a submission to the CDC local plan review consultation in April 2024. CDC has, understandably, not yet produced a response or

further iteration of the review document. However, that submission suggested that it may be appropriate for CDC to switch to the standard method of calculating housing need which would increase its housing targets in line with government aims to boost the supply of housing. Page 34 of the NDP document recognises that the overall housing need of 9094 dwellings as identified by CDC is greater than the 8400 dwellings per annum identified in the adopted CDC local plan.

2.3 It is part and parcel of a vibrant and healthy community to have enough good quality homes which are suitable for the needs and budget of those living in them. As CDC recognised in their local plan review, development should normally be located in areas where residents have reasonable access to everyday services, facilities and/or employment opportunities (see their statement of reasons for policy DS3, note iv). We agree entirely with this aim.

2.4 Our view is that the approach of continuing with figures from a plan adopted in 2018 is not in line with the Government's objective of "*significantly boosting the supply of homes*" as set out in paragraph 60 of the NPPF. We consider that CDC should be using the standard method to establish housing land supply and looking for ways to ensure that homes are provided in line with projected population growth within Cotswold District.

2.5 This is because the actual need for housing in practice has not plateaued in the district. Population is increasing generally and minimum housing need figures should increase too. There are ONS statistics which suggest that the 2014 population growth predictions are far lower than actual growth in the district. 2014 statistics are used in the standard method.

2.6 Furthermore, the more houses which are being built, the greater the supply which helps to keep prices even for market housing at an affordable level. Developers are also finding it harder to secure finance to take development forward so the Council may see that more extant permissions lapse as a result of developers not getting their funding in time.

2.7 Housing delivery is also important. Over the plan period so far, we can see that there is an over delivery of just under 15%. In the last 4 years however, delivery has been consistently below the annualised figure of 430 which shows that even if CDC are correct in their current approach, they may see a decline in delivery generally over the coming years if this trend continues and the supply may dwindle as shown below on the Local Government Association calculator.

LGA Housing Delivery test results prediction

2022	2023	2024	2025	2026
PASS	110% PASS	81.3% Buffer and Action Plan	58.9% Presumption	48.8% Presumption

2.8 It seems clear to us that a more pragmatic and less restrictive approach to housing, reflected in both the local plan and the Chipping Campden Neighbourhood plan, could allow the area to provide suitable much needed housing with other policies providing the checks and balances necessary to ensure that important landscapes or natural features are not harmed.

3. Allocation of the Broad Campden site for housing

3.1 Even if the CDC housing target as set out in the local plan is taken as read, the allocation of housing sites (specifically the site owned by our client) could contribute towards meeting the target in a sustainable way with a proportionate addition to Broad Campden.

3.2 The site is ideal for housing for the following reasons;

- It is sustainably located, in close proximity to a number of local amenities.
- Development at the site would enable Broad Campden to grow in a well-managed way. This growth will in turn allow local businesses and services to grow too, securing their long term viability.
- The development would have the potential to increase the housing mix within the area; the NDP document confirms that there is not a wide variety of different types of housing in the area at present.
- Any potential harm that might be identified can be mitigated through a carefully considered, appropriate design and landscaping, in line with NDP and local plan policies.

3.3 Along these lines, the NPPF focuses on the need for development in village locations to help to maintain the vitality of smaller communities and foster community wellbeing. The site can do this by providing a proportionate increase in the village population on a mostly previously developed site will result in more people using the village services in a sustainable way. It will also bring an underused site into active use.

3.4 The site is well related to existing buildings (see below) and could be considered under-developed relative to its size but clearly capable of hosting housing development, given the current outbuildings and vehicle hardstanding. Use of this land for housing is supported by the NPPF and other Government policy which promotes the effective use of land in

meeting housing need and the use of as much previously developed land as possible. Recent changes to the NPPF have sought to incentivise use of brownfield land as far as possible. The NDP recognises that brownfield land has not been utilised to its full potential, although this should be caveated by saying there simply is not very much brownfield land available. Therefore, this site should be supported as much as possible.

3.5 Although the site is not within a principal settlement, Broad Campden still has a number of services and facilities, and as mentioned, Chipping Campden can be accessed easily on foot.

3.6 Development at the site would enable Broad Campden to grow proportionately in a well-managed way. This growth will in turn allow local businesses and services to grow too.

3.7 The site could be advanced quickly following the grant of permission, and therefore could aid with housing supply in the short to medium term, thereby helping to sustain a five-year housing land supply of deliverable sites. Paragraph 70 of the NPPF recognises that small to medium sites make a significant contribution to housing supply and are often delivered much more quickly than larger sites.

4. **Other matters**

4.1 We note that there are a significant number of local green spaces proposed for designation and that these appear to almost act as a barrier around the built-up area. This may constrain the growth of the town which could have an economic impact, as growth of businesses would also be stifled, and a social impact in the inability to meet housing need in locations closest to the town centre.

5. Please contact me should you find it helpful to discuss the information included in this submission.

Yours faithfully

Liz Shield **MRTPI**
SF Planning Ltd.

SPF Planning Ltd on behalf of landowner interests at Springhill Industrial Estate

SFPLANNING

21 May 2024

Chipping Campden Town Council,
Old Police Station,
High Street,
Chipping Campden,
Gloucestershire,
GL55 6HB

By email: *clerk1@chippingcampden-tc.gov.uk*

Dear Sirs

Chipping Campden Neighbourhood Plan – Regulation 14 consultation
Representation on behalf of landowner interests at Springhill Industrial Estate

1. This representation is made by SF Planning Limited in response to the Chipping Campden Neighbourhood Plan consultation 2024 (the NDP document), on behalf of the owners of 4.95ha land at Springhill Industrial estate, Chipping Campden, GL56 9TP as shown edged approximately in red on the plan below. Their site falls within the neighbourhood plan area.



Red line showing our client's site edged approximately in red for identification purposes only.

CHELTENHAM 12 ROYAL CRESCENT GL50 3DA T: 01242 231575
GLOUCESTER 9 COLLEGE GREEN GL1 2LX T: 01452 527997
LONDON 19 EASTBOURNE TERRACE W2 6LG T: 020 3763 8005

sfplanningltd @sfplanningltd info@sfplanning.co.uk www.sfplanning.co.uk

REGISTERED NO: ENGLAND 06114677



Extract from NDP document showing Neighbourhood area.

2. The site is an established industrial estate comprising various industrial buildings and businesses, including an oil distribution depot, storage tank manufacture and repair facility, and a waste oil storage depot. The site also includes a worked-out quarry that has been repurposed for industrial use.

3. The industrial estate benefits from existing infrastructure, including access roads and utilities including fast broadband, which support the current businesses operating on the site.

4. The site has a long history of employment use and development, with a number of planning applications having been approved at the site over the years. Our client submitted a representation to the Cotswold District Council (CDC) local plan review earlier in 2024 to allocate the site as an established employment site under policy EC2. Our case was that the site meets the criteria set out in the explanatory wording to the CDC local plan and there appears to be no reason not to safeguard the site in the local plan.

5. In addition to the local plan review, the NDP provides an opportunity to recognise the importance of the Springhill Industrial Estate as a local employment site and part of the local economy and safeguard it for future growth.

6. Page 29 of the NDP document recognises that; *"Chipping Campden shows a lower level of economic activity than for England (Chipping Campden has 49% of the population as economically active compared with 57% for England) and 41% of these people work mainly from home. For those who travel to work, the majority tend to work locally."* As such there is a need to support, protect and enhance the employment sites which are available to ensure a thriving local economy. Likewise at page 39 of the NDP document; *"Plan policies should seek to maintain and develop the Town's economy, protect and develop existing employment sites, create new employment opportunities within the parish, and*

support and develop tourism".

7. Despite this need, at present there are no policies allocating or seeking to protect existing employment sites. The focus of the NDP at present in terms of commercial development is on town centre uses. We consider that the NDP would be improved and would be more effective at ensuring a vibrant local economy if it included a policy supporting existing employment sites. Our suggested wording would be something reflecting the following;

   "Proposals to proportionately upgrade or extend existing employment sites will be supported provided that the impact on the amenities of surrounding properties, local green space and nature recovery sites is acceptable".

8. In addition, our submission is that the NDP should allocate or dedicate the land for employment uses. Its contribution to the local economy, and its potential for future employment growth make it a valuable asset that should be safeguarded.

9. Its location a few minutes from Chipping Campden but outside the settlement boundary should not prohibit its safeguarding. Paragraph 9.2.7 of the Cotswold local plan notes that there are a mix of safeguarded employment sites both in and outside of settlements.

10. The retention and potential expansion of the Springhill Industrial Estate still aligns with the principles of sustainable development by providing employment opportunities for the area and supporting the longer term vitality and viability of the local economy.

11. Our client is happy to have discussions with the Town Council about the parameters of the site and the potential for growth and how it could support the local economy as the NDP progresses. This would assist in the policy wording.

12. We note that the NDP document proposes a number of Local Nature Recovery (LNR) sites one of which is either within or adjacent to land owned by my clients (a woodland area along the A44). Our client shares the goal of retaining the woodland however, this land secures the quarry face close to the A44 so is needed primarily for safety reasons. This restricts the ability to further enhance the woodland and facilitate nature recovery and therefore our client considers that it would not be appropriate to designate this section as a LNR site.

13. Please contact me should you find it helpful to discuss the information included in this submission.

Yours faithfully

Liz Shield **MRTPI**
SF Planning Ltd.

Morgan Elliot Planning for Pete Mackenzie

morgan elliot planning

22 May 2024

Chipping Campden Town Council
Old Police Station
High Street
Chipping Campden,
Glos.
GL55 6HB

Sent via email: clerk1@chippingcampden-tc.gov.uk

Dear Sir/Madam

Response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 14 consultation –Local Green Space 20. The Hoo East and Local Green Space 21. The Cley

This representation has been prepared by Morgan Elliot Planning on behalf of our client Pete Mackenzie in response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 14 consultation that is running from 8th April to 22nd May 2024.

This representation relates to the site known as Local Green Space 20. The Hoo East and Local Green Space 21. The Cley. The snippet below shows the sites outlined in the Neighbourhood Plan.



This letter follows previously submitted objections to these designations.

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS
office@morganelliot.co.uk • www.morganelliot.co.uk
Registered in England 14455430

Preliminary Matters

Local Green Space 20 – The Hoo East
The ownership details set out on Page 144 of the NP for Local Gren Space 20 are incorrect. Mr Mackenzie does not own the full extent of this proposed designation. Mr Mackenzie owns one parcel of land within this designation.

The designation includes five other landowners.

Local Green Space 21 – The Cley
The landowner details set out on Page 145 of the NP for Local Gren Space 21 are incorrect. Part of the land is owned by **LAND AT GREVEL LANE 1 SPV LIMITED.** This entity does not own the full extent of this proposed designation, with at least two separate individuals controlling the southern portion.

As with other aspects of neighbourhood planning, engagement with the community and local stakeholders is an essential part of planning for green spaces. Policies and designations in the neighbourhood plan should be based on careful consideration of evidence and of the outcomes of community and stakeholder engagement.

Designations and policies should be based on a robust evidence base and community and stakeholder engagement. We recommend that the Neighbourhood Plan Group consult all other landowners.

National Planning Policy

Morgan Elliot Planning has thoroughly reviewed the proposed LGS designations against the requirements of the National Planning Policy Framework (NPPF). I draw the Neighbourhood Plan Groups' (NPG) attention to Paragraphs 105 and 106.

Paragraph 105 sets out that:

- The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period [our emphasis].

Paragraph 106 sets out that Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) local in character and is not an extensive tract of land.

Planning Assessment

Paragraph 105 Test
In relation to Paragraph 105 of the NPPF, and given the characteristics of both of these sites, it is not clear how they're consistent with local planning of sustainable development. Both sites are inaccessible to the public and do not complement investment in sufficient homes, jobs and other essential services.

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS
office@morganelliot.co.uk • www.morganelliot.co.uk
Registered in England 14455430

Furthermore, Local Green Spaces should provide a range of social, economic and environmental benefits. This is one of the basic conditions for neighbourhood plans.

Paragraph 106 Test

When reviewing Paragraph 106 of the NPPF, both sites would not meet the criteria.

Criteria	Site	
	Local Green Space 20 - The Hoo East	Local Green Space 21 - The Cley
a) in reasonably close proximity to the community it serves	The completion of the 'close to the community it serves' box should describe the proximity of the green space to the local community. The space should be within easy walking distance to meet this criterion satisfactorily. The site, however, is not accessible and therefore it is not clear what purpose this land serves.	The site is not accessible and therefore it is not clear what purpose this land serves.
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife	The 'demonstrably special to local community' should describe the ways in which the space is used or enjoyed by the community. The outcomes of community engagement should be useful in demonstrating that space is special to the community. We recognise that the NPG rely on Footpath HCC5. However, it has not been demonstrated why this is special. Further evidence is required to justify the extent of the land proposed.	Whilst the NPG includes text that includes details of the TPO and other designations. It is not clear how the Local Green Space Designation is demonstrably special to the local community. The site is constrained and a Local Green Space designation is not considered necessary and the site is not considered demonstrably special to the local community. The trees on site are already protected and it is necessary to consider whether the additional designation is necessary and would serve a useful purpose. Furthermore, in considering whether a space is demonstrably special to a local community, it is clearly important to engage with the community and to assess how the community uses a space.

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS
office@morganelliot.co.uk • www.morganelliot.co.uk
Registered in England 14455430

			The space has not been used and is solely in private ownership with no opportunity for community use.
c)	**local in character and is not an extensive tract of land.**	Consideration of whether the green space is local in character and not an extensive tract of land suggests spaces within a locality, rather than, for example, extensive green areas in the countryside around a settlement. The 'Local in character and not extensive tract' box should be used to demonstrate that the space in question is a local facility and not, for example, green space in the countryside around a settlement. The purpose of Local Green Space designation is to protect local spaces. Containing urban sprawl or protecting open countryside would not be proper uses of the designation.	The NPG sets out that this green space is an area of natural pasture and wild woodland, the last in the area. The site is not considered local in character.

Conclusions

Overall, Local Green Space designations must be made in accordance with the criteria contained in Paragraphs 105 and 106 of the National Planning Policy Framework and take account of National Planning Practice Guidance.

Policies should have a clear purpose, rationale and be evidence-based. Further evidence is required by the NPG to confirm how "Local Green Space 20 - The Hoo East" and "Local Green Space 21 - The Cley" comply with Paragraphs 105 and 106 of the NPPF.

In the meantime, I trust this representation will be considered as the emerging Neighbourhood Plan progresses and we would be delighted to assist in anyway possible.

Yours Sincerely,



Grant Baylis BSc (Hons), MSc, MRTPI, BwN Assessor

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS

office@morganelliot.co.uk • www.morganelliot.co.uk

Registered in England 14455430

Morgan Elliot Planning
grantbaylis@morganelliot.co.uk

RESIDENTS

Additional Written Responses

1. The Campden Society
2. JK resident
3. CJ resident
4. AC resident

1. The Campden Society

On Tue, 21 May 2024 at 19:20, Vanessa Rigg <campdensociety20@gmail.com> wrote:

Dear Town Council

Please find attached four documents we are submitting as our response to the draft Neighbourhood Development Plan consultation.

The first document titled "TCS response to Draft NDP 240520 v4" is our tabulated answers to the questionnaire. These answers will also be logged digitally via Survey Monkey for your convenience.

Along with these responses are three supplementary documents referred to in our responses:

- TCS Design Guide Comments V2
- TCS 240518 amended letter TCS response to Aston Road consultation
- Litter Bin Report V5

We do hope you find our comments useful and if you have any questions, please do not hesitate to get in touch.

Yours Sincerely

Chipping Campden Town Council Draft NDP

The Campden Society: Response to the draft NDP.

Deadline for submission to town Council 240522

240521v4

General comments		
The draft NDP can be found at : https://www.chippingcampden-tc.gov.uk/neighbourhood-plan		
	Question	Comments
Q1:	1. Do you agree with the Vision for Chipping Campden? If not, what alternative wording can you suggest?	Yes, TCS agree with the vision statement entirely but we would like to see the inclusion of reference to housing. So perhaps:

	A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings. A society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area. Yes No Please give your alternative wording here	A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings. A society working together to realise the potential of our young people, to develop our businesses, *to ensure an equitable housing policy for all the residents of the town,* and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area.
Q2:	Do you agree with the wording of Policy 1 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 1: Chipping Campden Town Centre. 1. The information in Appendix 3 in this plan should be the baseline for the Local Plan Policy EC8, and there will be a presumption that town centre uses (Class E, Sui Generic and all forms of visitor accommodation) will be retained. 2. The Key Centre Boundary is extended as shown in Figure 13.	We support the extension of the Town Centre boundary as proposed in the draft NDP. However, we are also of the view that the boundary should be extended at the other end of Town (the figure on page 97 of the NDP) to include the part of what is known as Cutts Yard that is not currently included, i.e. the garage building. In our view, it would be incoherent to include two separated parts of Cutts Yard but not the central connecting part. While we agree that accommodation close to or within the Town Centre well adapted for the use of the elderly would be an advantage, we do not agree that conversion of upper floors of commercial Town Centre premises is likely to provide such suitable accommodation for the elderly. While the locations concerned are obviously ideal, the accesses to the upper floors of what are almost all if not all listed buildings do not lend themselves to being suitably adapted for the use of the elderly.

	3. Where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre. 4. Proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported. Yes No Other (please specify)	We agree that visitor trade is important in supporting the mix and range of facilities in the Town Centre. Further, the NDP notes on p52 that many of the residential use Town Centre properties are short term let (e.g. Air BnB), and that if the number of such properties is allowed to grow too far (in our view, any further than the current level), that would have a very negative impact on the vitality of the Town Centre, to the detriment of the residents and visitors alike. We also note that the data on pg31 highlights the lack of privately rented accommodation (long-term lets) compared to the national average. We strongly support the suggestion made in the NDP that the creation of new non-services visitor accommodation throughout the area covered by the NDP_ (i.e. not just in the Town Centre) should be resisted. In the above context particularly, but also relevant to Policy 2, one important reference point for judging the appropriateness of a change of use application is the impact on the vibrancy (or also "vitality") of the High Street (or also "Town Centre"). Judging that impact is highly subjective unless some appropriate criteria are established. Nonetheless, short-term lets are likely to remain vacant for parts of the year. Vibrancy, in our view, should be considered throughout the year. As noted in our comments on Policy 2, in our view all applications for a change of use away from a Town Centre use should be resisted; all such changes diminish the vitality and vibrancy of the Town Centre. As noted in the draft NDP, it is not possible to draw strong conclusions from the results of the Parking Survey. We support the principle of finding out what are the views of residents in relation to parking. However, in our view, the process would be more successful and usable if it was in the context of the development of a wider strategy covering both transport (public

		and private), an active travel policy and parking in the neighbourhood. Further, the draft NDP suggests that the Town needs a new car park for cars and coaches. The great majority of visitors do not arrive by coach, and it is not clear that it would be positive for the Town if the number that do so were to increase. Coach visitors do not remain in the town for more than a few hours and do not generally use hospitality venues and the economic benefit to the town is much less than visitors who stay overnight. We strongly support the move towards changing the existing school car park to one for general public use, while acknowledging that this will only happen in the context of the wider Aston Road development going ahead. If this does go ahead, and the provision of a new Town car park is combined with some restriction on High Street parking (e.g. short term and residents only), it is essential that particular provision is made for those who work in the various commercial and retail premises in the Town Centre to be able to use the new public car park either free of charge or at heavily discounted rates (e.g. an annual easily affordable pass).
Q3:	Do you agree with the wording of Policy 2 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 2: Social and community infrastructure 1. The infrastructure identified in Table 6 and	We support both elements of the Policy as stated on page 65. Further, while we note that there are limitations in planning law on the change of use from commercial/retail to residential, the enforcement of the relevant provisions has been variable, and in our view too lenient in some cases. In our view, such changes should be resisted more strongly than is reflected in the current legal provisions, i.e. that such changes should be wholly exceptional. We recognise that this impacts the balance

	Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8. 2. The provision of suitable land for human burial will be supported. Yes No Other (please specify)	between the rights of individual property owners and those of the residents and other users of the neighbourhood where such property is located. That balance is not immutable – for instance, the restrictions applied to listed buildings also limit the rights of individual property owners in the interests of a wider constituency. It is appropriate in a historic town such as Chipping Campden to interfere with the balance that might apply at law. We note that the presumption under Local Plan EC8 is that it is not appropriate to move the Doctor's Surgery away from the Town Centre (recognising that the current Surgery is not within the Town Centre as defined but is close by). We are concerned that there seems to be a presumption that a new Surgery would be part of the Aston Road development plan, although the advantages of such a move have not in our view been demonstrated to outweigh the disadvantages, in particular in relation to how patients access the Surgery. The NDP notes an aspiration to relocate St James's Primary School to a site off the Bratches. If that goes ahead, the vacated current school site would seem a better location for a new Surgery, being large enough and more central to the Town. Noting that the site of St James is probably Diocesan property and will therefore be subject to the constraints of disposal under Diocesan governance regarding gaining the maximum values of the asset. The re-opening of the Train Station is noted as an aspiration and supported by the Town Council and is supported by the Campden Society. We note however that the reference to such re-opening is not included in the proposed revisions to the Local Plan. This is an example of the in our view disingenuous

		separation of the NDP and the Local Transport Plan; we acknowledge this is a matter not in the power of the Town Council to rectify. However, if it is possible in the context of the regulations around the NDP to include more about the transport needs of the community, especially in the context of the move towards zero carbon, we would strongly urge that such comment should be included. The case for re-opening a train station at the old site outside Chipping Campden is strengthening and should perhaps be better reflected in this section under a Public Transport heading on Page 62 alongside bus- stops. It should also feature as a separate section under Public Transport in Appendix 4. The development of a railway station, and the land around this could provide a real opportunity to the economic and social development of our market town. Greater emphasis should be given in the NDP document for the planning and development of public transport services. There is little reference here to public transport links. There is some reference to this in the Community Concerns/Aspirations section (pages 39-42), but these are omitted in Table 6 and Appendix 4. The NDP shows a photograph of the Hedgehog bus (a volunteer-led initiative) but fails to make any reference to the current commercial public transport bus services franchises. Nor is there any reference to the need to preserve and provide appropriate bus stop facilities within the town centre. These need to be provided and be accessible within Chipping Campden, particularly given that we are all expected to see less reliance on private car usage.

		The following items should be added to Table 8: • bus-stops • public footpaths • EV charging points, or potential EV charging point sites • litter bins • amenity spaces such as areas of green space such as verges, patches of green space and grassed roundabouts In addition, the potential route for a northern link road bypassing the town should also be noted so that any planned land use which prevented this potential should be rejected.
Q4:	Do you agree with the wording of Policy 3 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 3: Design of the built and natural environment. Planning proposals, particularly those with Design and Access Statements, should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed according to the Building with Nature Standards Framework. Yes No Other (please specify)	TCS agree that planning proposals should demonstrate that they have paid regard to the Chipping Campden Design Guide and should be designed in accordance with the Building and Nature Standards Framework. However, we do not think that the draft design guide is fit for purpose and should be substantially redrafted, preferably by an Architect / Urban Planner who is familiar with the vernacular of the Cotswolds. The generic sections of the current draft design guide have been substantially cut and pasted from the National Design Guide and need to demonstrate a less boiler plate approach. TCS have commented in detail on the draft Design Guide and we attached the table of comments to this response to the draft NDP.

Q5:	Do you agree with the wording of Policy 4 (given below) and its supporting text and evidence? If not, what alternative wording would you propose? Policy 4: The following features are designated as non-designated heritage assets: NDHA1 The Millennium Sign NDHA2 Westington Streetlamp NDHA3. High Street Stamp Box NDHA4 St Catharine's postbox NDHA5 Westington postbox NDHA6 High Street postbox NDHA7 Scuttlebrook NDHA8 Town Pump NDHA9 Cotswold Way marker NDHA10 Broad Campden Post Box NDHA11 Punk stone carving NDHA12 Graham Greene plaque NDHA13 Sundial Gravel House NDHA14 Sundial Dragon House/Cottage 1690 NDHA15 Sundial Sundial House NDHA16 Sundial Cotswold House Hotel NDHA17 Sundial Dial House	We concur with the items listed and we note that there is no clear definition of what constitutes a heritage asset. We suggest the TC draws up a Local Heritage List following Historic England Advice Note 7 or similar. The TCS also suggests that the TC have a watching brief on any contemporary and new installations that may qualify. Here is a list of other Non-Designated Heritage Assets which we feel contribute to the unique character of the town which we would like added. This list includes already identified and numbered NDHAs where useful. **Street Furniture and Environment.** 1. Boot Scrapers (already nominated). 2. Shop Signs and decorative ironwork are an important part of the town's character and tradition. Apart from the 3 signs listed, many others should be included, for example, The Sparlings; Saxon House; the Kettle; the Bistro at the Cotswold House. Also the iron railings with “Humpage Snail” detail at the Town Hall and Maylam’s. 4. Fire Insurance plates at Grevel House, the Silk Mill, and the Martins. 5. House lanterns, for example, along Leysbourne and outside Woolstaplers' House. 6. Brown plaques eg Ernest Wilson; Frank & Adeline Mottershead; FLM Griggs. • 7. TCS have carried out a survey of Litter Bins and written a report which we attach to this response. We suggest that from her on in all new litter bins are of one specification as proposed and that these should then become heritage assets as well as those that currently conform to this specification.

	NDHA18 Sundial Green Dragons NDHA19 Sundial Crosby House NDHA20 Sign of the Swan Inn NDHA21 Sign of the Lygon Arms NDHA22 Sign outside Elsley House NDHA23 Bootscraper Kings Hotel NDHA24 Bootscraper Baptist Church NDHA25 Bootscraper The Martins NDHA26 Bootscraper Trinder House NDHA27 Bootscraper Westcote House NDHA28 Bootscraper Ivy House NDHA29 Bootscraper Woolstapler Hall NDHA30 Bootscraper Dovers House NDHA31 Bootscraper Bantam Tearooms Yes No Other (please specify)	8. The cloud hedging at Westington (Pike Cottage; Old Westington Farm; Woodroffe Cottage.) 9. The Gazebo on the Recreation Ground, (minus the timber post with plaque attached, adjacent to it, which is a hazard.) **Historic Water Supply.** 1. The pumps along the High Street (one already nominated). 2. The wells in the gardens of the High Street. 3. The ScuttleBrook Pool (already nominated). 4. The Cidermill Lane Trough. 5. The Trough at Rose Cottage, Westington. (The other trough at Westington is Listed.) **Traditional Stone Stiles** 1. Stone Slab Stiles a) Dyer's Lane / Upper Leasows b) Blind Lane / The Craves c) The Mile Drive North d) The Mile Drive South e) Buckle Street f) Briar Hill Farm, Broad Campden 2. Stone Step Stiles a) Station Rd / The Coneygree 3. Stone Animal Stiles a) Buckle Street / The Bank Wood - tbc NB All Stone Stile data taken from CPRE Stone Stiles project.
Q6:	Do you agree with the wording of Policy 5 (given below) and its supporting text and evidence? If not,	1. We agree with the wording of Policy 5 but would add further detail. We suggest that the list of target sites

	what alternative wording would you propose? Policy 5: Biodiversity net gain and Local Nature Recovery. Land identified in Table 7, Figure 15 and Appendix 7 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021. Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows: a. Contact Cotswold District Council to determine whether work has been done towards the preparation of the Gloucestershire Local Nature Recovery Strategy regarding the proposal site, its relationship with the Gloucestershire Local Nature Recovery map, and seek advised on how best to deliver local nature recovery and biodiversity net gain within that context. b. Where biodiversity net gain cannot be delivered on site, applicants must work with Cotswold District Council to identify ways that off-site biodiversity net gain can be delivered in Chipping Campden Parish.	suitable for biodiversity net gain complied by GWT should be supplemented with local knowledge noting opportunities for BNG in the town's natural setting including the management of grass verges and nominated Local Green Spaces; and that the LNRAs should be linked into wildlife corridors, if possible, e.g. Areas 1 & 2 should be linked along the water course of the Cam. 2. We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature/Climate Resilient Water Management) addressing the mitigation of increasing Flood Risk in the town due to rainfall intensity due to the Climate Emergency. Any new development which doesn't fully address – and future proof - this increasing risk (including management of waste water) should be opposed. We also suggest that the importance of the remaining open ditches in the town is noted and that these should not be covered. In addition, the contribution of the nominated LGS to the town's natural flood management should be noted. 3. We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature) addressing Light Pollution in the town to the effect that any new development should guarantee it doesn't increase this pollution but instead conserves and enhances the town's natural setting and biodiversity. 4. We suggest that the guidance is given a more practical focus. For example, ref point 2 a clear commitment not to

	c. Where off-site biodiversity gain is proposed, this should be focussed on the nature recovery areas shown in Figure 15 or the Gloucestershire Local Nature Recovery Map. d. Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary. e. Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered. f. Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery. Yes No Other (please specify)	build on flood plains or in areas where there is a known flooding risk. 5. We note that there are no designated Gloucestershire Wildlife Trust Wildlife Sites within the list on Table 7. GWT notes 850 Local Wildlife sites on their website and we would hope that Chipping Campden could be a part of that.
Q7:	. Do you agree with the wording of Policy 6 (given below) and its supporting text and evidence? If not, what alternative wording would you propose?	6. We support the inclusion of all the Local Green Spaces included in the draft NDP. However, we had suggested previously that the two sites at the Sheppey should be included. The Sheppey and adjacent land demarcate the separation between Chipping Campden and Broad

	Policy 6: Local Green Spaces Land identified in Figure 16, Appendix 7 and listed below is designated as local green space. 1. Berrington Road 2. Leysbourne 3. High Street 4. Memorial Green 5. Castle Gardens Play Area 6. Olimpick Drive Play Area 7. Littleworth 8. Westington 9. The Mound, Broad Campden 10. Court Barn/Cartwash 11. Recreation Ground 12. Bowling Green 13. Cricket Ground 14. Ernest Wilson Garden 15. Wold's End Orchard 16. Badger's Field 17. Calf Meadow 18. Allotments 19. The Hoo West 20. The Hoo East	Campden. The land to the west of Catbrook has an almost continuous line of linear development but the land to the east including the Sheppey provides the rural separation between the two settlements. We think that it is essential to include this land as a Local Green Space to protect that demarcation.

	21. The Cley 22. The Craves Yes No Other (please specify)	
Q8:	Are there any land use planning matters that were not covered in the plan that you think should have been? Can you please describe what you believe was missing or in need of correction?	The draft NDP does comment that there is a lack of social housing that needs to be addressed. It also notes that a large proportion of the properties built over the most recent 5-year period have been larger (4+ bedrooms), with many being under-occupied per the most recent census. Drawing a distinction between market demand and need, the data indicates that more larger and fewer smaller dwellings have been built than have been needed. We note in this connection the direction of travel indicated by the proposed revisions to the Local Plan, i.e. that while acknowledging that the market demand for larger dwellings in the North Cotswolds generally is high, the focus on the building of new dwellings should nevertheless be on meeting need rather than market demand. In that context, and in our view consistent with the requirement that the NDP should support sustainable development, we would like to see a positive endorsement of the principle of building > 100 dwellings off Aston Road, subject to conditions. These should include: • the size and tenancy of the proposed dwellings • A firm commitment to design excellence not just compliance with the Design Guide.

		• Urban Planning that includes shared green spaces that are well thought through and include and benefit the whole development. • We proposed that GCC enter into a development agreement with a developer in order to retain control of the design until the development is complete. This is known to have commercial benefit as it raises the standard of design and build. • Zero carbon development, including solar panels and ground source pumps) • active flood risk management and SUDS • Focus on Active Travel in the development • Biodiversity Net Gain measures including minimising light pollution. • All public areas of the development to be adopted by GCC (and not retained by the developer) as part of the planning consent. As part of the TCS response to the consultation on the draft NDP we include the letter that TCS wrote to GCC in response to the consultation on the Aston the proposed. In relation to the nature and tenancy of new residential building, we would suggest, consistent with the proposed revisions to the Local Plan, that: • Any new building outside the existing Development Boundary should be 100% affordable

		• Any new building development of more than 10 dwellings should include 40% (calculated on the basis of gross internal area) either First Homes or homes for social rent • Viability Statements justifying non-compliance with the above should only be accepted in cases where there have been very significant and unforeseeable changes in the relevant circumstances. We understand that may mean that the relevant land is worth less than was thought, or possibly less than a Developer paid for it – that is part of a developer's risk. TCS would like to see an end to the inequitable reliance by both local councils and developers in setting up management companies for new developments. New residents are effectively forced into business relationships with their neighbours to pay for services that they already pay for in their community charge taxes. For example, the failure by the Local Authority to adopt new roads built, to pay for street lighting and other maintenance charges such as for the maintenance of green spaces. It is an inequitable situation between the services residents receive outside such developments and those within new developments when both pay the same level of Council Tax. Ultimately, if councils want new development and new housing to happen, the concomitant costs of the public services that arise from such developments needs to be factored in to Local Authority finances.

The Campden Society

Response to the Draft Chipping Campden Design Guide

AECOM Rev 2 11.02.2022

05/12/2022 V2

Chipping Campden Design Guide https://www.chippingcampden-tc.gov.uk/uploads/220223-final-campden-design-guide-lowres.pdf?v=1646046240
General comments
A better numbering system and numbered bullet points would make comment and review easier.
There is a lack of integrated thought throughout the document. Themes such as zero carbon, sustainability and wildlife should be considered at every stage and aspect of design.
Better referencing of the stated documents is required.
National Design Guide
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf
Guidance notes for Design Codes
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957207/Guidance_notes_for_Design_Codes.pdf
National Model Design Code Part 1
https://www.gov.uk/government/publications/national-model-design-code
National Model Design Code Part 2

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009795/NMDC_Part_2_Guidance_Notes.pdf			
Cotswold District Council Design Code			
https://www.cotswold.gov.uk/media/5brn1kaq/appendix-d-cotswold-design-code-cotswold-district-local-plan-2011-to-2031.pdf			
Detailed comments			
Section/ Section number	pg	Text from Design Guide	Reference / notes
1 Introduction			
1.4	6	The town is not preserved in aspic. It is a living, working town and has accommodated a significant amount of growth in recent years, ~~although sensitive design can mean that new buildings are sometimes difficult to distinguish~~ and a high standard of design is required to add to the quality of the town.	This is not something to boast about. There is a presumption that modern or contemporary architecture is an unwelcome addition to the community.
1.7		Insert the following after the first paragraph: All planning applications and consequent decisions should, above all, take into account the unique, irreplaceable and fragile nature of Chipping Campden's historic environment, built and natural and its regional and national significance. All developments, no matter the scale, should aspire to excellence in design.	
2 Context and Character			
20th Century Suburbs	15	Building along Catbrook is eclectic, ranging from the impressive Arts and Crafts houses closest to Broad Campden to the ~~modernist~~ 1960s Fire Station in its	FLR Griggs built a number of A&C houses along Catbrook

	15	landscaped grounds.	Really? Modernist? Perhaps best not compare this building to modernist architecture here, suggest 1960s.
Windows	19	Add 'Yorkshire Windows' as a type: windows with horizontally sliding sashes are often called 'Yorkshire' sliding sashes though they were used widely. They appear on at least two buildings in the High Street and Leysbourne.	https://historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading/heag039-traditional-windows-revfeb17/
	19	Drip Moulds	
	21	Vernacular vs Polite. Change to "Vernacular and Polite" Be more specific about the Polite buildings: In the area, generally vernacular buildings tend to be in coursed stone rubble with no decoration, while buildings which incorporate elements of polite might be in squared, coursed rubble and have a number of decorative features. These may include area railings to the street, porticoes with columns and/or pediments, fanlights, dressings to doors and windows, storey bands, raised window surrounds, mullioned windows, leaded lights, gables facing the street, quoins, copings, parapets and decorative chimney stacks. ~~Given the low proportion of polite to vernacular buildings, the number of examples of some of these features can be low.~~ Add additional caption to Fig 14 – "the building on the right includes a regency style bay not common in the town".	Note: As a theoretical term, the differences between "the polite" and "the vernacular" can be a matter of degree and subjective analysis. Between the extremes of the wholly vernacular and the completely polite, many buildings incorporate both.
Rooflines	23	While two storey buildings predominate ~~there are enough~~ one and three-storey examples break up the roofline. ~~to prevent the street scene from becoming monotonous~~. Side walls of three and two-storey buildings are visible when they stand next to shorter buildings and the height of the two-storey buildings also	There is a presumption here that similar heights of buildings is a cause of monotony.

		differs providing a texture to the street scene; ~~giving the same effect~~, ~~often with~~ differing roof pitches ~~to~~ also add to the variety. The occasional presence of top-floor gables adds ~~to the~~ interest as does the intermittent presence or absence of dormers	
Chimneys		Examples on more modest buildings are plain while those on more polite buildings have carved stone bands.	'polite' is this correct in this context as Cotswold stone is a vernacular material or one that is specific to the area?
3 Understanding and Responding to Context			
3.2 Site Analysis / 3.4 Responding to Context	26	Add: Sun Path Diagrams and orientation of buildings. This will allow buildings to be orientated on a north south axis which is the optimum orientation for the benefit and mitigation of solar gain in summer and winter. Add in Ecological Survey	The approach to any site needs to be holistic and appraised using every available tools and survey.
4 Design Guidance 4.1 Introduction			
		"whilst any new design….."	
	29	Existing Typologies – mixture of typologies "However a *considered* mixture of typologies can create variety ~~and interest~~ in the streetscape.	Assumption that interest is only provided by variety.
4.2 Strategic Design Principles			
Provide meaningful connections and walkable neighbourhoods	30	"prioritise pedestrian movements"	Suggest there needs to be more information about how this will "reduce car dependence" and "support healthy mobility choices" mobility choices that reduce carbon emissions require an integration of walking, cycling, public transport and car sharing. So new developments of four or more houses on the edge of the town should take into

			account new pedestrian and cycle routes *outside* of the development and how public transport (Ha! Remember that? But we can hope.) or car sharing could be accommodated within the site.
Enable Wayfinding	31	People feel safer when they can easily memorise places and navigate around them. A high standard of urban planning which utilises predictable street layouts are easier for the public to comprehend; ~~When places are well signposted, they are easier for the public to comprehend. people feel safer when they can easily memorise places and navigate around them.~~ it is easier for people to orientate themselves when the routes are direct, particularly for people with dementia and related cognitive and sensory challenges. When places are well signposted, they are easier for the public to comprehend.	Check CDC guide Change the order and added urban planning
	31	F27 example of wayfinding on LHS is twee and on RHS is not clear.	
Create a Green Network	32	See note re diagrams for section 1.0	
		3rd para This DG should be specific	
		4th para ref ecological surveys and wildlife corridors	
Block Structure	33	2nd para "it must be ~~reminded~~ remembered" Is this needed? Start the para with "New development should respond…." etc	
		4th bullet point "sufficient façade depth" Omit this. This is not a necessity in providing "visual interest". There is ample precedent in well-designed housing to show that a flush façade can feature in beautiful buildings.	The presumption here is in favour of "vernacular" style of buildings and does not encourage contemporary interpretation of vernacular.

		5th Bullet point omit this: ~~The scale of blocks is broken down vertically and horizontally to create an appropriate scale so as not to overwhelm the block opposite.~~	This is out of an inner-city design guide and is overly dogmatic and unnecessary in this context.
		Blocks Must: first two points: • Accommodate a range of housing types ~~to create a strong sense of place and legible environment.~~ to accommodate the needs of the local population and to provide a mix of demographics. • Contribute to a ~~Create~~ good street rhythm by ~~addressing the roofscape and keeping~~ having regular plot widths.	The presumption here is that the sense of place and legibility will only be created by having a mix of building types. The question should be asked the other way round – "what creates a sense of place and a legible environment?" A high standard of design with clear intentions.
Overlook Public Space	34	No reference to Secure by Design here.	
	34	2nd Bullet point Main building façades should overlook the open spaces and be aligned to improve natural surveillance on the street. In addition, side windows and driveways should also be well-overlooked.	
	34	3rd bullet point What does this mean? Play equipment, allotments, a pub? This needs to be spelt out. Integrate facilities into the open spaces that meet the needs of the people living around in order to make them attractive.	
	34	4th bullet point This directly contradicts pg 36 bullet point 4 which encourages the use of hedgerow planting to conceal on-plot car parking etc Avoid using too much green screening on the front gardens in order to allow for some views to the street and the open spaces.	
Enclosure	35	This whole page needs reviewing and rewriting	Principles of Urban Design
	35	Principles of enclosure	These principles of enclosure would appear to have been abstracted from a now discontinued paper from the Scottish Government and are not

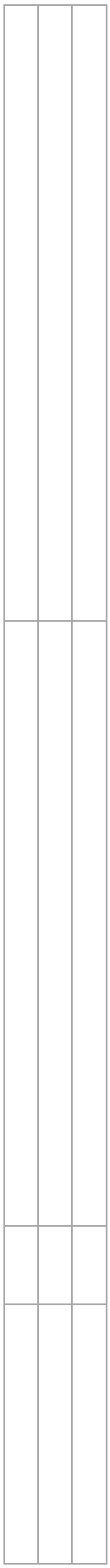
			appropriate to smaller settlements. As they have been pulled form a much longer paper, they are out of context and not clear. In that paper a 1:6 ratio is described as being a square Main building façades should overlook the open spaces to improve natural surveillance on the street. In addition, side windows and driveways should also be well-overlooked. which is not clear here. In addition, there are studies which undermine this theory of enclosure. Land scarcity in Campden means that this guide should be demonstrating how to develop more dense housing. National Model Design Code provides better references for enclosure.
		F29 and 1st bullet point A ratio of 1:6 results in the loss of a sense of enclosure omit this part of the diagram. The Land that will be available in Chipping Campden is scarce and wide streets leading to a loss of density are not appropriate.	
		2nd bullet point	
	35	3rd bullet point, LH column Generally, building façades should front onto streets, but may be orientated otherwise to maximise solar gain. Variation to the building line is not generally recommended but may be acceptable. ~~can be introduced to create an informal character.~~	Disagree. Orientation of buildings may mean that they are turned at right angles to the street, provided that overlooking issues are resolved. Gratuitous variation to a building line looks confused and messy ill-considered. A consistent building line is helpful for scale and order. The presumption here is that informality is required to

			create character. Variation is generally the result of buildings being built at different times by different developers. Variation introduced artificially looks contrived and does not engender a sense of place. Viz new development at Broadway.
	35		
		4th bullet point LH Column In the case of terraced and adjoining buildings, ~~it is strongly recommended that a variety of plot widths, land use, building heights, and façade depth~~ a high standard of should be considered during the design process to create an attractive streetscape ~~and break the monotony of the street wall.~~ Rewrite this	Arrgghh. Disagree. This contradicts plot widths above (I can't find it now) Presumption is that a uniform width and appearance is a bad thing. Viz examples of terraces around Campden, some set back from the road. Clear, uncluttered and generous design with adequate landscaping considerations will provide interest and scale and it is this that breaks up the monotony. Uniform plot widths allow pedestrians to understand the scale of the road and the distance to be travelled and this makes walking easier in large developments.
Street Planting	36	2nd bullet point Too prescriptive, people will not necessarily maintain 'ornamental' species. Native planting is more helpful to biodiversity and would tie in with other aspirations in this design guide such as section	
		3rd bullet point Cf point about native species above Also note Secure by Design anti-crime principles	

Wildlife Friendly Environment	37		
		3rd bullet point How is biodiversity strengthened?	
		4th and 5th bullet points This needs a reference to a comprehensive guide to biodiversity and ecological appraisals. How is the 'ecological function' to be established. There is no point in putting in a bug house or a swift brick if there is no understanding of the holistic requirements of specific species. Developments need to have an ecological strategy that will allow the relevant species to thrive without further intervention or degradation of the required habitat.	
		6th bullet point Aligning gardens for wildlife should be mentioned in the section above re Context pg 25, Block Structure, Green Network pg 32,	
4.3 Detailed Design			
Building Lines and Boundary Treatments	39	1st para	
		3rd bullet point	

		Natural boundary treatments should reinforce the sense of continuity of the building line and help define the street, appropriate to the character of the area. They should be mainly continuous hedges and low stone walls, as appropriate, made of Cotswold stone. The use of either panel fencing or metal or concrete walls in these publicly visible boundaries should be avoided.	
		4th bullet point Delete the second sentence, or link it to the wildlife and biodiversity element. On residential streets outside the historic core, front gardens or planting strips should be provided. Those should include some green elements, like flowers, hedges or trees if possible, and earthy paving materials.	
Building Lines / Roof Lines	39	The treatment of roofline should be carefully considered: variety of height *may* be appropriate for differing typologies of dwelling but a consistent roof geometry and uniform rooflines can provide cohesion. See bullet point 5 on pg	
Fenestration	40	3rd bullet point Windows should be of sufficient size and number for abundant natural light and should meet or exceed statutory regulations.	
	40	4th bullet point Site layout and building massing should ensure access to sunshine and avoid overshadowing and overlooking neighbouring buildings. New developments should also use opportunities for siting houses to maximise solar gain and provide long-distance views through a careful placement of windows.	
	40	5th bullet point	

		Consistent window styles and shapes should be used across a given façade to avoid visual clutter and dissonance. ~~Varieties in window types, shapes, and details should however be encouraged across the same development.~~ Do not agree check CDC	
	40	6th bullet point Delete this: ~~Within and near the conservation area, fenestration should reflect an understanding of locally distinctive features such as scale, proportions, rhythm, materials, ornamentation, and articulation. This should, however, not result in low-quality pastiche replicas.~~	please change the photos in both F36 & 37. These may not be 'low quality' but they are pastiche replicas and have no place in modern developments. F37 leaded lights are simply a decorative pastiche which results in less available light entering the building on what are already somewhat mean window sizes. They look old artificial and contrived. These do not let in 'abundant natural light' cf 3rd bullet point pg 40 F38 sash windows ditto for pastiche. These are not as efficient as a modern casement window. Glazing bars are not needed in modern windows and only serve to reduce the light available. Please stop encouraging developers and designers to be fearful of contemporary design and more energy efficient solutions. At the start of this guide is a description of polite architecture – contemporary design could be described as 'polite' as it does not rely on local vernacular.
Materials	41		The exemplar pictures do not include any brick, bar for a brick chimney, nor any rendered buildings. Many of the pictures depict pastiche architecture and a 'cottagey' idiom.
Checklist	44		Please indicate the source of this checklist.



The Litter Bins of Chipping Campden and Broad Campden

by The Campden Society
August 2023

V5

THE CAMPDEN SOCIETY

Introduction

- The Campden Society have carried out a survey of the existing litter bins in Chipping Campden and Broad Campden to assess the condition and suitability of the types of bins and the spread across the town.
- The survey demonstrates that the litter bins are inconsistent in design and not always suitable for the location.
- The spread of bins across the town appears to be relatively even, although there are only two bins in Broad Campden.
- There are other litter bins within the Parish which have not been surveyed, for instance the layby to the A44 between Westington Hill and Kingcombe Lane.
- We propose that the Town Council adopt one or two designs that are used going forward to provide consistency and a good standard of design.
- We suggest that street furniture should be unobtrusive and practical with a modern design and made of steel for longevity
- We understand that Cotswold District Council supply the bins and have a preference for green.
- TCS recommend that black or grey is slightly less obtrusive and provides a less dated look. A selection of possible models is included in this report.
- Litter bins are available with various optional extras which tailor the bin to the circumstances of fixing and other requirements.
- Prices for bins are not included in this report.
- If a wider replacement were to be enacted, funds could be raised by adding a surcharge to the cost of parking in the Town Hall Square care park.
- Bouton-on-the-Water have used a tourist surcharge to fund improvements to the town, which was put to a public consultation. (ref. https://www.cotswolds.org/blog/bourton-on-the-water-tourism-charge/85/)

Proposed specification of future Litter Bins



- A consistent approach to street furniture provides an uncluttered environment. This includes using the same colour as well as the same model of litter bins, albeit with variations as to fixing or other specific requirements.
- TCS propose a formed metal design in black. Black is less intrusive than green and provides a better backdrop to the honey coloured Cotswold Stone of the towns' heritage buildings.

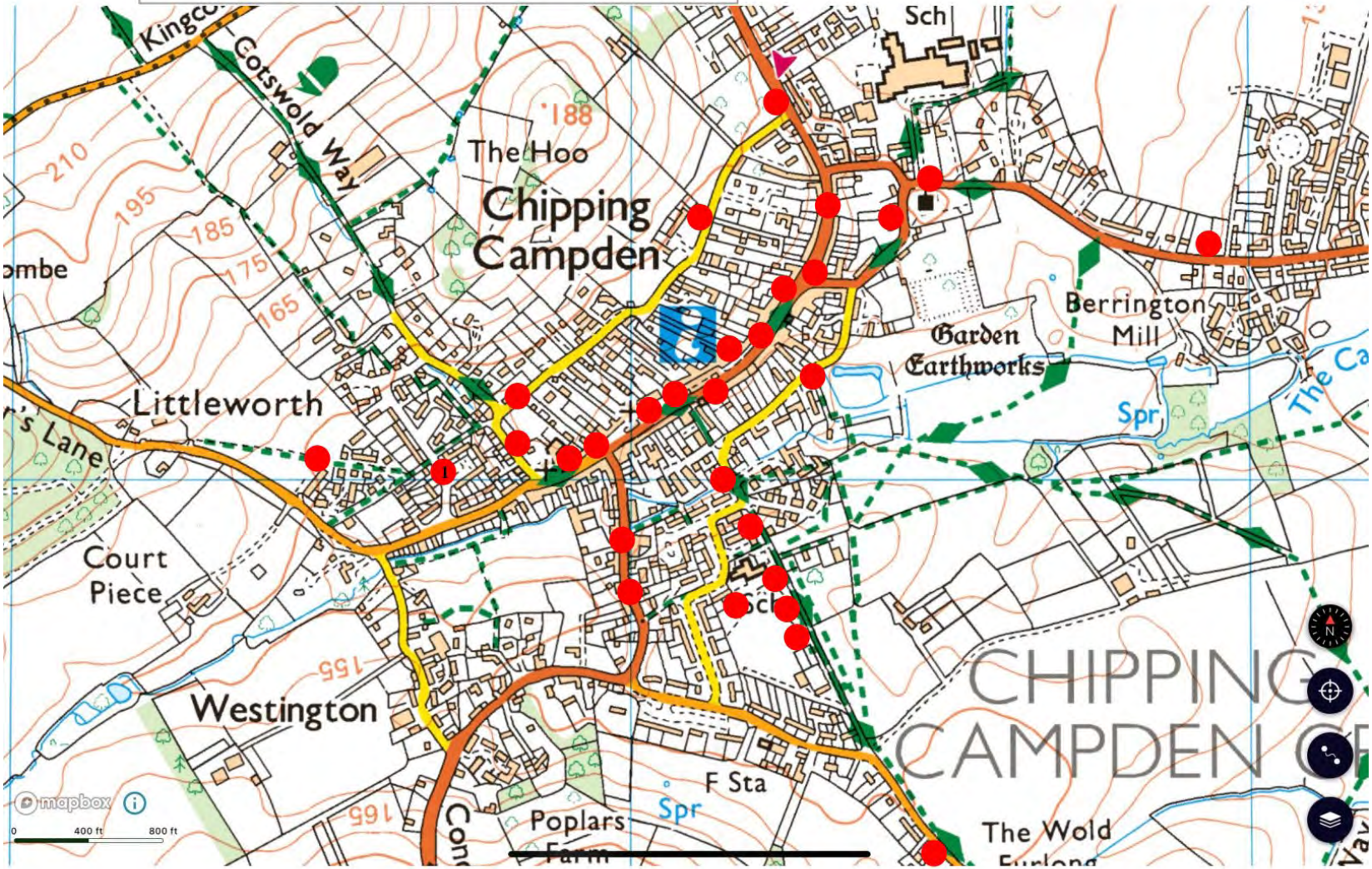
- Proposed Specification:
- Broxap Derby Contemporary
- 120l capacity; Steel
- Various colours available
- Optional Extras available
- Various fixing methods, bolt down, ballast, etc.
- Variations on the design can be found on the Broxap website:

https://www.broxap.com

Overview of Existing Litter Bin Types

- There are 32 litter bins across Chipping Campden & Broad Campden
- The bins are of six different designs, the majority in green with gold trim.
- All the bins are free standing with various methods of fixing to the ground.
- The capacity of the bins varies but is generally 90l.
- The bins are mostly open sided, one is open topped.

Litter Bin Locations



Overview of Existing Litter Bin Types



4 x Green with trim and square.
All in Recreation Ground



11 x Green with trim and column.
Type: Maelor Trafflex Round High Security - 90 L



2 x Black with trim and column



3 x Green with trim



4 x Black with trim



5 x Plain green



1 x Black with trim and square with stub tray

Chipping Campden Litter Bin Survey (1)



1. Olympic Drive play area



2. Coronation Close, Littleworth



3. Back Ends, entrance to St C's graveyard



4. Back Ends, opposite entrance to St C's School



5. Back Ends, Sorting Office



6. Corner of Back Ends and Aston Road



7. Corner of Old School Drive and Station Road



8. Church Street, opposite Court Barn

Chipping Campden Litter Bin Survey (2)



9. Station Road, opposite Lodge House



10. Calf Lane, on corner of drive to Mill House



11. Calf Lane, by the Cam



12. George Lane, near Calf Lane junction



13. George Lane, entrance to Recreation Ground



14. Recreation Ground play area



15. Recreation Ground, near picnic tables



16. Recreation Ground, near tennis courts

Chipping Campden Litter Bin Survey (3)



17. Catbrook, near last house before Broad Campden



18. Sheep Street, opposite Chinese takeaway



19. Sheep Street, WCs



20. Lower High Street, near phone box



21. Lower High Street, St Catharine's school



22. Town Hall square



23. Front of Town Hall



24. Memorial Green

Chipping Campden Litter Bin Survey (4)



25. High Street, Co-op



26. High Street,
Frankie Doodle



27. High Street,
Old Grammar School



28. High Street, opposite
to Pharmacy



29. Leysbourne



30. Leysbourne,
Ernest Wilson garden

Notes:

Litter bin 6. Corner of Back Ends and Aston Road: the Town Council have requested a replacement for this broken bin

Litter bin 1. Olympik Drive: the Town Council have asked CDC to adopt this bin for litter collection.

Broad Campden Litter Bin Survey



Broad Campden,
outside church



Broad Campden,
opposite phone box

Pg	Comment
3	Capitalisation of “Contents” descriptors and titles of pages not consistent To aid navigation suggest: Add titles : Policies 4, 5, and 6 and Split Community concerns and Community aspirations as they are 2 pages?
10	No sources for key
11	Maybe add in explanation about how this will work with the Partial Update.
15	Design – could inc flooding; Facilities could inc education
18	Not the Arts and Craft Movement – CR Ashbee’s Guild of Handicraft
19	No sources for key
20	“Old Campden House”. One Camden. No explanation of the red dots? Assuming Grade 1? Why aren’t NT properties included? Old Market Hall & Coneygree
25	One Camden. Add a sentence about the Performing Arts Centre.
26	Could there be a reference to the poor quality of the woodland and what we would like to do about it?
27	Need a grid reference and local name to where these key viewpoints are as it’s difficult to work out.
28	Label missing from purple colour in key. Could the differentiation between blues of the Zones be more distinct?
30	Definitions should be added – or a link put in across all definitions. eg The deprivation scale isn’t explained and therefore hard to understand.
31	Occupancy not occupency.
33	Built not build
34	Table 2 The relationship between the three columns isn’t clear and needs a line of explanation
38	Key findings
39	Punctuation of first point needs editing. The first point includes a comment which goes against the Aston Rd development??
43	The primary school is on Pear Tree Close.
44	The Business Park seems to be situated on private /farm land?
46	Maybe add in explanation about how this will work with the Partial Update.
48	Fairly opaque wording which I find difficult to understand and refers to the policies before they have been introduced. Can this be put later in the document? NPPF – perhaps spelt out? - as introduced without explanation. Why don’t Non Designated Assets have an economic objective? Helpful for Tourism.

52	“Other north Cotswold settlements that are a similar size as Chipping Campden such as Blockley and Northleach do not boast as many shops and eateries.” CC pop 2400. Blockley pop 1067; Northleach pop 1993. Suggest removing Blockley and adding a reference to the success of Stow Pop. 1905. Or lack of facilities in Mickleton pop 2318
53	Noel Arms and Cotswold House aren’t identified on map. Neither is the pharmacy. Sul Generis needs a line of explanation.
61/5	To aid navigation I suggest the policy section and summary and contents page should have to same title.
62	Bowling Green double counted . Suggest Old Police Station rather than Visitor Centre for location of toilets. There’s no mention of the King’s Arms
3/ 66/8	To aid navigation I suggest the policy section and summary and contents page should have to same title.
71	Suggested name Scuttlebrook Pool. (Additions: Stone Stiles x 4; the old Kettle; Old Arched Trough, Cidermill Lane; further troughs up Westington Hill)
3/72/78	To aid navigation I suggest the policy section and summary and contents page should have to same title.
74	It would be helpful to have the names next to the numbers to aid navigation.
76	Camden/Campden Kingscome/Kingcombe
83	The Appendices seem to be in the wrong order for the sequence of the policies. Ie Appendix 2 Natural Environment should be with Appendix 7 Local Nature Recovery
94	“Grevel’s”
100	They prefer Campden Home Nursing to Jecca’s House I think.
102	Meeting House is Listed. (To add if mentioned for St James’ Church?) Defibrillator will be active.
105	Add Listings to Town Hall and Old Police Station?
106	Campden
108	No mention of the Kings Arms?
119	“Grevel’s”
124	Need a source reference. Plus perhaps simple explanation of how these were developed?
125	Camden x 2
127	Kingscome/Kingcombe
131	Landowner missing
132	Landowner will be confirmed? x 2
133	Landowner for Memorial Green Town Trust. Does the War memorial inc WW2? Landowner will be confirmed? x 1
134	Langan Homes will be transferring to a Management Company? Landowner will be confirmed? x 1
135	Landowner will be confirmed? x 2
136	Landowner will be confirmed? x 1

140	? check “The volunteers who maintain the site still make cider and perry from its fruit.”
143	Landowner - the Haines?
144	Landowner - the Haines?

).

The Campden Society
The Old Police Station
Chipping Campden
Gloucestershire
GL55 6HB

Neil Corbett
Asset Management and Property Services
Gloucestershire County Council
Shire Hall
Gloucester
GL1 2TG

22 November 2021

Dear Neil

Land off Aston Road, Chipping Campden
Outline plans for new access road and car/coach park for school, replacement surgery and new housing
Public Consultation – 18 November – 10 December 2021

It was very nice to meet you at the consultation, as promised here is the response from the Campden Society.

The Campden Society strongly supports the proposals put forward by Gloucestershire County Council for the creation of:

- a new access and car/coach park for the school
- the existing school car park becoming a public car park
- the provision of a replacement surgery
- the provision of additional housing that would enable the delivery of the above

Generally

The Campden Society believe this development provides a unique opportunity to improve the lives of the people of Chipping Campden and we support the initiative and recognize the efforts of Gloucestershire County Council and Lynden Stowe, Chipping Campden School, Dawn Lodge Associates, Cotswold District Council, CC Town council, CC Surgery, to get to this point. We appreciate the work that has gone into enlarging the original outline planning scheme to include the new road and the creation of a new car park and surgery for the town.

We think this is an opportunity to make an innovative scheme with visionary aspirations. We will be pushing for design excellence and the highest standards of environmental construction and delivery so that this can become a landmark scheme that is a credit to the town and will have wider exemplary outcomes. We would like this to be a scheme which balances being a desirable place to live with usable private space within an overall structure of high-quality public space. We have included exemplars of CLH and innovative housing design at the end of this letter.

Chipping Campden has a proud history, not only as a remarkable market town with exceptional architectural heritage, but also Campden has some more recent housing schemes of exemplary design. Littleworth estate designed by Pemberton & Bateman for the Local Authority won a 1953 Housing Medal and Wolds End was design by the award-winning architectural practice of Wallace & Hoblyn Partnership.

Both of these schemes have been variously praised for the quality of the design and layout, the generosity of the layouts and the quality of the craftsmanship.

We would like to see a scheme of contemporary design that sits within the AONB without looking like a pastiche of the local vernacular architecture, but rather which provides a modern interpretation of it, much

like Wolds End and Littleworth. We do not want to see another development such as Fereby Close or Olympick Close with poor urban design and unimaginative detailing.

New Housing

Chipping Campden also has a history of providing affordable housing for young families and key workers. The Bratches, close to the development site, built in the 1980s was an early example of affordable housing. Chipping Campden School also has a linked Housing Association aimed at providing teachers and other key workers a small selection of homes in this expensive area of the country.

- We would like to see as much affordable housing as possible provided under the scheme and we would ask that a minimum of ten dwellings would be developed as Community Led Housing under a Community Land Trust so that the land would remain as affordable rented housing in perpetuity and would not be subject to Right to Acquire legislation.
- We would like to see the majority of the affordable housing be marketed as affordable rented properties under the aegis of a registered provider rather than for affordable sale. Those units of affordable housing that are marketed for sale we would like to see as mixed tenure We would like to see enforceable and enforced covenants put in place for the affordable housing to ensure that units may not be sold on the open market and that they would remain in reach of low earning households.
- We call for the housing to be developed as zero carbon housing to Passivhaus standards.

We would support the inclusion a further nominal number of housing units to pay for the uplift in design and environmental standards that we are calling for.

Developer Selection

We propose that a) the developer is selected on the grounds that there is buy-in to the innovative nature of this scheme and b) strict mandates are set in place on the selected developer to ensure that:

- A design led architectural practice is selected for the scheme.
- A stricture on the selected developer sub-selling any portion of the land to another developer to reduce the obligation of affordable housing from 40% and prevent the loss of any affordable housing units.
- All the add-ons of open space etc are included and not lost due to miscalculation of cost once the development is started.

You mentioned the example of Starvehall Farm which was a developer led scheme delivered with Built for Life standards. We would endorse this approach but we would want to evaluate the architects appointed for the design as the BfL standard can still end up with somewhat mediocre architecture, despite including all the other aspects of a well-considered scheme.

We would propose that the following green initiatives are incorporated into the proposed scheme to demonstrate a meaningful commitment to playing a part in addressing the climate emergency.

- Zero carbon housing
- solar panels, ground source heat pumps or district heating, (not air source heat pumps)
- Inclusion of SUDS
- Mitigation for skylarks and other affected species
- Wildflower verges with mown strips
- On the green boundary to the north/north east of the site, useful tree planting that is easily maintained and that the maintenance of the new green strip is clearly defined and funded.

We would also like the following issues to be considered and implemented into the development:

- Well-designed green open spaces that accommodate the variety of needs that will be present in the development with a mixed demographic. This could include play equipment for under 10yo. Outdoor gym equipment and the opportunity for a community garden.

- Thoughtful and inclusive urban planning that provides a mixed housing development with the variety of tenures integrated across the scheme.

Materials and Design

- Adherence to Cotswold Design code assumed
- Modern vernacular design

New Road and School Car Park

- We would suggest that the location of road into the school grounds is moved to the north east slightly to avoid loss of any school playing field area. Currently the way the road is shown it interrupts the school running track. and consultation with Sport England.
- Clear and safe crossing points are included at all three new intersections onto Aston Road – two pedestrian/ cycle paths and the new road junction.
- That the pavement to Aston Road is upgraded to provide safe walking and encourage people to walk.
- We feel it is imperative that a route for a possible 'by-pass' to Station Road is maintained in this development, even if this seems a remote possibility at this stage, it may be needed in decades to come and it would not cost anything to ensure that the possibility is left open for a route through.

New Town Car Park

- The new town car park should be leased and managed by the Town Council, or a subcontractor thereof, and not be a drain on Chipping Campden School resources in any way.
- Electric charging (EVC) points should be included in the carp park, the number to be determined by a traffic survey and anticipated increase in EV ownership.
- All requirements for the effectiveness of the new town car park are covered by the development as set out by CCS.
- The Town Council and Cotswold District Council provide support to Chipping Campden School and to Chipping Campden Surgery to instigate Active Travel measures and campaigns.

We hope that you will be able to drive forward the inclusion of these suggestions and we are happy to provide any support that you need to do so. The Campden Society will continue to push for the highest standards in this scheme.

Yours sincerely

2. JK resident

CHIPPING CAMPDEN NEIGHBOURHOOD DEVELOPMENT PLAN RESPONSE -KISSEL

From J kissel

Chipping Campden Neighbourhood Development Plan 2023-2031 (Plan)

The Plan is intended to be a legal document not a pictorial guide to Chipping Campden with advertising for chippingcampdenonline.org, campdenbri.co.uk, landmark trust etc. and illustrated with dozens of pictures which should all be removed.

I am not a Local. I was not born in Chipping Campden. However, I have lived on the High Street for over 50 years. I have an interest in the preservation of heritage assets. The Chipping Campden Town Council web site only refers to conservation area and makes no mention of these heritage assets. In fact the entire High Street is lined with, as well as in the middle, heritage assets from Grade 1, 11* to 11 except for the Baptist Church.

The Plan, intended to be based on The Way Forward of 76 unillustrated pages produced by the Chipping Campden Area Partnership formed in November 2004 with the objectives of carrying out research and seeking the views of the community in order to document the current situation, was intended to set our likes and dislikes concerning the use of land. (Minutes April 2013)

Land in the area of the Plan is used for crops, woodlands, shooting, business park, housing, retail units, working from home and so on. To me it is the area which draws people moving here but as the extraordinary High Street is written about its retail uses have changed so that many shops frequented by locals are fast becoming nothing but shops selling to visitors while the Area itself continues to encourage the elderly (meaning retired) to move here.

Over the years the butcher, the baker and the candlestick maker have closed. The new business owners seldom live above the shop and they and developers more often except for local farmers come from afar to develop land.

In the past I have been involved with lorry watch, a proposal to improve the quality of the lives of the residents of Chipping Campden resulting in an Order by Gloucestershire County Council, the school car park when first opened for visitor parking and the Local Plan

The Localism Act encourages those living in the area of the Plan to speak up as to what development we would like and what we do not like.

The Designation of Neighbourhood Area was signed 20 November 2013 by the Town Clerk and once accepted by Cotswold District Council the Council had the duty of publicing on their website under section 6 and 7 so as to bring to the attention of people who live, work or carry on businessin the area to which the area application relates—

a copy of the area application;
details of how to make representations; and
the date by which those representations must be received, being not less than 6 weeks from the date on which the area application is first publicised.

Town Council approved a working party to turn The Way Forward into the Plan April 2013 (April minutes).

I am personally interested in the setting of heritage assets and change of use, trees, parking, affordable housing and downsizing and making sure Town Councillors have access to sites.

Whether the first publicity in 2014 was sufficient to satisfy an Independent Examiner is not up to me but I feel it was insufficient as there were only 27 responses (April 2014 minutes). The population is around 2,000 and responding was open to anyone.

There is no Town Council minute setting out what the 27 responses covered. No working party minutes.

The Town Council resolved to instruct a Mr Davidson to produce the Plan (September 2014 minutes)at a cost of £1,500 and the draft Plan produced by Mr Davidson pursuant to Regulation 14 was published on the Town Council web site with a one day public meeting in May 2017 and open for comments.

The Minutes refer to 100 people who were generally supportive; that car parking was contentious; affordable housing a problem and a meeting was to be held with Cotswold District Council in June to run through the next steps.(Minutes 9 May 2017)

I sent in my comments. Others may have done.

The next step is set out in the Regulations. The comments should be read by the working party and the Plan adjusted to accommodate those that can be included. I have found none reproduced as is usual after a Regulation 14 for the public to read. The public are to be kept informed. Here they are not. The Draft Plan is sent by the qualifying Town Council to Cotswold District Council.

From the evidence from the Town Council Minutes the Regulations were not followed by the working party or indeed by Cotswold District Council. I have not been given access to the Minute Book to check any reference or indeed most on page 9.

The Regulations make no reference to another Draft Plan being able to be produced under Regulation 14.

Whether a further Regulation 14 Plan is permitted by the Regulations is up to the Internal Examiner.

Mr Davidson in February 2020 is minuted as drafting. I can see no instruction. Mr Davidson was paid £5,000 in March.

In 2021 Mr Davidson is minutes as still drafting.

In 2023 the Town Council was reconsidering Mr Davidson or another professional (Minutes 14 March 2023)

11 July 2023 Town Council resolves to pay Andrea Pellegram for one day of professional advice on the draft approved by the Town Council with comments by Cotswold District Council before proceeding to public consulation.

This further Regulation 14 Plan has been produced and can be read on the Town Council web site or a copy is in the Library. This Plan

fails to propose Policies on parking or social housing as highlighted in The Way Forward or Plan 2017.

The Qualifying Body referred to throughout Regulation 14 is the Chipping Campden Town Council and not Andrea Pellegram. I have written above that I have already commented on Regulation 14 Plan in 2017 again not prepared by the Qualifying Body. In my view this draft Plan 2024 may be unlawfully made. However, I wish to comment and make proposals:

STREETSCAPES VIEWS AND BUILDINGS

Justification/Explanation

In April 2012 the Town Council resolved to write a document with teeth stating where and what development it would like and where not and to turn the Way Forward into a Neighbourhood Development Plan. It was expected to take a year to produce and cost in excess of £30,000.

The Way Forward of 76 unillustrated pages was produced by the Chipping Campden Area Partnership formed in November 2004 with the objectives of carrying out research and seeking the views of the community in order to document the current situation. It is believed to have been published in 2010.

The Way Forward reports:_

"There is a strong sense of community in the town and an awareness of the need to keep a balance between conservation of the built environment, links with the countryside and the importance of ensuring economic viability.

That according to English Heritage, Campden has the second highest density of listed buildings of any town or city in England – 223, which is more than 5% of the total for the whole of the North Cotswold District. There are five Grade 1 listed buildings - St James' Church, The Almshouses, The Market Hall, Grevel House and Woolstaplers' Hall and 18 grade 2. There are over 200 Grade 2 listed buildings in the town. A complete list of the listed buildings is available at Cotswold District Council*

Chipping Campden High Street has been described as 'the most beautiful village street now left in the island'. However, research has shown that there are a number of problems in relation to signage for the town. 2.16

The signs in the town square giving details of the car parking charges are ugly, and surprise has been expressed that they have been allowed. 2.21

Some of the shops in the high street have started to encroach on to the pavements with their advertisements and goods - this not only looks unsightly but could be a danger to public safety. 2.22"

There is support for the information centre in The Way Forward and it includes a figure of 50,000 visitors to St.James's Church in 2007 and 21,503 visitors to the Information Centre during 2008 to 2009.

The Court Barn produced figures from April 2023 to March 2024 of 14,000 visitors to the museum and shop (10,000 shop 4,000 to museum).

There are no up to date figures in the Regulation 14 Plan April 2024 which would have been helpful in assessing the increase in visitors.

Over the years owners have adapted to the times and altered the ground floor of their heritage asset or yard to commercial. More recently these heritage assets have been let or sold to owners who live outside the area and often far way and who wish to profit from visitors from their purchase or let leading to street clutter from signage whether an advertisement in words or skins, or table and chairs, umbrellas, goods are designed to entice customers to enter and spend.

Street clutter used as signage such as advertisement boards, planters, tables and chairs, umbrellas and goods on the pavements to encourage those passing to step into a commercial unit and in particular I would like to see the High Street benefiting from 'tidying up' and also there is the risk of creeping proliferation of street clutter in future – given that this clutter is produced by those who ignore the harmful impact on the character and expect to profit from the clutter – such as those already listed as well as electric charging points, restrictive parking signs, advertisements fixed to heritage assets, parking meters and so on all land uses which can be addressed in the Plan.

Clutter on the footway.The main function of a footway is to get pedestrians about and whilst a desirable clear footway width is 2 metres to allow a pram and wheelchair to pass and allow safe passage for those with a disability the present clutter visually harms in particular on the High Street the heritage assets listed Grade 1, 11* to 11 except the Baptist Church from Church Street to Sheep Street and restricts safe passage.

In 2017 I included clutter in my comment after reading the Regulation 14 draft in the library and the May 2017 exhibition. I can not be the only resident concerned about the setting of heritage assets on the High Street. Councillor Bates and the Deputy Town Clerk as well as myself have approached Gloucestershire Highways. Clutter is still on the footway or highway and it is open to include in the Plan that clutter is not acceptable on highway surfaces in the interests of protecting visual amenity and preserving and conserving heritage assets and Conservation Areas

Advertisement boards in particular are subject to The Secretary of State's powers to make regulations for the control of outdoor advertisements in sections 220, 221, 223 and 224 of the Town and Country Planning Act 1990. The current regulations are the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, SI2007/783.29 Mar 2007. The planning authority is to use these.

Further, the planning authority could rely on paragraph 193 of NPPF when considering the impact of development or temporary development on the setting of heritage assets or paragraph 194 that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification and there can be no possible public benefit arising from clutter but the planning authority seems to have no desire to.

I emailed about 20 infringements to the planning authority and was informed by email:-

From: planning.enforcement@cotswold.gov.uk

To: 'J Kissel'

Mon, 6 Nov 2023 at 08:07

Dear Mrs Kissel,

Whilst A-boards are considered an advertisement in the legislation, they are more easily dealt with by the Highways Authority as the land owner. With this in mind, Cotswold District Council have referred these onto Gloucestershire County Council.

Alison has now left the enforcement team and there is now very limited resource in the team. As such, resources are having to be focussed on the most serious & harmful breaches that are being reported.

Kind regards

Daniel Lewis

Enforcement Consultant

From: J Kissel <jenpax1@yahoo.co.uk>
Sent: 30 October 2023 17:25
To: Planning Enforcement (CDC) <Planning.Enforcement@cotswold.gov.uk>
Subject: Re: Query on A-Boards within Chipping Campden

"Dear Alison,

I refer to your email of the 26 September concerning the installation of A boards in Chipping Campden following on from Historic England contacting yourselves about them and me emailing ownership details and list.

This afternoon I bumped into the deputy Town Clerk who mentioned Bob Skillern of Gloucestershire Highways is involved in seeking to remove A boards and I replied that I understood A boards were also controlled by Cotswold District Council and indeed I had sent a list of A Boards to yourselves. The Application for Consent to Display advertisement(s) Town and Country Planning (Control of advertisement) Regulations 2007 applies. I mentioned under these regulations A boards may be found to be harmful by CDC to the amenity of the High Street and be removed....."

I then emailed the photographs of clutter which I had emailed to the Planning Authority to Bob Skillern of Gloucestershire Highways in September 2023 and also to Deputy Town Clerk and informed Town Councillor Bates. Unfortunately Bob Skillern has limited powers and nothing has changed.

Chipping Campden itself is so special that if street furniture is continued to be allowed to harm the settings of the heritage assets and their character as well as the appearance of the Conservation Area the character of the Area will be lost.

As written, streetscape views and building clutter would certainly benefit from ‘tidying up’ in the Plan with a Policy and would amplify the planning decision making framework

Cutter as signage is mentioned in Local Plan p 171 11.4(b) should avoid street clutter, page 224/4 should not be visually dominant or incongruous and not result in visual clutter of the surroundings and information limited to avoid visual clutter does not appear to stop clutter being included in the Plan as a Policy in respect of Chipping Campden and in particular the High Street would be reasonable and would be a material consideration for an officer at the planning authority have in mind.

Appendix Streetscapes

POLICY FOR STREETSCAPE AND VIEWS and BUILDINGS

To preserve the views of heritage assets and their settings and buildings the following are not acceptable:-

Internal illumination of signs

External illumination of signs

Signage on advertisement boards

As a form of advertising animal skins

Random objects or bits and bobs for sale within the grade 1 Market Hall owned by the National Trust

Tables, chairs, planters, umbrellas, boxes, goods, plants, trees. Hanging baskets or boxes

Any item intended to draw attention to or advertise shall not be permitted on highway land

Advertisements fixed to heritage assets which also require listed building consent shall be limited to one

In order to conserve the High Street and elsewhere in the Area there shall be immediate removal of any form of the above clutter following notification by letter from the planning authority followed fby enforcement procedure in the Magistrates Court if not immediately removed.

TREES

Justification/Explanation

Cotswold District Council no longer employs a tree expert.

The existing Local Plan has 34 references to trees and includes replacement. However, the officer deciding tree applications as far as Chipping Campden is concerned does not condition trees to be removed to be replaced as within existing Local Plan or as requested in the comments of the Town Council Planning Committee and this in my view justifies the Chipping Campden Town Council recommendation of a replacement to be a material consideration to be taken on board by the planning officer included in the Plan. This to also include hedges and existing or removed boundary wall which should be retained or restored. I dislike ranch type and close boarded fencing is not appropriate.

Appendix Trees walls fences

Policy:- Trees, Hedges and boundary walls

1. Proposals for removal of trees within or surrounding residential land must specify a specie to replace. The Chipping Campden Town Council to agree or propose in writing a specie that is most resistant to the impacts of the changing climate, provided these do not have a detrimental impact on the heritage or townscape of the area. To be replaced after 5 years if specie fails to grow.

2. high-quality green infrastructure (e.g. living walls, green roofs) shall not be acceptable.

3 New and existing boundary walls shall be retained and maintained by the developer

4. Where heritage or non heritage boundary walls are in disrepair or there is a gap in the boundary of an existing boundary feature and so is out of keeping with the surrounding area it shall be restored.

5.Ranch type or close boarded fencing shall be discouraged as being out of keeping with the character of the Area.

6. Councillors shall have the right to enter the site upon Notice to the applicant in order to inspect and make their statutory comments.

PARKING

Justification and explanation

The Way Forward is to form the Plan.

The Regulation 14 draft Version April 2024 p 58 is surely wrong to state parking options can not be a Policy and only be progressed through planning applications. The point of the Plan is we have the choice of stating where we would like development and where we would not like development.

In common with other historic towns, Chipping Campden was not built for modern traffic and consequently suffers problems associated with parking and traffic flow. If visitor numbers increase, these issues will become more of a priority. Way Forward 9.2

There are no figures printed in the 2024 draft plan as to visitor numbers and The Way Forward printed it is believed in 2010 correctly expressing concerned about future visitors includes 50,000 in 2007 for St James’s Church and just under 25,000 for 2007-2008 Way Forward 4.11 and 21,503 2008-2009 for the information center Way Forward 4.12

I would like to aim to redirect those long-stay vehicles that do not need to be parked on-street to a car park. The most acceptable site is at Wold’s End Orchard. Way Forward 9.5.5.(this land is no longer available.)

Managed sustainable tourism which will safeguard the town, its unique heritage and landscape for residents can be seen to need addressing by the saturation of day visitors on the pavements, vehicles looking for parking spaces and coaches not entering the town and leaving along Aston Road (Gloucestershire County Council (Chipping Campden) (General Traffic Restrictions for Public Service

Vehicles) Order 2002. There is some parking in the School car Park out of school time or term time.

Recreation Ground as possible for extra parking as well as Badgers Field verge and Wolds End Orchard. (mins 8 March 2016

In April 2017 the Regulation 14 Plan proposed Recreation Ground should be allocated for parking.

Minutes following the release of the Regulation 14 Draft Plan in 2017 (9 May 2017) state "Car parking contentious" "survey shows spaces available".

Again in 2017 the minute for July refers to spaces at the school off Cider Mill Lane which could be used for off street parking. Unfortunately any decision followed by building to enable this is surely years away. However, the future is not a reason not to include the possibility of parking in the school car park in the Plan.

To avoid the mistake of not including sufficient parking spaces on estates parking spaces need to be clearly set out in the Policy in the Plan. Berrington Road has insufficient spaces as does Juliana's View.

The Town Council misinformed itself as minuted April 2018 in stating the Playing Fields Association rules does not allow parking on the recreation ground. The Playing Field and Recreation Ground (Recreation Ground) is owned by the Town Council and is a Charity and I can find no evidence the playing field and recreation ground is in fact owned or operated by the Playing Fields Association.

There is already parking on the Recreation Ground. I would like to see parking extended around the edge with the trees which would not interfere with the football pitch. Those working in Campden could have 8 hours parking 5 days a week with an allocated spot upon payment with pedestrian access through the Noel Arms and two vehicle access from George Lane unless the pitch was being used. There may be 40 to 60 spaces.

The parking survey in November 2023 did not include Town Council land. The survey included a space for anyone to note the location

of a site not suggested. I put forward the Recreation Ground and infront of the Almshouses for disabled residents. The Regulation 14 2024 draft Plan page 58 and 59 Plan fails to include my suggested locations. Could I be the only resident to make a suggested location?

Parking sign directing to school car park off Cider Mill Lane when available at the corner of Aston Road and Cider Mill Lane must help visitors find parking.

With heritage assets each side and in the middle of the High Street to avoid harm to them it is best to fix as few as possible Notices on their walls and to avoid parking meters in their settings. The heritage assets are listed Grade 1, grade 11* and 11 and one could say it is these heritage assets that bring visitors from nearby and internationally to the town. It is not to shop which the Parking Survey seems to be so keen to support but the heritage assets which draw visitors. Most of the present shops are there because of the visitors and few support the residents who the Plan is designed for and who the Town Council should have at the top of their list.

The principles set out in the Department for Communities and Local Government (DCLG) 'Residential Car Parking Research' document at page 85 of the Local Plan have been used to formulate a parking toolkit which, after entering details of the proposed development and mix, calculates the level of car parking which should be provided in new residential developments. There is also one for commercial development and change of use. These tools are unhelpful for Chipping Camden Area because of its heritage as well as a totally unique environment combining beauty, character, biodiversity and tranquillity appreciated by all who live here.

The proposed development at Lloyds Bank at Braithwaite House 11* to create 5 dwellings 23/02678/FUL in 2023 generated many comments of objection particularly as there was no parking available on site and vehicles generated by the proposed permitted scheme are to park on the High Street. Any parking objections were overcome by the Technical Note submitted by the Developer relating to TRICS database and the fact there was no objection from GCC Highway Officers.

The built estates have insufficient parking spaces and parking has spilled over onto the highway.

The Chairman Councillor of the working party did not accept my invitation to meet at the Recreation Ground so I could demonstrate where cars belonging to owners of shops or offices could park and demonstrate there is plenty of space for additional parking. Parking on the recreation ground should go into a Policy in the Plan in order that in the future the Plan is in place to enable parking spaces to be developed.

Residents need to decide whether they wish a tourist town or a town for residents. There may be too many councillors who are failing to declare their interests and pecuniary interests and voting when they should have left the room.

The Town Council owns the land and could apply for parking on the Recreation Ground immediately. The Town Council borrowed to buy the Police Station and could borrow to extend car parking at the Recreation Ground accessed from two entries from George Lane for cars and the Noel Arms for pedestrians leaving the High Street for resident parking and visitor parking.

Coaches

On the whole I am aware because I was one of the residents who spent hours researching and applying and achieving through County Councillor Girling (Gloucestershire County Council (Chipping Campden) (General Traffic Restrictions for Public Service Vehicles) Order 2002 that coaches drop and collect their passengers at the library on the High Street and park on Back Ends and enter and leave the town along Aston Road.

At about the same time as making the Order heavy traffic was stopped entering the town along Sheep Street or by the chemist on the High Street.

Most HGV’s passing through the town today are from Aston Road to Station Road or vis versa.

I am biased because of my role in controlling coaches and buses but I like the town to support residents and my view is that there are sufficient tourists and we need no more coaches parking spaces.

Bus parking in Regulation 14 Draft April 2024 at page 39 surely refers to tourist coaches?

Appendix Parking

Appendix Recreation Ground

Appendix (Gloucestershire County Council (Chipping Campden) (General Traffic Restrictions for Public Service Vehicles) Order 2002

I like more parking whether for residents or others. Now is the time to consider the parking and to include the Recreation Ground and the possibility of parking at the school :-

POLICY PARKING

1 all new applications for development including change of use including those for heritage assets shall include two parking spaces in a garage or car port for the first bedroom proposed and one space thereafter accessed in the same manner from the highway and one parking space for any room to be used for sleeping so as not to clutter the highway with vehicles and leaving spaces on the highway for visitors and delivery vans. A Condition that the garage to be used for the parking of vehicles to be made.

2 The estimated trip generation associated with vehicles and multi-modal users of any proposed planning application or change of use in comparison with estimates of trip attraction by the existing uses shall not be used in the determination of a proposed application or change of use

3 Any change of use or new use not providing evidence of sufficient parking for staff, visitors or owners shall not be allowed

4 (Gloucestershire County Council (Chipping Campden) (General Traffic Restrictions for Public Service Vehicles) Order 2002 to remain in force.

5. High Street parking shall not mitigate the need for substantial provision on site.

6 Town Councillors shall have the right to enter the site of applications for development upon Notice to the applicant in order to inspect and make their statutory comments.

BUILDING AND HERITAGE ASSET REFURBISHMENTS AND ENLARGEMENTS

Justification and explanation

The desire for many heritage asset owners in Chipping Campden to make material changes to their listed building is very strong. Too often it is common for a heritage asset to be totally refurbished including a full strip out and replacement of original features of historic interest and alterations too often executed to the heritage asset without a listed building consent application or application to retain unauthorised work or planning application.

Too often I have seen permitted development having negative effects on neighbouring buildings or heritage assets resulting from damaging building works, such as demolition, excavating, drilling, piling etc, as well as the effects of large construction vehicles and equipment (e.g. cranes, cement mixers, skips and skip loaders, scaffolding trucks, low loaders, etc) using streets not designed for, and not capable of, accommodating their bulk and weight. - Creating nuisance and harm to the personal health and well-being of residents caused by noise, dust, vibrations and air pollution (e.g. increased idling of vehicles, fumes from diesel equipment and generators, asphalt, adhesives). - Causing damage to community infrastructure (e.g. pavements, streets, bollards, lamp posts, utility boxes, manhole covers, etc) caused by works and vehicles and I wish to see amplification in a Policy in the Plan for officers to consider as material considerations.

Whilst it is important development conserves and preserves the historical, cultural and architectural heritage of in particular the High Street, there are two areas within the Area namely Broad Campden and Westington which should remain predominantly residential and essentially as at present.

It is surely wrong that residents should face disruption by large domestic developments which can take a year or more to complete.

Too often the required construction works are disturbing to surrounding properties and infrastructure

Disruption and nuisance caused by construction work particularily on the High Street has never been dealt with. Building work or major development must be carried out in a way that is as sustainable as possible.

Regulation 14 2024 Draft Plan page 96 column 4 empty property being renovated

Not found in Local Plan or proposed Local Plan or NPPF. Reasonable to include in Plan.

POLICY BUILDING AND HERITAGE ASSET REFURBISHMENTS AND ENLARGEMENTS

1 Proposals for building refurbishments and enlargements including heritage assets which require a planning and or listed building application must actively demonstrate how they will:

A Minimise and mitigate the impact of construction on neighbouring properties, particularly relating to vibration, noise and dust

B Minimise disturbance on residential amenity including visual amenity.

2. High Street parking shall not mitigate the need for substantial provision on site.

3. Broad Campden and Westington should remain predominantly residential and development which potentially changes their use and character will be resisted.

4. demonstrate in the application where demolished materials will be stored until removed; where new building materials will be stored;

where contractors vans will park; where skips will be placed; when the work will stop each day;

5. Demonstrate in the application action to be taken to restore grass verges, footways, roads, walls, hedges damaged to as they were before work commenced following completion of works.

6. measures to reduce heat loss including secondary, double or triple glazing in buildings in conservation areas and heritage assets with timber or metal framed windows will be encouraged

7 the replacement of fossil fuel burning energy sources with renewable sources with zero air emissions where there is no harm to heritage assets or conservation areas will be encouraged.

8. Town Councillors to be granted access to site by applicant in order to make meaningful comments to local planning authority pursuant to their statutory obligation.

HOUSING

Justification and explanation

New building developments have taken place in Westington, the Leasows, Cider Mill Lane, Barrels Pitch and others and granted for Aston Road as well as within the centre of Campden changes of use for example at Braithwaite House from commercial and residential to residential or Smiths the butcher from commercial with residential above to new development in the burgage plot and extra residential within the building.

The intent of this may be to make the area more attractive to longer term occupiers such as local people and newcomers working from home, thereby encouraging employment and homeworking through the recently improved broadband but it needs to be controlled in sustain.

To encourage residents to downsize to smaller properties to encourage those with larger families to move here it is important to encourage those in larger homes to move to a bungalow and it is

therefore also important to keep bungalows as they are without enlarging as for example the older estate through the Noel Arms and to have within the Plan.

The town needed 22 affordable homes some time ago and the Gloucestershire application 18/04768/OUT includes a figure of 40 affordable homes hopefully with enough parking spaces so the highway is kept for visitors and delivery vans. I have supported this as I approve of development on this good farming land because it is on a bus route, on a main road, services can be laid and a Surgery seems to be possible and affordable homes to rent are needed and I can only hope the tenant farmer will be able to stay in the farmhouse and have enough land to farm if these fields are removed for housing and in particular affordable housing perhaps being let can be built soon.

I prefer the town and area to have homes with residents and holiday lets, a b and b, discouraged.

This should augment the alternatives open to officers in determining planning applications.

Not found in Local Plan or proposed Local Plan

See also appendix parking

POLICY HOUSING

Proposals for housing development must be justified against the following criteria:

1 To provide with Registered Providers social rented, affordable rented and intermediate housing, to eligible households whose needs are not met by the market and can demonstrate close connection to the Chipping Campden area and be given priority.

2 In order to continue to provide housing for the elderly or the disabled and to encourage home owners in the area to downsize any application for development to enlarge a bungalow shall not be permitted unless there are exceptional circumstances

3 Each new dwelling shall include one garage/car port with access from the highway together with on site and accessed using the same access from the highway two parking spaces for the first bedroom and one space for each additional bedroom thereby retaining space for visitor parking on the highway and an uncluttered look for the development

4 Permission or change of use to be conditioned not to be used for bed and breakfast, air b and b or any use that causes annoyance to others within the development

5. To be conditioned that the developer shall maintain hedges

alongside any highway to reduce noise and pollution at developer’s expense for ever.

6. Town Councillors to have access to the site upon application to the applicant in order to make meaningful comments to the local planning authority pursuant to their statutory obligation.

15 May 2024


08/13/2023 03:32

Kissel.

DESIGN.WHOOSH WITH STONE SLATE S OR MODERN TILES

Photographs of Stone Slate Roofs and Tiled roofs as Cotswold Guidance



whoosh at the base of a stone slated roof



Whoosh at the base of a stone slated roof





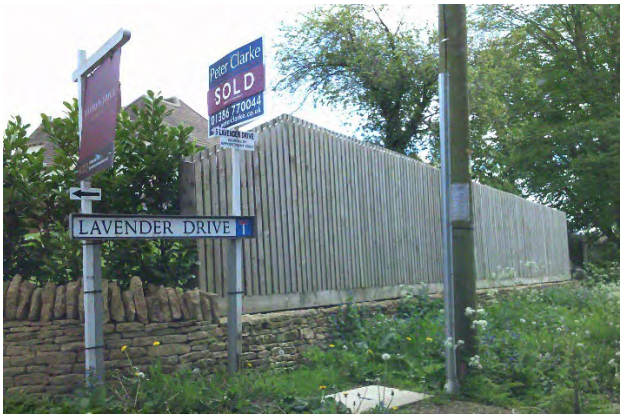
Showing the whoosh at the base of a modern tiled roof

CHIPPING CAMPDEN NEIGHBOURHOOD DEVELOPMENT PLAN RESPONSE -KISSEL

Appendix Trees Walls Fences



Aston Road





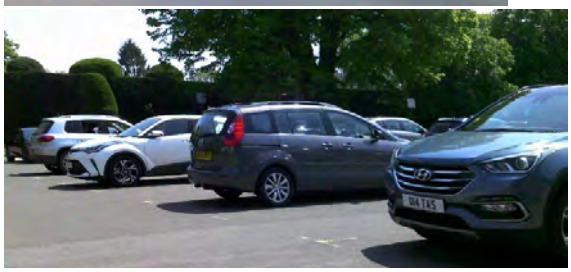


Before demolition High Street

CHIPPING CAMPDEN NEIGHBOURHOOD DEVELOPMENT PLAN
RESPONSE -KISSEL

Appendix Parking Photographs 12 May 2024





Parking in front of Almshouses should be for May 2024

47 cars parked in school car park 12

Occupants written on the highway



Calf Lane



Calf Lane



Visitor cars or too few parking spaces

Berrington Road



one lowered kerb leaves parking for visitors or delivery vans on highway without reducing the cars parked on site.



Insufficient parking spaces for affordable

Homes at Juliana's View

CDC slate-roofing-technical-guidance-2000.pdf
.pdf File

Design.Whoosh with cotswold stone slates or modern tiles.docx
.docx File

Stone slate roofs

page 22

The last sentence makes no sense at all.

Please include Cotswold District Council Guidance attached See in particular page 3 with the whoosh at the base of the roof.

I attach a page seeking to show the team how important the whoosh at the base of the roof is as a characteristic of a Chipping Campden roof.

Please acknowledge safe receipt.

Appendix Recreation Ground



2023



2023





2024

2024 still no goal post







Access from George Road 2024

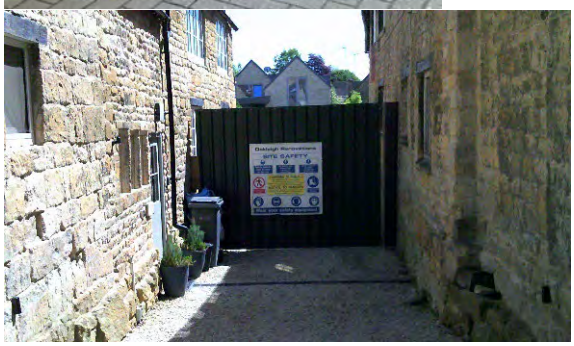
Access from George Road 2024

Space for parking alongside trees 2024

Fillet and Bone GL55 6AT







Grafton House GL55 6AT







Gallery. GL55 6AT



Cutts GL55 6AT





Mooch GL55 6AT



Camperdene, GL55 6AT

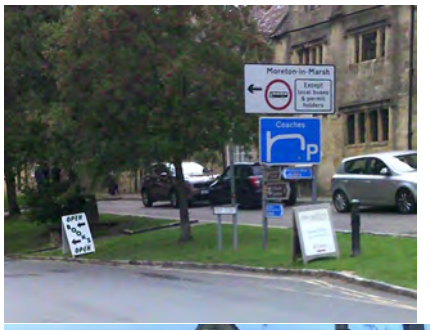


Red Lion, , GL55 6AT



OTHER SIDE

Draycot Books GL55 6DX





Advertising sale in Town Hall



Island Cottage GL55 6AL



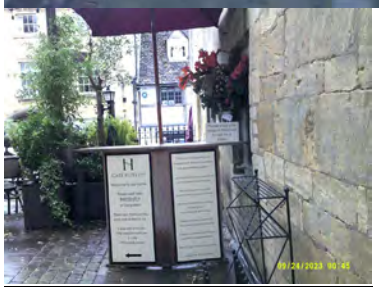


Cotswold Luxe GL55 6AL

. Huxleys GL55 6AL







OTHER SIDE OF HIGH STREET

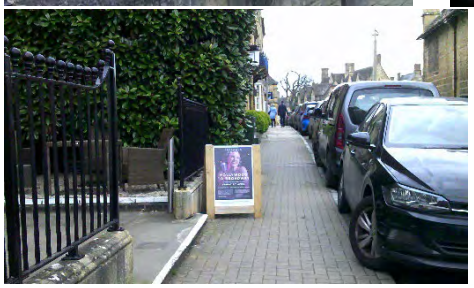
L

Baptist Church, GL66 6AL

Cotswold House Hotel







Michaels , Woolmarket House,

Cotswold House Hotel

Cotswold House Hotel

Little Martins GL55 6AG

Frankie Doodle GL55 6AG





The Bay Tree GL55 6AG





Bennetts Toke's High St, Chipping Campden GL55 6AG



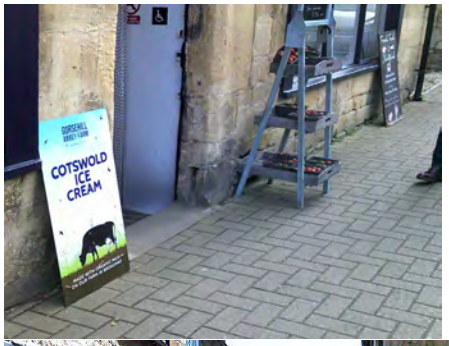


Kendall House.GL55 6AG

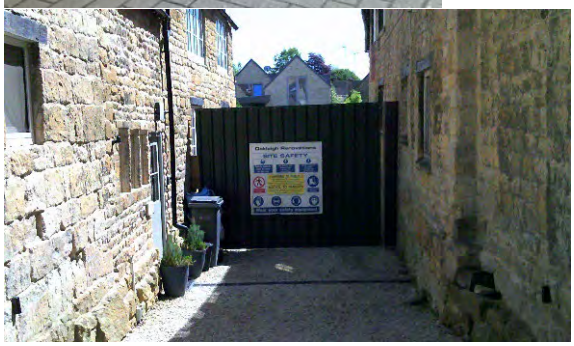


Various items Various dates from 30 September 2023 to May 2024

Fillet and Bone GL55 6AT







Grafton House GL55 6AT







Gallery. GL55 6AT

Cutts GL55 6AT







Mooch GL55 6AT

Camperdene, GL55 6AT

Red Lion, , GL55 6AT

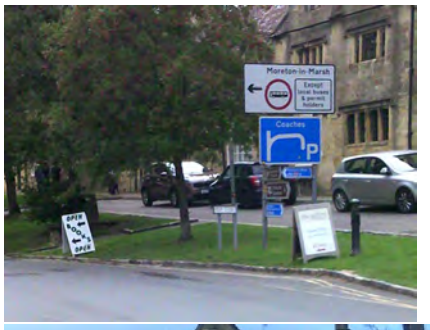






OTHER SIDE

Draycot Books GL55 6DX





Advertising sale in Town Hall



Island Cottage GL55 6AL



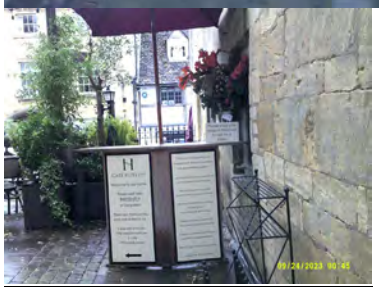
Cotswold Luxe GL55 6AL



. Huxleys GL55 6AL







OTHER SIDE OF HIGH STREET

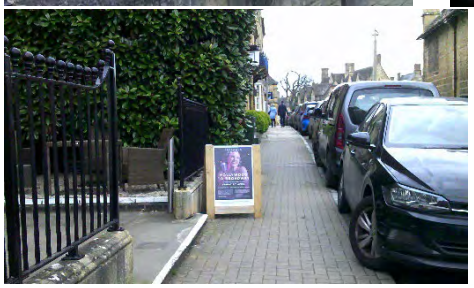
L

Baptist Church, GL66 6AL

Cotswold House Hotel







Michaels , Woolmarket House,

Cotswold House Hotel

Cotswold House Hotel

Little Martins GL55 6AG

Frankie Doodle GL55 6AG





The Bay Tree GL55 6AG





Bennetts Toke's High St, Chipping Campden GL55 6AG





Kendall House.GL55 6AG



Various items Various dates from 30 September 2023 to May 2024

STREETSCAPE VIEWS OF HERITAGE ASSETS

CLUTTER

Delicatessen GL55 6AL

Grammar School GL66 6AL





Charles Whiston GL55 6HB

Stuart House Antiques GL55 6HB





Luigi Bistro GL55 6HB

Bantam Tea Rooms GL55 6HR





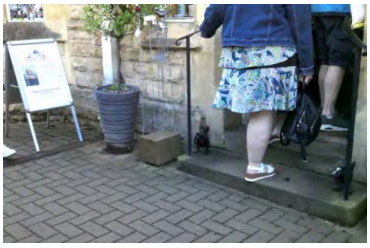


Old Police Station GL55 6AT. Town Council











Market Hall , National Trust





Town Hall. GL55 6HB











Badgers Hall





Noel Arms GL55 6AT Sullivan Funeral GL55 6AT





Hook House? 42nd east bakehouse next to the the library.

3. CJ

Submitted a paper copy survey and these comments added in addition...

Town Clerk, I should also perhaps have mentioned in the 'non designated heritage section' the following for you to consider:

Brown plaque for Ernest Wilson in Lower High St
Brown Plaque for Guild of Handicraft on Silk Mill

There may also be a Firemark Plaque on the Silk Mill and also on Grevel House. Should they be considered?

And what is the view on Water Wells in gardens?

Regarding Pumps this is the list that I knew of a couple of years ago:
Leyland Noel Pump and tank Leysbourne
Pump and tank at Vicarage Cottages, Leysbourne
Pump at Forge Cottage, Church Cottages, Cidermill Lane
Pump at back of Court House, Calf Lane
Pump in the side passage at Trinder House
Pump in the side passage at Kings Hotel
Another at the back of Kings curtilage by the cottage
Pump at Grafton Mews near Todays Dentist
Pump at rear of Bantam Tea Rooms
Pump in 13 Littleworth garden frontage with concrete(?) tank
Pump in Withy Bank Garden, Hoo Lane
Pump outside West End Terrace
Pump in garden at Camside, Park Road – I think no longer there
Pump in garden of Wycliffe, Back Ends
Pump in garden of Shepherds Close, Westington
Pump in garden of Southcroft, Westington
The Pump/water space at the Alms Houses, the metal base still there, dated 1838 (?)

Please acknowledge that you can add to my hard copy delivered yesterday. Carol Jackson, Elm Tree House.

4. AC resident

I have just submitted the Survey Monkey questionnaire regarding the NDP but I thought I would also email mainly so I have a record of what I have said! Survey Monkey doesn't seem to give me a copy. It's also formatted a bit better in the email.

Sorry it's so long but here it is:

1. Do you agree with the Vision for Chipping Campden

I fully support the vision which neatly encapsulates physical attributes, community and business. Creativity, culture and commerce are a large part of what makes Campden different to most other small Cotswold settlements. According to the RSA, nationally creative industries are growing at one and a half times the whole economy. Campden should be part of that.

2. Do you agree with the wording of Policy 1 Chipping Campden Town Centre?

I support the extension but wonder if it should be further extended to include some key locations that remain outside the newly-defined town centre boundary; eg the Cidermill Theatre, St James' Church, Court Barn Museum.

Policy 1.3 (change of use) is very important but misses a crucial point regarding the vibrancy of the town: ie conversion of commercial premises to residential. An additional policy should be included along the lines of "Proposals resulting in the loss of space for economic activity will be opposed in order to protect and enhance the town's economy." I would like to see this applied throughout the town and not just the town centre.

The vibrancy of the town centre is very subjective and difficult to define satisfactorily. A good attempt is made with the six objectives under Economy on page 14 but vibrancy also includes a good mix of residential and commercial. It is important that neither dominates.

I fully agree with Policy 1.4 to support the new school car park but suggest the policy is re-worded "Proposals to create a new school car park at the back of the school and make over the use of the existing school car park for the use of the public will be supported" The parking survey on page 59 does not provide clear evidence of views over charging in the new public car park. My view is that it should be free (or as a minimum a significantly reduced charge) to all residents of the town and employees of businesses in the town (with an upper limit to the number of the latter related to their total number of employees) in order to preserve the attraction of working and living in the town. Businesses will find it more difficult to recruit staff if parking becomes more difficult or expensive.

I appreciate that the cost of the new access road is substantial but I would like to see the road extended at least as far as the Haines pack house so that their HGVs can be kept out of the town centre. Surely the financial gain to GCC from the development could and should be used to facilitate this infrastructure improvement in Chipping Campden so as to protect the historic town centre from damage caused by HGVs, to reduce traffic congestion and to maintain a pleasant environment for residents, businesses and visitors.

A vision for Cutts Yard should be included. This is a key town centre location and may well be developed,. My suggestion would be a mix of retail, commercial and residential, utilising Cam Brook as a feature.

3. Do you agree with the wording of Policy 2 Social and Community Infrastructure?

Table 6 refers simply to "Shops" whereas Appendix 4 refers to "Food Shops". In my opinion ALL businesses listed in Appendices 1 and 3 whether food or other should be included.

Please see also my comments on Policy 1.3 (change of use).

4. Do you agree with the wording of Policy 3 Design of the built and natural environment?

I think the Design Guide is an excellent document and it is good that it forms part of the Neighbourhood Plan

As evidenced by Para 4.1 (page 28), I like the fact that it is not too prescriptive and allows for some variations, although I suppose that calls into question its enforceability. What happens if a developer ignores large parts of it?

Para 4.1 is correct in my view; developments should not consist of pastiches of traditional Cotswold buildings. New buildings should sit comfortably in their surroundings, acknowledging local traditions but allowing for contemporary interpretations.

In view of the fact that the Design Guide is not too prescriptive, I think that the wording of Policy 3 could replace the words "paid regard to" with the words "complied with".

I am apprehensive about Para 4.2 emphasising pedestrian over cars. Whilst a noble aim, cars are essential in a rural location such as Chipping Campden.

It might be preferable to include some of my additional suggestions for Policy 5 in the Design Guide as well as in a revamped Policy 5.

5. Do you agree with the wording of Policy 4 Non-designated Heritage Assets?

I have no comments to make.

6. Do you agree with the wording of Policy 5 Biodiversity net gain and Local Nature Recovery?

In my view, this section is not sufficiently comprehensive and should be re-titled "Environment and Sustainability" and thus the policy should be broadened to include at least the following important points:

- In line with Cotswold Conservation Board Position Statement on Dark Skies and Artificial Light, proposals which can not demonstrate a need for external lighting (and where a need exists do not limit to a minimum lighting intensity and duration) will be opposed.
- Any proposals for development that do not avoid areas identified as at risk of flooding or increase the level of flood risk will be opposed. Specific mention should be made about the Olimpick Drive development where flooding has taken place despite it being passed for development.
- Three key views are shown on page 27 but there are many more iconic views within Campden (eg The High Street) which are worthy of protection.
- The section on Sustainable Development on page 48 makes no mention of solar panels, recycling etc. These are important topics that deserve inclusion and I would like to see a policy along the following lines included in the NDP:
    - Only planning applications which incorporate energy efficiency, other sustainability and environmental protection and flood mitigation provisions will be supported. In line with CPRE recommendations:
        - Solar PV or thermal panels on suitably orientated roofs should be a standard expectation for all new buildings, including homes.
        - Conversions and major external changes to existing buildings should require full planning permission (in other words, removing permitted development rights) unless they bring the building up to the Future Homes Standard or equivalent.
        - Planning permission should not be granted for commercial or public car parking spaces unless they also provide solar energy generation.

7. Do you agree with Policy 6 Local Green Spaces?

These green spaces are all integral to both the character of Chipping Campden and in achieving the important goals for the environment and sustainability. They are valued as providing the rural setting for the town to the benefit of both residential and commercial properties.

I am not an expert in Neighbourhood Planning but I hope that the evidence for each of the 22 Green Spaces has been drafted in accordance with guidance so as to ensure that they are granted.

8. Additional Points

Many congratulations to those involved under the leadership of Councillor Mark Benson on producing the Neighbourhood Plan. It is a great achievement. In addition to the comments above, I have the following suggestions:

8.1 Structure of Plan

Some simple re-ordering of the pages to bring together all the relevant parts of the plan under one of the stated objectives set out on pages 14 and 15 would make it easier to understand what actions are needed to achieve each objective. eg:

- Environment & Sustainability
    - Include Pages 26-28; 48-49; 72-78
- Housing
    - Include Pages 33-36
- Economy
    - Include pages 23-25; 50-57; 60 (bullets 1-3)
- Design
    - Include pages 66-71
- Facilities, Services & Amenities
    - Include pages 61-65; 79-82
- Traffic & Transport
    - Include pages 58-59; 60 (bullet 4)

Pages 29-32 and 46-47 would be included under Context.

Pages 37-44 would be split over the relevant objectives

Each of the objectives would thus become its own “chapter” and each chapter would list: Objectives, Concerns & Aspirations, Policies, Evidence and Supporting Text. I could easily prepare a rough draft of how this might look. I think it would make the NDP much more user-friendly and meaningful.

8.2 Points not covered in the draft

As stated I say in my response to to question regarding Vision, I fully support the Vision but the actions needed to achieve that vision are not always clear.

The objectives on pages 14 and 15 are excellent and provide some good indicators for achieving the vision but these are not always followed through in the rest of the NDP. Some of the objectives are left hanging without any policy or action to address them. For instance, what specifically needs to be done to achieve the objectives for Environment & Sustainability or Housing?

I understand that some points of importance to the town are not included in the draft because they are outside the remit of the Town Council.

If so perhaps this could be overcome with a policy such as "Where it is not within the power or resources of the town council itself to achieve this objective, it will encourage and support to the best of its ability all efforts by public bodies, commercial entities, individuals and others to achieve the objective."

Bearing in mind the above, in my view, the following points should be added to the relevant chapter:

8.3 Environment and Sustainability

Please see comments in response to Question 6, Policy 5 above.

8.4 Housing

I find the plan remarkably light on housing considering this could have a major impact on the unique character of the town. In my view I think the following points should be included:

- There is no mention of the development boundary needing adjustment to take account of the developments outside it that have already been approved. This is important so as not to establish a precedent for developments outside the boundary.
- Support for opportunities to provide residential accommodation above commercial premises, either new builds or existing properties.
- When considering planning applications consider "local need" not "commercial demand". The latter is likely to be higher due to Campden being an attractive place to live or have a second home. This should apply to both affordable and open-market applications. In the past Campden has in effect provided houses for people who work elsewhere and has thus been meeting the needs of other areas. This over-building should be corrected.
- Identify suitable and unsuitable sites - even if only in broad terms.
- All significant new building developments in the town should:
    - Be contemporaneous with infrastructure improvements to reduce congestion and strain on existing facilities;
    - Enhance the historic significance of the town;
    - Safeguard and enhance its status as a small working market town and ensure it does not become a dormitory, a retirement town or a theme-park tourist attraction,
    - Be part of an overall strategy rather than piecemeal;
    - Include restrictive covenants to avoid a proliferation of holiday lets/second homes.

8.5 Economy

Previous drafts contained a number of "projects" which are no longer included and Campden Business Forum drew up a Plan for Campden in 2015/16 that included several projects, and identified six key sectors to enhance the town's economy - Culture & Creative Industries; Hospitality & Tourism; Food; Education & Research; Retail; Entrepreneurship. Inclusion of these in the NDP would help with achieving the vision and the objectives under Economy.

The NDP should include support for measures to create employment opportunities within the parish for residents of new, additional dwellings.

The NDP should identify areas where employment could be encouraged eg the area around Campden BRI; small clean and quiet units within any large new housing developments (likely to be offices and nothing noisy); Live/Work units etc.

One of the problems with retail in Campden is the relatively small size of most retail premises. Support should be given to proposals for amalgamation of premises to provide larger retail units attracting sustainable retailers.

Support for the relocation of the two primary schools to a site adjoining Chipping Campden School to create an Education and Learning campus which could be broadened out to include adult courses which would enhance the town's economy. The existing primary school sites could be developed and provide additional car parking at the west of the town.

8.6 Design

Please see comments in response to Question 4, Policy 3 above.

8.7 Facilities, Services & Amenities

Please see comments in 8.1 Structure of Plan and response to Question 3, Policy 2 above.

8.8 Traffic and Transport

There is text relating to the new school car park but I can't find anything that addresses HGVs or Signage where the Town Council submitted proposals to GCC. I think reference should be made to this submission it should be an objective to support GCC in its implementation.

The Community Aspiration for a new railway station could be a two-edged sword. Whilst in theory a station for Campden could bring benefits, it could also create overwhelming pressure on housing and potentially a huge increase in new housing developments in much the same way as in Honeybourne

and Moreton-in-Marsh. In addition, according to Google Maps, the site of the station would be half an hour's walk from the town centre and residents are likely to drive or take a bus to the station. If they are to do that, they might as well go to Moreton-in-Marsh or Honeybourne, thus negating a large part of any benefit to residents.

8.9 CIL Monies

The fact that greater CIL grants should follow adoption of the NDP is to be welcomed but I would like to see indicators for appropriate uses for any future CIL monies received so that they have the support of the town as evidenced in the public consultation - rather than face the possibility of a rushed decision when they are available?

This (alongside the projects proposed under Economy above) could also provide some positive and specific examples of how the vision for the town is to be achieved.

8.10 Strength of NDP

The text in Foreword and Acknowledgements (page 5) suggests that the NDP has few teeth which I think downgrades its value. Whilst the third paragraph may be factually true, I understand that planners MUST take account of NDPs and can only go against them in extreme circumstances - and if they do go against them they have to have very good reasons for doing so and must make those reasons public. I think the above wording would be preferable to the existing para 3 on page 5 and possibly include on page 5 a phrase such as "All planning applications will be assessed against this NDP." We seem to be setting off on the wrong foot to say that we don't expect our plan to have much effect.

9. Name and Address

This page is intentionally left blank

COTSWOLD DISTRICT COUNCIL

Chipping Campden
Neighbourhood Development Plan

Strategic Environmental Assessment & Habitat Regulation Assessment Screening

28 February 2024

Contents:

Conclusion

Annex A: SEA Screening

Annex B: HRA Screening

Annex C: Consultation Responses

C1 Historic England
C2a Natural England Letter
C2b Natural England Advice

Conclusion

1. In December 2023, Chipping Campden Town Council supplied a preliminary draft of their Neighbourhood Development Plan to Cotswold District Council, for the express purpose of having their proposals screened in line with the requirements of both the Strategic Environmental Assessment ('SEA') and Habitats Regulation Assessment Regulations ('HRA'.

2. Cotswold District Council commissioned Land Use Consultants Ltd ('LUC') to carry out both these assessments on their behalf. LUC provided two reports, one for each screening requirement: the SEA screening is attached as Annex A; the HRA Screening as Annex B.

3. Following review by the Council, these screening reports were provided to the statutory consultation bodies for SEA and HRA (Historic England, the Environment Agency and Natural England) for their opinion, in line with the SEA and Habitats Regulations. The 5 week consultation period ended on the 22nd February 2024. The responses provided indicated no concerns with the conclusions reached by LUC in their review (see responses in Annex C; the Environment Agency declined to comment).

4. Based on the Screening Report and taking into account responses from the statutory environmental bodies, it is determined by Cotswold District Council in accordance with SEA Regulation 9, as the 'responsible authority', that the Chipping Campden Neighbourhood Plan is unlikely to have significant environmental effects and is therefore 'screened out' i.e. that no Strategic Environmental Assessment is required.

5. In accordance with Regulation 106(1) of the Habitats Regulations, Cotswold District Council, as the 'competent authority,' does not consider that an 'appropriate assessment' under Regulation 105 is required.

6. If the issues in the Neighbourhood Plan should change then a new screening may need to be undertaken. New development proposals in Chipping Campden will be determined in line with the Development Framework, and may individually require screening for Environmental Impact Assessment (EIA) based on their type, scale and location.

Chipping Campden Neighbourhood Development Plan

SEA Screening Opinion

Cotswold District Council

Final report
Prepared by LUC
January 2024

Version	Status	Prepared	Checked	Approved	Date
1	Draft SEA Screening Report	H Ennis	K Nicholls	K Nicholls	10.01.2024
2	Final SEA Screening Report	H Ennis	K Nicholls	K Nicholls	17.01.2024

EMS566057 FS566056 OHS627041

Land Use Consultants Limited

Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

Contents

Chapter 1 2
Introduction

Chapter 2 4
SEA Screening

Scope of the Chipping Campden Neighbourhood Development Plan 4
Baseline Information 7
SEA Screening 12

References 21

Table of Tables

Table 2.1: Application of SEA Directive to the Chipping Campden Neighbourhood Development Plan 14
Table 2.2: Likely Significant Effects 15

Table of Figures

Figure 2.1: Application of the SEA Directive to Plans and Programmes 13

Chapter 1

Introduction

1.1 Chipping Campden Town Council is supporting the preparation of a Neighbourhood Development Plan, which is being prepared by a Steering Group supported by Andrea Pellegram Ltd. The entirety of the parish of Chipping Campden is included within the Cotswold National Landscape (formerly called the Cotswold Area of Outstanding Natural Beauty). The emerging Neighbourhood Development Plan covers the full extent of the electoral boundary of the Town Council, which includes the Campden Vale Ward.

1.2 LUC has been appointed by Cotswold District Council to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the Neighbourhood Development Plan. SEA may be required for a Neighbourhood Development Plan if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice Guidance (PPG) **[See reference** 1**]** clarifies that there is no legal requirement for a Neighbourhood Development Plan to be subject to SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.

1.3 Cotswold District Council has commissioned LUC to carry out SEA Screening of the Draft policies for Chipping Campden Neighbourhood Development Plan (December 2023) in order to determine whether an assessment is required under European Directive 2001/42/EC (the SEA Directive), transposed into UK law through the SEA Regulations **[See reference** 2**]**.

1.4 In October 2023 the Levelling up and Regeneration Act received royal assent, setting out detailed reforms to the planning system. Amongst other things, the Act allows for the replacement of the current SEA regime with a new

requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation.

Chapter 2

SEA Screening

Scope of the Chipping Campden Neighbourhood Development Plan

2.1 Chipping Campden Town Council approached Cotswold District Council to have the electoral boundary designated as a neighbourhood area, so the Town Council could develop a Neighbourhood Development Plan. A Steering Group, supported by Chipping Campden Town Council and Andrea Pellegram Ltd, has been involved in producing the Draft Policies for the Chipping Campden Neighbourhood Development Plan (December 2023).

2.2 The Chipping Campden Neighbourhood Development Plan seeks to address the issues identified by the local community during consultations carried out by the Town Council since 2014.

2.3 The Neighbourhood Development Plan covers the entire electoral boundary of Chipping Campden Town Council, which includes Campden Vale Ward. The Chipping Campden Neighbourhood Development Plan includes a vision for the long-term future of Chipping Campden along with 17 objectives under six themes:

- Environment and Sustainability
  - To conserve and enhance the natural environment, and encourage a wide diversity of flora and fauna.
  - To conserve and enhance the natural setting that characterises the town.
  - To provide and/or maintain green corridors for wildlife across and around Chipping Campden.

- To meet the challenge of climate change, flooding and light pollution.

- Housing
  - To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside.
  - To ensure that new housing location is consistent with the environmental objectives noted above, and is designed in accordance with the design objectives below.
- Economy
  - To protect and develop the town's economy.
  - To strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail, hospitality and other commercial offerings.
  - To improve the town's tourism offer and its attraction to tourists and visitors by improving existing facilities and introducing new ones.
  - To ensure that there is an appropriate balance between rental accommodation for tourists and that which meets the needs of residents and their families.
  - To support the development of specialist food and food-related industry and businesses.
  - To encourage start-up business.
- Design
  - To protect and enhance the area's heritage assets and its AONB location, by encouraging development and conservation projects for uses that are sympathetic to the character of Chipping Campden and its beautiful landscape setting and resisting developments for inappropriate uses, or that are unsympathetic to the character and setting of the Town.
- Facilities, Services and Amenities

  - To ensure that the community has appropriate infrastructure in terms of health services, sports/leisure facilities, amenities, public transport and green infrastructure.
  - To protect existing green spaces and to increase the provision of green spaces.
- Traffic and Transport
  - To improve facilities for car parking.
  - To improve the facilities and safety for cyclists and pedestrians.

2.4 The Neighbourhood Development Plan sets out six planning policies to realise and deliver the vision for Chipping Campden. These include:

- Policy 1: Chipping Campden town centre
- Policy 2: Social and Community infrastructure
- Policy 3: Design of the built and natural environment
- Policy 4: Non-designated heritage assets
- Policy 5: Biodiversity net gain and local nature recovery
- Policy 6: Local Green Spaces

2.5 No sites have been allocated for housing or other forms of built development within the Neighbourhood Development Plan, although various policies include criteria that will apply to any proposals for development. Policy 1 restricts change of use from residential and town centres uses to visitor accommodation within Chipping Campden town centre. The policy also supports proposals that provide extra parking at Chipping Campden School or elsewhere to alleviate congestion. in addition, the policy modifies the ‘town centre’ boundary beyond that defined in the Local Plan Policy EC7. Policy 2 identifies existing social and community infrastructure that should be protected. The policy also supports suitable land for human burial: the Cotswold Local Plan allocated land for burial but this site is no longer available, so an alternative has been sought. Policy 3 requires planning proposals to have regard to the Chipping Campden Design Guide and to be designed according to

the Building with Nature Standards Framework. Policy 5 identifies habitats that could be improved for biodiversity as part of Chipping Campden's Nature Recovery Areas and how developments could contribute to biodiversity gain. Policy 4 and 6 provide protection for non-designated heritage assets and local green space.

Baseline Information

2.6 This section summarises baseline information for the town of Chipping Campden, drawing from the information set out in the Draft Policies for the Chipping Campden Neighbourhood Development Plan.

Context

2.7 The town of Chipping Campden is located within Cotswold District and includes part of the Cotswold National Landscape. The Town Council electoral boundary, which the Neighbourhood Development Plan covers, includes Campden Vale Ward.

Biodiversity, Flora and Fauna

2.8 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within Chipping Campden, the closest being Dixton Wood SAC approximately 13.6km south-west and Bredon Hill SAC approximately 13.5km west.

2.9 There are a number of Sites of Special Scientific Interest (SSSIs) around Chipping Camden although none are within the area covered by the Neighbourhood Development Plan. These include Wellacre Quary SSSI next to the eastern boundary of Chipping Campden, Broadway Hill SSSI approximately 0.1km to the west, Campden Tunnel Gravel Pit SSSI approximately 0.2km to

the north, Hornsleasow Roughs SSSI approximately 1.3km to the south and Hornsleasow Quarry SSSI approximately 1.4km south. All are in favourable condition.

2.10 Within Cotswold District as a whole there are over 260 locally designated Key Wildlife Sites. In addition, there are 13 Nature Recovery Areas within Chipping Campden.

Population

2.11 In 2021, Chipping Campden had a population of approximately 2,288 people. The town has a higher than average population of elderly people, with 32.9% of people being over the age of 65 compared to 18.4% nationally. The number of people aged 0-15 is lower than nationally, at 12.3% compared to 17.4% across England.

2.12 Chipping Campden has a higher proportion of one and two person households compared to England as a whole and household composition is dominated by one person households (35%) and single-family households (62%). In 2019, all of Chipping Campden fell within the 20% or 30% least deprived areas in England according to the Indices of Multiple Deprivation.

Human Health

2.13 The majority of Chipping Campden's residents are in good or very good health (81.6%) with a small proportion (4.2%) in bad to very bad health. Information from the 2021 Census indicates that the proportion of the Chipping Campden population that is in very good health (42.8%) is slightly lower than the Cotswold average (50.4%) and the England average (47.5%). This may reflect the older age profile of the town.

Soil

2.14 Around Chipping Campden town the land is classified as Grade 1 or Grade 2 agricultural land. The majority of the rest of the plan area comprises of Grade 3 agricultural land. It is not known whether the Grade 3 land comprises Grade 3a which is classed as high quality, or the lower quality Grade 3b.

2.15 The soil type in and around Chipping Campden is primarily clay-enriched soils or relatively young soils or soils with little profile.

Water

2.16 While the majority of the plan area is at very low risk of fluvial and surface water flooding, there are areas of flood zone 3 and flood zone 2 associated with the River Cam which runs through Chipping Campden town. The areas of flood zone 3 cover mainly the floodplains of the River Cam which includes the majority of the centre of Chipping Campden town and small rural parts to the east of Chipping Campden town. In the face of climate change, the risk of further surface water drainage problems is likely to increase.

Air and Climatic Factors

2.17 Air Quality in the Cotswold area is generally very good. There are two Air Quality Management Areas (AQMA) within Cotswold District at Air Balloon roundabout, Birdlip and Thames Street, Lechlade, which are approximately 27.8km and 37.3km respectively from Chipping Campden. There are no AQMAs within Chipping Campden. Air quality monitoring, using a network of diffusion tubes to measure nitrogen dioxide (NO2) levels, is undertaken throughout the District. The District's air quality monitoring shows that NO2 levels during 2022 were below the National Air Quality Objective in all locations.

2.18 Climate data is not available at ward level, but within Cotswold District as a whole, reductions in overall carbon emissions of 32% were achieved between 2005 and 2021. This reduction is mostly due to progress in reducing emissions from domestic, followed by commercial with minimal progress on public sector and transport. Transport makes the largest contribution to carbon emissions in Cotswold District.

Material Assets

2.19 Chipping Campden is a relatively rural parish with limited public transport and therefore the majority of residents are reliant on private cars to travel. Two bus routes run from Chipping Campden town to Stratford-upon-Avon every two hours. There are only B roads within the plan area. However, the A44 runs along the south of Chipping Campden Parish.

2.20 The main settlements within Chipping Campden are Chipping Campden town and Broad Campden. Chipping Campden town is a small market town with a historic high street containing a variety of small shops, food and drink establishments and local services including a library. Within Chipping Campden town, there is a thriving arts and makers industry. In 2023, there were the following commercially active organisations: 15 organisations that specialised in performance and exhibition; nine “visual artists” including painters and photographers; 14 artisans and makers; and six digital designers and publishers. Broad Campden is a small hamlet that lies close to Chipping Campden town.

2.21 Due to its location within the Cotswold National Landscape, tourism is a major and growing part of Chipping Campden’s local economy. Reflecting this, there are 21 food and drink establishments in Chipping Campden town. There is also a large number of holiday cottages, B&Bs and hotels.

2.22 Due to the popularity of the Cotswold National Landscape with tourists, there is a high rate of second homes, with the majority of residential properties within Chipping Campden town centre serving as holiday homes as well. There

were 3,776 houses and flats in the District classed as second homes for council tax purposes as of October 2021. This means one in every 18 homes in Cotswold District were out of use. This issue can impact housing supply and create pressure for new development sites to be built out to meet the local housing need.

Landscape

2.23 The majority of Chipping Campden falls within the Cotswold National Landscape (formally called the Area of Outstanding Natural Beauty, or AONB).

2.24 Chipping Campden falls within National Character Area 107: Cotswolds. The Cotswolds landscape consists of a steep slopes crowned by high, open uncultivated land with increasingly wooded valleys.

Cultural Heritage

2.25 There are two Conservation Areas within Chipping Campden: Chipping Campden Conservation Area and Broad Campden Conservation Area. Chipping Campden Conservation Area covers the majority of Chipping Campden town.

2.26 Within Chipping Campden there are five Grade I, 22 Grade II* and 228 Grade II Listed Buildings. There is also one Scheduled Monument and one Park and Garden of Special Historic Interest. These include:

- Campden House formal garden and associated medieval cultivation earthwork; and
- Spring Hill House, at the southern-most part of the parish is an 18th century landscape park.

SEA Screening

2.27 An assessment has been undertaken to determine whether the Draft Policies for the Chipping Campden Neighbourhood Development Plan (December 2023) requires SEA in accordance with the SEA Regulations.

2.28 Figure 2.1 overleaf presents the flow diagram entitled ‘Application of the SEA Directive to plans and programmes’ which is taken from the Practical Guide to the Strategic Environmental Assessment Directive, published in September 2005. This is a useful guide when considering whether a plan should be subject to SEA (The Practical Guide has been superseded by the National Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions).

Figure 2.1: Application of the SEA Directive to Plans and Programmes

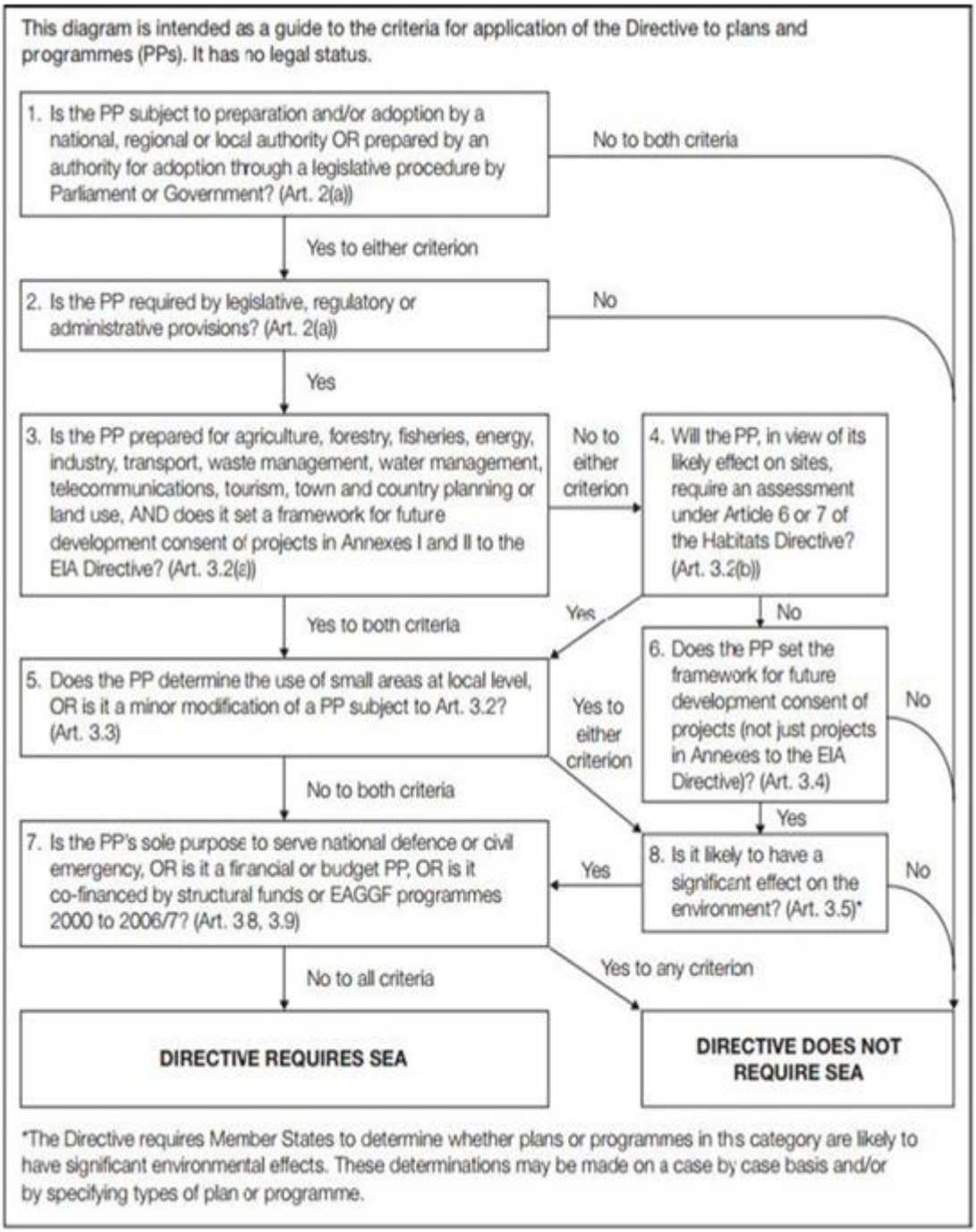


Table 2.1: Application of SEA Directive to the Chipping Campden Neighbourhood Development Plan

Stage	Yes/No	Reason
1. Is the PP (plan or programme) 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))	Yes	The Chipping Campden Neighbourhood Development Plan is being prepared under the Localism Act 2011 and will be adopted ('made') by the Local Authority (Cotswold District Council) as part of the statutory development plan. **Move to Q2.**
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The Chipping Campden Neighbourhood Development Plan is being prepared under the Localism Act 2011 and in accordance with the Neighbourhood Planning (General) Regulations 2012. However, there is no requirement to produce a Neighbourhood Development Plan; it is an optional plan. Once made it will become part of the statutory development plan. Therefore, it should continue to be screened. **Move to Q3.**
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))	Yes and No	The Chipping Campden Neighbourhood Development Plan is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive. **Move to Q4.**

Stage	Yes/No	Reason
4.Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	No	HRA screening of the Chipping Campden Neighbourhood Development Plan has identified that there are no likely significant effects on European sites and an Appropriate Assessment is not required. **No: Move to Q6.**
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)	Yes and No	The Chipping Campden Neighbourhood Development Plan does not allocate sites for development; however it includes policies against which proposals for development within the plan area will be assessed. **Move to Q8.**
8.Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Table 2.2. **SEA IS NOT REQUIRED.**

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of the plans and programmes, having regard, in particular, to:	N/A.
1. 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.	Once made, the Chipping Campden Neighbourhood Development Plan will become part of the statutory development plan and will guide the delivery of development in Chipping Campden, including in terms of design. The Chipping Campden Neighbourhood Development Plan does not allocate sites for residential or other forms of development. Policy 2 supports suitable land for human burial: the Cotswold Local Plan had allocated land for

SEA Requirement	Comments
	burial but this is no longer available, so an alternative has been sought. The Cotswold District Local Plan 2011-2031 (adopted in August 2018) allocates new development sites in Chipping Campden through Policy S16. These include one housing development site, one established employment site, one allocated employment development site, a burial ground site, public car park and coach car park and new open space. The adopted Local Plan is set to deliver 9,671 dwellings over the Local Plan period. In addition, it is expected that a further 233 homes will be released to the market resulting from the net increase in bedrooms in communal accommodation developments over the plan period. In total, the updated housing need aims to deliver 9,904 dwellings. The delivery of 9,904 dwellings will be delivered over the Local Plan period and will provide more homes than the housing need. Therefore, the housing land supply is capable of fully delivering the updated housing need. The emerging Cotswold District Local Plan Partial Update Regulation 18 'Issues and Options' was consulted on between 4th February and 20th March 2022. It is at an early stage in its preparation and does not yet set out information about housing figures.
2. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The Chipping Campden Neighbourhood Development Plan has to be in general conformity with the local strategic framework (the adopted Cotswold District Local Plan 2011-2031 (2018) and the emerging Cotswold District Local Plan Partial Update). The Chipping Campden Neighbourhood Development Plan must also have regard to the National Planning Policy Framework. The Chipping Campden Neighbourhood Development Plan does not have influence over other plans. Once made, the Chipping

SEA Requirement	Comments
	Campden Neighbourhood Development Plan will form part of the statutory development plan for Chipping Campden and will be used in conjunction with the Cotswold District Local Plan 2011-2031 and the emerging Cotswold District Local Plan Partial Update (once adopted) to determine planning applications.
3. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	One of the Basic Conditions which the Neighbourhood Development Plan must meet is to contribute to sustainable development.
4. Environmental problems relevant to the plan or programme.	Baseline information relating to the plan area was described earlier in this chapter. Key issues of relevance to the Neighbourhood Development Plan are the presence of the Cotswold National Landscape, local biodiversity assets and the variety of designated heritage assets.
5. 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).	N/A.
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	N/A.
6. The probability, duration, frequency and reversibility of the effects.	The Chipping Campden Neighbourhood Development Plan does not allocate sites for housing or other forms of development. The Chipping Campden Neighbourhood Development Plan covers the period up to 2031. Effects of the Chipping Campden Neighbourhood Development Plan are expected to be indirect (due to not allocating sites) but long-term and permanent.

SEA Requirement	Comments
7. The cumulative nature of the effects.	Cumulative effects could result from the Chipping Campden Neighbourhood Development Plan in combination with development that takes place in the surrounding towns and villages, although the Chipping Campden Neighbourhood Development Plan does not allocate sites for housing or other forms of development. As the emerging Cotswold District Local Plan Partial Update is still at an early stage in its development, it is not yet possible to assess with certainty the amount and location of development that may result from the Plan within and close to Chipping Campden. The Cotswold District Local Plan 2011-2031 (adopted August 2018) allocates a number of new development sites in Chipping Campden, as detailed in row 1 above.
8. The transboundary nature of the effects.	The Neighbourhood Development Plan focuses on Chipping Campden only. Transboundary effects under the SEA Regulations refers transboundary effects on other EU Member States; therefore they are not relevant to the Neighbourhood Development Plan.
9. The risks to human health or the environment (e.g. due to accidents).	There are no anticipated risks to human health or the environment from the Chipping Campden Neighbourhood Development Plan.
10. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The Chipping Campden Neighbourhood Development Plan covers all of Chipping Campden. The population of the town was estimated to be around 2,288 people as of 2021.
11. The value and vulnerability of the area likely to be affected due to: ■ Special natural characteristics or cultural heritage;	The plan area falls within the Cotswold National Landscape. There are a number of SSSIs within 3km and numerous designated heritage features within the plan area.

SEA Requirement	Comments
■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use.	
12. The effects on areas or landscapes which have a recognised national, Community or international protection status.	The plan area falls within the Cotswold National Landscape.

SEA Screening Conclusion

2.29 A screening assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the Chipping Campden Neighbourhood Development Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.30 The Chipping Campden Neighbourhood Development Plan sets out a vision and planning policies to shape development in Chipping Campden up to 2031 and decision makers will need to consider the criteria of these policies when determining future applications in Chipping Campden. However, it does not directly impact on land use through the allocation of sites for housing or other forms of development.

2.31 On this basis, it is therefore considered that the Chipping Campden Neighbourhood Development Plan is unlikely to have significant environmental effects and that full SEA is therefore not required.

Next Steps

2.32 This SEA Screening Report will be sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) and will be reviewed as appropriate in light of any comments received.

LUC

January 2024

References

1 Available at: Department for Levelling Up, Housing and Communities (2016, updated 2023) Planning practice guidance

2 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

Report produced by LUC

Bristol
12th Floor, Colston Tower, Colston Street, Bristol BS1 4XE
0117 929 1997
bristol@landuse.co.uk

Cardiff
16A, 15th Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 032 9006
cardiff@landuse.co.uk

Edinburgh
Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 202 1616
edinburgh@landuse.co.uk

Glasgow
37 Otago Street, Glasgow G12 8JJ
0141 334 9595
glasgow@landuse.co.uk

London
250 Waterloo Road, London SE1 8RD
020 7383 5784
london@landuse.co.uk

Manchester
6th Floor, 55 King Street, Manchester M2 4LQ
0161 537 5960
manchester@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment
Development Planning / Urban Design & Masterplanning
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation

Chipping Campden Neighbourhood Development Plan

Habitats Regulations Assessment Screening Report

Cotswold District Council

Final report
Prepared by LUC
January 2024

Version	Status	Prepared	Checked	Approved	Date
1	Draft HRA Screening Report	H Ennis	K Sydney	D Green	12.01.2024
2	Draft HRA Screening Report	H Ennis	K Sydney	D Green	17.01.2024











Land Use Consultants Limited
Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

Contents

Chapter 1 1
Introduction

Stages of HRA 1
Previous HRA Work 4
Structure of this Report 5

Chapter 2 6
Chipping Campden Neighbourhood Development Plan

Vision 6
Objectives 6
Policies 8

Chapter 3 9
HRA Screening Methodology

Identifying European Sites that may be Affected and their Conservation Objectives 10
Assessment of ‘Likely Significant Effects’ of the Plan 11
In-combination Effects 12
Types of Impact 14

Chapter 4 15
Screening Assessment

Screening of Impact Pathways 15

HRA Screening of Policies 18

Chapter 5 21
Assessment Conclusion

Summary of HRA Screening 21

Appendix A 23
Relevant Legislation and Case Law

Appendix B 31
Map of European Sites within 15km of the Chipping Campden Neighbourhood Development Plan Area

Appendix C 33
Attributes of European Sites

References 38

Table of Figures

Figure B.1: European sites within 15km of Chipping Campden Neighbourhood Development Plan area 32

Chapter 1

Introduction

1.1 LUC has been commissioned by Cotswold District Council to carry out Habitats Regulations Assessment (HRA) Screening of the Chipping Campden Neighbourhood Development Plan (hereafter referred to as the 'Neighbourhood Plan'. This HRA report assesses the impacts of the Draft policies in the December 2023 version of the Neighbourhood Plan and considers whether further, more detailed, assessment will be required as part of a HRA Appropriate Assessment.

1.2 HRA considers the effect of a development plan on Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites – collectively referred to as 'European sites' (see Appendix A for further information on the legislative context).

1.3 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or a whole development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features'. Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of HRA

1.4 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the European site in question.

1.5 LUC has been commissioned by the Council to carry out HRA work on the Council's behalf, and the outputs will be reported to and considered by the Council, as the competent authority, before adopting the Plan.

Typical Stages

1.6 Below summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance documents **[See reference** 1**]** **[See reference** 2**]** **[See reference** 3**]**.

1.7 This report focusses on Stage 1 (Screening).

Stage 1: HRA Screening

Task

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.
- Identification of potentially affected European sites and their conservation objectives **[See reference** 4**]**.
- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures **[See reference** 5**]**.

Outcome

- Where effects are unlikely, prepare a 'finding of no significant effect report'.
- Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

Stage 2: Appropriate Assessment (where Stage 1 does not rule out likely significant effects)

Task

- Information gathering (development plan and European Sites **[See reference 6]**).
- Impact prediction.
- Evaluation of development plan impacts in view of conservation objectives of European sites.
- Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced ('mitigation').

Outcome

- Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures.
- If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation

Task

- Identify 'imperative reasons of overriding public interest' (IROPI).

- Demonstrate no alternatives exist.
- Identify potential compensatory measures.

Outcome

- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.8 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Previous HRA Work

1.9 The Neighbourhood Plan is a new plan and has not previously been subject to HRA. However, HRA work has been undertaken for the Cotswold District Local Plan.

1.10 The Local Plan was adopted in 2018 and the HRA of the Local Plan was prepared by LUC in 2017. LUC is currently undertaking the HRA of the emerging revisions to the Local Plan. The Regulation 18 'Issues and Options' consultation took place in February and March 2023. LUC prepared a HRA Scoping Report, which was published as part of the Regulation 18 Consultation. Information from the Local Plan HRAs has informed the HRA of the Chipping Campden Neighbourhood Development Plan, where relevant.

Structure of this Report

1.11 This chapter (Chapter 1) described the background to the production of the Neighbourhood Plan and the requirement to undertake HRA. The remainder of the report is structured as follows:

- Chapter 2: Chipping Campden Neighbourhood Development Plan summarises the content of the plan, which is the subject of this report.
- Chapter 3: Method sets out the approach used, and the specific tasks undertaken during the screening stage of the HRA.
- Chapter 4: Screening assessment describes the findings of the screening stage of the HRA.
- Chapter 5: Conclusions and next steps summarises the HRA conclusions for the Chipping Campden Neighbourhood Development Plan and describes the next steps to be undertaken.

1.12 The information in the main body of the report is supported by the following appendices:

- Appendix A provides details of relevant legislation and case law.
- Appendix B presents a map showing the European sites within 15km of the Chipping Campden Neighbourhood Development Plan Area.
- Appendix C sets out information about the European sites that are considered in the HRA.

Chapter 2

Chipping Campden Neighbourhood Development Plan

Vision

2.1 The overarching vision for Chipping Campden by the end of the Neighbourhood Development Plan period in 2031 is:

> A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings. A society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area.

Objectives

2.2 The overarching vision is supported by a series of objectives within six themes. The objectives for the Chipping Campden Neighbourhood Development Plan are as follows:

- Environment and Sustainability
  - To conserve and enhance the natural environment, and encourage a wide diversity of flora and fauna.
  - To conserve and enhance the natural setting that characterises the town.

- To provide and/or maintain green corridors for wildlife across and around Chipping Campden.
- To meet the challenge of climate change, flooding and light pollution.

- Housing
  - To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside.
  - To ensure that new housing location is consistent with the environmental objectives noted above, and is designed in accordance with the design objectives below.
- Economy
  - To protect and develop the town's economy.
  - To strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail, hospitality and other commercial offerings.
  - To improve the town's tourism offer and its attraction to tourists and visitors by improving existing facilities and introducing new ones.
  - To ensure that there is an appropriate balance between rental accommodation for tourists and that which meets the needs of residents and their families.
  - To support the development of specialist food and food-related industry and businesses.
  - To encourage start-up business.
- Design
  - To protect and enhance the area's heritage assets and its AONB location, by encouraging development and conservation projects for uses that are sympathetic to the character of Chipping Campden and its beautiful landscape setting and resisting developments for

inappropriate uses, or that are unsympathetic to the character and setting of the Town.

- Facilities, Services and Amenities
  - To ensure that the community has appropriate infrastructure in terms of health services, sports/leisure facilities, amenities, public transport and green infrastructure.
  - To protect existing green spaces and to increase the provision of green spaces.
- Traffic and Transport
  - To improve facilities for car parking.
  - To improve the facilities and safety for cyclists and pedestrians.

Policies

2.3 The policies within the Chipping Campden Neighbourhood Development Plan are listed below. New development provided for within the Chipping Campden Neighbourhood Development Plan is expected to be in line with the Cotswold Local Plan, and no development sites are allocated within the Chipping Campden Neighbourhood Development Plan. There are a total of six policies within the Chipping Campden Neighbourhood Development Plan:

- Policy 1: Chipping Campden town centre
- Policy 2: Social and Community infrastructure
- Policy 3: Design of the built and natural environment
- Policy 4: Non-designated heritage assets
- Policy 5: Biodiversity net gain and local nature recovery
- Policy 6: Local Green Spaces

Chapter 3

HRA Screening Methodology

3.1 HRA Screening of the Chipping Campden Neighbourhood Development Plan has been undertaken in line with current available guidance and sought to meet the requirements of the Habitats Regulations. The tasks that were undertaken during the screening stage of the HRA are described in detail below; and the conclusions reached are provided in Chapter 4. Relevant legislation and case law is described in Appendix A.

3.2 The purpose of the screening stage is to:

- Identify all aspects of the plan which would have no effect on a European site, so that that they can be eliminated from further consideration in respect of this and other plans.
- Identify all aspects of the plan which would not be likely to have a significant effect on a European site (i.e. would have some effect because of links/connectivity, but which are not significant), and which therefore do not require ‘Appropriate Assessment’. These effects are considered in relation to the plan both alone and in combination with other aspects of the same plan or other plans or projects.
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require Appropriate Assessment.

Identifying European Sites that may be Affected and their Conservation Objectives

3.3 In order to initiate the search of European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the area covered by the plan, and other sites that may be affected beyond this area.

3.4 A distance of 15km from the boundary of the plan area is typically used in the first instance to identify European sites with the potential to be affected by the proposals within a development plan. Consideration is then given to whether any more distant European sites may be connected to the plan area via effects pathways, for example through hydrological links or recreational visits by residents. The 15km distance has been agreed with Natural England for HRAs elsewhere and is considered precautionary. All European sites within 15km have been assessed in this HRA.

3.5 The assessment also takes into account areas that may be functionally linked to the European sites. The term ‘functional linkage’ is used to refer to the role or ‘function’ that land beyond the boundary of a European site might fulfil in terms of supporting the species populations for which the site was designated or classified. Such an area is therefore ‘linked’ to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

3.6 While the boundary of a European site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that

may conceivably be used by the species **[See reference 7]**. HRA therefore considers whether any European sites make use of functionally linked habitats, and the impacts that could affect those habitats.

3.7 Two European sites are within 15km of the Chipping Campden Neighbourhood Development Plan area:

- Bredon Hill SAC (13.5km west); and
- Dixton Wood SAC (13.4km south-west).

3.8 These sites are shown on the figure in Appendix B. Detailed information about each European site is provided in Appendix C, described with reference to Standard Data Forms for the SPAs and SACs, and Natural England's Site Improvement Plans **[See reference 8]**. Natural England's conservation objectives **[See reference 9]** for the SPAs and SACs have also been reviewed.

3.9 None of the sites with 15km of the Neighbourhood Development Plan area has qualifying features that require functionally linked habitat (i.e. mobile species such as bats or birds). No other European sites beyond 15km from the parish boundary are considered to be linked to the Plan area.

Assessment of 'Likely Significant Effects' of the Plan

3.10 As required under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 **[See reference 10]** (as amended) (the 'Habitats Regulations'), an assessment has been undertaken of the 'likely significant effects' of the Plan. The assessment has been prepared in order to identify which policies would be likely to have a significant effect on European sites. The screening assessment has been conducted without taking mitigation into account, in accordance with the 'People over Wind' judgment (see Appendix A).

3.11 A risk-based approach, involving the application of the precautionary principle, has been adopted in the assessment, such that a conclusion of 'no significant effect' has only been reached where it is considered unlikely, based on current knowledge and the information available, that a policy would have a significant effect on a European site.

3.12 Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan (see Appendix A).

3.13 A screening assessment has been prepared, to document consideration of the potential for likely significant effects resulting from each policy in the Chipping Campden Neighbourhood Development Plan. A summary of the findings of this assessment is provided in Chapter 4.

In-combination Effects

3.14 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where "a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site". Therefore, the Screening assessment must consider whether any impacts identified from the Neighbourhood Development Plan may combine with other plans or projects to give rise to significant effects in-combination.

3.15 Where the Neighbourhood Development Plan is likely to have an effect on its own e.g. due to water pollution (due to impact pathways being present) but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be the same types of effect from other plans or projects that could combine with the Neighbourhood Development Plan to produce a significant effect. If so, this likely significant effect (e.g. water pollution) arising from the Neighbourhood Development Plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if water pollution would

have an adverse effect on integrity of the relevant European site. Where the screening assessment concludes that there is no impact pathway between development proposed in the Neighbourhood Development Plan and the conditions necessary to maintain qualifying features of a European site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. Where the screening assessment concludes that likely significant effects from the Neighbourhood Development Plan alone cannot be ruled out, this potential effect is carried forward for more detailed consideration (including of in-combination effects) at the Appropriate Assessment stage and no consideration of in-combination effects is necessary at the Screening stage. This approach accords with current guidance contained in the HRA Handbook **[See reference** 11**]**.

3.16 The in-combination assessment will focus on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor, for example, if impacts could arise as a result of changes to a waterway, then planned growth in local authorities along that waterway will be considered. Where relevant, any strategic projects in the area that could have in-combination effects with the Neighbourhood Development Plan will also be identified and reviewed.

3.17 The HRA Handbook suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge;
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;
- Projects authorised but not yet started;
- Projects started but not yet completed;
- Known projects that do not require external authorisation;
- Proposals in adopted plans; and
- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

Types of Impact

3.18 Where a development plan results in new development or activities, the HRA considers the impact pathways that could result in a likely significant effects. These impacts typically include:

- Physical loss or damage to habitat;
- Non-physical disturbance (noise, vibration and light pollution);
- Non-toxic contamination;
- Air pollution;
- Recreation pressure; and
- Changes to water quantity or quality.

Chapter 4

Screening Assessment

4.1 As described in the Chapter 3, a screening assessment has been carried out in order to identify the likely significant effects of the plan. The detailed screening assessment, which sets out the decision-making process used for this assessment can be found below.

Screening of Impact Pathways

4.2 Only Bredon Hill SAC and Dixton Wood SAC are within 15km of the Neighbourhood Plan area. This section considers potential impact pathways in relation to those two sites.

Physical Loss or Damage to Habitat

4.3 Physical loss or damage to habitat will only occur where development is within the boundaries of a European site, or its functionally linked land. There are no European sites within the Plan area and functionally linked land is not relevant to the sites within 15km. Therefore, there is no impact pathway for physical loss or damage to habitat and this impact has not been assessed in the HRA Screening.

Non-physical Disturbance

4.4 Non-physical disturbance is most likely to be significant within a distance of 500 metres from a European site. There are no European sites or functionally linked land within 500m of the Plan area; therefore there is no impact pathway

for non-physical disturbance and this impact has not been assessed in the HRA Screening.

Non-toxic Contamination

4.5 Non-toxic contamination can include the creation of dust and is most likely to be significant if development takes place within 500m of a European site with qualifying features sensitive to these disturbances. There are no European sites or functionally linked land within 500m of the Plan area; therefore there is no impact pathway for non-toxic contamination and this impact has not been assessed in the HRA Screening.

Air Pollution

4.6 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. In terms of vehicle traffic, nitrogen oxides (NOx, i.e. NO and NO2) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.

4.7 Based on the Highways England Design Manual for Road and Bridges (DMRB) LA 105 Air quality **[See reference** 12**]** (which sets out the requirements for assessing and reporting the effects of highway projects on air quality), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

4.8 The two European sites within 15km of the Plan area are sensitive to air pollution (see Appendix C). However, neither Dixton Wood SAC or Bredon Hill SAC are within 200m of an A road or a motorway. Therefore, there is no impact

pathway for air pollution and this impact has not been assessed in the HRA Screening.

Recreation Pressure

4.9 Recreation activities and human presence can result in significant effects on European sites. European sites with qualifying bird species are likely to be particularly susceptible to recreational disturbances, for example from walking, dog walking, angling, and illegal use of off-road vehicles and motorbikes. Recreation can also physically damage habitat as a result of trampling, fire or vandalism and also through erosion associated with terrestrial activities.

4.10 The two European sites within 15km of the Plan area have habitats that are sensitive to recreation pressure (see Appendix C); therefore recreation pressure has been considered within the HRA Screening.

4.11 Each European site will typically have a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys and the findings are therefore typically specific to each European site (and often to specific areas within a European site). There is currently no visitor surveys for Dixton Wood SAC and Bredon Hill SAC. Therefore, using a precautionary approach and based on the findings of the Monitor of Engagement with the Natural Environment (MENE) survey **[See reference** 13**]**, a ZOI of 8km has been applied to all non-coastal European sites where a ZOI derived from visitor surveys is not available. The 8km ZOI derived from the MENE data relates to the distance of '3 to 5 miles' that 75% of visitors from Cotswold District travel to reach a natural environment. ZOIs are typically based on the distance that 75% of visitors travel from; therefore, 8km is deemed appropriate to use as a precautionary ZOI in this assessment. ZOIs for the three European sites within 15km of the Plan area have been established through visitor survey work and are as follows:

- Dixton Wood SAC: 8km

- Bredon Hill SAC: 8km

4.12 Both Dixton Wood SAC and Bredon Hill SAC are beyond 8km from Chipping Campden parish boundary. Recreation impacts are therefore screened out of this HRA.

Changes to Water Quality or Quantity

4.13 An increase in demand for water abstraction and treatment resulting from the growth can result in changes in hydrology at European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, this could result in likely significant effects, for example, due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions.

4.14 Dixton Wood SAC and Bredon Hill SAC both contain moist soils which support the Violet click beetle, a qualifying feature of both sites. However, there are no abstraction licenses impacting Dixton Wood SAC and there are no other hydrological connectivity **[See reference** 14**]**. In addition, Bredon Hill SAC does not overlay the same aquifers as the plan area and there are no other hydrological connectivity. Therefore, the potential for hydrological impacts on Dixton Wood SAC and Bredon Hill SAC has been screened out.

HRA Screening of Policies

Policies with the Potential for Likely Significant Effects

4.15 This section provides an explanation of the HRA Screening conclusions reached in this HRA, in relation to each policy. The following categories are used:

- Screened out – Due to distance thresholds/lack of sensitivities of qualifying features as discussed in this chapter.
- No likely significant effects – As impact of Chipping Campden Neighbourhood Development Plan is unlikely to be significant on its own or in combination.

Policy 1: Chipping Campden Town Centre

4.16 This policy provides details of the use that will be acceptable within the town centre. It results in the following:

- Modifies the 'town centre' boundary beyond that defined in Local Plan Policy EC7;
- Withdraws Local Plan allocated sites 'Wold's End Orchard' (Policy S16);
- Supports a new car park (100 spaces); and
- Discourages the conversion of residential accommodation to tourist accommodation, where possible.

4.17 Although the policy influences the location that specific uses would occur, it will not itself result in new development. This policy will not result in likely significant effects.

Policy 2: Social and Community Infrastructure

4.18 This policy identifies existing social and community infrastructure that should be protected (through Local Plan Policy INF2 and EC8). The policy also supports suitable land for human burial: the Local Plan allocated land for burial but this is no longer available, so an alternative will be sought. Therefore, although this policy influences the location that specific uses would occur, it will not itself result in new development. This policy will not result in likely significant effects.

Policy 3: Design of the Built and Natural Environment

4.19 This policy defines design standards and guidance relevant to developments in Chipping Campden but it will not result in new development. This policy has been screened out.

Policy 4: Non-designated Heritage Assets

4.20 This policy identified features that are non-designated heritage assets and therefore does not result in new development/activities. This policy has been screened out.

Policy 5: Biodiversity Net Gain and Local Nature Recovery

4.21 This policy identifies habitats that could be improved for biodiversity as part of Chipping Campden's Local Nature Recovery Areas, and sets out how developments can contribute to biodiversity gain. This policy will not result in new development/activities. This policy has been screened out.

Policy 6: Local Green Spaces

4.22 This policy designates 22 existing sites as local green space; but not result in new development/activities. This policy has been screened out.

Chapter 5

Assessment Conclusion

5.1 At the Screening stage of HRA, no likely significant effects are predicted on European sites, either alone or in combination with other policies and proposals.

Summary of HRA Screening

5.2 The HRA Screening has not identified any likely significant effects that will require Appropriate Assessment, either for the Neighbourhood Plan alone or in combination with other plans or projects.

5.3 Most policies have been screened out as they will not result in new development/activities and there are no impact pathways.

5.4 There are potential impact pathways for air pollution and recreation pressure, but the policies will not increase development relevant to these impacts so they have been screened out.

5.5 Policies 1 and 2 will influence the locations in which specific uses are acceptable, but will not themselves result in new development; therefore they will not result in likely significant effects.

Next Steps

5.6 An Appropriate Assessment is not required for the Chipping Campden Neighbourhood Development Plan as none of the policies will directly result in new built development and likely significant effects from the plan can therefore be ruled out.

5.7 HRA is an iterative process and as such, this assessment should be updated if any relevant, newly available evidence or comments from key consultees are received prior to the plan being finalised. This report should be subject to consultation with Natural England to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making.

LUC

January 2024

Appendix A

Relevant Legislation and Case Law

Legislation

The Requirement to Undertake Habitats Regulations Assessment of Development Plans

A.1 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 **[See reference** 15**]**; the currently applicable version is the Habitats Regulations 2017, as amended **[See reference** 16**]**. When preparing a development plan, the Council is therefore required by law to carry out an HRA. The Council can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by the Council as the 'competent authority'. The Council will consider this work and would usually only progress a Plan if it considers that the Plan will not adversely affect the integrity **[See reference** 17**]** of any 'European site', as defined below (the exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated). The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance **[See reference** 18**]** (PPG).

A.2 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but since 1 January 2021 are protected in the UK by the Habitats Regulations 20172 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make

reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive **[See reference** 19**]**) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Before EU exit day, designation of SACs also had regard to the coherence of the 'Natura 2000' network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'national site network'.
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive **[See reference** 20**]**), and for regularly occurring migratory species not listed in Annex I.

A.3 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites **[See reference** 21**]** and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper **[See reference** 22**]** on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refer to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

A.4 Although Ramsar sites do not form part of the new national site network, Government guidance **[See reference** 23**]** states that:

> "Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- proposed SACs
- potential SPAs
- Ramsar sites – wetlands of international importance (both listed and proposed)
- areas secured as sites compensating for damage to a European site."

A.5 Furthermore, the NPPF **[See reference** 24**]** and practice guidance **[See reference** 25**]** currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

A.6 For simplicity, this report uses the term 'European site' to refer to all types of designated site for which Government guidance **[See reference** 26**]** requires an HRA.

Requirements of the Habitats Regulations

A.7 In assessing the effects of a Local Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed if necessary by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects (the 'Significance Test'). If yes, proceed to Step 3.

- [Steps 1 and 2 are undertaken as part of Stage 1: HRA Screening.]

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.
  - [This step is undertaken during Stage 2: Appropriate Assessment.]
- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a European site.
  - [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process.]
- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI).
  - [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation.]

Case Law

A.8 This HRA has been prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

A.9 The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an

Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

> "Article 6(3)… must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.

A.10 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Local Plan could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

A.11 This HRA also considers the Holohan v An Bord Pleanala (November 2018) judgement which stated that:

> Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

A.12 In undertaking this HRA, LUC has considered the potential for effects on species and habitats, including those not listed as qualifying features, to result

in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has also been considered in this HRA.

A.13 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat have been considered in the HRA, in line with the High Court judgment in RSPB and others v Secretary of State and London Ashford Airport Ltd [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

> "There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied… that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice."

A.14 In addition to this, the HRA takes into consideration the 'Wealden' judgement from the CJEU.

A.15 Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority

(2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

A.16 In light of this judgement, the HRA therefore considers traffic growth based on the effects of development from the Local Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

A.17 The HRA also takes into account the Grace and Sweetman (July 2018) judgement from the CJEU which stated that:

> "There is a distinction to be drawn between protective measures forming part of a project and intended avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project."
>
> "As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future."
>
> "A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is "sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area."

> "Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are "imperative reasons of overriding public interest"."

A.18 The Appropriate Assessment of the Local Plan therefore only considers the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

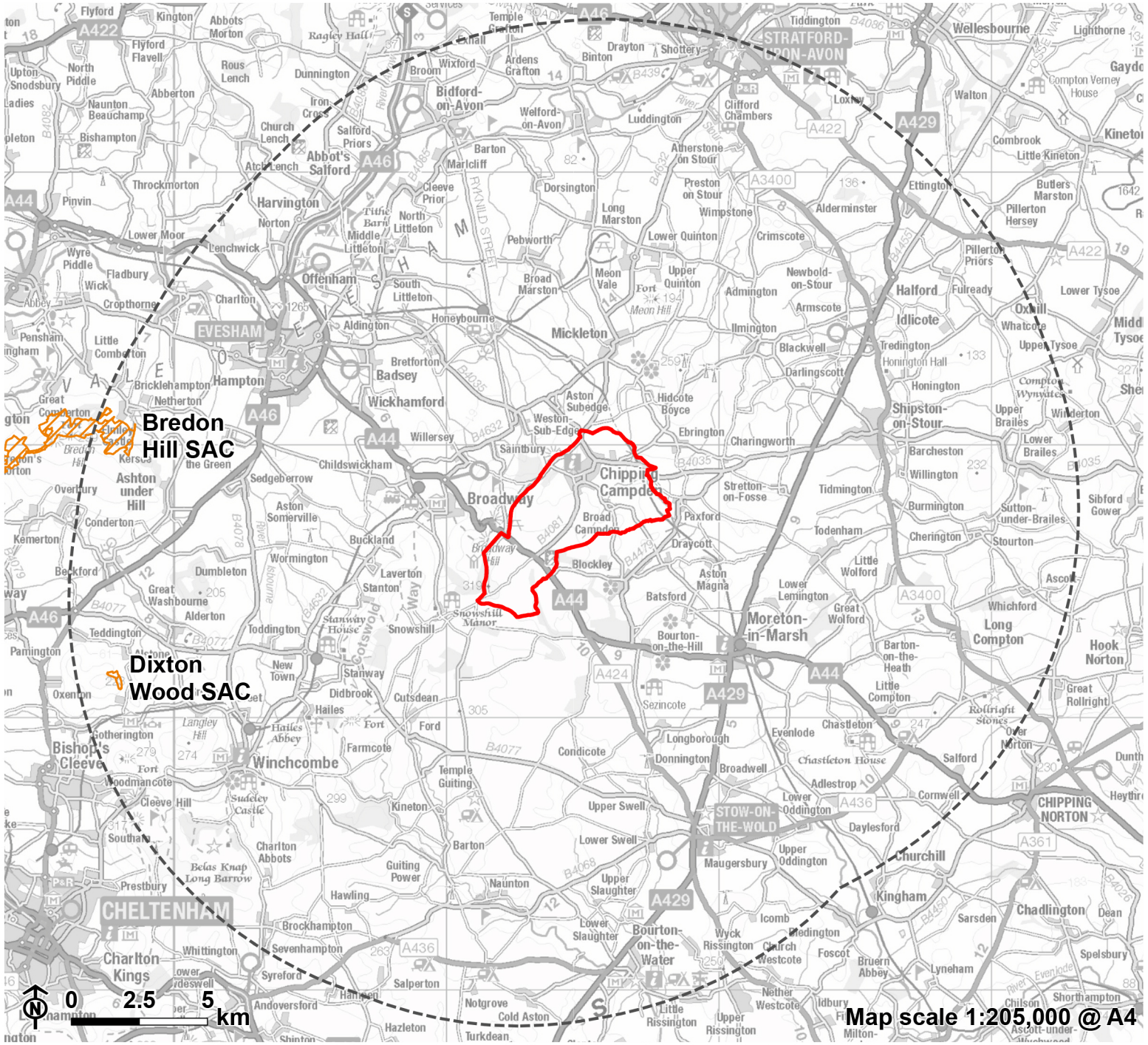
Appendix B

Map of European Sites within 15km of the Chipping Campden Neighbourhood Development Plan Area

Chipping Campden
HRA
Cotswold District
Council

LUC

Figure B.1: European sites within 15km of the Chipping Campden Neighbourhood Development Plan area



Chipping Campden Parish Boundary

15km buffer

Special Area of Conservation (SAC)

Contains Ordnance Survey data © Crown copyright and database right 2024

Appendix C

Attributes of European Sites

C.1 This appendix contains information on the European sites scoped into the HRA. Site areas and designated features are drawn from SAC and SPA Standard Data Forms and Ramsar Site Information Sheets **[See reference** 27**]**. The overviews of sites and their locations are drawn from Natural England's Site Improvement Plans **[See reference** 28**]**. Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs **[See reference** 29**]**.

Dixton Wood SAC

C.2 Violet click beetle *Limoniscus violaceus* was discovered at Dixton Wood in 1998 and it has been found at the site on a single occasion subsequently. It is a small site with large number of ancient ash Fraxinus excelsior pollards, and supports a rich fauna of scarce invertebrate species associated with decaying timber on ancient trees.

Qualifying Features

- 1079 Violet click beetle; *Limoniscus violaceus*

Conservation Objectives

C.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species;

- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Site Improvement Plan **[See reference** 30**]**: Pressures, Threats and Related Development

1. Changes in Species Distributions – Because of its rarity and highly specialised ecology associated with decaying wood and leaf litter in tree cavities, specialist involvement is required for survey, monitoring and the provision of detailed habitat management advice.

2. Forestry and Woodland Management – The beetle depends on the production of humid wood mould where it lives for part of its life cycle within decaying trees; this is typically found in veteran trees where they show signs of rot. The amount of suitable and available wood mould in the SAC is unknown. The lack of succession in veteran cohorts is an issue and it make the need for extending the life of the existing veteran trees even more important.

3. Disease – Ash dieback disease Chalara fraxinea is a potential threat to the site. The Violet click beetle population at Dixton Wood is thought only to use ash trees.

Non-qualifying Habitats and Species upon which the Qualifying Habitats and/or Species Depend on

- Violet click beetle

- Habitat preferences – Ancient and veteran trees.
- Diet – Wood mould.

Bredon Hills SAC

C.4 Bredon Hill is an outlier of the Cotswolds with remnants of wood pasture and many veteran trees. Their dead wood supports one of the three known populations of the Violet click beetle *Limoniscus violaceus*, in the UK.

Qualifying Features

- 1079 Violet click beetle; *Limoniscus violaceus*

Conservation Objectives

C.5 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Site Improvement Plan **[See reference** 31**]**: Pressures, Threats and Related Development

1. Forestry and Woodland Management – The lack of succession in veteran tree cohorts is an issue, as current planting will only benefit the beetles after about 400 years and it is uncertain how long tree surgery will prolong the veterans' lives. The beetle depends on the production of humid wood mould within decaying trees and the amount of available wood mould in the SAC is unknown.

2. Feature Location/Extent/Condition Unknown – There is a current lack of information on the distribution across the site of the rare and secretive Violet click beetle.

3. Disease – Ash die-back caused by the Chalara fraxinea fungus threatens the large number of current veteran ash trees and their replacements on which the Violet click beetle depends. Whilst the beetle is known to use other species elsewhere (eg Windsor), ash dominates the trees on Bredon Hill. The scale of this impact on the persistence and continuity of wood mould is uncertain and is likely to be beyond human control.

4. Air Pollution: impact of atmospheric nitrogen deposition – Nitrogen deposition exceeds site relevant critical loads. This site is sensitive to nitrogen deposition.

5. Climate Change – The likelihood of increased violent storm events and the viability of ash in a changed environment threatens the veteran ash trees on which the beetle depends.

Non-qualifying Habitats and Species upon which the Qualifying Habitats and/or Species Depend on

- Violet click beetle
  - Habitat preferences – Ancient and veteran trees.
  - Diet – Wood mould.

References

1 Available at: UK Government Planning Practice Guidance

2 European Commission (2001) Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC

3 Available at: The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document

4 Available at: Conservation objectives are published by Natural England for SACs and SPAs

5 In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.

6 In addition to European site citations and conservation objectives, key information sources for understanding factors contributing to the integrity of European sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England

7 Chapman, C. & Tyldesley, D. (2016) Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects – a review of authoritative decisions. Natural England Commissioned Reports, Number 207.

8 Available at: Obtained from the Natural England website

9 Available at: Natural England (undated) Conservation Objectives for European Sites

10 SI No. 2017/2012

11 David Tyldesley and Associates (undated) The HRA Handbook (Section A3) – a subscription based online guidance document

12 Available at: National Highways (2019) Design Manual for Roads and Bridges, LA 105 Air quality

13 Available at: Natural England (2020) Monitoring Engagement with the Natural Environment, MENE Visit data Year 1 to 10 filtered by resident local authority (Cotswold) and distance travelled (q8)

14 Available at: Natural England (2018) Supplementary advice on conserving and restoring site features: Dixton Woods SAC

15 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

16 The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).

17 The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)

18 Available at: https://www.gov.uk/guidance/appropriate-assessment

19 Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive')

20 Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')

21 Available at: The network of protected areas identified by the EU

22 Available at: https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017

23 Available at: Defra and Natural England (2021) Guidance - Habitats regulations assessments: protecting a European site

24 Available 1t: NPPF para 187

25 Available at: The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document

26 Available at: Defra and Natural England (2021) Guidance - Habitats regulations assessments: protecting a European site

27 Available at: JNCC (2019) UK Protected Area Datasets for Download

28 Available at: Natural England (2014-2015) Site Improvement Plans: East of England

29 Available at: Natural England (undated) Conservation Objectives for European Sites

30 Available at: Natural England - Site Improvement Plan: Dixton Wood

31 Available at: Natural England – Site Improvement Plan: Bredon Hills

Report produced by LUC

Bristol
12th Floor, Beacon Tower, Colston Street, Bristol BS1 4XE
0117 929 1997
bristol@landuse.co.uk

Cardiff
16A, 15th Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 032 9006
cardiff@landuse.co.uk

Edinburgh
Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 202 1616
edinburgh@landuse.co.uk

Glasgow
37 Otago Street, Glasgow G12 8JJ
0141 334 9595
glasgow@landuse.co.uk

London
250 Waterloo Road, London SE1 8RD
020 7383 5784
london@landuse.co.uk

Manchester
6th Floor, 55 King Street, Manchester M2 4LQ
0161 537 5960
manchester@landuse.co.uk

Sheffield
32 Eyre Street, Sheffield, S1 4QZ
0114 392 2366
sheffield@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment / Transport Planning
Development Planning / Urban Design & Masterplanning / Arboriculture
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation

Joseph Walker

From: Stuart, David <David.Stuart@HistoricEngland.org.uk>
Sent: 15 February 2024 14:04
To: Neighbourhood Planning
Subject: Chipping Campden Neighbourhood Development Plan: SEA and HRA Screening opinions

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from david.stuart@historicengland.org.uk. Learn why this is important

Dear Joseph

Thank you for your consultation on the SEA Screening for the emerging Chipping Campden neighbourhood Plan.

This would appear to be our first involvement in the preparation of this plan and we welcome the opportunity this also provides to identify and highlight any issues of interest to us.

That interest tends to focus on where Plans advocate the allocation of sites for development. We note that the Chipping Campden Plan does not propose to allocate sites, and there are no other issues raised by other policies upon which we wish to comment or envisage wishing to do so at future consultation stages.

On this basis we therefore have no objection to the view that a full SEA is not required. We are happy to leave providing a view on the need for an HRA to the relevant agencies.

Kind regards

David

David Stuart | Historic Places Adviser

I now work only 2 days a week, usually Tuesdays and Wednesdays

Historic England | South West
1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ
Direct Line: 0117 975 0680 | Mobile: 0797 924 0316
https://historicengland.org.uk/southwest



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
Follow us: Facebook | Twitter | Instagram Sign up to our newsletter

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full privacy policy for more information.

From: Neighbourhood Planning <Neighbourhood.Planning@cotswold.gov.uk>
Sent: 17 January 2024 15:12

To: 'Planning_THM@environment-agency.gov.uk' <Planning_THM@environment-agency.gov.uk>; 'consultations@naturalengland.org.uk' <consultations@naturalengland.org.uk>; Stuart, David <David.Stuart@HistoricEngland.org.uk>
Cc: 'Robert.NIBLETT@gloucestershire.gov.uk' <Robert.NIBLETT@gloucestershire.gov.uk>
Subject: Chipping Campden Neighbourhood Development Plan: SEA and HRA Screening opinions

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please find attached two screening reports on whether the Draft **Chipping Campden Neighbourhood Plan** might have significant environmental effects and therefore require a full SEA or HRA.

Please also find attached the draft plan.

As you are aware, we are required to consult with the environmental assessment bodies and as such, we are seeking your advice on this matter. It is likely we will include your response with the statement of reasons, as to why (if this is the case) a SEA/HRA was not required, which is then submitted to the Examiner.

A response is due within 5 weeks, by 12:00 noon on **22nd February**

I would be grateful if you could also acknowledge receipt of this email. If you have any queries please feel free to contact me.

Regards,

Joseph Walker

Publica is a company wholly owned by Cotswold District Council, Forest of Dean District Council, West Oxfordshire District Council and Cheltenham Borough Council to deliver local services on their behalf.

The content of this email and any related emails do not constitute a legally binding agreement and we do not accept service of court proceedings or any other formal notices by email unless specifically agreed by us in writing.

Recipients should be aware that all e-mails and attachments sent and received by Publica on behalf of West Oxfordshire, Cotswold and/or Forest of Dean District Council may be accessible to others in the Council for business or litigation purposes, and/or disclosed to a third party under the Freedom of Information or Data Protection Legislation.

Date: 30 January 2024
Our ref: 463928
Your ref: Chipping Campden Neighbourhood Plan

Joseph Walker
Cotswold District Council

BY EMAIL ONLY
Neighbourhood.Planning@cotswold.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Joseph Walker,

Cotswold District Council - Chipping Campden Neighbourhood Plan - SEA & HRA Screening Consultation

Thank you for your consultation on the above dated 17 January 2024which was received by Natural England on 17 January 2024

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.

Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)

It is Natural England's advice, on the basis of the material supplied with the consultation, that:

- **significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,**
- **significant effects on Habitats sites[1], either alone or in combination, are unlikely.**

The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the Planning Practice Guidance. This identifies three triggers that may require the production of an SEA:

- 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 may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

[1] Habitats sites are those referred to in the National Planning Policy Framework (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites".

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require an SEA. Further information is included in Natural England's standing advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Cotswold National Landscapes

The proposed development is for a site within or close to a nationally designated landscape namely the Cotswolds AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Green Infrastructure

Natural England's Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional

and national scales.

Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

GI mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Please send any new consultations, or further information on this consultation to consultations@naturalengland.org.uk

Yours sincerely

Holly Marlow

Holly Marlow
Planning for a Better Environment – West Midlands Team

Annex A –Natural England general advice

Protected Landscapes
Paragraph 182 of the National Planning Policy Framework (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes
Paragraph 180 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Biodiversity duty
The local planning authority has a duty to conserve and enhance biodiversity as part of its decision making. Further information is available here.

Designated nature conservation sites
Paragraphs 186-188 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites. Both the direct and indirect impacts of the development should be considered. A Habitats Regulations Assessment is needed where there is a likely significant effect on a habitats site and Natural England must be consulted on 'appropriate assessments'. Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via Impact Risk Zones or as standard or bespoke consultation responses.

Protected Species
Natural England has produced standing advice to help planning authorities understand the impact of particular developments on protected species. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases.

Local sites and priority habitats and species
The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 180, 181 and 185 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre,

wildlife trust, geoconservation groups or recording societies. Emerging Local Nature Recovery Strategies may also provide further useful information.

Priority habitats and species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk.

Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Biodiversity and wider environmental gains
Development should provide net gains for biodiversity in line with the NPPF paragraphs 180(d), 185 and 186. It is anticipated that major development (defined in the NPPF glossary) will be required by law to deliver a biodiversity gain of at least 10% from early 2024 and that this requirement is expected to be extended to smaller scale development in spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

Further information on the timetable for mandatory biodiversity net gain can be found here. Further information on biodiversity net gain, including draft Planning Practice Guidance, can be found here.

The statutory Biodiversity Metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites, the Small Sites Metric may be used. This is a simplified version of the Biodiversity Metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 186 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 74, 108, 124, 180, 181 and 186). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the Biodiversity Metric and is available as a beta test version.

Further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain can be found in government Planning Practice Guidance for the natural environment.

Ancient woodland, ancient and veteran trees
The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 180 and 181). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further

information is contained in GOV.UK guidance Agricultural Land Classification information is available on the Magic website and the Data.Gov.uk website

Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, separate guidance on soil protection for site restoration and aftercare is available on Gov.uk website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying *Good Practice Guide for Handling Soils in Mineral Workings*.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure
Natural England's Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

GI mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails
Paragraphs 104 and 180 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Further information is set out in Planning Practice Guidance on the natural environment

This page is intentionally left blank



AECOM

CHIPPING CAMPDEN DESIGN GUIDE

September 2024

locality
the power of community

Revision History

Revision	Revision date	Details	Name	Organisation
3	26-09-2024	Third draft	Ben Castell	AECOM
2	11-02-2022	Second draft	Ben Castell	AECOM
1	24-08-2021	Review	Martin Davidson	CCTC
0	02-07-2021	First draft	Ben Castell	AECOM

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with Locality (the "Client") and in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

CONTENTS

1. Introduction 5

1.1. Introduction 5

1.2. Objective 5

1.3. Process 5

1.4. Introduction to Chipping Campden Parish 6

1.5. Key national and local reference documents 9

1.6. Engagement 10

1.7. Delivery 11

2. Context and character..... 13

2.1. Historical context 13

2.2. Landscape setting 13

2.3. Chipping Campden's townscape 14

2.4. AECOM buildings survey 16

3. Understanding and responding to the context..... 26

3.1. Introduction 26

3.2. Site analysis 26

3.3. Responding to context 26

4. Design guidance..... 28

4.1. Introduction 28

4.2. Strategic design principles 30

4.3. Detailed design 38

Introduction

01



1. Introduction

1.1. Introduction

Through the Ministry of Housing, Communities and Local Government (MHCLG) Neighbourhood Planning Programme delivered by Locality, AECOM has been commissioned to provide design support to Chipping Campden Town Council.

This document supports Neighbourhood Development Plan (NDP) policies that guide the design of future development proposals and to inform and encourage anyone proposing development in the Parish to create developments which complement and enhance the area's outstanding architectural and environmental qualities.

1.2. Objective

The main objective of this report is to present design guidance for the Neighbourhood Plan area, informing the design of future planning applications principally for residential development. The guidelines, which are focused on the design of the built environment, should be flexible enough to apply to sites of different sizes and types. The report contains diagrams and images that provide illustrative the guidelines.

The Chipping Campden Design Guide has been prepared in response to the concerns of the community to help to ensure that:

- The unique architectural and townscape quality of both Chipping Campden and Broad Campden are conserved;
- The quality of the rural area of the Parish is safeguarded, and;
- Sustainability, net zero and wildlife are considered throughout the design process.
- That new developments and alterations and extensions to existing properties complement the existing environment in design and materials.

This document not a pattern book. All applicants for planning permission will be expected to engage skilled designers to come up with appropriate solutions based on the specific site's context. However, it does contain the Town Council's expectations of both design process and outcomes. Chipping Campden Town Council is a statutory consultee for any planning applications made for developments in the Parish.

1.3. Process

The following steps were undertaken to produce this report:

- Initial meeting between AECOM and the Chipping Campden Town Council's consultant;
- Urban design and local character analysis, based on site visits and review of existing evidence base, including community engagement;
- Preparation of draft design guide document;
- Engagement - text to follow once agreed; and
- Preparation of final document.

This design guide is informed by the draft Community Design Statement, with valuable contributions by Chris Propert, Peter and Charlotte Fiell and Martin Davison. It is also informed by the comments that Cotswold District Council made on drafts of that document.

1.4. Introduction to Chipping Campden Parish

Chipping Campden is often referred to as 'the Jewel of the Cotswolds'. For many years, its unique architecture and townscape have been recognised by architectural commentators and historians as being of national and international architectural importance and are visited and enjoyed by visitors from across the world who make a vital contribution to the local economy .

The Cotswold Local Plan recognises this, stating that Chipping Campden has a high-quality townscape together with a fine landscape setting within the Cotswold National Landscape[1].

Chipping Campden's High Street, which dates from the 12th to the 17th Century, is world famous for its elegant, terraced houses and other buildings made from honey-coloured Cotswold limestone.

It has been described as 'the most beautiful village street now left in this island'. Sir Nikolaus Pevsner described it as 'the best piece of townscape in Gloucestershire - arguably one of the best in England'. John Julius Norwich describes the town as 'one of the most attractive small town in the Cotswolds, if not all England, the town has been magnificently preserved, with scarcely an eyesore anywhere'.

This acclaim has been warmly welcomed and appreciated by the Chipping Campden community, which is immensely proud of its Parish's outstanding architecture and townscape, especially the environment the two main settlements, Chipping Campden and the village of Broad Campden.

The local community works hard to conserve, maintain and enhance these qualities, and is determined to ensure that the policies and guidelines in the Chipping Campden Neighbourhood Development Plan and Design Guide contribute to achieving this.

The town is not preserved in aspic. It is a living, working town and has accommodated a significant amount of growth in recent years. A high standard of design is required to add to the quality of the town.

The majority of both Chipping Campden and Broad Campden have long since been designated as Conservation Areas, with an Article 4 Direction placing particular constraints on development within Chipping Campden.

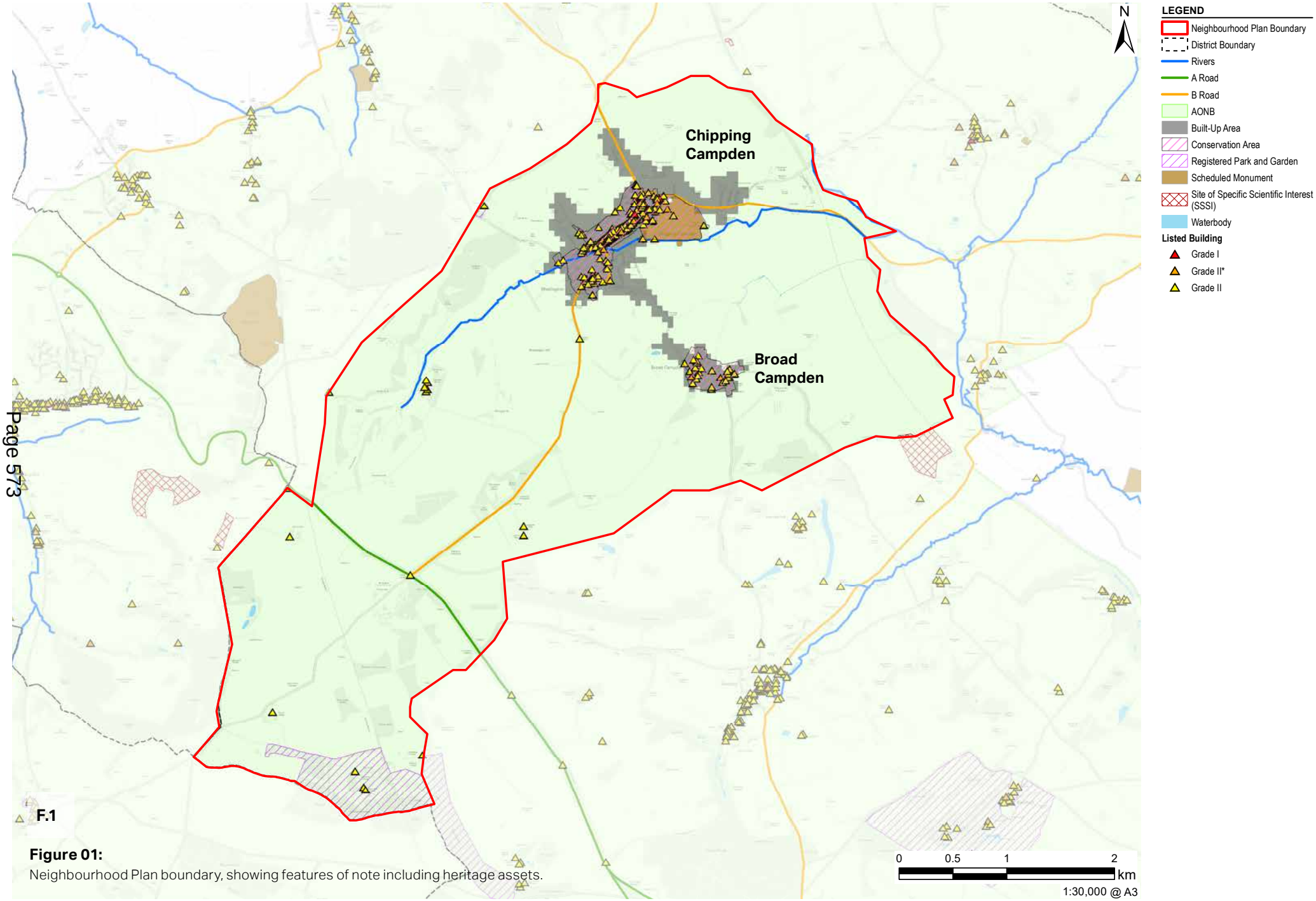
The Parish is within the Cotswold National Landscape, which also places restrictions and requirements on development.

Apart from Chipping Campden and Broad Campden, there are no other major settlements in the Parish. There are around fifty individual properties outside these settlements.

The Neighbourhood Plan boundary shown in figure 1 aligns with the Parish boundary.

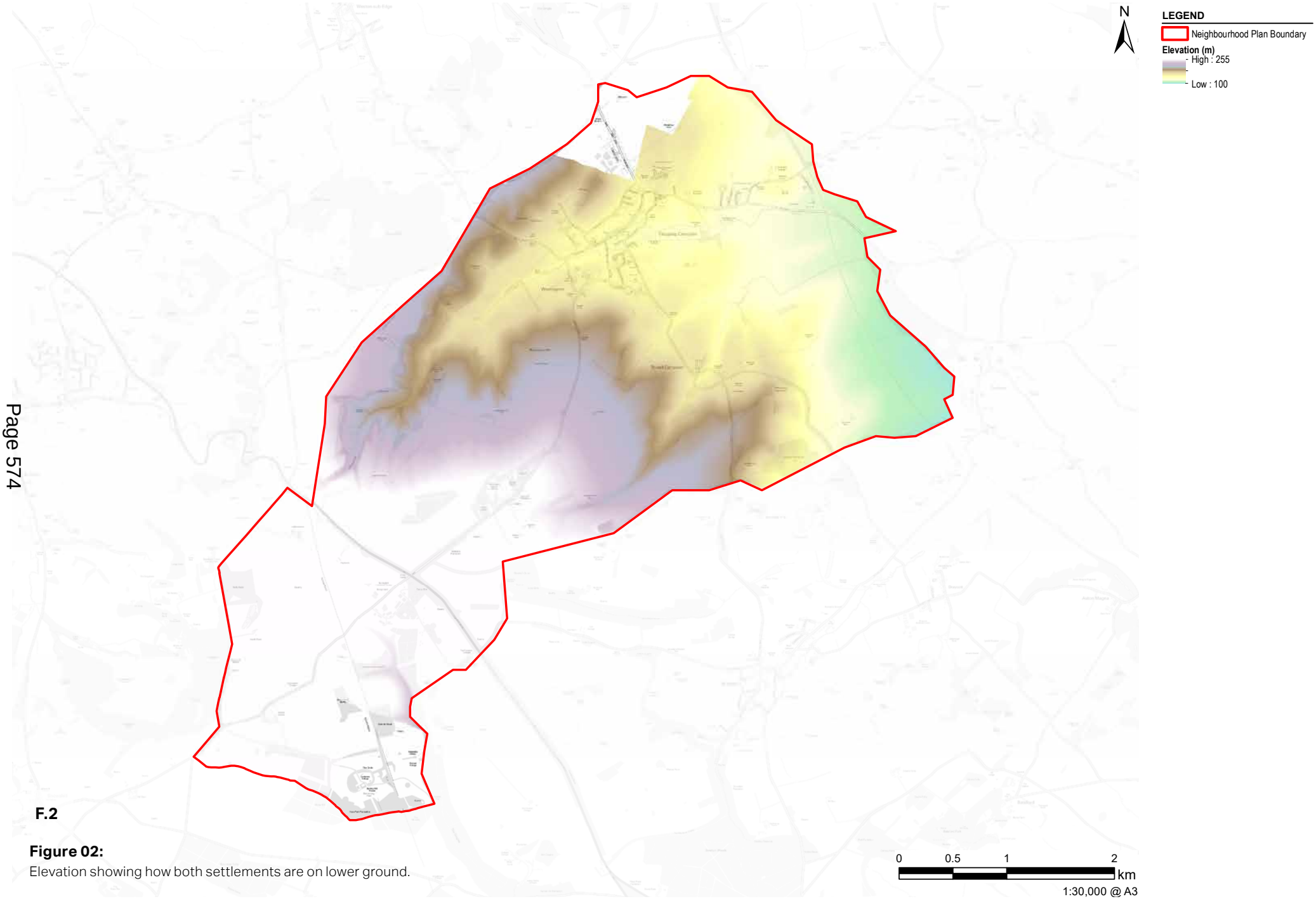


1 Areas of Outstanding Natural Beauty (AONB) were renamed to National Landscapes in 2023. Some documents prepared prior to this change refer to AONB. AONB are therefore referenced in this report where citing titles of these documents.



F.1

Figure 01:
Neighbourhood Plan boundary, showing features of note including heritage assets.



F.2

Figure 02:
Elevation showing how both settlements are on lower ground.

1.5. Key national and local reference documents

There is a suite of documents that the Chipping Campden Design Guide forms the most local component of. It is expected that applicants apply the Design Guide alongside this other guidance. **For major applications, usually defined as being at least 10 homes or 0.5 hectares in area, applicants will be expected to show how they taken account of the full suite**.

National Design Guide (MHCLG, 2021)

The National Design Guide seeks to illustrate how well-designed places that are beautiful, enduring and successful can be achieved in practice.

It contains high level advice, including ten principles of good design that can be applied at all scales.

National Model Design Code (MHCLG, 2021)

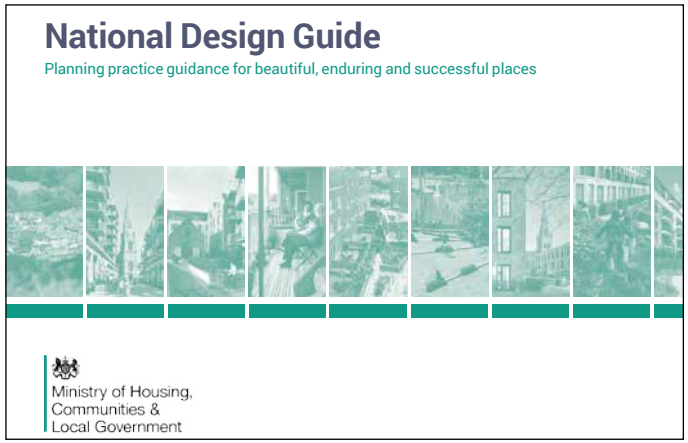
The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and policies to promote successful design.

It expands on the ten characteristics of good design set out in the National Design Guide and provides a common overarching framework for design, including a suggested approach for local design guides and codes.

Building for a Healthy Life (Homes England and partners, 2020)

Building for a Healthy Life (BHL) is the new (2020) name for Building for Life, the government-endorsed industry standard for well-designed homes and neighbourhoods. The new name reflects the crucial role that the built environment has in promoting wellbeing.

The BHL toolkit sets out principles to help guide discussions on planning applications and to help local planning authorities to assess the quality of proposed (and completed) developments, but can also provide useful prompts and questions for planning applicants to consider during the different stages of the design process.



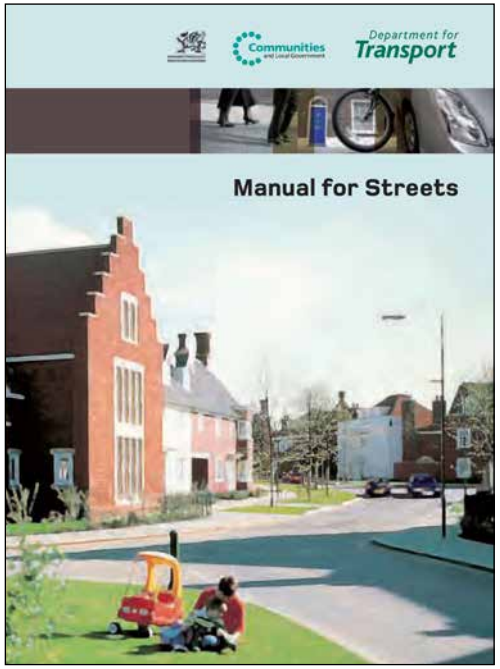




Manual for Streets (Department for Transport, 2007)

Major development is expected to respond positively to the Manual for Streets, the Government's guidance on how to design, construct, adopt and maintain new and existing residential streets. It promotes streets and wider development that avoid car dominated layouts but that do place the needs of pedestrians and cyclists first.

For a more local interpretation street design requirements, please refer to Gloucestershire County Council's **Manual for Gloucestershire Streets.**

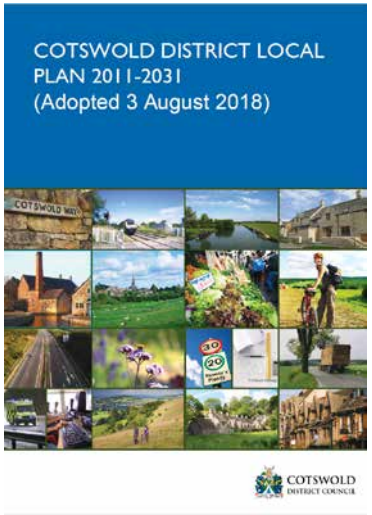


Cotswold District Local Plan, including Cotswold Design Code (CDC, 2018)

The Local Plan sets the local planning policies that development in Chipping Campden needs to comply with. In includes Policy EN2 on the Design of the Built and Natural Environment, which states that development must accord with the Cotswold Design Code and be of a design quality that respects the character and distinctive appearance of the locality.

The Cotswold Design Code itself is appended to the Local Plan. It contains detailed guidance on all aspects of design - defined as architectural, urban, landscape, ecological and sustainable - but lacks illustrations.

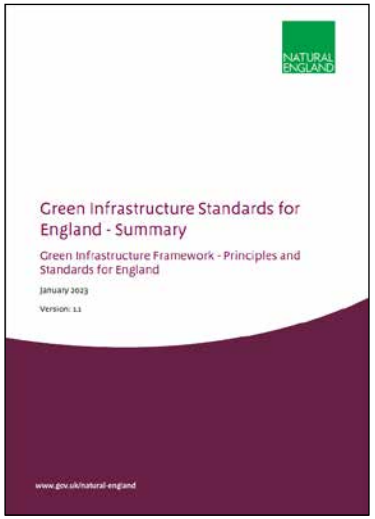
The Chipping Campden Design Guide is intended to complement the Cotswold Design Code, adding very local detail and illustration. **It is imperative that the two documents are read and applied together**, with the Cotswold Design Code the starting point. For this reason, its contents are not repeated here.



Green Infrastructure Framework (Natural England, 2023)

The Green Infrastructure Framework seeks to support the greening of settlements and connections with the surrounding landscape as part of the Nature Recovery Network. The framework comprises:

- Principles: the why, what and how of good green infrastructure;
- Standards: guidance on national standards for green infrastructure quantity and quality;
- Maps: mapped environmental, socio-economic datasets to support the standards;
- Planning and design guide: advice on how to design good quality green infrastructure; and
- Process guide and journeys: designed to help developers and neighbourhood planning groups.



1.6. Engagement

As noted in the opening section above, the Chipping Campden Design Guide has been prepared in response to the concerns of the community to help to ensure that the unique architectural and townscape quality of both Chipping Campden and Broad Campden are conserved, the quality of the rural area of the Parish is safeguarded, and that new developments and alterations and extensions to existing properties complement the existing environment in design and materials.

In the Chipping Campden NDP consultation process, concerns were expressed by the local community about future developments in the Parish, including:

- To conserve the uniqueness of Chipping Campden and Broad Campden's townscape, and the environment of the rural area of the Parish, specific design guidance was required which highlighted the importance of the architecture and townscape of these two settlements;
- Both Chipping Campden and Broad Campden have developed in a small scale 'organic' way and that this should continue in order to avoid the development of large, peripheral 'housing estates' built using standard designs; and
- Chipping Campden's unique townscape, which is a key factor in attracting tourists to the town and an important element in the town's prosperity, needs to be safeguarded.

1.7. Delivery

The Design Guide will be a valuable tool in securing context-driven, high quality development within Chipping Campden Parish. It will be used in different ways by different actors in the planning and development process, as summarised in the table.

All planning applications and consequent decisions should, above all, take into account the unique, irreplaceable and fragile nature of Chipping Campden's historic, built and natural environments and its regional and national significance.

It's important to note that the illustrative examples of this report are intended to visually communicate the concept of the guidelines. These examples may not always represent the best design outcomes for the context of a given development and site. All developments, no matter the scale, should aspire to excellence in design. Replicating illustrative examples of this report or developments elsewhere in the Parish may not be an acceptable design outcome.

ACTORS	HOW THEY WILL USE THE DESIGN GUIDE
Applicants, developers, householders and landowners	As a guide to community and Local Planning Authority expectations on design, allowing a degree of certainty – they will be expected to follow the Guide as planning consent is sought. As a guide for householders to help design changes to their properties, including changes that may not require planning permission.
Local Planning Authority	As a reference point, embedded in policy, against which to assess planning applications. The Design Guide should be discussed with applicants during any pre-application discussions.
Town Council	As a guide when commenting on planning applications, ensuring that the Design Guide is complied with.
Community and civic organisations	As a tool to promote community-backed development and to inform comments on planning applications.
Statutory consultees	As a reference point when commenting on planning applications.

Context and character

02



AECOM

2. Context and character

This section outlines the broad physical, historical, and contextual characteristics of Chipping Campden and Broad Campden.

2.1. Historical context

The wool trade brought prosperity to Chipping Campden Parish with development being focussed mainly on the town. From 1800 to 1930, the Parish population remained stable at about 1,700, then rose to its present level of around 2,400, mainly due to developments within the town.

Within Chipping Campden town, the prosperity saw the building of St James Church, Old Campden House, Grevel House and the late c14th wool merchant's house subsequently restored by CR Ashbee who named it Woolstaplers' Hall. In about 1610, Sir Baptist Hicks bought the local manor and subsequently built a fine manor house, almshouses and a Market Hall in the High Street. CR Ashbee, a follower of William Morris, who started his Guild of Handicraft in 1888 in London's East End, brought his Guild and families of 150 people to Campden in 1902.

By 1900, Chipping Campden had changed very little, with development being concentrated on either side of the High Street with burgage plots behind the properties on the north side of the high street and many orchards distributed around the edges of the town. Westington was a separate village to the south of the town. In the next hundred years Chipping Campden expanded considerably with new developments along Aston Road, Westington, Station Road, Calf Lane and Littleworth, although the historic core of the town on either side of the High Street retained its form and did not suffer from inter-war and post war development.

Broad Campden is located just over one mile from Chipping Campden but has its own identity based around the influences of the Arts and Crafts movement. In the 18th century, Broad Campden contained 54 houses and just over 250 inhabitants. By 1971 there were over seventy houses but only 137 inhabitants. Many of Broad Campden's cottages are thatched and built with Cotswold Stone.

2.2. Landscape setting

In 2014, White Consultants prepared a report for Cotswold District Council entitled 'Study of land surrounding Key Settlements in Cotswold District'. This section draws heavily on that report and is also informed by the Cotswold AONB Landscape Character Assessment.

Chipping Campden sits in a broad hollow of flat land on the north bank of the Cam Brook with higher ground on three sides, and within the Cotswold National Landscape and National Landscape Character Area 107, Cotswolds.

The landscape immediately around Chipping Campden consists of a number of valleys and the floodplain of Cam Brook. To the north west is 'The Hoo' which is a backdrop to the Town when approaching along the B4081. To the north west of the town directly north of the School is a less distinctive low ridge consisting of larger fields in both arable and pasture use. The urban form of the town respects the form of this low ridge by wrapping around its southern edge. The ridge is an important part of the backdrop to the town when approaching from the south.

The valley of the Cam Brook on the eastern edge of the town is characterised by a flat floodplain with prominent stands of poplars, low hedges and fences and stone walls from which there are important views to the church and village edge. The Coneygree to the north of the Cam Brook is an area with distinctive topography related to ancient ruins with a strong visual link to the church and contributes to its setting.

To the south the landscape consists of larger fields of arable land with a less intimate scale than the landscape that surrounds the north western edge of the town. There is also a green open gap between the settlement and Broad Campden to the south.

The linear urban form of the town relates very strongly to the valley sides and generally does not intrude onto the 'top' land. When viewed from a distance the town is seen nestling in the landscape.

The White report also makes the following specific comments relating to Chipping Campden's relationship with its surroundings:

- The relationship between town and landscape is one of the most important in the Cotswolds. The ability of the landscape surrounding the settlement to accommodate further development is limited because the valley sides and ridge tops are visually exposed. Large scale development would compromise the linear character of the town;
- In-fill development, although limited when compared with other Cotswold settlements, has reduced the linear nature of the town and the key relationship with topography is being obscured to some extent;
- Neither Chipping Campden nor Broad Campden have what are commonly known as housing 'estates'. However, as Chipping Campden has expanded outwards, the Cotswold vernacular has become watered down and low quality materials used;
- There is a historic but weakening variety of building forms including cottages and farm buildings give variety, structure, and an openness to the town edge;
- The church and tower are a central focal landmark in the Town. Because of the generally linear urban form there is a direct visual linkage between the town and the agricultural land surrounding it. This is most evident around the Hoo and the Cam Brook valley;
- The Coneygree and part of the Cam Brook Valley together constitute the essential landscape setting for the church; and
- The floodplain has generally been kept clear of development in the past and large scale development along it would compromise the landscape setting of the town.

Broad Campden is also nestled in a valley and on its sides, but is not prominent in the landscape the way than Chipping Campden is. Views towards it are across classic, undulating Cotswold countryside through open fields and woodland.

2.3. Chipping Campden's townscape

Heritage assets

Chipping Campden is one of the best examples of a linear medieval town and contains over 200 listed buildings. The majority are contained within the Chipping Campden Conservation Area (designated in 1970) and are located either side of High Street and Lower High Street. There is also a significant collection of Listed Buildings in Westington and several cottages along Park Road.

At the time of writing, there are five grade I listed buildings within the town including the Church of St James dating to the 12th, 13th 14th and 15th centuries; Grevel House, a medieval barn converted into a dwelling; the Jacobean Almshouses; the early 17th century Market Hall; and the 14th/15th century Woolstaplers' Hall.

The 19 grade II* listed buildings are predominantly dwellings but also include the Town Hall; the Court House, the Old Silk Mill, two banks and the east and west banqueting houses and the lodges, gates and archway to Old Campden House. The house itself was destroyed during the Civil War and its remains are listed grade II. Its formal gardens and associated medieval cultivation earthworks are scheduled, the only scheduled monument in or around the town.

The town's grade II listed buildings are predominantly dwellings dating to the 18th and 19th centuries but also include the former Church Rooms (an early 19th century school); the Roman Catholic Church of St Mary; St Catherine's Roman Catholic School; the Old Grammar School; Chipping Campden Baptist Church; the Former Methodist Chapel; the late 19th century Police Station and Magistrates' Court; a 19th century cart wash; three mills and several hotels and public houses.

High Street and Lower High Street



The High Street is characterised by its large number of historic buildings which number approximately 130 between Cidermill Lane at the north-east end and Hoo Lane at the south-west end.

The material used is almost exclusively the local limestone and buildings almost all front straight onto the street. However, the street avoids becoming monotonous by variation in age, building height and style.

Buildings on the High Street date from the 14th to the 19th century and the street scene is broken up by the variation in building height which exposes the gable ends of the taller buildings above the lower ones. Only a few buildings are arranged with their gable ends facing the street but these, and the large number of buildings with gables, gablets and dormers in the roof, the presence of one, two and three storey buildings, and buildings in both polite and vernacular styles all lead to some variety.

The historic buildings on the 'island' sites at the market place break up the street scene and form focal points from either direction.

Church of St James and Campden House



The Church of St James and the former grounds of Old Campden House form an impressive entrance to the town from the east. The house was built in 1609 and destroyed during the Civil War but the grounds, a scheduled monument, are instantly recognisable as parkland behind their low stone wall on the south side of Station Road.

The grounds contain a number of listed buildings including the remains of the old house (grade II) and two contemporary banqueting houses (grade II*), all in the Flemish Baroque style. Further west on Station Road the parkland gives way to the churchyard and the impressive Church of St James, a Cotswold 'wool church' in the Perpendicular style. Once the west end of the church is passed the grade II* listed Lodges, Gates and Archway to Old Campden Manor and the grade I listed almshouses (1612) are encountered , further underlining the influence of the owner and builder of Campden House, Sir Baptist Hicks.

20th century suburbs



In the 20th century the town expanded to the north, south, east and west. Houses on Aston Road are detached and semi-detached and set back from the street behind hedges or stone walls. The presence of standard trees in the front gardens adds to the impression of a prosperous suburb. The majority of houses are in local stone but the occasional use of unpainted pebble dash or render adds to the variety and preserves a natural, local feel. Gables facing the road are a nod to the historic core and prepare the visitor for the entry to the High Street.

Buildings on Station Road are similarly set back from the street and the examples close to the Coneygree and church all present gable ends to the street. These examples are in local stone but further east are a pair of red brick semi-detached houses and a number in painted render with stone quoins and dressings. The inter-war semis on Berrington Road are of painted pebble dash while those at the circus at the north end of the street are in stone.

Building along Catbrook is eclectic, ranging from the impressive Arts and Crafts houses closest to Broad Campden to the 1960s Fire Station in its landscaped grounds. Stone dominates but white painted pebbledash is also used. The majority of the dwellings on Cherry Orchard are bungalows of coursed rubble with gables facing the street. A number of properties have retained the original scheme of no boundaries giving an open feel to the streetscape.

Westington has been absorbed into the town through development on Sheep Street and Blind Lane but the area retains a number of listed buildings, many of them thatched, which preserve its character and provide an attractive entrance to the town from the south along Conduit Hill.

The south end of Hoo Lane features three attractive 19th century semi-detached cottages in red brick with squared stone fronts and continues with a mix of old cottages, some thatched, and new houses set back from the street. Littleworth has something of a Garden Suburb feel with houses set in front gardens behind very low boundaries and broad grass verges. It won a housing medal in 1953. Here as elsewhere the predominant material is stone, mainly coursed rubble, with some painted pebble dash.

Later notable additions include the Wolds End developments built in the mid-1970s by an award-winning architectural practice.

21st century additions



Modern developments in the 21st century have been on small, discrete sites either on the outskirts of town or as infill. The style used tends toward the vernacular although there are nods to polite architecture at Seymour Gate, Rolling Stones and elsewhere with stone dressings, gabled bays, full height canted bays, external chimneys and drip moulding all being used.

The majority of 21st entry houses use squared and coursed stone with or without stone dressings Roofs are reconstituted stone slate or artificial slate. Shaping and coursing of the stone is often regular but more successful examples have more variety, often interspersing broad and narrow courses of stone as at New Barrel's Pitch and elsewhere.

Windows are generally timber casements set almost flush with the wall. Ground floor canted bay windows are sometime used. Doors are sometimes provided with canopies supported by timber brackets.

Chimneys are often of stone to match the walls but the use of old bricks at Castle Nurseries is particularly successful and has more precedent in the town. This development is entered between two square-plan lodges with central ashlar chimneys and stone dressings while the houses within the development are a mix of coursed rubble and render with stone dressings. One house in particular has gabled bays that step forward either side of the entrance, and windows with drip courses, other feature decorative anchor plates.

Gables, irregular coursing, brick chimneys and reconstituted stone slate roofs are all used to good effect at The Stables north of Back Ends. Where dormers are used they often have rendered gables and sides as at Weighbridge Court, a technique with many precedents in the town.

While most 21st century houses are traditional in style, those at Lavender Drive present a mix of traditional and contemporary styles combining coursed rubble walls and reconstituted stone roofs with modern fenestration and flat-roofed additions.

2.4. AECOM buildings survey

To inform this Design Guide, a survey was carried out on buildings within the centre of the town. The study area chosen was the historic core of the village from the junction of Cidermill Lane and Leysbourne, along High Street, Lower High Street and Park Road to the junction of Park Road and Littleworth.

All buildings in this area were studied apart from the Church of St Catherine and Chipping Campden Baptist Church and the buildings on the 'island' sites at the centre of High Street/Lower High Street. A total of 164 buildings were surveyed, each building was assessed for the following attributes:

- Age;
- Height;
- Material of walls;
- Material of roof;
- Material of chimneys;
- Window type;
- Presence of hoods/drip moulds to doors; and
- Presence of drip moulds to windows.

The results are presented under these headings below, and should be used, where appropriate, to inform the design of new development - but not necessarily imitated.

Age

The largest number of buildings in the sample (65 or 40% of the total) were of 19th century origin. This figure diminishes as the buildings get older with 53 (32%) built in the 18th century; 33 (20%) in the 17th century; 7 (4%) in the 16th century and 4 (2%) before the 16th century.

Height

The height of the buildings in the sample was predominantly two storeys with 106 examples (65%). 35 buildings were of three storeys (21%) and 18 (11%) had a single storey. 83% of the single storey buildings had dormers followed by 47% of the two storey buildings and just one example of the three storey buildings.





Figure 03:
Historic buildings of varying ages, High Street

Figure 04:
Two and three-storey buildings, High Street

Material

Construction is overwhelmingly in local stone with only two buildings (1%) having visible timber framing and five buildings (3%) being of brick construction. Both the timber-framed buildings date to the 16th century and all the brick buildings to the 19th century. The brick buildings are located at the edges of the study area, four (Nos. 1 -4 Brick Row) are a single terrace. A further six buildings are rendered and date predominantly to the 19th century.

Of the stone buildings, 102 (62%) are of coursed rubble. This covers both vernacular and polite buildings from an architectural point of view. Around half of the coursed rubble buildings (52) have ashlar dressings to the windows and doors.

51 buildings (31%) were built of or faced in ashlar. Use of ashlar reached its height in the 18th century with 21 buildings (40%) and had declined to 14 buildings (22%) in the 19th century. The majority of the ashlar buildings are clustered in the centre of the sample area.



Figure 05:
Ashlar frontages, High Street



Figure 06:
Timber framing, High Street

Roofs

83 buildings (51%) have stone slate roofs. This is followed by 63 with slate roofs (38%) and 14 with clay tiled roofs (14%). Slate and clay tile roofs on older buildings are an exception and appear as the result of later amendment. Stone slates predominate until the 19th century when Welsh slate became available by rail. 75% of the 19th century buildings (49 in total) have slate roofs). Thatch is present but rare.

Chimneys of buildings of all ages are predominantly of stone with just 26 examples (16%) in brick and 7 examples (4%) being rendered. The ages of the properties with brick chimneys suggest that they are replacements for earlier, stone versions.

Gables facing the street were a fairly common feature on 17th century buildings with 10 (33%) examples. There are few examples of gables after the 17th century but dormers are a feature on 41% of the sample. They appear on houses of all ages but are most prevalent on 18th century buildings with 32 examples (60%).



Figure 07:
Stone slate, slate and clay tiled roofs, Leysbourne

Doors

Hoods over doors are a common feature with 39 examples (24%). The proportion of houses with hoods over the doors remains constant across the centuries. While they account for a smaller number of buildings, doors with Drip Moulds are not insignificant in number with 19 examples (12%). Drip Moulds over doors are a feature of the 17th century buildings and were revived in the 19th century.

Windows

Almost half the buildings have casement windows (81 examples). The proportion remains fairly similar across the years. 58 buildings (35%) have sash windows but the ages of some of them would indicate that a number of these are replacements for earlier casements. Horizontally sliding sashes, often referred to as 'Yorkshire' sliding sashes, were widely used in the Parish. Mullioned windows are also a feature, especially of the 17th century buildings, 82% of which have the feature. 36% of the 17th century buildings also have drip moulds to the windows. Oriel windows are rare, appearing on only one pre-16th and one 17th century building.

Bay windows appear on 48 buildings (29%). They are less prevalent on 19th century buildings than 17th and 18th century examples but a number of the earlier examples will have been applied at a later date, sometimes as 19th century shop windows.



Figure 08:
Thatched roof, Hoo Lane



Figure 09:
Drip Moulds, Leysbourne



Figure 10:
Casement windows, Leysbourne

17th century buildings

There were 33 17th century buildings* in the sample. 27 examples (82%) were two storeys high with two one-storey examples and two three-storey examples. Coursed rubble predominates over ashlar by a ratio of 70/30. Around 2/3 of the coursed rubble buildings have ashlar dressings and around 1/3 have drip moulding. 85% of the sample had stone slate roofs and 55% had dormers. Mullioned windows predominate at 82% of the total. While 36% have bay windows, most if not all of these will have been later additions. 85% have stone slate roofs while 73% have stone chimneys.

*Note: Date on this page refer to external appearance; older buildings may be concealed within. Also note: there are not enough examples of pre-16th century buildings (4) and 16th century buildings (7) to make representative observations about the presence or absence of features.



Figure 11:
Badger's Hall, High Street

18th century buildings

There were 53 18th century buildings in the sample. The majority (70%) are two storeys high but one-storey buildings make up a not insignificant 19%. While coursed rubble still predominates the ratio over ashlar is lower at 60/40. Mullioned windows make up just 28% of the total with the remainder being almost equally split between casements and sashes. The proportion of stone slate roofs is lower than for 17th century buildings at 60%, the reminder being fairly evenly split between slate and tile. The 18th century buildings have the highest incidence of dormers at 60% and the highest incidence of stone chimneys at 79%.



Figure 12:
The Post Office, High Street

19th century buildings

The 19th century buildings are still predominantly two storeys high but three-storey buildings make up a significant 38%. Coursed rubble becomes more prevalent again at 66% (ashlar 22%) and all the examples of brick buildings are 19th century. Casement windows (54%) are better represented than sashes (40%) with a few examples of mullions, the result of a revival of earlier architectural styles. The 19th century buildings have the lowest proportion of stone slate roofs at 23% with slate predominating at 75%. Stone chimneys however still account for 75% of the total.



Figure 13:
Littlecote and The Corner House, Leysbourne

Vernacular and polite

The buildings in the sample can be divided into the vernacular - functional buildings using traditional, local materials - and the polite - buildings in non-local styles with features that go beyond functionality. In the area, generally vernacular buildings tend to be in coursed stone rubble with no decoration, while the buildings which incorporate elements of polite might be in squared, coursed rubble and have a number of decorative features. These may include area railings to the street, porticoes with columns and/or pediments, fanlights, dressings to doors and windows, storey bands, raised window surrounds, mullioned windows, leaded lights, gables facing the street, quoins, copings, parapets and decorative chimney stacks.



Figure 14:
Vernacular (left) and polite (right) architecture, High Street. A polite building has a regency style bay not common in the Parish.

Render

Render is very rarely used and tends to be in natural/ neutral colours when it is.



Figure 15:
Painted render, Back Ends

Coursed stone rubble

The coursed stone rubble used in the majority of buildings varies greatly across the sample. Stone in older buildings and to the sides of later buildings may be quite roughly shaped and coursed, the courses varying greatly in height by a factor of x3 or more. In other examples the stones are so regularly squared and in such regular courses that they resemble ashlar. The mortar joints also differ, ranging from broad to very fine. In general the rougher cutting, coursing, and jointing gives a more vernacular look while the more regular work is reserved for more polite buildings. It is noticeable on some ashlar-faced and squared, coursed rubble buildings that the quality of the side walls is lower than that of the façade.



Figure 16:
Coursed stone rubble, Sheep Street

Door hoods

The most common type of door hood is a flat stone slab with carved and chamfered edges supported on plain, scrolled brackets.

Sash windows

A number of configurations of lights are used but six over six is the most common.

Mullioned windows

Where mullioned windows are used leaded lights are employed, usually three lights wide. Examples where new leaded lights two panes wide or plain glass have been used as a replacement are apparent.



Figure 17:
Simple door hood, Sheep Street



Figure 18:
Six over six sash window, High Street



Figure 19:
Mullioned windows, High Street

Ashlar dressings

The simplest use of ashlar dressing is stone windowsills and lintels to the windows and doors. Some buildings have long and short work in ashlar to the window and door jambs. Some examples of buildings in squared rubble have raised dressings and storey bands.

Rooflines

While two storey buildings predominate, the height of the rooflines vary. One and three-storey building examples also break up the roofline. This variation in the height of the roofline adds interest to the street scene. The changing roofline height results in the side walls of three and two-storey buildings being visible when they stand next to shorter buildings, providing texture to the street scene.

Differing roof designs provide additional variety and interest to the street scene. Roof pitches vary, and there is the occasional presence of top-floor gables and intermittent presence or absence of dormers.

Stone slate roofs

Stone slate roofs are laid in the traditional manner with larger slates towards the eaves graduating to smaller slates at the ridge. Where slate or tile is used rather than stone slates the ridge tiles are discrete rather than decorated.



Figure 20:
Ashlar dressings, Leysbourne



Figure 21:
Varied rooflines, High Street



Figure 22:
Stone slate roofs, High Street

Dormers

Dormers are either gabled or hipped and have the same roof covering as the main slopes of the roof. The sides of the dormer are generally rendered but some examples use the roof covering material laid vertically or are close-boarded. Dormer windows use casements in all cases.

Chimneys

The majority of chimney stacks are in stone. Examples on more modest buildings are plain while those on more polite buildings have carved bands. These are usually two in number, one at the bottom and one at the top of the stack but some have an intervening band half way up. The majority of chimney pots are circular in section although there are some square-section examples. The material is predominantly cream coloured clay.

Rainwater goods

Rainwater goods tend to be discretely located to the sides of the façades apart from on larger buildings where more downpipes are necessary. While there are some examples of ornate hoppers these are not generally a feature.



Figure 23:
Dormer windows, High Street



Figure 24:
Stone chimneys, High Street



Figure 25:
Rainwater goods, High Street

Understanding and responding to the context

03



3. Understanding and responding to the context

3.1. Introduction

The key thing that all development in Chipping Campden should do is to respond to its context. The Chipping Campden Design Guide does not specify a particular architectural style - either traditional or contemporary styles may be appropriate in the right context, but **Chipping Campden Town Council wants applicants to show how their proposals have been prepared based on an understanding of the particular characteristics of the town or village and the specific site**.

This section briefly introduces what the Town Council will want to see accompanying planning applications where a Design and Access Statement is required. The expectation is the same for all applications but will be proportionate to the scale of the development.

3.2. Site analysis

All development proposals should start with a site analysis that utilises all available tools and survey approaches, as appropriate to the scale of development. Development never happens in isolation; there is always a context to respond to. This includes what is within the site itself and what surrounds the site.

A basic approach to a site analysis will include the following steps:

- Desk-based studies of topography, surrounding land uses, connections, designations, policies and more.
- Site visit to observe and assess the characteristics of the site. This can review things like existing buildings, vegetation, wet areas, potential wildlife activity and boundary conditions.
- Prepare and review sun path diagrams to ensure buildings are orientated on a north-south axis, which is optimum for the benefit and mitigation of solar gain in summer and winter.
- Explore around the site, looking at, for example, access, connections, views, local facilities that people will want to use and local character – heights, massing, materials, uses.
- Gather evidence on the natural environment and landscape. This may involve an ecological survey, review of national and local landscape assessments, and assessment of relevant environmental and habitat designations.
- Make sure all of this is recorded so that anybody reviewing a development proposal can understand what makes the site and its surroundings unique and the basis for the design decisions taken.

An important function of the site analysis is to distil what defines the special character of the site and the neighbourhood or area it forms part of.

3.3. Responding to context

The site analysis outlined above should form the basis of carefully considered design response. Those assessing designs will need to understand how the designer has:

- **Shaped the proposals based on the site's natural features, topography, landscape and views, and the surrounding built environment**. For example, how has a particular view been framed and how and why does the density and massing of development differ across the site?
- **Connected the proposed development to existing routes** (streets, footpaths, cycle paths) **and facilities** (shops, schools, employment, public transport).
- **Crafted a bespoke vision and set of development principles** for the scheme, particularly for larger developments.

Larger schemes – those of at least 10 homes or that require new streets to be constructed – will be expected to be guided by a masterplan. This should show the key structural elements of the design, including access, open space, development blocks and character areas.

Design guidance

04



4. Design guidance

This chapter presents specific design guidelines for development that consider the local character and can enhance local distinctiveness by creating good quality developments, thriving communities and prosperous places to live.

4.1. Introduction

As noted above, any development should not be viewed in isolation. Considerations of design and layout must be informed by the wider context, considering not only the immediate neighbouring buildings but also the streetscape and landscape of the wider locality.

The local pattern of streets and spaces, building traditions, materials and the natural environment should all help to determine the character and identity of a development, recognising that new building technologies are capable of delivering acceptable built forms and may sometimes be more efficient. It is important with any proposal that full account is taken of the local context and that the new design embodies the "sense of place" and also meets the aspirations of people already living in that area.

Reference to context does not mean to copy or use pastiche solutions systematically. It means using what is around as inspiration and influence and it could be either a contemporary or a traditional solution that is in harmony with the surroundings.

Beyond the important guidelines in the documents introduced in chapter 1.5, most notably the **Cotswold Design Code**, there are a set of general design principles that are specific to Chipping Campden Parish.

They are presented below under two main headings:

- **4.1. Strategic design principles** - which promotes development that is well laid out and connected.
- **4.2. Detailed design** - which has more of a focus on the appearance of individual buildings.





4.2. Strategic design principles

This sub-chapter comprises guidelines for strategic design principles. These high-level, strategic guidelines promote development that is well laid our and connected. The guidelines are organised into the following topics:

- **A. Consider the context**
- **B. Provide meaningful connections and walkable neighbourhoods**
- **C. Enable wayfinding**
- **D. Create a green network**
- **E. Block structure**
- **F. Overlook public space**
- **G. Enclosure**
- **H. Street planting**
- **I. Wildlife friendly environment**

Strategic design principles

A. Consider the context

01. New development must demonstrate an understanding of the landscape sensitivities and designations of the area.

02. New development should be well integrated into the existing settlement pattern and avoid any kind of fragmentation. Pedestrian, cycle and road connectivity is important to create accessible places and a more cohesive social issue.

03. New development should prioritise creating a well-connected green system and promote alternative ways of transportation. The rich landscape surrounding both Chipping Campden and Broad Campden could be linked with new development where appropriate.

04. New development should respect the historic character of the Parish. Heritage designations and architectural details, as well as local materials and techniques, presented below, should be used as reference for new development.

05. Whilst any new design should be a good fit to its surroundings in order to preserve the unique characteristics that are found in the Parish, this does not rule out contemporary design. High quality contemporary buildings which, in time, will be recognised as heritage assets are encouraged.

06. Existing typologies should be reflected in new development. For example, terraced housing is a characteristic and popular typology that should be used for future developments as well. However, a considered mixture of typologies is also welcome in order to create variety in the streetscape.

07. New development should consider the options and set a preferred approach to aspire to achieve net zero, sustainable outcomes and biodiversity and wildlife protection and enhancement throughout the design process, from concept through to detailed design.



Figure 26:
The town integrated but not hidden within a beautiful Cotswold landscape

Strategic design principles

B. Provide meaningful connections and walkable neighbourhoods

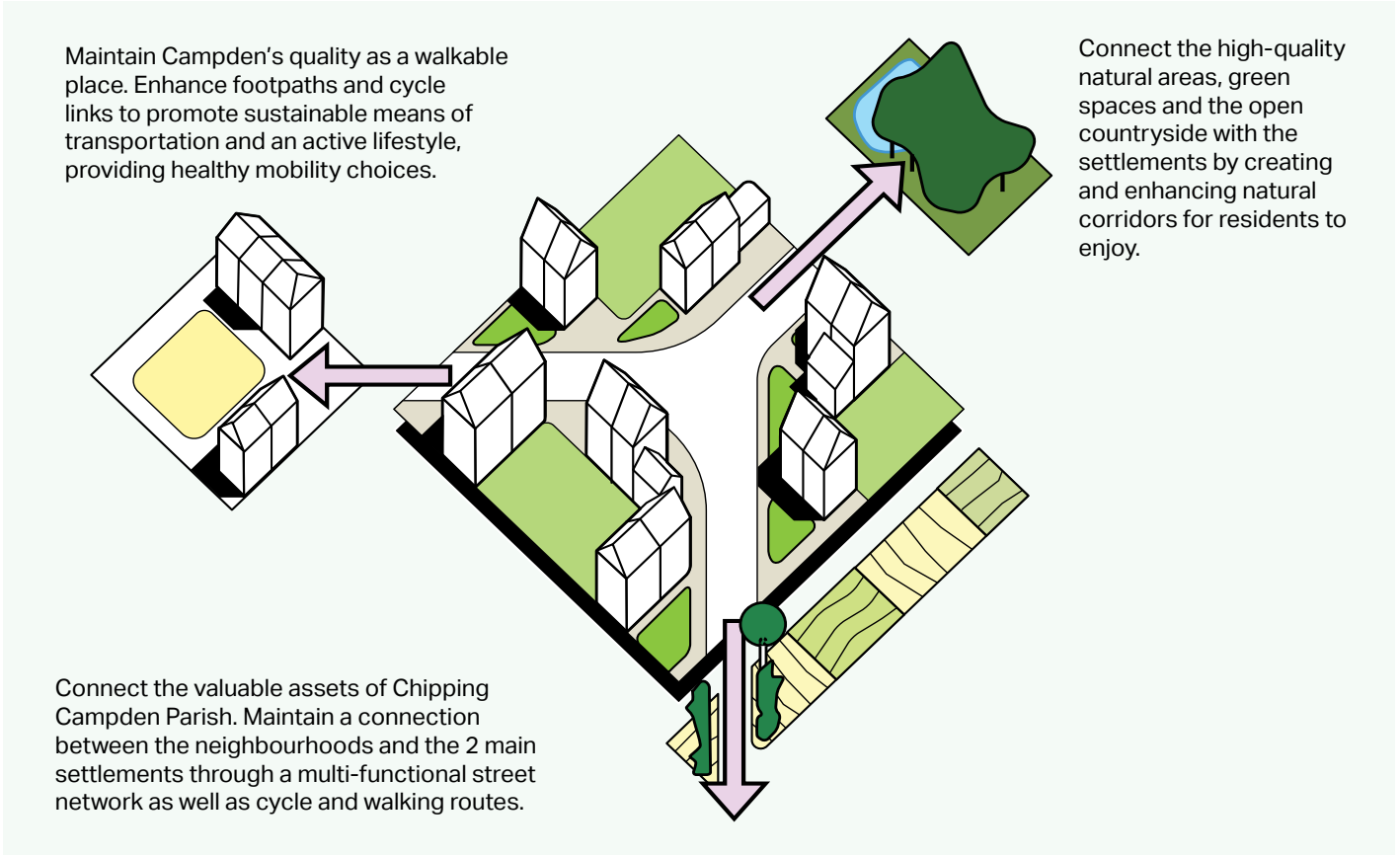
Chipping Campden consists of connected street networks in its core, as well as some cul-de-sac layouts in newer developments. Good practice favours a generally connected street layout that makes it easier to travel by foot, cycle, and public transport, as well as private/shared car. A more connected pattern creates a 'walkable neighbourhood', which results in a variety of community benefits, such as reduced car dependency and healthy mobility choices.

01. New development should follow the Manual for Streets, which priorities pedestrians within the transport user hierarchy. Importantly, the design process for Manual for Streets involves a context appraisal, which identifies places in the surrounding area that need to be made accessible to local people, particularly on foot and by bicycle. The masterplan for development should bring together an established movement framework, - which integrates walking, cycling, public transport and, as relevant, car sharing - with other important aspects of design.

02. New development should aspire to achieving a '20-minute neighbourhood' as set out in the Town County and Planning Association Guide. The masterplan should demonstrate how the site sustainably connects to surrounding features, such as wellbeing facilities, employment areas, local food production, green spaces, the high street and education. Where sustainable connections are not possible, infrastructure improvements to better support active and public transport should be identified.

03. Provide direct and attractive footpaths between neighbouring streets and local facilities. Streets must be designed to prioritise the needs of pedestrians and cyclists.

04. Propose routes laid out in a permeable pattern, allowing for multiple connections and choice of routes, particularly on foot. Any cul-de-sacs should be relatively short and provide wide, overlooked onward pedestrian links, subject to community safety considerations.



Strategic design principles

C. Enable wayfinding

People feel safer when they can easily memorise places and navigate around them. A high standard of urban planning which utilises predictable street layouts are easier for the public to comprehend; it is easier for people to orientate themselves when the routes are direct, particularly for people with dementia and related cognitive and sensory challenges. When places are well signposted, they are easier for the public to comprehend.

01. A familiar and recognisable environment makes it easier for people to find their way around. Obvious and unambiguous features should be designed in new development.
02. Buildings which are located at corners, crossroads or along a main road could play a significant role in navigation.
03. At a local level, landmark elements could be a distinctive house, public art, or even an old and sizeable tree.
04. Signage is a common way of helping people to find their way to and around a place. New signage design should be easy to read. Elements likes languages, fonts, text sizes, colours and symbols should be clear and concise, and avoid confusion.
05. Signage can also help highlight existing and newly proposed footpaths and cycle lanes, encouraging people to use them more.

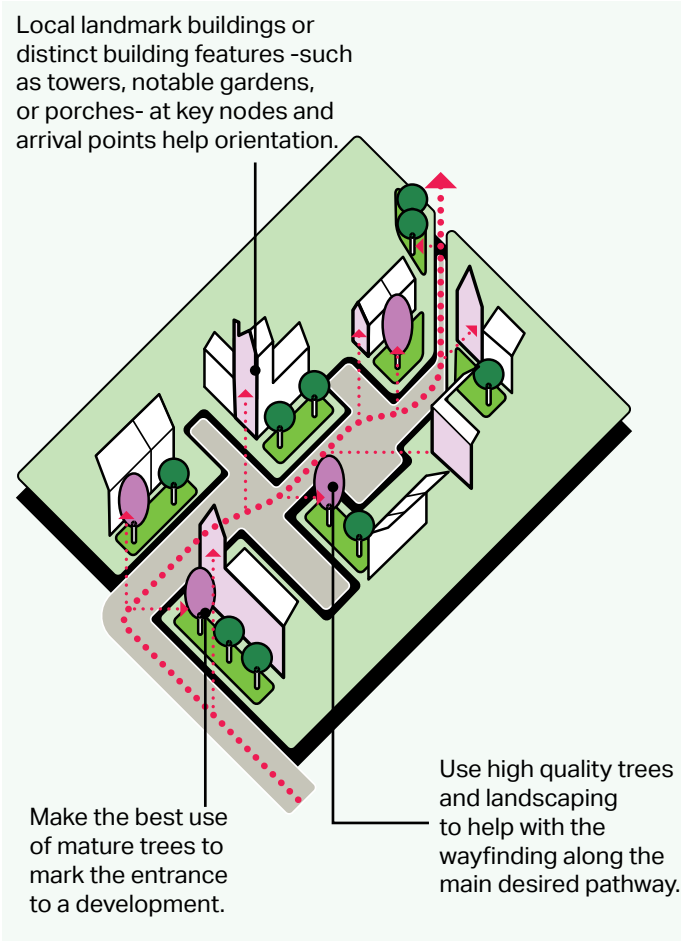






Figure 27:
Examples from elsewhere that are used for wayfinding purposes and could be a good fit in and around Chipping Campden. (Left photo: Nature sign design made from Forest Stewardship Council United Kingdom, Right photo: Meadow garden, Pennsylvania.)



Figure 28:
Heritage and landscape: a dramatic gateway into Chipping Campden.

Strategic design principles

D. Create a green network

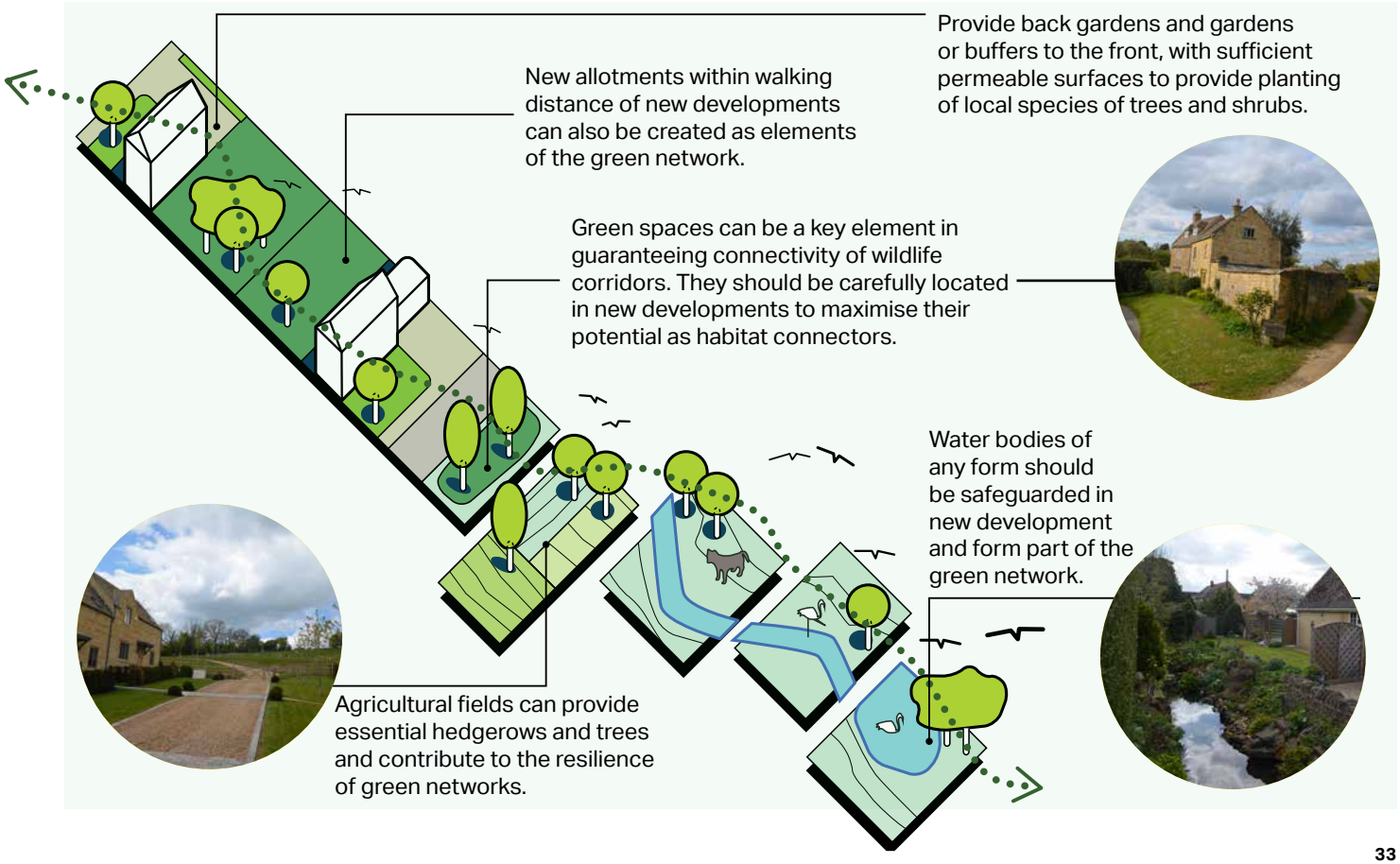
01. Whilst the town centre has a quite urban feel, other parts of the Parish do not. Development should offer a variety of open spaces that can host a diverse range of activities and users. Open spaces play an important well-being role as places to meet and exercise. They are associated with better mental health and lower stress levels. Trees and vegetation can also improve air quality and reduce flooding.

02. New and existing landscapes and open spaces should be delivered in accordance with the size, accessibility and quality standards and other components of the Natural England Green Infrastructure Framework, and the local requirements of the Cotswold District Green Infrastructure Strategy. The Cotswold District Green Infrastructure Strategy promotes the Building with Nature Benchmark that should be applied to Chipping Campden.

03. New green infrastructure, such as back gardens and open space, should be linked to form connected networks. A connected network is often makes a greater contribution to green infrastructure objectives, such as to create visual amenity, increase recreational use, and establish wildlife corridors. Where direct links are not possible, it may be appropriate to link green infrastructure features together through green routes, shared surfaces and streets. Tree lined avenues can achieve a visual and physical connection to open space.

04. New developments should be informed by ecological surveys and incorporate existing native trees and shrubs and avoid unnecessary loss of flora. Any trees or woodland lost to new development must be replaced and should be in locations where the greatest benefit to green networks, such as wildlife corridors, can be realised. Native trees and shrubs should be used to reinforce the more rural character of the fringes of the town. Emphasis should be given to the maintenance and improvement of existing hedgerows and the planting of new ones.

05. Development adjoining public open spaces and important gaps should enhance the character of these spaces by either providing a positive interface (i.e. properties facing onto them to improve natural surveillance) or a soft landscaped edge.



Strategic design principles

E. Block structure

Urban structure compromises the pattern or arrangement of urban blocks, streets, buildings, public realm and landscape. The size and organisation of any block varies, depending upon diverse parameters such as location, land use and density (see sections on designing in context above). At an urban scale, it is important to achieve a good mix of block form and block size, to facilitate adaptability over the years and ensure a good variety of uses within the new parts of the development.

New development should respond to the existing pattern of development within Chipping Campden, taking cues from existing typologies, block sizes and structures, patterns of plot subdivision and the relationship between buildings and public and private space.

Principles for designing blocks are set out as follows:

01. Buildings should have a public front and a private back.
02. Buildings on both sides of a street should work together to create visual interests and a pedestrian experience and thus create a strong sense of place.
03. The blocks either side of the street should resonate to each other (i.e. symmetrical or asymmetrical rhythm).

Blocks must:

04. Accommodate a range of housing types to accommodate the needs of the local population and to provide a mix of demographics.
05. Contribute to a good street rhythm by having regular plot widths.
06. Define public and private domains within and around these blocks by locating all front entrances facing surrounding streets, resulting in active street frontages.
07. Maintain a proper distance between building face to building face at the rear of dwellings to provide residential privacy.

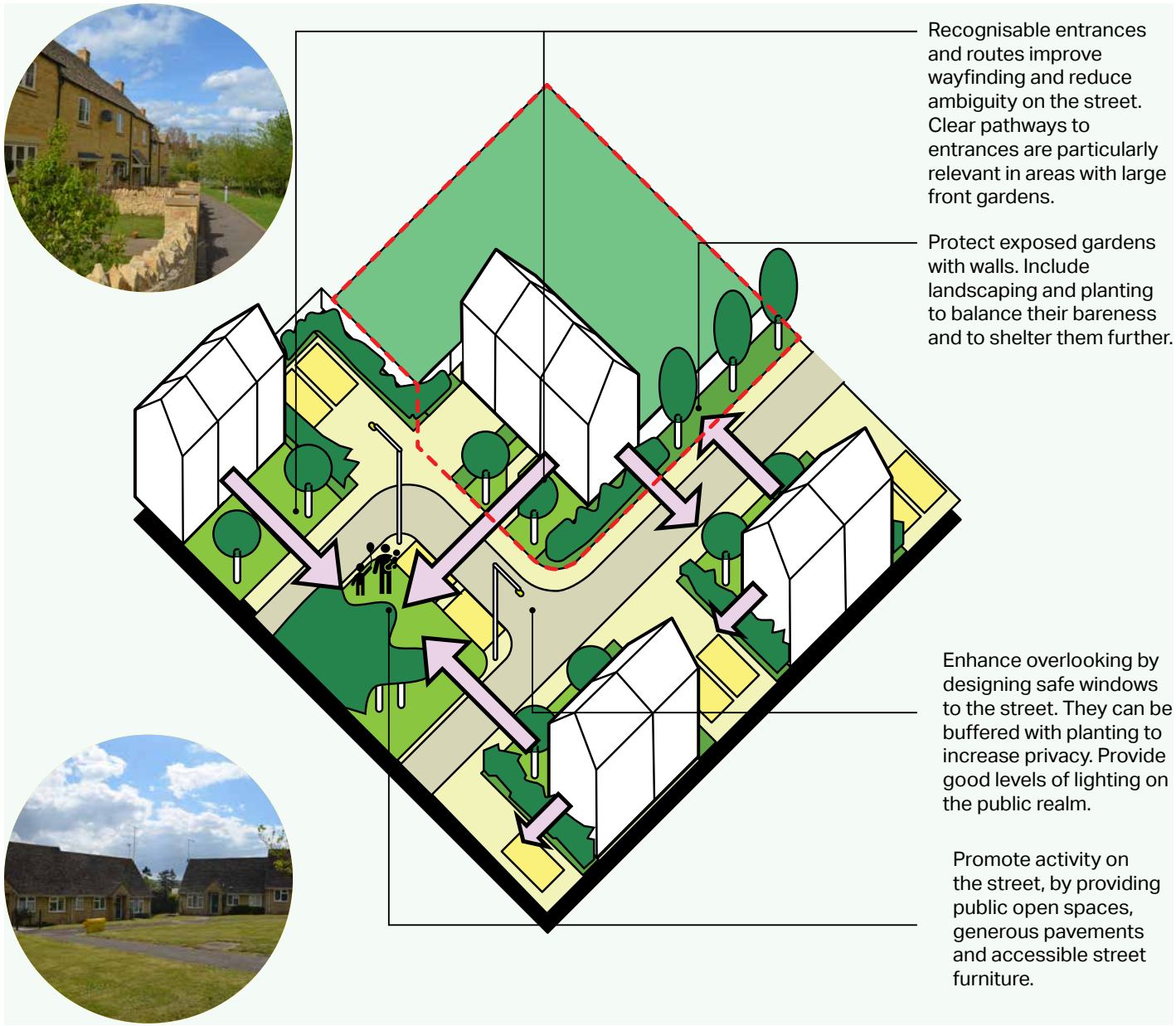
In some contexts, rear parking in courtyards, mews, or lanes may be the most appropriate parking solution.

Strategic design principles

F. Overlook public space

Designing out crime and designing community safety is essential to the creation of successful, safe and attractive developments. The following guidelines are in line with the latest manual endorsed by the police 'Secured by Design - Homes'. Some guidelines for new development are:

01. There should be well-defined routes, spaces and entrances that provide convenient movement without compromising security.
02. Main building façades should overlook the open spaces and be aligned to improve natural surveillance on the street. In addition, side windows and driveways should also be well-overlooked.
03. Design communal areas, such as play areas and seating facilities, to allow natural surveillance from nearby dwellings. Areas that could attract anti-social behaviour at night, such as play equipment, should ideally be designed so that they can be secured during these periods.
04. Front garden planting of feature shrubs and suitable trees are acceptable should they maintain clear pathways and sightlines to fenestration. It is desirable for most dwelling frontages to be visible. Obstructive features such as walls, fences and hedges should therefore be kept low.
05. Integrate light installations along the streets as well as in the open spaces in order to improve the feeling of safety in the area.



Strategic design principles

G. Enclosure

Focal points and public spaces in new developments should be designed in good proportions and delineated with clarity. Clearly defined spaces help achieve cohesive and attractive places. They also create an appropriate sense of enclosure - the relationship between a given space (lane, street, square) and the vertical boundary elements at its edges (buildings, walls, trees).

The enclosure level of new developments must reflect an intelligent understanding of their surrounding historic environment. The use of narrow, intimate streets are typical in the Parish settlements. Naturally, with two storey buildings being most prevalent in the Parish, the historic core has a higher level of enclosure, with fewer front gardens and buildings that directly front the main street. The surrounding neighbourhoods have a greater variety of enclosure levels, but are in general more open than in the centre of the town with a higher prevalence of front gardens and more distinctive building setbacks. Notably, planting in front gardens in the surrounding neighbourhoods contributes to a green sense of enclosure.

Importantly, the Parish has limited land that has been identified as suitable for new housing and employment. The layout of development, including the sense of enclosure, therefore needs to strike the balance between efficiently utilising the land available and respecting the context of the historic, natural and built environments.

The following principles serve as general guidelines that should be considered for achieving a satisfactory sense of enclosure:

01. The sense of enclosure varies across the Parish. Street widths and the setback of buildings in new development should create a sense of enclosure that is appropriate for the context while ensuring the efficient use of the site. The enclosure ratio that is appropriate will be established through the contextual appraisal.

02. Buildings should be situated and address street corners to create attractive start and end points of a new street or frontage.

03. Generally, building façades should front onto streets, but may be orientated otherwise to maximise solar gain.

04. Variation to the building line along a street scene is not generally recommended. Interest in the street should be created with other design elements, such as building features that create articulation of the facade, mixed native planting to increase amenity and variation, or building materials to create texture.

05. Trees, hedges, and other landscaping features should be utilised to create a more enclosed streetscape in addition to providing shading and protection from heat, wind, and rain. Planting should be located to ensure safety (refer to Guideline F).

F.29

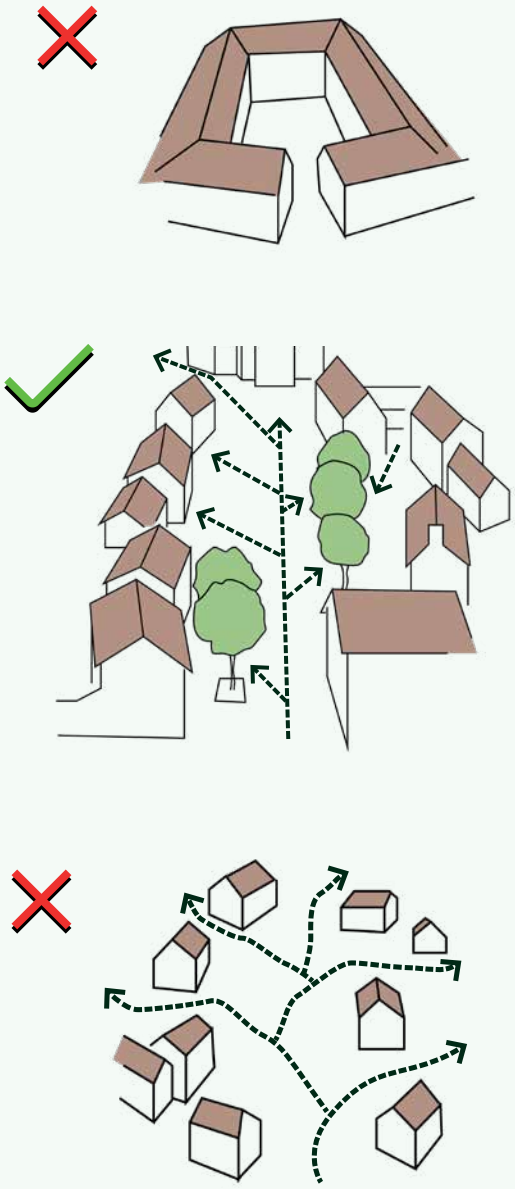


Figure 29:
Diagrams to illustrate different levels of enclosure within the built environment, with a balanced preference.

Strategic design principles

H. Street planting

01. New street planting helps maintain visual consistency along the public realm. It is associated with better mental health and well-being by reducing stress, fewer heat islands, and providing protection from natural elements such as wind and rain.

02. Flower beds, bushes and shrubs contribute to the livelihood of the streetscape. Normally planted within the curtilage boundary, a variety of native species add interest and colour to their surroundings and become an identity and expressive feature of each dwelling.

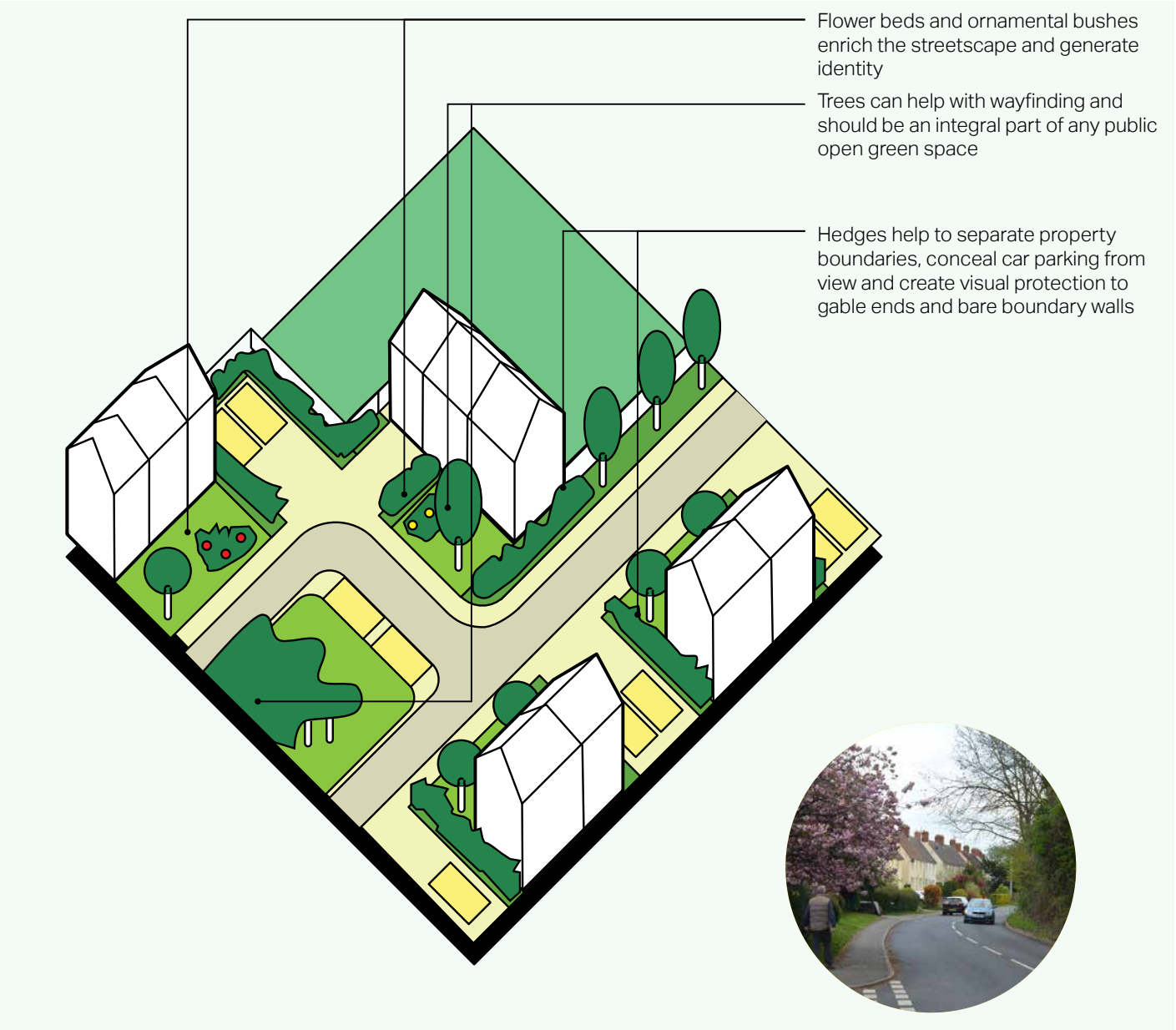
03. Native hedgerows can be planted in front of bare boundary walls to ease their visual presence or they can be used to conceal on-plot car parking and driveways within curtilages. It's important that the height of hedgerows do not create safety issues by obscuring views to communal areas, pathways or fenestration.

04. Trees can normally be used to mark reference points and as feature elements in the streetscape. When planted in intersections and key locations it can help with privacy whilst enhancing the wayfinding and distinctiveness of the area. These tend to be within property curtilages.

05. Trees should also be present in any public open space, green or play area to generate environmental and wildlife benefits.

06. Retained trees should be considered at the earliest design stage to ensure that any retained trees will be able to grow and mature in the future without outgrowing their surroundings.

07. The success of tree planting is more likely to be achieved when it has been carefully planned to work in conjunction with all parts of the new development, parking, buildings, street lights etc.



Strategic design principles

I. Wildlife friendly environment

01. Masterplanning for new development should be informed by an understanding of the existing landscape, habitats, vegetation and wildlife on and surrounding the site, and local nature recover plans or other biodiversity strategies. The detail of biodiversity and ecological appraisals / surveys to inform masterplanning should be equivalent to the scale of development. For example, a desktop ecological appraisal may be appropriate for a minor development, whilst large developments are expected to provide a detailed biodiversity and ecological appraisal / survey by a suitably qualified professional.

02. The layout of development should demonstrate how the retention of existing vegetation on the site, such as hedges, woodland and trees, has been prioritised by integrating these features into the landscape areas, such as road verges, natural tree buffers, back gardens or wildlife corridors.

03. Where existing vegetation cannot be retained new development should demonstrate the overriding need for its removed. For example, there is no reasonable alternative for site access, or the retention of vegetation results in an unsuitable orientation of buildings for solar gain.

04. New developments should seek to design streets, including footpaths and cycle paths, as potential corridors to surrounding countryside for wildlife as well as people.

05. Any removed vegetation should be replaced with new landscape areas on the site. The layout of development should seek to context existing and new vegetation with other green and blue infrastructure features in accordance with the Natural England Green Infrastructure Framework.

06. Abrupt edges to development with little vegetation or landscape on the edge of the settlement must be avoided and, instead, comprehensive landscape buffering should be designed.

07. Where wildlife species are identified on the site or in the locality, new development should seek to create and enhance suitable habitat. As appropriate to the species of wildlife, development should:

    - Utilise native plant species for habitat creation;
    - Provide buffers to existing habitat areas with a width suitable for the ecological function;
    - Utilise fencing that is open or has holes to allow for the movement of fauna;
    - Install habitats such as bird boxes or bricks in walls (refer to figures 30 and 31); and
    - Align corridors that enable wildlife to travel to and from foraging areas and their dwelling areas.


F.30


F.31

Figure 30: Swift bricks
Figure 31: Bug house located in an outdoor green space.



4.3. Detailed design principles

This sub-chapter comprises guidelines for detailed design. These guidelines focus on the appearance of individual buildings. The guidelines are organised into the following topics:

- **J. Building lines & boundary treatments**
- **K. Building lines / roofline**
- **L. Fenestration**
- **M. Materials**
- **N. Sustainable design**

Detailed design

J. Building lines & boundary treatments

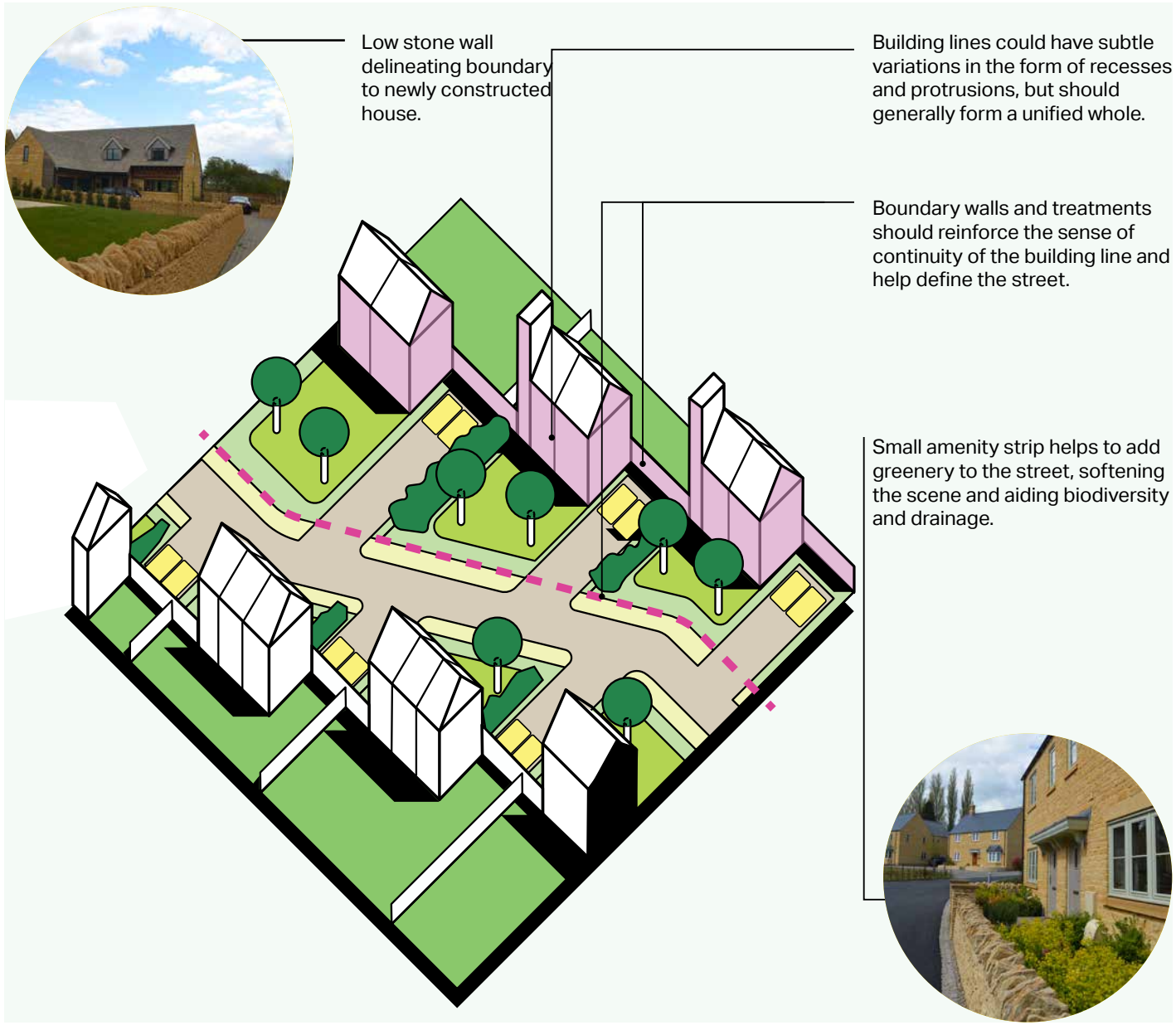
Building line and boundary treatments vary greatly across the Parish. To respect the existing context, both the building and the boundary feature should be consistent with neighbouring properties while enabling enough variations for visual interest.

01. Buildings should front onto streets. The building line should have subtle variations in the form of recesses and protrusions but should generally form a unified whole.

02. Buildings should be designed to ensure that streets and/or public spaces have good levels of natural surveillance from buildings. This can be ensured by placing ground floor habitable rooms and upper floor windows facing the street.

03. Natural boundary treatments should reinforce the sense of continuity of the building line and help define the street, appropriate to the character of the area. They should be mainly continuous hedges and low stone walls, as appropriate, made of Cotswold stone. The use of either panel fencing or metal or concrete walls in these publicly visible boundaries should be avoided.

04. On residential streets outside the historic core, front gardens or planting strips should be provided.



Detailed design

K. Building lines / roofline

Creating a good variety in the roof line is a significant element of designing attractive places. There are certain elements that serve as guidelines in achieving a good variety of roofs:

01. The scale of the roof should always be in proportion with the dimensions of the building itself;
02. Monotonous repetitions of the same building elevations should usually be avoided, therefore subtle changes in roofline should be ensured during the design process;
03. Traditional local roof materials, shapes, and detailing should be considered and implemented where possible in cases of new development; and
04. Dormers can be used as a design element to add variety and interest to roofs. They should be proportional to the dimensions of the roof and façade, and their design should be coordinated with the materials and architectural style used on the rest of the elevation. Render in an earthy colour is acceptable on the sides and gables of dormers.

The design of the roofline should also respond to the topography of the site and its surroundings in relation to inward long-distance views. New developments should therefore avoid locating taller buildings on crests and aim to keep rooflines below the tree canopy. They should also avoid obstructing key views and landmarks.


F.32



F.33


F.34

Figure 32:
Subtle variation in roofline
Figure 33:
Pronounced variation in roofline as a defining design decision.
Figure 34:
There are historical examples of uniform roof lines.

Detailed design

L. Fenestration

01. Fenestration on public/private spaces increase the natural surveillance and enhance the attractiveness of the place. Considerations for natural surveillance, interaction, and privacy must be carefully balanced.

02. Corner buildings should incorporate windows on both primary and secondary façades. Long stretches of blank (windowless) walls must be avoided.

03. Windows should be of sufficient size and number for abundant natural light and should meet or exceed statutory regulations.

04. Site layout and building massing should ensure access to sunshine and avoid overshadowing and overlooking neighbouring buildings. New developments should also use opportunities for siting houses to maximise solar gain and provide long-distance views through a careful placement of windows.

05. Consistent window styles and shapes should be used across a given façade to avoid visual clutter and dissonance.



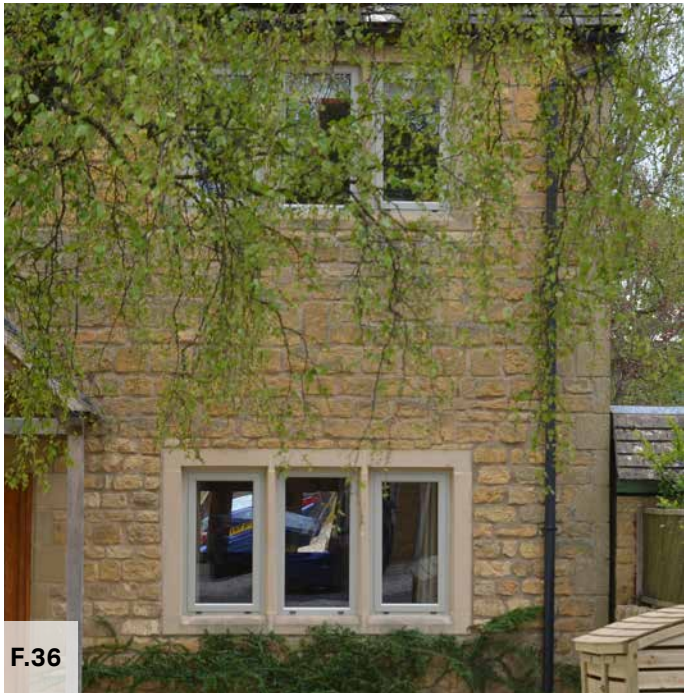




Figure 35:
Mullioned windows
Figure 36:
Mullioned windows
Figure 37:
6/6 sash windows

Detailed design

M. Materials

The materials and architectural detailing used throughout Chipping Campden contribute hugely to the historic character of the area and reflect the local vernacular. The materials used in proposed developments and renovations must be of a high quality and reinforce local distinctiveness. Development proposals should demonstrate that the palette of materials has been selected based on an understanding of the surrounding built and natural environment.

Particular attention should be given to the bonding pattern, size, colour, and texture of materials.

This section includes examples of building materials that contribute to the local vernacular of Chipping Campden and which could be used to inform future development. All examples are of recent buildings.



Local stone in irregular courses



Local stone in irregular courses, stone slate roof in diminishing courses, brick stacks



Prominent gables



Juxtaposition of coursed rubble and ashlar



Houses built close to street edge



Irregular coursing, ashlar dressings and casement windows



Rainwater goods flank front elevation



Use of mixed wall, including stone, brick and render, and roof coverings



Prominent gables with drip moulds to windows



Brick wall material



Door hoods and flush casement windows, use of decorative wall plates



Stone dressings and chimney



Variable roof line with dormers



Graduated stone slate roof with rendered dormer window



Graduated stone slate and slate roofs of variable height



Sparing use of canted bay windows



Red brick chimneys



Door hoods on simple brackets



Polite design with many historic features



Multiple dormer windows



Render wall material

Detailed design

N. Sustainable design

The use of sustainable design principles and tools are strongly encouraged to respond to the climate emergency. Please refer to CDC's exemplar **Net Zero Carbon Toolkit** for inspiration and guidance.

Energy efficient or eco design combines all around energy efficient appliances and lighting with commercially available renewable energy systems, such as solar electricity and/or solar/ water heating.

Starting from the design stage there are strategies that can be incorporated to include technologies such as passive solar heating, cooling and energy efficient landscaping which are determined by local climate and site conditions.

Figure 39eatures an array of sustainable design features. Those on the left show the features that should be strongly encouraged in existing homes, while those on the right show additional features that new homes should be encouraged to incorporate from the onset.



Figure 38:
Solar panels well integrated into design of new home.

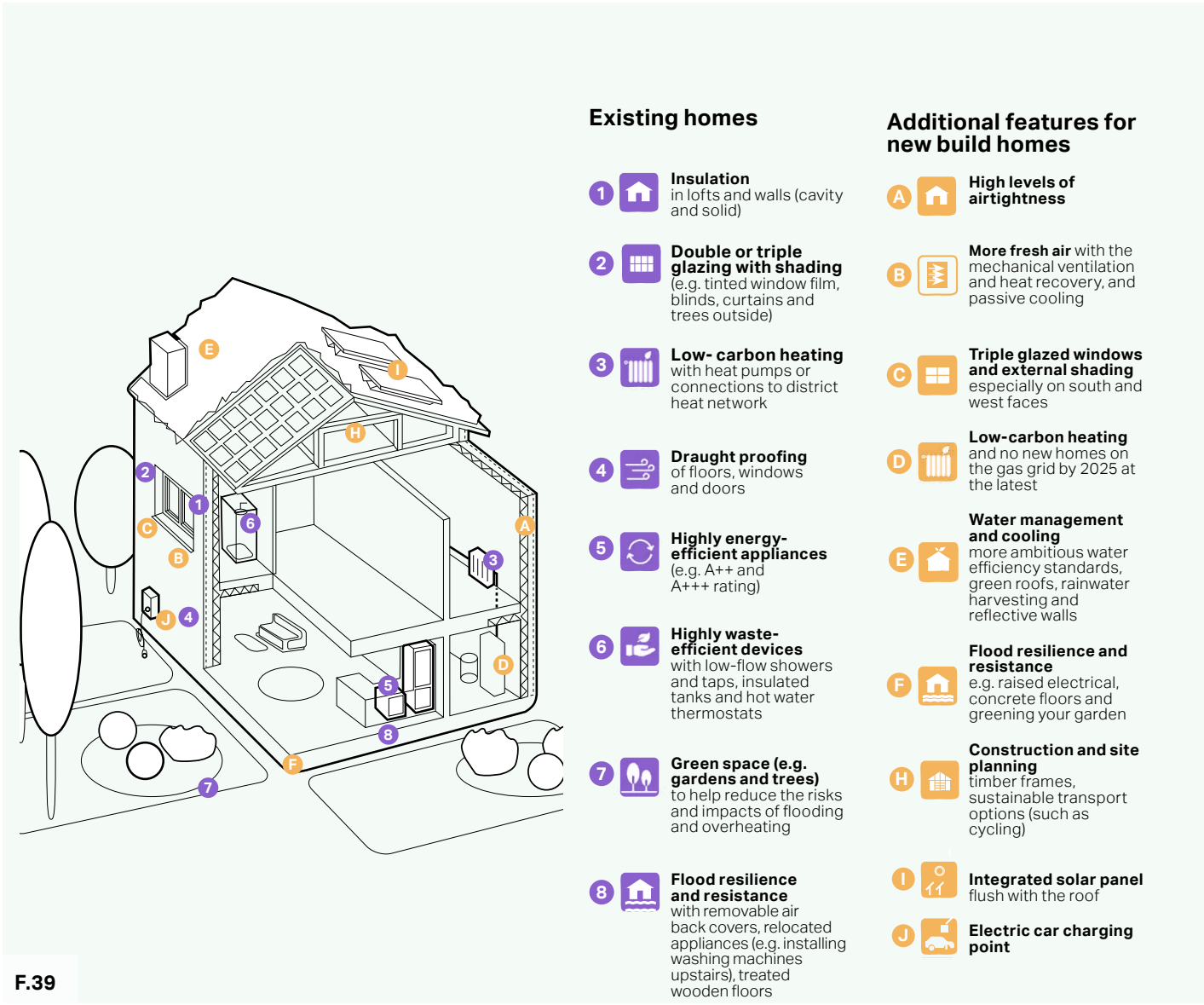


Figure 39:
Measures to address the climate emergency (adapted from Commission on Climate Change)



4.4. Checklist

Because the design guidelines in this chapter cannot cover all design eventualities, this concluding section provides a number of questions based on established good practice against which the design proposal should be evaluated.

The checklist can be used to assess all proposals by objectively answering the questions below. Not all the questions will apply to every development. The relevant ones, however, should provide an assessment as to whether the design proposal has taken into account the context and provided an adequate design solution.

As a first step there are a number of ideas or principles that should be present in all proposals. These are listed under "General design guidelines for new development." Following these ideas and principles, a number of questions are listed for more specific topics.

The checklist is organised into the following topics:

- **1. General design guidelines for development**
- **2. Street grid and layout**
- **3. Gateway and access features**
- **4. Local green spaces, views and character**
- **5. Buildings layout and grouping**
- **6. Building line and boundary treatment**
- **7. Building heights and rooflines**
- **8. Household extensions**
- **9. Building materials and surface treatment**
- **10. Car parking**
- **11. Architectural details and design**

1

General design guidelines for new development

01. Integrate with existing paths, streets, circulation networks and patterns of activity;
02. Reinforce or enhance the established settlement character of streets, greens, and other spaces;
03. Harmonise and enhance existing settlement in terms of physical form, architecture and land use;
04. Relate well to local topography and landscape features, including prominent ridge lines and long-distance views;
05. Reflect, respect, and reinforce local architecture and historic distinctiveness;
06. Retain and incorporate important existing features into the development;
07. Respect surrounding buildings in terms of scale, height, form and massing;
08. Adopt contextually appropriate materials and details;
09. Provide adequate open space for the development in terms of both quantity and quality;
10. Incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features;
11. Ensure all components e.g. buildings, landscapes, access routes, parking and open space are well related to each other;
12. Make sufficient provision for sustainable waste management (including facilities for kerbside collection, waste separation, and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours;
13. Positively integrate energy efficient technologies;
14. Ensure that places are designed with management, maintenance and the upkeep of utilities in mind; and
15. Seek to implement passive environmental design principles by, firstly, considering how the site layout can optimise beneficial solar gain and reduce energy demands (e.g. insulation), before specification of energy efficient building services and finally incorporate renewable energy sources.

2

Street grid and layout

01. Does it favour accessibility and connectivity? If not, why?
02. Do the new points of access and street layout have regard for all users of the development; in particular pedestrians, cyclists and those with disabilities?
03. What are the essential characteristics of the existing street pattern; are these reflected in the proposal?
04. How will the new design or extension integrate with the existing street arrangement?
05. Are the new points of access appropriate in terms of patterns of movement?
06. Do the points of access conform to the statutory technical requirements?

3

Gateway and access features

01. What is the arrival point, how is it designed?
02. Does the proposal maintain or enhance the existing gaps between settlements?
03. Does the proposal affect or change the setting of a listed building or listed landscape?
04. Is the landscaping to be hard or soft?

4

Local green spaces, views and character

01. What are the particular characteristics of this area which have been taken into account in the design; i.e. what are the landscape qualities of the area?
02. Does the proposal maintain or enhance any identified views or views in general?
03. How does the proposal affect the trees on or adjacent to the site?
04. Can trees be used to provide natural shading from unwanted solar gain? i.e. deciduous trees can limit solar gains in summer, while maximising them in winter.
05. Has the proposal been considered within its wider physical context?
06. Has the impact on the landscape quality of the area been taken into account?
07. In rural locations, has the impact of the development on the tranquility of the area been fully considered?
08. How does the proposal impact on existing views which are important to the area and how are these views incorporated in the design?
09. Can any new views be created?
10. Is there adequate amenity space for the development?
11. Does the new development respect and enhance existing amenity space?
12. Have opportunities for enhancing existing amenity spaces been explored?
13. Will any communal amenity space be created? If so, how will this be used by the new owners and how will it be managed?
14. Is there opportunity to increase the local area biodiversity?
15. Can green space be used for natural flood prevention e.g. permeable landscaping, swales etc.?
16. Can water bodies be used to provide evaporative cooling?
17. Is there space to consider a ground source heat pump array, either horizontal ground loop or borehole (if excavation is required)?

5

Buildings layout and grouping

01. What are the typical groupings of buildings?
02. How have the existing groupings been reflected in the proposal?
03. Are proposed groups of buildings offering variety and texture to the townscape?
04. What effect would the proposal have on the streetscape?
05. Does the proposal maintain the character of dwelling clusters stemming from the main road?
06. Does the proposal overlook any adjacent properties or gardens? How is this mitigated?
07. Subject to topography and the clustering of existing buildings, are new buildings oriented to incorporate passive solar design principles, with, for example, one of the main glazed elevations within 30° due south, whilst also minimising overheating risk?
08. Can buildings with complementary energy profiles be clustered together such that a communal low carbon energy source could be used to supply multiple buildings that might require energy at different times of day or night? This is to reduce peak loads. And/or can waste heat from one building be extracted to provide cooling to that building as well as heat to another building?

6

Building line and boundary treatment

01. What are the characteristics of the building line?
02. How has the building line been respected in the proposals?
03. Has the appropriateness of the boundary treatments been considered in the context of the site?

7

Building heights and roofline

01. What are the characteristics of the roofline?
02. Have the proposals paid careful attention to height, form, massing and scale?
03. If a higher than average building(s) is proposed, what would be the reason for making the development higher?
04. Will the roof structure be capable of supporting a photovoltaic or solar thermal array either now, or in the future?
05. Will the inclusion of roof mounted renewable technologies be an issue from a visual or planning perspective? If so, can they be screened from view, being careful not to cause over shading?

8

Household extensions

01. Does the proposed design respect the character of the area and the immediate neighbourhood, and does it have an adverse impact on neighbouring properties in relation to privacy, overbearing or overshadowing impact?
02. Is the roof form of the extension appropriate to the original dwelling (considering angle of pitch)?
03. Do the proposed materials match those of the existing dwelling?
04. In case of side extensions, does it retain important gaps within the street scene and avoid a 'terracing effect'?
05. Are there any proposed dormer roof extensions set within the roof slope?
06. Does the proposed extension respond to the existing pattern of window and door openings?
07. Is the side extension set back from the front of the house?
08. Does the extension offer the opportunity to retrofit energy efficiency measures to the existing building?
09. Can any materials be re-used in situ to reduce waste and embodied carbon?

9

Building materials and surface treatment

01. What is the distinctive material in the area?
02. Does the proposed material harmonise with the local materials?
03. Does the proposal use high-quality materials?
04. Have the details of the windows, doors, eaves and roof details been addressed in the context of the overall design?
05. Do the new proposed materials respect or enhance the existing area or adversely change its character?
06. Are recycled materials, or those with high recycled content proposed?
07. Has the embodied carbon of the materials been considered and are there options which can reduce the embodied carbon of the design? For example, wood structures and concrete alternatives.
08. Can the proposed materials be locally and/or responsibly sourced? For example, FSC timber, or certified under BES 6001, ISO 14001 Environmental Management Systems.

10

Car parking

01. What parking solutions have been considered?
02. Are the car spaces located and arranged in a way that is not dominant or detrimental to the sense of place?
03. Has planting been considered to soften the presence of cars?
04. Does the proposed car parking compromise the amenity of adjoining properties?
05. Have the needs of wheelchair users been considered?
06. Can electric vehicle charging points be provided?
07. Can secure cycle storage be provided at an individual building level or through a central/communal facility where appropriate?
08. If covered car ports or cycle storage is included, can it incorporate roof mounted photovoltaic panels or a biodiverse roof in its design?

11

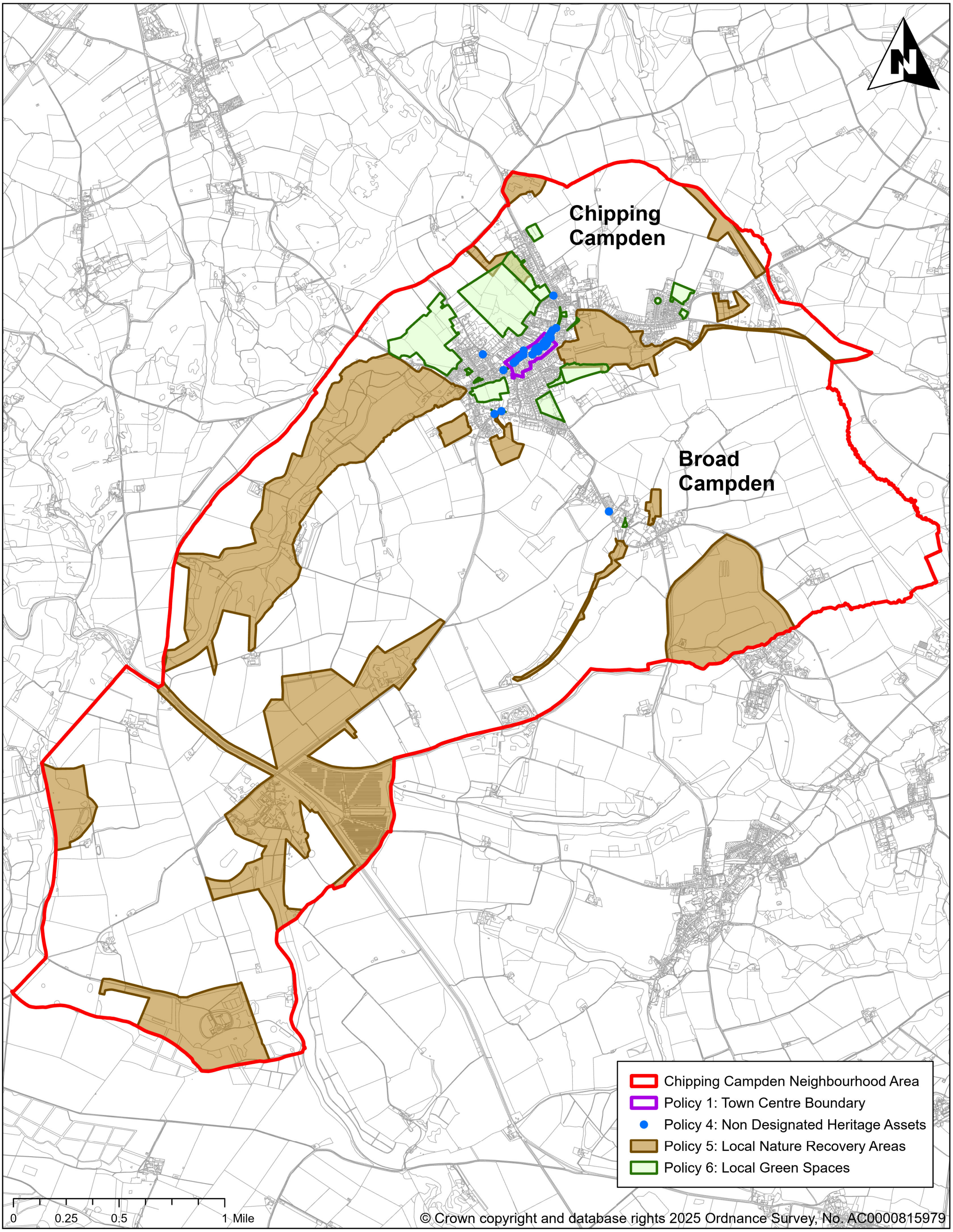
Architectural details and design

01. If the proposal is within a Conservation Area, how are the characteristics reflected in the design?
02. Does the proposal harmonise with the adjacent properties?
03. This means that it follows the height, massing and general proportions of adjacent buildings and how it takes cues from materials and other physical characteristics.
04. Does the proposal maintain or enhance the existing landscape features?
05. Has the local architectural character and precedent been demonstrated in the proposals?
06. If the proposal is a contemporary design, are the details and materials of a sufficiently high enough quality and does it relate specifically to the architectural characteristics and scale of the site?
07. Is it possible to incorporate passive environmental design features such as larger roof overhangs, deeper window reveals and/or external louvres/shutters to provide shading in hotter months?
08. Can the building designs utilise thermal mass to minimise heat transfer and provide free cooling?
09. Can any external structures such as balconies be fixed to the outside of the building, as opposed to cantilevering through the building fabric to reduce thermal bridge?

About AECOM
AECOM is built to deliver a better world. We design, build, finance and operate infrastructure assets for governments, businesses and organizations in more than 150 countries. As a fully integrated firm, we connect knowledge and experience across our global network of experts to help clients solve their most complex challenges. From high-performance buildings and infrastructure, to resilient communities and environments, to stable and secure nations, our work is transformative, differentiated and vital. A Fortune 500 firm, AECOM had revenue of approximately $17.4 billion during fiscal year 2016. See how we deliver what others can only imagine at aecom.com and @AECOM.

Contact
Ben Castell
Director
E: ben.castell@aecom.com

aecom.com

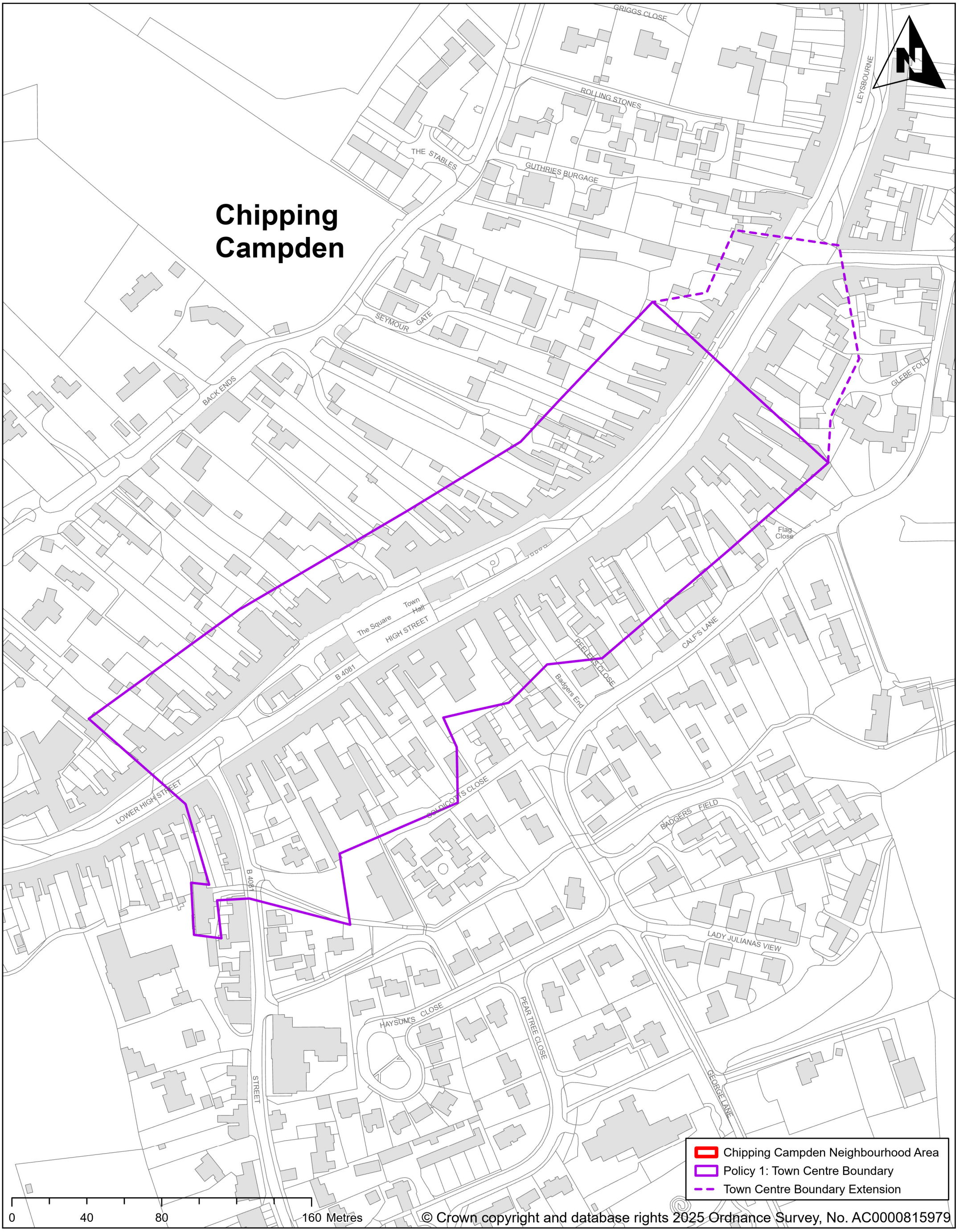


© Crown copyright and database rights 2025 Ordnance Survey, No. AC0000815979

Chipping Campden Parish Neighbourhood Development Plan

Policies Overview Map

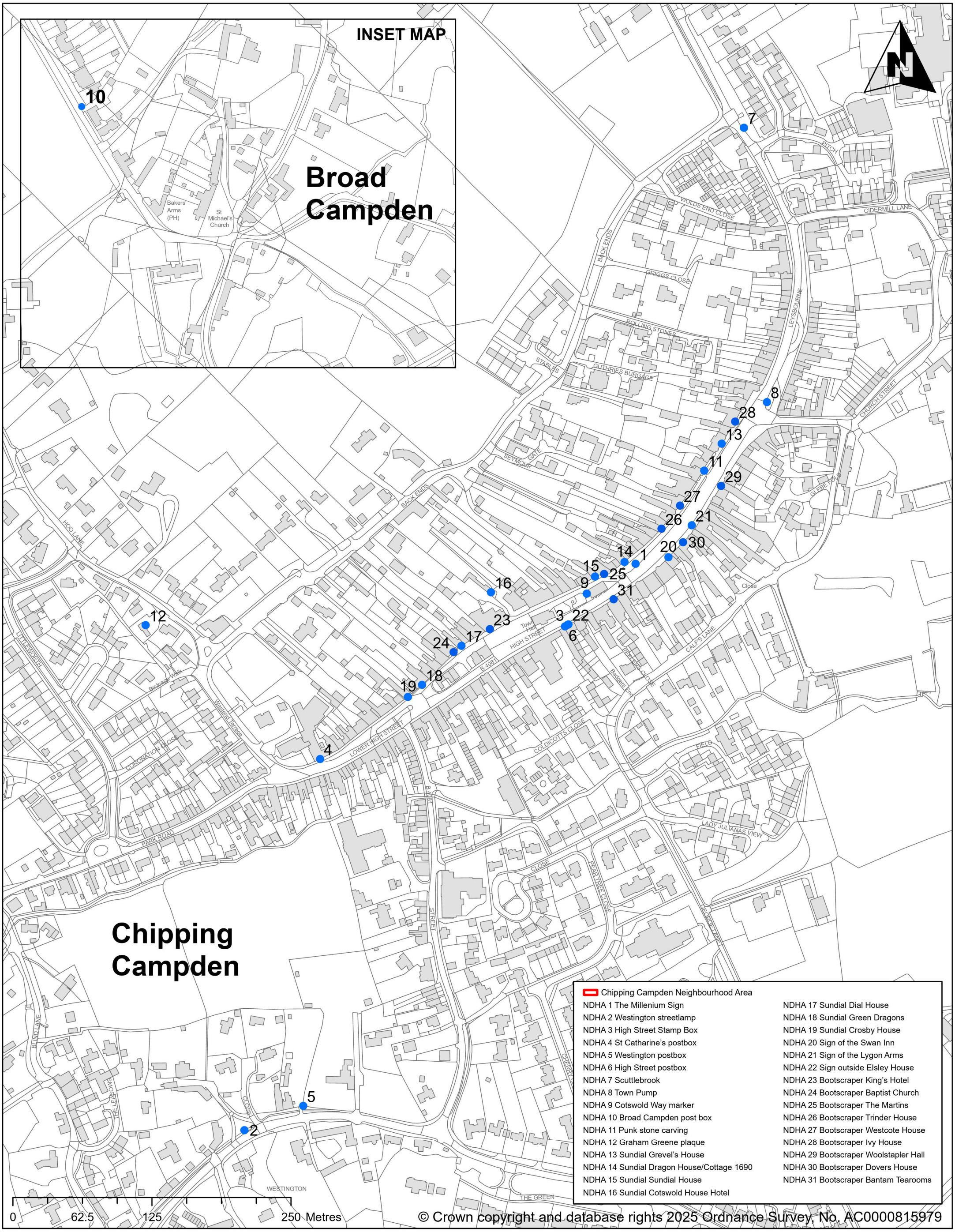
COTSWOLD District Council



Chipping Campden Parish Neighbourhood Development Plan

Policy 1: Town Centre Boundary

COTSWOLD District Council

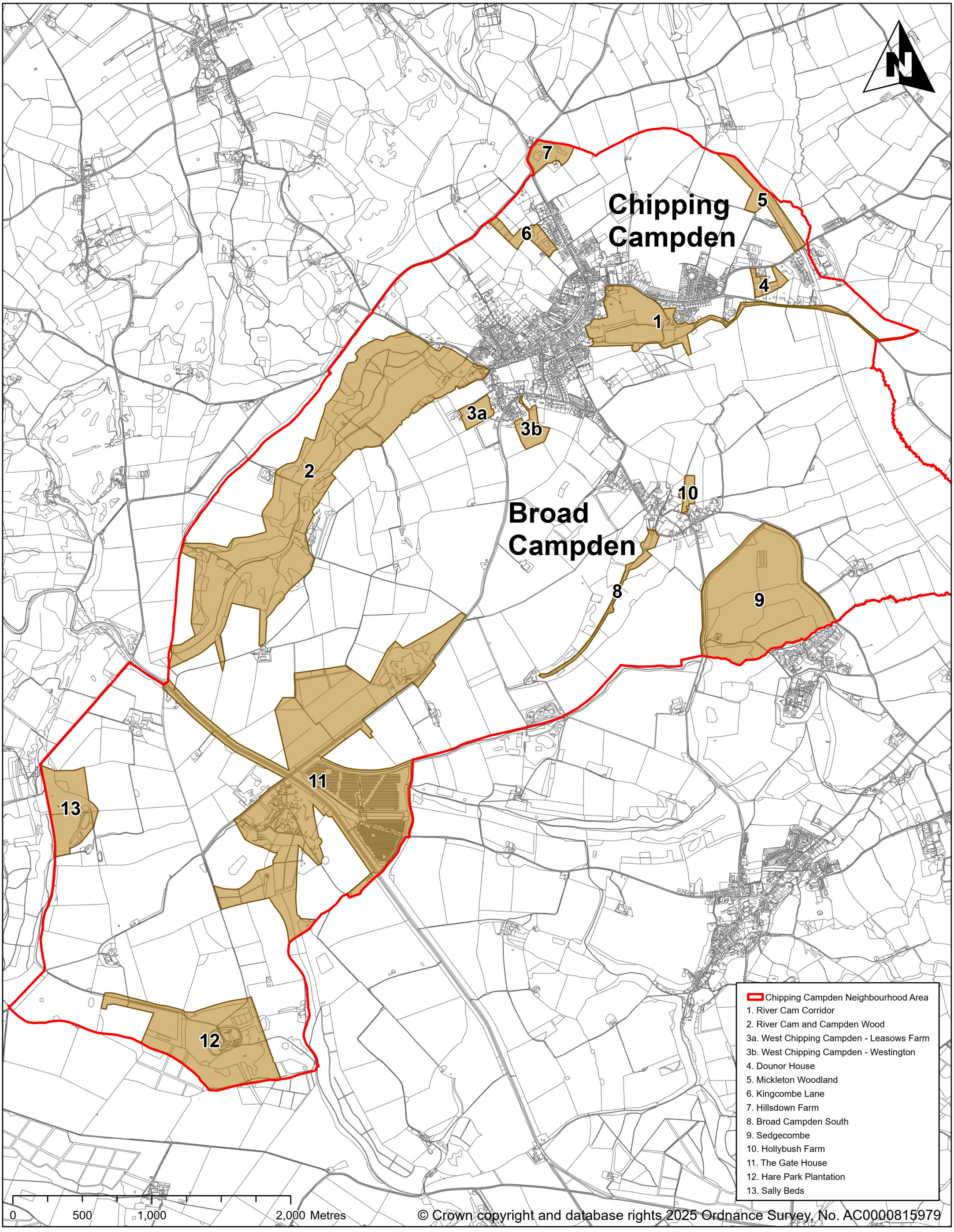


© Crown copyright and database rights 2025 Ordnance Survey. No. AC0000815979

Chipping Campden Parish Neighbourhood Development Plan

Policy 4: Non Designated Heritage Assets

COTSWOLD District Council

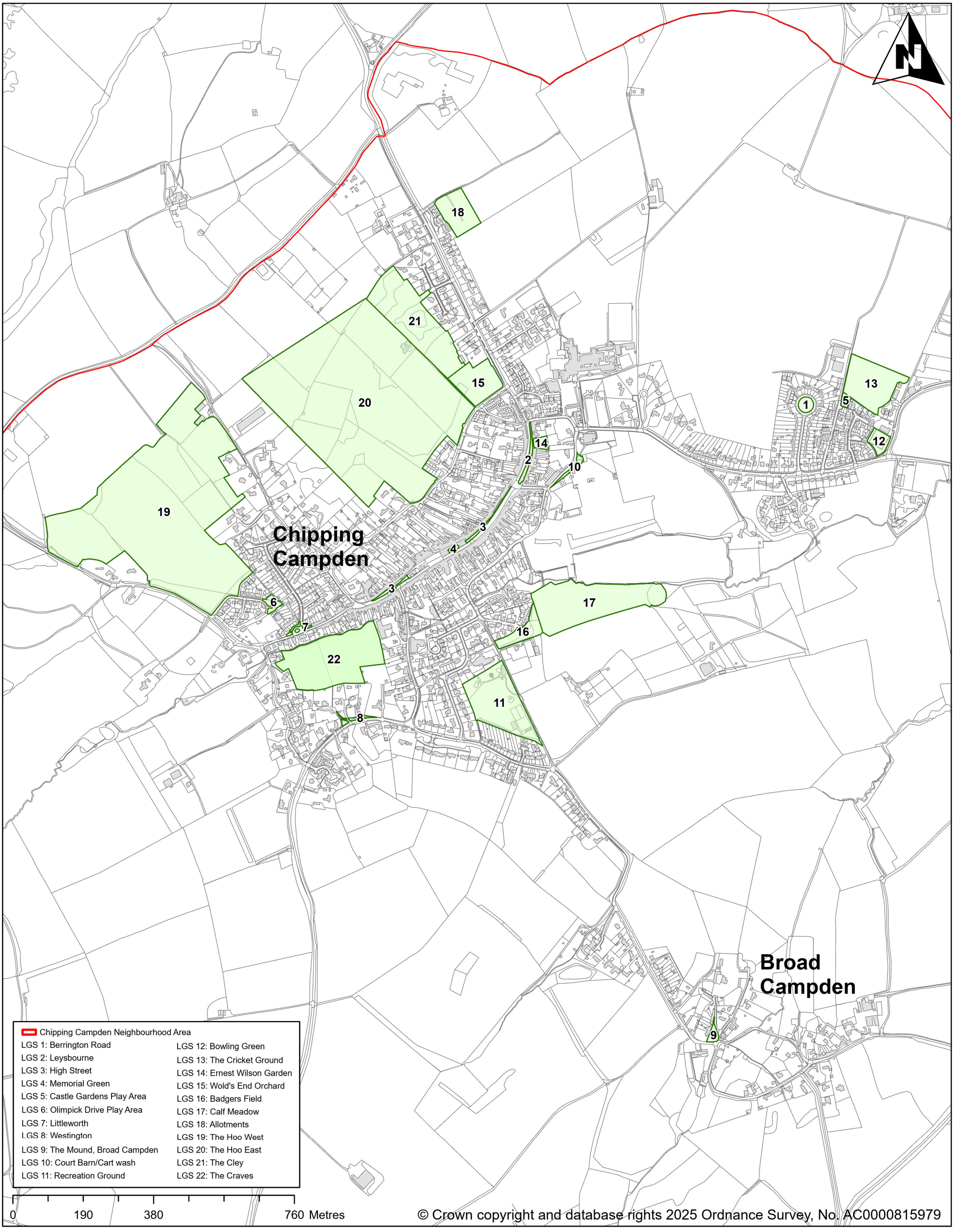


© Crown copyright and database rights 2025 Ordnance Survey. No. AC0000815979

Chipping Campden Parish Neighbourhood Development Plan

Policy 5: Local Nature Recovery Areas

COTSWOLD District Council



Chipping Campden Parish Neighbourhood Development Plan

Policy 6: Local Green Spaces

COTSWOLD District Council

This page is intentionally left blank

COTSWOLD
District Council

Examiner of the Chipping Campden
Neighbourhood Plan

Enquiries to: Mark Harrison
Senior Planning Policy Officer
mark.harrison@cotswold.gov.uk

1st December 2025

RE: Policies Map

Dear Examiner,

In preparing for the procurement of an Examiner for the Neighbourhood Plan, I observed that the Chipping Camden Reg 15 submission of their Neighbourhood Plan had been accepted without a standalone Policies Map.

Whilst there are inset maps amongst the text, the resolution was low, and it was deemed the provision of a map to identify areas, as per The Neighbourhood Planning (General) Regulations 2012 15(1)(a), was not clearly met.

As such, Cotswold District Council have created a Policies Map (Annex F). This has been done by copying across the boundaries from those inset maps mentioned, in the Reg 16 submission version of the Neighbourhood Plan.

The exceptions are:

- For Local Green Spaces #6, #7 and #8 we have excluded highways that transverse the green space. It is considered that perhaps the previous maps could not be drawn at such a level of detail to exclude the highways. It would be typical for Local Green Spaces to exclude highways, especially as the Reg 16 draft Neighbourhood Plan mentions in Appendix 7 that Highways were not consulted.
- For Local Green Space #12, the boundary on the east side appeared to follow the footpath rather than the hedge which we presume to follow the boundary line, as per the OS basemap.

For the Policies Map overall, and the boundary changes mentioned above, neither of these have been consulted on as part of the Reg 16 Consultation. CDC would like to

propose to the Examiner, that this does not change the approach or scope of policies including the designation of Local Green Space, but is merely a clarifying matter.

However, as this has not been part of the Reg 16 consultation, we ask for the Examiner to consider a recommendation for its conclusion, should the Examiner agree with our approach to this matter.

Yours faithfully,

Mark Harrison BSc(Hons) MA MRTPI
Senior Planning Policy & Neighbourhood Plans Officer
Planning Policy and Infrastructure
Cotswold District Council

P: Cotswold District Council, Trinity Road, Cirencester, GL7 1PX
E: mark.harrison@cotswold.gov.uk

[redacted]

[redacted]

[redacted]

OFFICIAL

Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

Date: 16 July 2025

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)
PROPOSAL: Chipping Campden Neighbourhood Development Plan

Dear Sir/Madam,

Thank you for consulting us on the Chipping Campden Neighbourhood Development Plan. This email forms for the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Chipping Campden Station
Page 44 of the NDP notes the support for a new railway station at Chipping Campden, however the Station is no longer proposed and policies to safeguard land have been removed from the Cotswold District Plan.

Level Crossings

Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

There are a number of level crossings within the plan area that may be affected by development proposals:

1. Mare Brook Bridleway/ Telephone Public Level Crossing (OWW 95m 24cns)
2. Paxford 2 Public Footpath Level Crossing (OWW 95m 42cns)
3. Paxford 3 Public Footpath Level Crossing (OWW 95m 61cns)
4. Campden 1 Public Footpath Level Crossing(OWW 96m 34cns)
5. Campden 2 Public Footpath Level Crossing(OWW 96m 61cns)
6. Chipping Campden CCTV Level Crossing (OWW 96m 77cns)

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- By any development or enhancement of the public rights of way

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that *"…development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway"* (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Yours Sincerely,

[redacted]

Network Rail
Temple Point, Redcliffe Way, Bristol, BS1 6NL
www.networkrail.co.uk/property

****

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure.

This email should not be used by anyone who is not an original intended recipient, nor may it be copied or disclosed to anyone who is not an original intended recipient.

If you have received this email by mistake, please notify us by emailing the sender, and then delete the email and any copies from your system.

Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, Waterloo General Office, London, SE1 8SW.

****

Rep #2 - behalf of Landowner

SFPLANNING

04 August 2025

Neighbourhood Planning
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

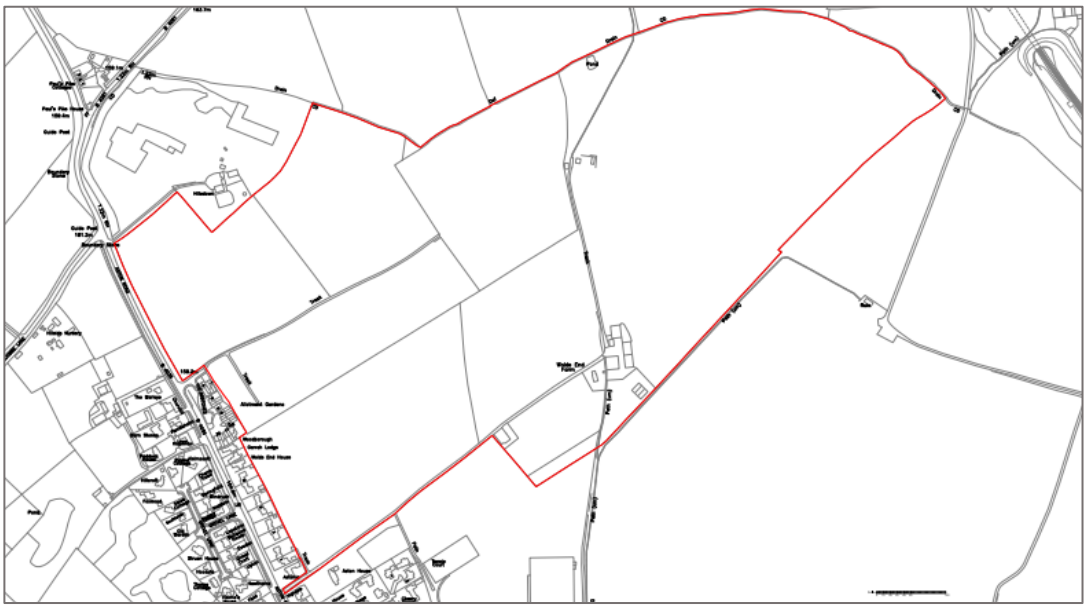
By email: Neighbourhood.Planning@cotswold.gov.uk

Dear Sirs

Chipping Campden Neighbourhood Plan – Regulation 16 consultation Representation
on behalf of the landowner interests of Gloucestershire County Council only (not its administrative functions)

1. This representation is made to the Chipping Campden Neighbourhood Plan (NDP) consultation by SF Planning Limited on behalf of Gloucestershire County Council (GCC) in their capacity as owner of land within the NDP area only (it does not relate to GCC's administrative functions such as highways or education).

2. As confirmed in previous representations, GCC own 48.4 ha of land to the north east of Chipping Campden at Wolds End Farm, Chipping Campden GL55 6JS as shown edged red on the plan below.



[redacted]

3. The land falls within the Cotswolds National Landscape. It lies outside the current Development Boundary and Conservation Area but is well-related to the existing settlement pattern, forming a logical extension and rounding off to the north and west of Chipping Campden. In terms of its proximity to local services, it is considered very sustainably located.

4. We have previously submitted representations on the 2024 Regulation 14 draft neighbourhood plan in the same format as this representation. However, our response on behalf of GCC as landowner is not recorded in the February 2025 consultation report.

5. We note that there have been some small changes to some of the supporting text within the plan. The purpose of this representation is to ensure that the text is accurate and that our client's views as a landowner have been taken into account in the preparation of the plan, including the proposal that an allocation of the Wolds End site (as outlined above) would deliver significant benefits, and enable the Town Council to better control development in the area. This is especially in light of Cotswold District Council's lack of five year housing land supply. We explain more about this below.

6. **Housing provision**

6.1 Since 12 December 2024, a revised standard method for calculating housing need as meant that CDC no longer has a five-year housing land supply. Current figures suggest that the housing land supply is at approximately 1.8 years owing to the significant increase in the required number of homes per annum.

6.2 Chipping Campden is considered a principal settlement in the adopted CDC local plan. It is considered one of the most sustainable locations to deliver future growth.

6.3 This ability to accommodate growth is especially important with such an acute affordable housing need. Page 35 of the NDP goes on to recognise the lack of social housing or housing suitable for the elderly and makes a clear statement that this needs to be addressed. This is explored in more detail on page 40. However, the NDP does not then go on to include policies which would boost the supply of housing (market, social and specialist) or allocations for any housing sites. It is open for the NDP to provide additional allocations for housing even where CDC has not chosen to allocate housing in the area.

6.4 For reasons covered in this letter, there is also merit in Chipping Campden understanding its specific housing need figure in more detail through

discussion with CDC and seeking to allocate housing sites and include policies which support appropriately designed and located housing, proportionate to the scale of the town.

7. **Allocation of the GCC site for housing**

7.1 The allocation of GCC's site for a residential led development would contribute towards meeting the CDC housing target in a sustainable way with a proportionate addition to Chipping Campden (using those areas of the site which relate best to the settlement).

7.2 We note that the approach of the Town Council remains to put up "*strong opposition to new peripheral housing developments outside the Chipping Campden Development Boundary*" as outlined on page 40 of the draft NDP. However, given the lack of affordable housing within the district and CDC being some way off meeting housing requirements, it would be more appropriate to take a flexible and holistic approach.

7.3 We consider the NDP an excellent opportunity to control where growth in the settlement happens, given the acute need to provide more housing across the district. The allocation of the site in the NDP would have a positive impact on CDCs ability to provide enough housing in highly sustainable locations. With no allocations, there is a strong risk that more speculative applications will come through, potentially being allowed on appeal.

7.4 The site is ideal for housing for the following reasons;

- It is sustainably located, in close proximity to a number of local amenities.
- Development at the site would enable Chipping Campden to grow in a well-managed way. This growth will in turn allow local businesses and services to grow too, securing their long term viability.
- Additional affordable housing and potentially specific types of housing such as self-build or elderly housing can be provided alongside the market homes.
- The development would have the potential to increase the housing mix within the town; the NDP document confirms that there is not a wide variety of different types of housing in the area at present.
- It can deliver a wider development which includes a new access to the school and a school car park (see below).
- Planning permission for housing was granted in 2020 as outlined above. Although that permission has now lapsed, it supports the credentials of the site and its suitability for housing.

7.5 The site can be advanced following the grant of permission to aid with

housing supply in the short to medium term, thereby helping to sustain a five-year housing land supply of deliverable sites.

8. **School car park and other infrastructure and services**

8.1 Page 42 of the NDP document states;
"*It is hoped that eventually, Chipping Campden School will have a new school campus that will offer new car park and coach parking opportunities for residents and tourists out of school hours.*"

8.2 In addition, proposed policy 1 (paragraph 4) clearly supports proposals to provide extra parking at Chipping Campden School.

8.3 GCC continues to progress proposals for a wider scheme which includes a new access and parking for Chipping Campden school, a site for a GP surgery, and improved footpath and cycle routes. This is in the same format we would expect an allocation to come forward. Previous pre-application advice from CDC and public consultation on this wider scheme was generally favourable. It should be noted that the consultation and pre-app proposals did not include a replacement primary school , however, Page 45 of the NDP still refers to the development of a replacement primary school. It is important to make it clear that the wider scheme does not include provision of a replacement primary school .

8.4 As indicated previously, there are some inaccuracies relating to the description of our client's proposals. Page 61 of the NDP document states that "*the car park would be accessed by a road integrated with the 'Bratches' housing development, on land in the ownership of Gloucestershire County Council; partly on the existing access road to Wolds End Farm, which would be upgraded"*. The current proposal is for a new car park for the school to be accessed via a road integrated with the wider development, but not '*partly on the existing access road to Wolds End Farm'* which is not suitable for such an access. We strongly suggest that this error is corrected in the next iteration.

9. Please contact me should you find it helpful to discuss the information included in this submission.

Yours faithfully

[redacted]

SF Planning Ltd.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable):

Date: 25 July 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: NO

Part B

Which part of the document does your representation relate to?

Paragraph number: "Community Aspirations", page 44-45

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications X Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

Strongly support aspirations to improve infrastructure for the benefit of town residents, businesses and visitors – as set out below.

What improvements or modifications would you suggest?

I would also ask the plan to consider:

- **Town centre parking – provision of rapid electric vehicle charging infrastructure in car parks for those residents without driveways (as well as visitors).**

- **Indoor sports facility – to include provision of swimming pool, sauna and spa facilities for residents to access in line with modern provision at gyms and wellness centres.**

Please make sure any additional pages are clearly labelled

Gloucestershire Wildlife Trust
Robinswood Hill Country Park
Reservoir Road
Gloucester
GL4 6SX
[redacted]
www.gloucestershirewildlifetrust.co.uk
[redacted]

24/07/2025

Chipping Camden NDP response

We welcome the Chipping Campden Neighbourhood Development Plan's strong commitment to the natural environment and the thoughtful integration of biodiversity, green space protection, and landscape character throughout its policies. In particular, Policies 5 and 6 represent a significant step forward in aligning local planning with the objectives of the Gloucestershire Local Nature Recovery Strategy (LNRS) and broader ecological goals.

We offer the following comments and suggested refinements to further strengthen the Plan's delivery and resilience in a changing strategic context.

Policy 5: Biodiversity Net Gain and Local Nature Recovery

We support the clear ambition of Policy 5 in aligning with the Environment Act 2021 and in targeting BNG delivery within the parish's ecological network. To reinforce the effectiveness and deliverability of this policy, we recommend the following enhancements:

1. Introduce a Preferred Minimum BNG Above 10%
   We recommend specifying a *preferred target of 15–20%* BNG, reflecting Gloucestershire's environmental ambition as outlined in Local Plan policies EN8/EN9 and the draft LNRS. This ensures greater resilience, especially in areas with a low ecological baseline.

Registered charity number: 232580
Registered in England number: 708575
VAT number: 535 6446 33

2. Require Monitoring and Long-Term Management Commitments
   Developers should be required to commit to *15–30 year habitat management plans*, including monitoring indicators, habitat condition assessments, and long-term delivery accountability—ideally overseen by the parish, CDC, or a recognised body (e.g. Wildlife Trust, local ecologists). County wide, we often find that developers fail to initially submit such commitments. Having a policy incorporated into the NDP should help to encourage developers to consider this crucial element from the outset.

3. Encourage Community Involvement in BNG Delivery
   We suggest encouraging or mandating opportunities for local biodiversity action groups or interested residents to participate in the design and stewardship of off-site and on-site BNG areas. Helping to encourage parish wide engagement in wildlife conservation/stewardship.

4. Clarify the Role of Nature-Based Flood Management (NFM)
   The policy should explicitly recognise the potential of areas such as the *Cam Brook corridor* and adjacent floodplain as dual-function BNG and NFM zones—supporting reedbed creation, riparian restoration, and natural water flow regulation**.**

5. Nature Recovery Sites
   We support range and number of areas designated for improvement and protection. We would like to encourage specific restoration/conservation efforts towards site that hold Wood pasture and Parkland. We would direct the parish to funding opportunities with the Dead Wood Society Project for such efforts. Additional, efforts should also be made in the development of existing orchard sites. County wide, this type of habitat has been under pressure, any effort to restore and enhance them would be welcomed by GWT.

Policy 6: Local Green Spaces

We strongly support the designation of 22 Local Green Spaces. Many of these sites offer overlapping community, heritage, and ecological benefits. To optimise their role in nature recovery, we suggest:

1. Distinguish Between Amenity and Biodiversity LGSs
   A typology separating primarily recreational LGSs from those with high biodiversity potential would be useful in targeting ecological funding and stewarding contributions to the Local Sites Network.

Registered charity number: 232580
Registered in England number: 708575
VAT number: 535 6446 33

2. Add Biodiversity Management Objectives for Each LGS
   Linking to the above point. Where applicable, LGSs with ecological should have site-specific objectives for habitat enhancement, tree cover, or pollinator value. Like what has been done for the Nature improvement areas in Table 7.

3. Enable Community Wildlife Stewardship
   Similar to the point in Policy 5 - the policy could include encouragement for community-led green space initiatives, citizen habitat monitoring, or educational use by schools and local groups. Again, to help better promote parish wide engagement and management.

Strategic Infrastructure Contingency - Railway Station

While we recognise the potential benefits of a railway station for Chipping Campden in terms of accessibility, sustainable transport, and economic development. We would also note that such infrastructure, if progressed, would likely shift the strategic development context of the town. Presently, the NDP denotes a more organic growth pattern in the coming years, the policies are as such suitable for this specified growth. However, if a rail station were to be opened it would almost certainly change the developmental hierarchy for the Parish.

Strategic 'Risks' Identified:

- Greater development pressure on greenfield sites, particularly to the east and south.
- Risk of sprawl beyond the current settlement envelope.
- Potential fragmentation of designated Local Nature Recovery Areas and key Local Green Spaces.
- Possibly given strategic allocations by CDC in line with new infrastructure connectivity.
- Undermining of current spatial assumptions throughout the NDP.

Consequently, we would suggest either a dedicated policy around the possibility of major infrastructure development or perhaps include an amendment within an existing policy. Whereby, the NDP would be immediately reviewed as to best ensure it remains robust and sustainable in light of the possible development. From our perspective it would allow for the review of Policy 5 and 6 (as well as the designated nature areas) under a new spatial context, from which they can be strengthened, altered or protected as appropriate.

Registered charity number: 232580
Registered in England number: 708575
VAT number: 535 6446 33

Conclusion

We commend the Parish and Steering Group for their commitment to biodiversity, local distinctiveness, and environmental stewardship. With the suggested refinements above, the Neighbourhood Plan could be even better equipped to deliver on local and countywide ecological ambitions while remaining robust in the face of future development scenarios.

We would welcome further engagement in supporting implementation or ecological monitoring, should the opportunity arise.

Regards

[redacted]
Planning and Green Infrastructure Lead
Gloucestershire Wildlife Trust

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable):

Date: 4 August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to?

Paragraph number: Sections 5 & 6 (Biodiversity and Green Spaces)

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Tick☐ Support with modifications ☐ Oppose ☐ Have comment Tick

Please give details of your reasons for support or opposition or make comments:

I am writing to provide a letter of support for your proposals to designate Local Green Spaces in Chipping Campden, with particular reference to the unique importance of maintenance, protection, and enhancement of the green space labelled in the Town Council site map as 'The Cley'. My strong support for the designation of the proposed Local Green Spaces (including The Cley) comes for the reasons outlined below:

- The trees in The Cley are visible from nearby roads and footpaths, adding beautiful, natural features that contribute to the character of the skyline of Chipping Campden and the surrounding area. The trees contribute significantly to the appearance of the area and are characteristic of an Area of Outstanding Natural Beauty (AONB), of which they are part. Furthermore, The Cley is characteristic of the 'High Wold' landscape type, which, in addition to the tranquility of the area, is one of the 'special qualities' of the Cotswolds (Cotswold District Local Plan, 2011-2031).
- The trees and greenspace in The Cley hold significant amenity value to residents, including schoolchildren who have a view of the trees and landscape on their way to school. They also have strong amenity value for members of the public, who also receive the mental and physical wellbeing benefits associated with the trees and surrounding green space of The Cley. I find the trees restorative and calming, with a peaceful background sound as the breeze rattles their leaves. I also spend many hours peacefully observing the diversity of wildlife to which these trees and greenspace are home. The Cley brings joy to the residents and visitors of Chipping Campden alike and are a key, longstanding part of the feel of this green town's community.
- The wooded areas mapped in the site labelled 'The Cley' comprise deciduous woodland - a habitat of principal importance, or Priority Habitat, under the Natural Environment and Rural Communities Act (2006) Section 41, according to maps available through DEFRA. The broadleaved trees found here are also noted as a 'special quality' of the Cotswolds AONB in its Management Plan (2018-2023).

- This country, and indeed planet, is dominated by forest loss and associated pressures on biodiversity. Land-use change from natural to anthropogenic is the leading cause of biodiversity loss globally. The trees in The Cley therefore provide a rare example of woodland expansion in a world dominated by forest loss and associated pressures on biodiversity. The trees provide habitats for: wild birds and their nests including Barn Owls, Red Kites, Sparrow Hawks and Pheasants; mammals including protected bats; reptiles and amphibians; and a rich diversity of invertebrate species (e.g. butterflies, bees, hoverflies, beetles, dragonflies, damselflies, etc., many of which are pollinators to encourage).
- The Cley has a sizeable mosaic of trees, varying in form and function, providing important habitat heterogeneity in an otherwise increasingly fragmented, urban and agricultural/grassland wider landscape. It makes an important contribution to the aims of the Biodiversity 2020 national strategy and the Natural Character Area of the Cotswolds. The woodland, associated trees, and habitats of The Cley function as 'stepping stones' for the migration and dispersal of wild species, which may be especially important given potential connectivity to the National Trust Dover's Hill woodland.
- The trees and natural land in The Cley also provide important ecosystem services. For instance, as many of Chipping Campden's residents live downhill of this area and have a high surface water flood risk, these trees will provide the important regulating service of flood management. In addition, the trees: reduce road noise; benefit human wellbeing; increase resilience to climate change (noting that Chipping Campden currently has medium climate-change vulnerability, according to MAGIC map data); and improve local water (wherein Chipping Campden falls in a Countryside Stewardship Water Quality High Priority Area, according to MAGIC map data), soil, and air quality.

In the list above, I summarise several key reasons for my support of your proposals to designate Local Green Spaces in Chipping Campden and Broad Campden, making particular reference to the area I know best. I fully appreciate the benefits of nature's contributions to people, with trees such as those on The Cley providing a soundscape rare in today's increasingly urbanised England. The strong dawn chorus, beautiful birdsong, and the flutter and buzz of a variety of insects (including valuable pollinators), and to witness birds building nests and small mammals scurrying, is a joy for all Campdonians. The Ernest Wilson Garden is a place of solace and contemplation unlike any other, with dappled light and shade, and a unique collection of species appreciated by all that visit it. The Coneygree is a stretch of green landscape offering an important, welcome view of natural land, open to walkers and providing the associated health and wellbeing benefits of this. These examples, and the Cley, are areas of natural beauty to protect for present and future generations. I cannot emphasise strongly enough my support for these plans and I cannot speak more highly of your work to protect beautiful, rare greenspaces in the town which promote such tranquility, joy, and wellbeing. Chipping Campden, and the Area of Outstanding Natural Beauty of which it is part, has a precious opportunity to conserve trees and green spaces for the benefit of people and wildlife through your proposals, which I hope will be approved.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable): District Councillor

Date: 04/08/2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

I think it is an excellent and thorough neighbourhood plan which firstly emphasises Chipping Campden's exceptional visual characteristics through its huge treasure trove of listed buildings grouped together in a delightful bowl in the Cotswold National Landscape (AONB).

In addition in its wide ranging scope it has headlined the matters which are most important to the residents of the town and within its locality as well as the many visitors who come from both the UK and abroad. I have made my notes on these below:

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

Page 40 More affordable housing is an issue across the Cotswolds and there is a strong demand for it in Chipping Campden as both house prices and rents are extremely high forcing those who were born and bred there to move away.

Page 41 parking has long been an issue in Chipping Campden and so locals from surrounding villages do not shop there as often as they would like and it also is challenging for many of the visitors to the town. Everyone would benefit from an improved parking provision and it is very much hope that this will be provided in the existing school car park once the Aston Road development comes into being.

A re-opened railway station would be a great boost to the town and is something I would like to see.

I strongly support encouraging local retail, hospitality and other commercial premises in the town to remain providing their services rather than being permitted to change of use to residential. This will help keep the town vital. Over the years we have already lost quite a few commercial

premises in this way and currently the Kings Head is still closed with no signs as to its future - sad landmark in the centre of the town.

Page 45 a new surgery is urgently required as well as a new primary school. Both the surgery and the St James's Primary are located where there is limited parking and road access is difficult. Surgeries are also going to be expected to cover a greater range of medical needs in the future and there is just not the capacity in the current one. It also needs to be remembered that Mickleton has not had a surgery for some years and with the likely significant growth in housing there its residents will be increasing the number of patients needing care at the Campden surgery.

Leisure facilities at the school are limited due to them only being available outside school hours and in the holidays. Apart from limiting the use of the pool, gym and all weather courts this makes the provision of GP prescribed fitness training in the gym for those recovering from surgery or needing help with weight loss difficult.

Page 48 a new burial ground has been on the wish list for many years and is now increasingly urgent.

The expansion of the Chipping Campden Academy is required not only in the anticipation of the increased housing but because it is already struggling to provide the name of student places from its catchment.

Page 58 Extend the town boundary to the West – fully in support for this as it is something of an anomaly not to have the chemist which is a key shop included.

Page 143-159 – Appendix 7

All the green spaces identified in this appendix are very much valued by residents and visitors so should be preserved in perpetuity.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable):

Date:06/08/25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES /

Part B

Which part of the document does your representation relate to?

Paragraph number: Appendix 7. Local Green Spaces Pages 143 to 159

Policy reference: Local Green Spaces

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

We support the retention of green spaces within the town, which are varied in character and usage. Chipping Campden sits within the fold of Cotswold escarpment and benefits from a beautiful natural backdrop of The Hoo. We support the development boundaries across the town being contained so as to ensure no loss of the green spaces proposed by the NDP. Each of these green spaces has been so designated for good reason and with the support of the Town Council.

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable):

Date: 08/08/2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: Appendix 7 Local Green Spaces

Policy reference: Local Green Space 21 The Cley

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

Dear Sirs
We strongly support the proposed Green Space allocation of the land to the west of Grevel Lane known as the Cley We are deeply concerned that such Green Space Allocation should be preserved and potentially improved in an area of outstanding natural beauty. There is currently a tree preservation order on the trees on the land and we are naturally keen to conserve the wildlife and tranquillity of the plot which as a community, we hold very dear for the following reasons:-

- The Cley responds positively to the listed objectives of Policy 5: Environment and Biodiversity Net Gain, namely "to provide and/or maintain green corridors for wildlife" providing as it does, an important link within the green corridor from Aston Road to Hoo Lane which also provides the opportunity for further improvement of the existing habitat.
- As we are all aware flooding is becoming an increasingly common event and mature trees provide a natural protection against storm water run-off, delaying the time of entry of the storm water into the system and thereby protecting the storm water system both in the immediate vicinity of Grevel Lane as well as the main supporting system further down the line in the town centre which we know is already vulnerable, witness the storm event of summer 2007.
- This field and the mature trees within it represents one of the last surviving areas of natural woodland in Chipping Campden providing an important habitat for local wildlife, such as the Green Woodpecker and the Great Spotted Woodpecker both of which are welcome colourful visitors to local gardens and which nest annually in the woodland along with numerous other species of importance such as barn owls, hares, rabbits, moles, field mice, muntjac deer, roe deer, foxes, badgers and a wide variety of birds, some of them rare species. It serves as a vital safe haven for protected species such as Pipistrellus (common pipistrelle bat). Clearly the destruction of the natural woodland would remove the diverse habitat required to sustain the local wildlife and will leave us all the poorer for its loss.
- The land is within an Area of Outstanding Natural Beauty and is not allocated for development. The trees are important to the local environment being visually prominent from Grevel Lane, the Aston Road and Chipping Campden in general.
- In this era of environmental awareness, climate change and the UK's drive for carbon neutrality we should not be cutting down mature trees and thereby obliterating the benefits of a limited natural resource which will be lost forever!

Therefore, we reiterate our strong support for the inclusion of The Cley within the Green Space Allocation in the Neighbourhood Development Plan currently being drawn up.

Yours faithfully

[redacted]

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

Part A



Organisation and position (if applicable):

Date:7.8.25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: Section 6, Appendix 7 : The Cley

Policy reference: Planning Policies:Policy 6 Local Green Spaces

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support √ Support with modifications □ Oppose □ Have comment □

Please give details of your reasons for support or opposition or make comments:

We are regular users of the public footpath on the north boundary of The Cley and see and enjoy the variety of wildlife present in that area. We strongly support the proposal to keep this biodiverse space as a Local Green Space in order to protect and maintain the vital woodland habitat the Cley provides. We notice that the newly installed hard fencing alongside the path has already had an impact on the ability of the general public to enjoy the path and its views and presumably on the movement of the wildlife in the area.

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable): N/A

Date: 6/7/25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: Pages number 50 and 143-159

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support X Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

We support the development boundary as drawn. We also support the designation of local green spaces as drawn which form a key part of the natural setting of the town. The Hoo behind our our house and butting on to the central conservation area the other side of the road in Back Ends is rising land and forms an integral part of this setting in our view

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

[redacted]

TO: Neighbourhood Planning,
Cotswold District Council,
Trinity Road,
Cirencester, GL7 1PX

6th August 2025

Dear Sir/Madam,

Chipping Campden Parish Neighbourhood Development Plan – Green Spaces

I write in support of the Chipping Campden Neighbourhood Development Plan (Regulation 15 Submission document (version 4th March 2025)), particularly its allocation of Local Green Spaces as set out in Policy 6.

[redacted]. I welcome the fact that The Cley is identified in Schedule 7 of the Plan and is to be a designated Green Space in the Neighbourhood Plan. I am writing to support in the strongest possible terms the designation of The Cley as a Green Space.

The Cley, situated entirely within the Chilterns AONB, makes a hugely positive contribution to the setting of the town of Chipping Campden and we need to preserve it for future generations. The Clay is now one of the last surviving pieces of wild woodland in Chipping Campden and, occupying an elevated position adjacent to footpaths, is visually prominent, not only to Grevel Lane but also to the Aston Road, multiple public footpaths and across the town.

The Clay is a haven of biodiversity and wildlife, and the land, soil and trees provide a valuable "carbon sink" for the area. The ecology of the site is settled and long-established over centuries, creating highly complex and varied habitats for a wide range of plants, trees and wildlife.

In 2020, the whole of the site was granted a blanket Tree Protection Order in recognition of its arboricultural significance.

This unique site thoroughly warrants its designation as a Green Space given its historical significance, its importance to the character and appearance of the town and its vital role as a haven for wildlife and biodiversity.

Yours sincerely,

[redacted]

COTSWOLD
District Council

www.cotswold.gov.uk

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025.** There are a number of ways to make your comments:

Complete an electronic response form

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our privacy notice. Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to? Regulation 15. submission 4th march.

Paragraph number: Section 6. Appendix 4.

Policy reference: Local Green Space 21. The Cley.

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

The Cley is an area of natural outstanding beauty, home to a great deal of wild life. Once green spaces have gone, they are gone forever. What will we be leaving the next generation?

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

COTSWOLD
District Council

www.cotswold.gov.uk

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025.** There are a number of ways to make your comments:

Complete an electronic response form

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our privacy notice. Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

[redacted]

Date: 10 August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: Policy 6

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

The areas 19, 20, 21, 15.
These areas are under constant threat by developers. These people are only concerned with making themselves richer.

What improvements or modifications would you suggest?

Please ensure that the District Council protects these precious areas. They support wild life & sheep pastures.

~~Please make sure any additional pages are clearly labelled~~

They are already (21) especially big abroad, to the detriment of folk living adjacent.

COTSWOLD
District Council

www.cotswold.gov.uk

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025.** There are a number of ways to make your comments:

Complete an electronic response form

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our privacy notice. Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable):

Date: 11 08 25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: POLICY 6

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications ☐ Oppose ☐ Have comment ☐ AREAS 19, 20, 21, 15

Please give details of your reasons for support or opposition or make comments:

These areas support a diversity of wildlife and 19 and 20 are used for grazing sheep. They are areas of natural beauty enjoyed by locals and visitors to Chipping Campden.

(What improvements or modifications would you suggest?)

These areas are under constant threat from developers who have no interest in their natural appeal and only want to make a lot of money in an unfair way.

Please make sure any additional pages are clearly labelled

Areas 19 and 20 are steep slopes which, if built on, could cause flooding.

COTSWOLD
District Council

www.cotswold.gov.uk

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025.** There are a number of ways to make your comments:

Complete an electronic response form

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our privacy notice. Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

[redacted]

Email:

Organisation and position (if applicable):

Date: 01.8.25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to? P. 44 Community Aspirations

Paragraph number: Page 44

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? P. 44 (Please tick)

Support ☐ Support with modifications ☒ Oppose ☒ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

No more development until car parking is sorted because Chipping Campden cannot absorb any more traffic.

What improvements or modifications would you suggest?

Build and ~~develop~~ develop a car park. (Not the school car park) P. 44

Please make sure any additional pages are clearly labelled

Part A

[redacted]

Organisation and position (if applicable): Local resident

Date: August 12th 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: ***YES*** / ~~NO~~

[redacted]

Part B

Which part of the document does your representation relate to?

Paragraph number: PAGES 85-88 ‘Local Green Spaces’

Policy reference: Policy 6

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

~~Support □ Support with modifications □ Oppose~~ □ **Have comment** □

Please give details of your reasons for support or opposition or make comments:

I absolutely support the inclusion of Local Green Spaces - they’re hugely important for the mental and physical well-being of the Town’s residents and visitors. My concern is that property developers have their eye on various spaces (most especially 19. The Hoo West 20. The Hoo East & 21. The Cley) and that ‘letters of objection’ have been received by the Town Council from those owners/developers (presumably about the designation and/or inclusion in the NDP), which in turn suggests to me that they intend to challenge the protected status of these spaces in order to build. In my view, this would be hugely detrimental to both the fabric of the Town and the natural landscape - part of the unique charm and joy of Chipping Campden is that it’s simply folded into the valley between the hills, and to build in these areas would be to place this unique character under threat. My key concern, then, is that the ‘Local Green Space’ designation has real and genuine ‘teeth’ that means developers wouldn’t be able build on those spaces, rather than them being able to relatively easily overturn it. In terms of traffic and services, any development in these areas would also have a significant impact on Back Ends - which is already very unsafe for pedestrians and cyclists given the speed many people drive along it. There is no footpath, inadequate signage and no traffic calming measures. [redacted], the level of safety is already unacceptable and would only worsen with development. Additionally, the coaches need somewhere else to park and wait for their passengers (valued and important visitors to the Town), rather than waiting with their engines running on Back Ends.

What improvements or modifications would you suggest?

[1] The Hoo, most especially, is a hugely important part of the natural fabric of Chipping Campden and deserves to be fully protected from development forthwith.

[2] Prevent coaches and other large lorries from driving along Back Ends.

[3] Footpath and traffic calming measures along Back Ends

Rep #17 - Gloucestershire County Council

To: Sent via e-mail.

[redacted]
Economy, Environment, and Infrastructure
Shire Hall, Westgate Street, Gloucester, GL1 2TG
[redacted]

Our Ref: 2025/07/CDC-CCNDPR16/AD **Your Ref:** **Date:** 12 August 2025

Dear Sir/Madam,

Chipping Campden Neighbourhood Plan, Regulation 16 Consultation

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the Regulation 16 consultation materials for the draft Neighbourhood Plan of Chipping Campden in Cotswold District.

Broadly, this officer response delves into the following main aspects:

- **Climate change** – officers provide additional references to achieve net-zero goals of the county. Officers request to explore a dedicated policy on climate change.
- **Transport** – officers advise mapping existing facilities, conducting studies to understand people's preferences regarding travel patterns (and choices), and arriving at a wish list of projects that the community would like to see. This acknowledging, that projects can only be delivered contingent on resources becoming available.

Officers would be grateful to remain notified of key decisions regarding this plan.

Detailed officer-level comments are as below.

Yours faithfully,

[redacted]
Senior Planning Officer
Gloucestershire County Council

DETAILED OFFICER COMMENTS

Archaeology

GCC officers have no further comments.

Climate Change

In addition to support of comments from Transport Planning (see below) on decarbonising the transport sector, GCC officers working on Climate Change and Air Quality would like to highlight that in 2022, the transport sector accounted for 32% of Gloucestershire's emissions. Furthermore, among all district and boroughs in the county, Cotswold District has the second highest emission footprint by private cars.

GCC officers would encourage further emphasis on climate change within the plan. Officers appreciate, that the draft neighbourhood plan makes some references to Cotswold's Local Plan regarding this. However, the local plan was adopted in 2018. It would be prudent for the draft neighbourhood plan to reflect upon more recent advances / legislative changes in building energy efficiency, renewable energy, and construction methods that can help achieve a low-carbon future.

To this end, we acknowledge the reference – within policy 3 in the draft plan on design and built environment – to the "Chipping Campden Design Guide" published in September 2024 that has a more up to date reflection of sustainable design principles. Officers would suggest making this reference (and implications) more prominent within the draft plan.

As a gentle reminder, the Future Homes Standard will be **published in autumn 2025** and will require carbon dioxide emissions produced by new homes to be 75-80% lower than those built to current standards.

Although tackling climate change is made implicit within the draft plan under various policies (e.g., Policy 5 on BNG and Local Nature Recovery), officers feel, the neighbourhood plan should have a dedicated policy on "climate change". In this regard, the Moreton-in-Marsh Neighbourhood Plan is one reference document that has climate change as a dedicated policy (page 27): The Plan | Plan.

Gloucestershire aspires to become Net Zero by 2045. With buildings and heating being our third highest carbon emitter for the county, the draft neighbourhood plan would be a good opportunity to encourage design and layout of new developments to maximise their potential to be as energy efficient as possible and to encourage the use of renewable energy.

Ecology

GCC officers have no further comments.

Fire and Rescue

GCC officers have no further comments.

Libraries

GCC officers have no further comments.

Minerals and Waste Planning

GCC officers have no further comments.

Public Health

GCC officers have no further comments.

Transport Planning

On **page 15**, as one objective under Traffic and Transport, the draft neighbourhood plan mentions "To improve the facilities and safety for cyclists and pedestrians". However, the draft plan does not appear to mention whether traffic speed or other barriers to active travel exist. That would be helpful to identify.

It may also benefit the plan to establish what safety issues currently prevent people from making shorter journeys on foot or by bike, to enable solutions to be found. A resident's survey might help gauge the need for active travel infrastructure. A community speed watch programme could provide evidence if speeds are an issue.

It's not currently clear in the plan what transport infrastructures are existing in the area; and whether facilities are accessible by walking, wheeling and scooting. The plan needs to set out what is expected of developers. For example, where can routes to school be improved with off-street infrastructure or perhaps providing formal or informal crossing points? Are there routes that people take to access shops, public transport or health care that a developer would need to link to or help improve?

In the Gloucestershire Local Transport Plan (LTP) 2020-2041, a lack of high frequency bus services is identified for the area. Identifying local journeys through census data might help to establish whether developer contributions towards public transport would be of benefit. Do many people drive to a certain destination, which could make a bus service viable?

The LTP Policy 5.2 on "Rail Service Enhancements" states that GCC will:

> *"Work with the rail industry, local authorities and other stakeholders to consider the reinstatement of the rail link between Honeybourne and Stratford on Avon, as well as suitable other railway line reinstatements".*

At present, GCC's LTP 2020-2041 does not have a policy specifically for a new Chipping Campden (Railway) Station. Therefore, officers request to please redact/delete the text reference on **page 48**: *"requirements in the Local Transport Plan for a new station"*.

Having said that, officers are broadly supportive of better rail connectivity in the area. GCC's Rail Investment Strategy (Gloucestershire Rail Study | September 2015) has indicated significant economic gains from re-establishing the rail corridor. However,

line reopening would be a complex undertaking, requiring rail industry backing and a successful full business case. It is therefore considered a long-term aspiration.

It may be prudent to also consider opportunities for improving bus connections to Honeybourne and/or Moreton-in-Marsh to make other existing railway stations more accessible to local residents.

GCC have identified the need for a “mobility hub” adjacent to the Town Hall. Thus, officers would welcome reference to this, along with a consideration of public realm and bus stop facility enhancements to improve access to local bus services.

13 August 2025

Chipping Campden Town Council
Old Police Station
High Street
Chipping Campden,
Glos.
GL55 6HB

Sent via email: Neighbourhood.Planning@cotswold.gov.uk

Dear Sir/Madam,

Response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 15 consultation

This representation is submitted by Morgan Elliot Planning on behalf of our client, [redacted], in response to the Regulation 16 consultation on the Chipping Campden Neighbourhood Development Plan (the "Neighbourhood Plan").

Our comments relate specifically to the proposed designation of Local Green Space (LGS) sites 20 and 21, which include land within [redacted]'s part ownership and control. These are shown below:

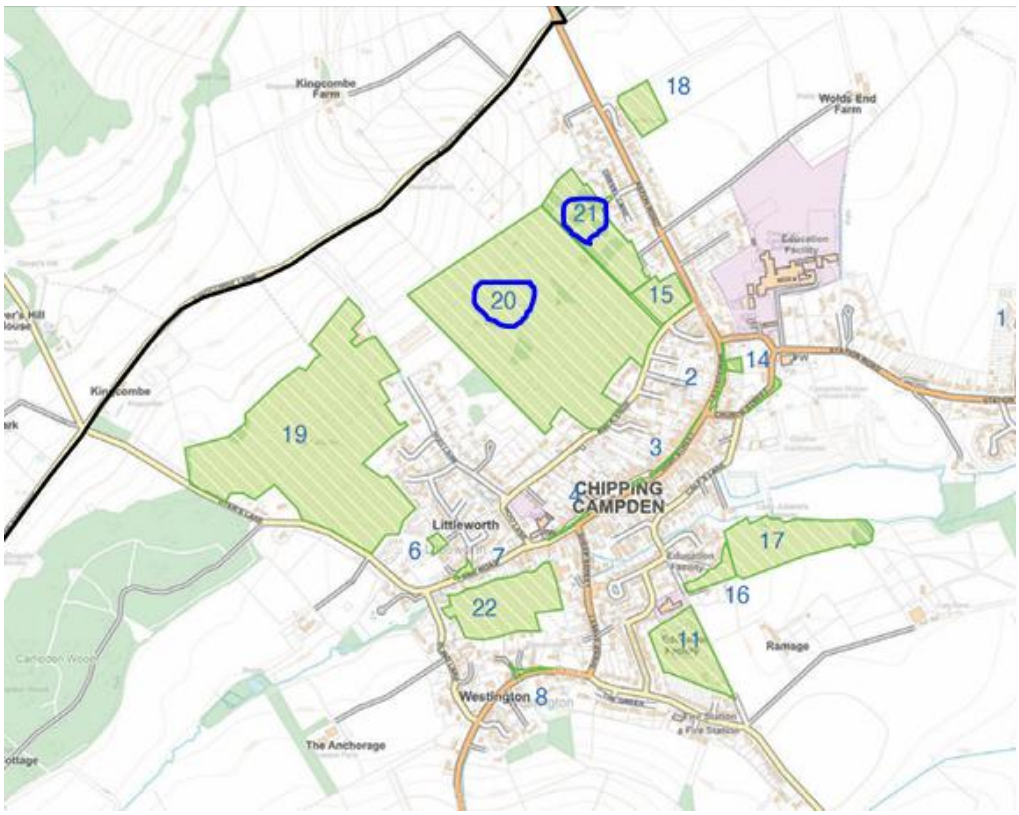


Figure 1 – Land at Local Green Space 20 and 21

Background and Procedural Context

Our client previously submitted a representation to the Regulation 14 consultation. That submission set out clear and evidence-based objections to the proposed designation of LGS20 (The Hoo East) and LGS21 (The Cley).

The Consultation Report (dated February 27, 2025) by Andrea Pellegram Ltd summarises the response on behalf of the Chipping Campden Neighbourhood Plan Group (CCNPG) as follows:

Copy of Andrea Pellegram Ltd summary of Regulation 14 Comments	Copy of Andrea Pellegram Ltd Response
The representation related to proposed local green spaces 20 and 21. With regard to LGS20 The Hoo East, the ownership details regarding the site are incorrect and [redacted] does not own the full extent of the site. With regard to LGS21 The Cley the land ownership details regarding the site area also incorrect. The representation from the landowner sets out justification why the sites do not meet the tests for LGS set out in the NPPF. The evidence is compelling, and the sites will be removed. The LPA also objected to the inclusion of site 20 because it was an extensive tract of land.	Noted. With regard to the question of whether these sites form extensive tracts of land, it is understood that this may not be the case, purely considering their size. The two sites are divided from each other by Hoo Lane and a wide strip of development and are considered by CCTC to be of different character and are therefore different sites providing different benefits and having different significance to the local community. The value/significance of the spaces is explained in site entries for site 20 and site 21 in Appendix 6, which were prepared by CCTC. In other respects, CCTC have reviewed the comments received and has resolved not to delete these sites and maintain their proposals for designation for the reasons set out in the appendix.

The Regulation 14 Consultation Statement prepared by Andrea Pellegram Ltd, on behalf of the Neighbourhood Plan Group, acknowledges the strength of the representation, stating:

- "The evidence is compelling and the sites will be removed; and
- "The LPA also objected to the inclusion of site 20 because it was an extensive tract of land".

However, **the sites have not been removed**, and instead, the justification for their designation stands without properly addressing the substantive issues raised by the LPA or the client.

Continued Factual Errors and Misrepresentation of Ownership

Despite being made aware of the issue at Regulation 14, the Neighbourhood Plan continues to present incorrect land ownership for both sites:

- ***LGS20 (The Hoo East):*** The site is not in single ownership. It comprises five separate land parcels, owned by different individuals. This fact was made clear in our Regulation 14 submission but has been ignored in the revised documentation (e.g., p.157 of the Plan).

- ***LGS21 (The Cley):*** The site boundary again misrepresents ownership and has not been corrected in the current version of the Plan.

This undermines the validity of the proposed designations. Meaningful consultation with affected landowners is a fundamental principle of neighbourhood planning, particularly in the designation of Local Green Space. The continued failure to reflect factual ownership data calls into question the transparency and robustness of the plan-making process.

Conflict with Sustainable Development Objectives

The designation of these sites risks undermining the ability of Chipping Campden to meet its housing needs. Paragraph 106 of the NPPF states:

- *"Local Green Space designation should be consistent with the local planning of sustainable development and* ***complement investment in sufficient homes, jobs and other essential services****."*

Chipping Campden and Cotswold District Council suffers from a chronic housing market and affordability issue, which the Neighbourhood Plan fails to acknowledge or address. Notably:

a. The current Cotswold Local Plan is over five years old;
b. The District Council's published housing land supply is just 1.85 years; and
c. Over the last year, properties in Chipping Campden had an overall average sale price of £977,681.

As a consequence of points a) and b) above, the existing Development Plan is out of date, and the Neighbourhood Plan—if made now—would be out of date on the day of adoption.

Under usual circumstances, the LPA would advise that Neighbourhood Plan Groups pause their Neighbourhood Plan until updated Local Plans have been adopted.

Failure to Meet the NPPF Tests for Local Green Space Designation

The NPPF (paragraph 107) is explicit: land designated as Local Green Space must be (inter alia):

1. Demonstrably special to a local community, and holds particular local significance due to its beauty, historic significance, recreational value, tranquillity, or richness of wildlife;

2. Local in character and not an extensive tract of land.

The proposed designations of LGS20 and LGS21 fail to meet these tests on multiple grounds:

a. Unsubstantiated

No substantive evidence has been provided to show that either site is "demonstrably special" within the meaning of the NPPF. The submitted photographs are of poor quality, lack metadata, and do not meet standard published guidance on visual assessments.

The claim that the public right of way (PROW HCC5) through LGS20 is "well used" is not supported by any quantifiable evidence. We have reviewed heatmap data from Strava, which shows very low recorded usage of the footpath, contradicting the narrative of significant public value (See attached heatmap with arrow pointing to the low usage of the PROW).



Figure 1 – Strava Walking Use Heat Map

Furthermore, Page 157 claims that Part of Hoo (East) was identified as an Amenity Green Space in the CDC's Green Infrastructure, Open Space and Play Space Strategy, Aug 2017. However, this document has been superseded on 11th January 2024 and was adopted by Cabinet. The committee report stated that it needed to be updated to reflect the substantial changes to the NPPF and material considerations.

Therefore evidence base that is being relied upon is already out of date.

b. <u>Extensive Tract of Land: Acknowledged by the LPA</u>

At the Regulation 14 stage, the client objected to LGS20 on the basis that it represents an "extensive tract of land". The Neighbourhood Plan Group has not engaged with this objection, nor provided any justification as to why the site's scale is now considered appropriate. This directly contravenes the NPPF.

The explanation by Andrea Pellegram on behalf of the CCNPG states:

- *The two sites are divided from each other by Hoo Lane and a wide strip of development and are considered by CCTC to be of different character and are therefore different sites providing different benefits and having different significance to the local community.*

The Consultation 14 representation highlighted that LGS 20 is an expansive tract of land. Whereas the response from the CCNPG discusses the sites contributing together as an expansive tract of land. This completely misses the point that the representation assesses each proposed LGS designation individually.

Also, there is not a wide strip of development, so it is not clear whether this response is even commenting on the sites in question. The response to the consultation process is considered poor.

c. <u>Arbitrary Boundaries</u>

The boundary of LGS20 has been drawn arbitrarily, seemingly to include the PROW. This is not a legitimate basis for designation. Simply being visible from a PROW, or adjacent to residential areas, is not sufficient to justify protection under the LGS policy.

Updates to the National Planning Policy Assessment since Regulation 14

Morgan Elliot Planning has thoroughly reviewed the proposed LGS designations against the requirements of the National Planning Policy Framework (NPPF). I draw the Neighbourhood Plan Groups' (NPG) attention to Paragraphs 105 and 106.

Paragraph 106 sets out that:

> - The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and ***complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period***.

Paragraph 107 sets out that Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) ***local in character and is not an extensive tract of land***.

Planning Assessment

Due to the recent update to the NPPF, this representation also includes an updated assessment, which is present below for the examiner's convenience.

Paragraph 106 Test

In relation to Paragraph 106 of the NPPF, and given the characteristics of both of these sites, it is not clear how they're consistent with local planning of sustainable development. Further, both sites, unequivocally, do not complement investment in sufficient homes, jobs and other essential services; in fact, it would appear that they are being used as a tool to put a hurdle in front of investment opportunities.

Relevant to LGS 20, a pre-application enquiry is currently live with the Council for development along Backends. The Council is currently receiving applications for edge of settlement areas to assist in meeting their chronic shortfall of 1.85 years.

Moreover, Local Green Spaces should provide a range of social, economic and environmental benefits. This is one of the basic conditions for neighbourhood plans. I am not clear what economic benefits the LGS designations provide. The PROW is protected under the Highway Act and therefore, there is no need to further impose protection on this.

Paragraph 107 Test

When reviewing Paragraph 107 of the NPPF, neither site would meet the criteria.

Criteria	Site

		Local Green Space 20 - The Hoo East	Local Green Space 21 - The Cley
a)	**in reasonably close proximity to the community it serves**	The completion of the 'close to the community it serves' box should describe the proximity of the green space to the local community. The space should be within easy walking distance to meet this criterion satisfactorily. The public right of way is clearly accessible; however, the land to the south, towards Backend, is not accessible, and it is not clear from the evidence what the land serves for the community.	The site is not accessible, and therefore, it is not clear what purpose this land serves to the community.
b)	**demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife**	The 'demonstrably special to local community' should describe the ways in which the space is used or enjoyed by the community. The outcomes of community engagement should be useful in demonstrating that space is special to the community. We recognise that the CCNPG rely on Footpath HCC5. However, it has not been demonstrated why this is special. There are photographs uploaded which do not indicate where the photographs are taken from and they don't appear to be showing anything particularly or demonstrably special. The site is located in the Cotswold National Landscape, which provides a degree of landscape protection; therefore, the LGS designation is borderline unnecessary and is only being used as a tool to put hurdles in front of investment.	Whilst the NPG includes text that includes details of the TPO and other designations. It is not clear how the Local Green Space Designation is demonstrably special to the local community. The site is constrained, and a Local Green Space designation is not considered necessary, and the site is not considered demonstrably special to the local community. The trees on site are already protected, and it is necessary to consider whether the additional designation is necessary and would serve a useful purpose. Furthermore, in considering whether a space is demonstrably special to a local community, it is clearly important to engage with the community and to assess how the community uses a space. The space has not been used and is solely in private ownership with no opportunity for community use. It's not clear at all from the evidence

	Further evidence is required to justify the extent of the land proposed.	what purpose this serves to the local community.
c) local in character and is not an extensive tract of land.	Consideration of whether the green space is local in character and not an extensive tract of land suggests spaces within a locality, rather than, for example, extensive green areas in the countryside around a settlement. The 'Local in character and not extensive tract' box should be used to demonstrate that the space in question is a local facility and not, for example, green space in the countryside around a settlement. The purpose of Local Green Space designation is to protect local spaces. The parcel of land is arguably found in other areas of the National Landscape and is not particularly special or locally significant in character to Chipping Campden. Containing urban sprawl or protecting open countryside would not be proper uses of the designation.	The NPG sets out that this green space is an area of natural pasture and wild woodland, the last in the area. The land is privately owned and is being managed by the landowner, which various felling licenses granted due to the limited value many of the trees have. The evidence base shows nothing to suggest that the site local in character.

Conclusions

The proposed designation of LGS20 (The Hoo East) and LGS21 (The Cley) is fundamentally flawed, both in process and in substance.

At the Regulation 14 stage, our client submitted clear, evidence-based objections to these designations. These concerns were acknowledged by the Neighbourhood Plan Group's own consultant, who described the evidence as "compelling" and recommended the removal of the sites. It's also suggested that the Local Planning Authority objected to LGS20 on the basis that it constitutes an extensive tract of land, contrary to the NPPF.

Despite this, the sites have not been removed. Instead, the Neighbourhood Plan continues to rely on inaccurate landownership data, insufficient evidence, and unsubstantiated claims of community value. No meaningful effort has been made to address the issues raised—either with the landowner or the Local Planning Authority—nor has there been compliance with the procedural expectation of genuine stakeholder engagement.

In planning terms, both sites fail to meet the tests for Local Green Space designation set out in Paragraphs 105–107 of the NPPF. The designation appears to serve no clear purpose beyond restricting future development, contrary to the requirement that such designations support sustainable development and complement investment in homes, jobs, and services (Paragraph 106 of the NPPF).

This is particularly critical in a context where:

- Evidence base relied upon is out of date;
- The Cotswold Local Plan is currently out of date;
- The Council can demonstrate only 1.85 years of housing land supply;
- The Neighbourhood Plan itself risks being out of date immediately upon adoption.

Given these factors and the absence of any demonstrable local significance for these sites, their continued inclusion as Local Green Spaces is not justified and would result in an unsound approach to Local Green Space Policy that would not stand up to scrutiny over the course of the current development plan period.

We respectfully request that the Examiner recommend the removal of LGS20 and LGS21 from the Neighbourhood Plan in order to ensure that it meets the basic conditions and conforms with national policy, including the NPPF.

Should the Examiner require any further evidence, ownership plans, or supporting information, we would be pleased to assist.

Yours Sincerely,

[redacted]

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS

office@morganelliot.co.uk • www.morganelliot.co.uk

Registered in England 14455430

Rep #19 - on behalf of Landowner (different to #18)

[redacted]

Dear Sir/Madam,

On behalf of the Campden Estate, I am pleased to attach a response to the Chipping Campden Neighbourhood Development Plan: pre-examination consultation (Regulation 16). This should be read alongside Figures 16 and 17 attached.

As per the representation, I have highlighted that a representation we submitted in the Regulation 14 consultation last year has not been considered in the 'Consultation Report' Annex C, and therefore I am concerned this has not been considered as part of the overall neighbourhood plan process. Please can you confirm? I attach the email I originally sent with the representation attached.

Please can you confirm receipt of the attachments in this email?

Kind regards,

[redacted]

morgan elliot planning

Registered in England and Wales. No.14455430

13 August 2025

Neighbourhood Planning
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

Sent via email: neighbourhood.planning@cotswold.gov.uk

Dear Sir/Madam,

Response to the Chipping Campden Neighbourhood Development Plan: pre-examination consultation (Regulation 16) – Westington Quarry, Chipping Campden.

This representation has been prepared by Morgan Elliot Planning on behalf of our client the Campden Estate in response to the emerging Chipping Campden Neighbourhood Development Plan pre-examination consultation (Regulation 16 of The Neighbourhood Planning (General) Regulations 2012) which is running until 15th August 2025.

This representation follows previous representations submitted by the Campden Estate in response to the Regulation 14 consultation that took place in May 2024, the first promoting the site known as Westington Quarry for a mixed use development and providing comments on a proposed 'key view' (see **Appendix 1**), and the second responding to draft Policy 5 'Environment and Biodiversity Net Gain' (see **Appendix 2**).

Having reviewed Annex C 'Consultation Report' that accompanies this consultation, and it has come to our attention that the representation in **Appendix 1** has not been included in this report and therefore, we are concerned that this representation has not been formally considered. We request confirmation from the Neighbourhood Plan steering group as to whether this representation was reviewed as part of the previous consultation and expect a response to its contents.

A detailed review of the remaining consultation documentation that supports the emerging Neighbourhood Plan Regulation 16 consultation has been undertaken and broadly, it is noted that the same policy principles remain. It is noted that the emerging Neighbourhood Plan continues not to allocate any land for development, the key view remains as previously proposed, and Policy 5 remains as previously drafted, although the accompanying text to this policy has been amended.

The following response comments on each of these aspects in the context of updates that have been published since, including updates to the National Planning Policy Framework (NPPF), the district council's need to find additional sites for development, and the progression of the draft Local Nature Recovery

Strategy for Gloucestershire. Where relevant, this response will draw on the previous representations contained in the accompanying appendices.

The Need for New Development

Since the previous Neighbourhood Plan consultation, the district Council are now required to find additional sites for development given the updates to the NPPF and the local housing need figures. The revised NPPF was published in December 2024 (updated in February 2025) and sets out revised housing targets for local authorities. For Cotswold District Council, the annual local housing need figure rose from 504 dwellings per annum to 1,036 dwellings. In June 2025, the Council published an updated Housing Land Supply Report which took this new annual local housing need figure into account, resulting in the Council only being able to demonstrate a 1.8 year supply of housing.

Whilst a Neighbourhood Plan is not obliged to allocate sites for development, the Neighbourhood Plan body should work closely with the Local Planning Authority (LPA) to ensure that emerging evidence of development need within the neighbourhood plan area, whether residential or commercial, is addressed. In our view, the Neighbourhood Plan consultation documentation has not identified whether further evidence gathering has been undertaken to reflect the clear need for additional sites to come forward in the district, particularly as Chipping Campden is identified as a sustainable settlement to accommodate growth.

Whilst the proposals at Westington Quarry do not seek to deliver residential development, the delivery of commercial uses can help support the need to deliver further residential development in such locations. Indeed, the different uses support one another. The emerging Neighbourhood Plan should therefore recognise the need to deliver further development within the area. Otherwise, there is the risk that the Neighbourhood Plan once made, will become out of date almost immediately.

The PPG is clear that *"Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in"* inter alia *"the emerging neighbourhood plan…with appropriate regard to national policy and guidance."* It goes onto state that *"It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies."*

The Cotswold Local Plan is now 7 years old and therefore out of date. It is understood that the district Council are looking to update their Local Plan, with a view to submitting it to the Secretary of State in December 2026. Consequently, it is planned that there will be a Regulation 19 consultation in Autumn 2025. This will be based on the need to find sites to meet the inflated local housing need figures. Clearly, any neighbourhood plans emerging should align with such targets.

To support such development, the emerging Neighbourhood Plan should also recognise the importance of delivering commercial uses that can provide local job opportunities, hotel and leisure uses that can support tourism for the district, and the ability for leisure uses to be utilised by the local community, all of which support residential development.

The proposals at Westington Quarry, contained in **Appendix 1**, provide a rare and exciting opportunity to deliver these principles, enabling enhanced job prospects and community facilities within the area, supporting not only the existing community but the future growth of Chipping Campden.

The site remains available, suitable and achievable for development, and therefore is deliverable as defined in the NPPF. We respectfully request that the site is considered as an allocation for development in the emerging Neighbourhood Plan.

Landscape and Ecology

Landscape

In the previous representation submitted contained in **Appendix 1**, comments were made in relation to Figure 5 of the Neighbourhood Plan consultation document which identified a key view just west of the Westington Quarry site directed towards Chipping Campden north east. It was requested that the key view was amended given the viewpoint proposed by the Neighbourhood Plan is a topographic highpoint bounded by dense tree cover, and therefore there is no long distant view from this location. From a review of the latest Neighbourhood Plan consultation document it is noted that this has not been amended.

As there is no response to the representation we submitted previously, it is unclear why this has not been amended. However, given the reason above, it is respectfully requested that this is amended to a key view that can be experienced at the entrance of Stanleys Quarry and Westington Hill where the view northwards opens up:

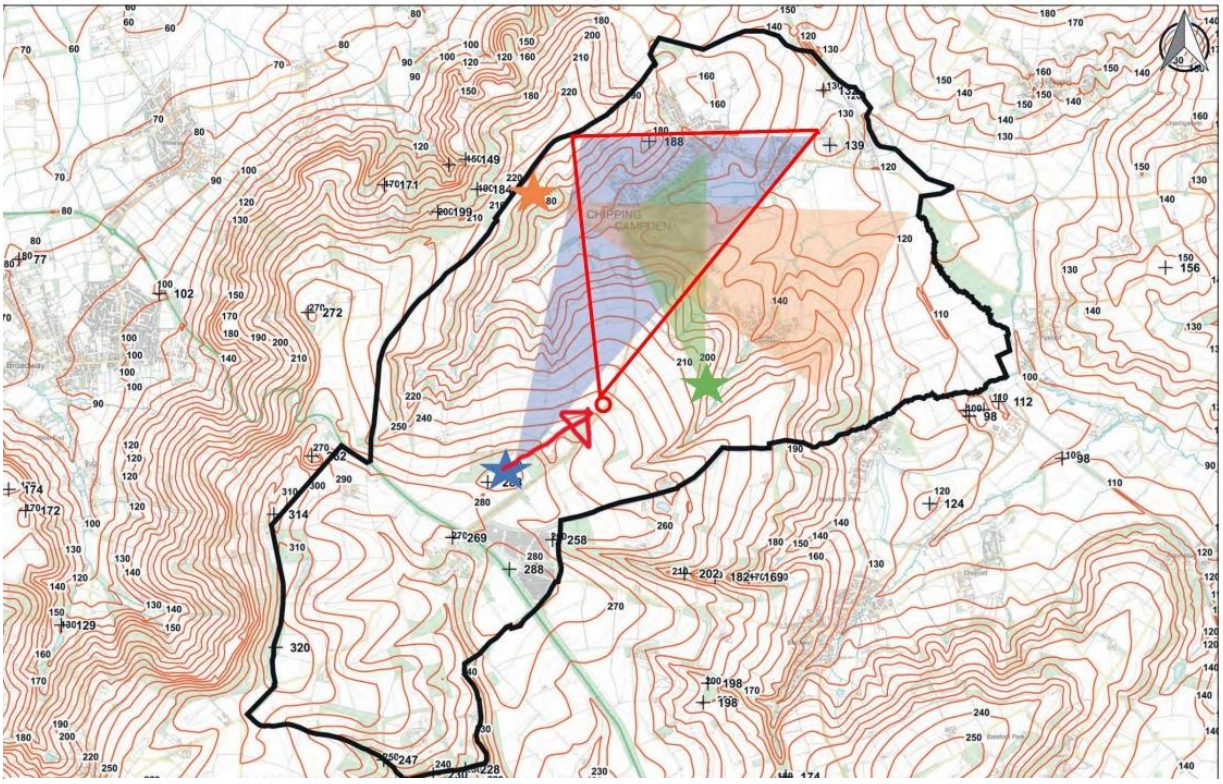


Figure 1 - Plan suggesting amendment to key view (Figure 5 in Neighbourhood Plan consultation document).

Local Nature Recovery Areas and BNG

The other representation submitted by Campden Estate in the last consultation solely responded to draft Policy 5 'Environment and Biodiversity Net Gain'. Having reviewed the 'Consultation Report' at Annex C, it is noted that the following points of this representation have been addressed in the latest consultation document:

Campden Estate comment	NP Steering Group response
1) The representation states that the text is not clear whether the areas identified in Figure 15 are of existing ecological value or as areas to provide green corridors between areas of ecological value (2.1). The response has requested that land be deleted from the Figure and the appendix but has not stated why these sites are not good locations for nature recovery and improvement. The respondent asked for Policy 5 to be deleted in its entirety.	The text now makes it clearer what the basis for the identification of locations is and how they might play a role in delivering nature recovery and improvement in the parish. Whilst there is a request to delete land identified, CCTC has decided not to do this on the basis that the locations identified as optimum or most ecologically significant locations for nature recovery and improvement. It acknowledges data limitations (the age of the data) but reaches the broad conclusion that the locations identified are likely to remain those with the most potential. It is also acknowledged that it is up to landowners what they do with their land with respect to nature initiatives. It clearly states that development is not precluded by the CCNDP on these points. The policy requires that applicant demonstrate that they have actively considered/sought use of local locations identified where their BNG obligations cannot be met on site. As set out above in relation to the Northwick Estate response, CCTC believe that the CCNDP approach is consistent with PPG in providing local detail to contribute to LNRS development and BNG implementation.
2) The response raises concern regarding text wording.	The response from the LPA has led to significant changes being made to the text of the CCNDP and it is hoped that this will allay the concerns raised in this representation. The text and policy wording should assist landowners in the identified areas to create BNG

	opportunities and plans for their sites (including by putting them on the BNG register). The policy is means to be supportive of this aim
3) The respondent also raised concerns that the data in support of the CCNDP was from 2017 and therefore likely to be out of date.	The Northwick Estate and CDC raised a similar concern and an acknowledgement has been added to the CCNDP text as follows, 'These are based on data provided by the Gloucestershire Environmental Records Centre. It is acknowledged that the report (published in 2017) relies on data from that time and more recent data will be available, but it is considered to remain a realistic and credible representation of nature recovery and improvement potential in the area.' The CCNDP must be based on evidence and the qualifying body secured evidence in 2017. Given the nature of the information and the lack of significant change since 2017, the data in the report is considered sufficient to allow locations to be identified as potentially optimum for local nature recovery and improvement. It is acknowledged that landowners have freedom to act in accordance with their own objectives and that the identification of the locations does not preclude development. The LRNS will add significant detail. The requirement is to show active consideration of the use of these locations where BNG obligations cannot be met onsite, to provide the best opportunity to promote for the parish BNG benefits required from developments in the parish.

In light of the above, the Estate wishes to make the following further comments.

In response to point 1), whilst we accept that Local Recovery Nature Areas do not necessarily preclude development from coming forward, they can influence it.

Furthermore, since the publishment of the last Neighbourhood Plan consultation, the draft Local Recovery Nature Strategy for Gloucestershire has progressed and the interactive map supporting it does not identify the entirety of Westington Quarry as a Nature Recovery Area (see Figure 2 below). It is therefore disingenuous for the emerging Neighbourhood Plan to identify the entirety of the site as a Local Recovery Nature Area. Indeed, the screenshot taken from the draft Local Recovery Nature Strategy for Gloucestershire

identifies areas of 'Woodland: Medium Priority' where woodland does not exist. Rather this area comprises land associated with the B2/B8 uses on site and should also be removed as a Local Recovery Nature Area. This demonstrates why the extent of the site proposed is not deemed suitable as a Local Recovery Nature Area.



Figure 2 - Extract of Westington Quarry taken from the Gloucestershire's Natural Capital website.

Consequently, it is proposed that Figure 16 and the plan that accompanies Local Nature Recovery Area 11 in Appendix 6 are revised to omit the Westington Quarry site as Local Recovery Nature Areas. Enclosed within the submission of this representation are two revised plans to be inserted in the next iteration of the Neighbourhood Plan, for ease.

In response to point 2) in the table above, a review of the amended wording has been undertaken. Whilst some changes have been made to the text accompanying Policy 5 which we agree with, that make clear that Local Nature Recovery Areas do not preclude development and that it is up to the landowners to decide whether they want to carry forward their land as part of a nature recovery area, there other areas which we request are amended further:

- Page 78: Remove *"This should be referred to by landowners and scheme proposers when devising schemes"*. This seems restrictive and therefore does not align with the principle that Local Recovery Nature Areas do not preclude development coming forward.
- Policy 5 should be removed as it still remains our view that the draft Local Nature Recovery Area for Gloucestershire is the appropriate document to designate such areas, rather than the

Neighbourhood Plan. However, in the event that Policy 5 remains, the first paragraph should be reworded to the following:

> *"Land identified in Table 7, Figure 16 and Appendix 6 is highlighted as being of particular importance with high opportunities for nature recovery and improvement. These areas should be considered alongside the Local Nature Recovery Areas that are designated in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021."*

The Estate note the response to point 3).

Notwithstanding the above, it still remains the case that the Campden Estate have not been approached by Gloucestershire County Council nor the Neighbourhood Plan steering group about the potential designation of this site as a Local Nature Recovery Area.

Paragraph 89 of the 2023 DEFRA guidance states, "*If the responsible authority knows that a landowner opposes a potential measure on their land and is very unlikely to choose to carry it out, it would be better to explore alternatives or include other more suitable measures before public consultation. This is particularly important if they propose a location due to its potential to join up areas of habitat to create a wider network. If objections from landowners only become clear at public consultation, the responsible authority should try to accommodate their views where this does not undermine the coherence and ambition of the strategy as a whole.*"

It therefore is superfluous including Westington Quarry as a Local Nature Recovery Area and we respectfully request its proposed designation is removed as part of the next iteration of the Neighbourhood Plan process.

Comments around BNG remain as per the representation submitted previously within **Appendix 2**. With regard to the wording of Policy 5, if this is to remain, part c) seems overtly restrictive by suggesting that any off site BNG must be directed to the Local Nature Recovery Areas shown in Figure 16 of the consultation document. However, clearly, if these Local Nature Recovery Areas do not preclude development, and that there has to be landowner agreement, BNG cannot be directed towards such areas. The Estate support the principle of delivering BNG but the wording as drafted in Policy 5 c) is restrictive and should be removed.

Yours Sincerely,

[redacted]

Appendix 1 – Previous representation supporting the development of Westington Quarry (Regulation 14 consultation)

22 May 2024

Chipping Campden Town Council
Old Police Station
High Street
Chipping Campden,
Glos.
GL55 6HB

[redacted]

Dear Sir/Madam

Response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 14 consultation – Westington Quarry, Chipping Campden

This representation has been prepared by Morgan Elliot Planning on behalf of our client the Campden Estate in response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 14 consultation that is running from 8th April to 22nd May 2024.

From reviewing the survey questionnaire it is understood that there is no specific opportunity to submit a Call for Site representation. However, following an email exchange with the clerk of the Town Council on 4th May 2024, it is understood that *"Residents may respond in any way they feel appropriate and it is not for the town council to direct those comments."*

As a result, this representation demonstrates the deliverability of the site known as Westington Quarry for a mixed use development comprising a hotel (Use Class C1), a spa facility (Use Class E), an employment work hub and flexible office/workshop space (Use Class E) and the opportunity for live/work units (Sui Generis). **Appendix 1** includes a site location plan depicting the exact extent of the site. **Appendix 2** contains a Concept Document illustrating indicatively how the site could accommodate such uses. Following this, the representation will make comment on how the proposals meet the aspirations of the emerging Neighbourhood Plan, specifically addressing question 1 of the consultation response form.

Before delving in, its worth noting that a representation was submitted on 29th March 2024 in response to Cotswold District Council's recent Call for Site's consultation which similarly supported the site's development for the aforementioned proposals. The representation also highlighted the site's ability to tie in with proposed development strategy 'Scenario 3: Dispersed Growth' given the site sits within the open countryside. This scenario provides a stronger emphasis on small to medium-scale development outside of Principal Settlements, key settlements where growth has been favoured towards by Cotswold District Council.

Notwithstanding this, given the site's proximity to Chipping Campden (approximately 1.3 miles south west of the settlement) and the opportunity for sustainable transport links from the site to Chipping Campden (see Section 1.4 of the Concept Document) it is considered the site is within a sustainable location for the development proposed, particularly when having regard to Paragraphs 89 and 109 of the NPPF:

*"**Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport**. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). **The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist**."* [own emphasis added]

*"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, **opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.**"* [own emphasis added]

Call for Sites submission

As an overview, the proposals provide the opportunity to restore what is a former, unsightly quarry and a former factory within a sensitive part of the landscape to a high quality, naturalistic and sustainably designed scheme that will deliver significant benefits to the local economy. These benefits will be further supported by sustained environmental benefits including landscape enhancements and biodiversity net gains. Furthermore, with the site's proximity to Chipping Campden, the national cycle route that runs through the town as well as the local PROW network, there is the opportunity to connect and enhance connectivity to local services and sustainable transport routes.

Background Context

The accompanying Concept Document sections 1.1-1.14 detail the site's context, history and site analysis. Located off the B4081, the site comprises a former quarry use of which has now ceased. Presently, the site's western half and eastern boundary comprise a B2 Use Class due to a former Biomass Facility on site[1]. The central part of the site comprises B8 Use Class used for storage and distribution[2]. Figure 1 below depicts the two different uses.

[1] Ref. 16/0111/CWMAJW
[2] Ref. 18/04957/CLEUD



Figure 1 - Plan depicting different use classes that exist on site.

The site therefore comprises brownfield land and its redevelopment should therefore be given substantial weight in line with Paragraph 124 c) of the NPPF, notwithstanding the support within Paragraph 89 of the NPPF for the redevelopment of such sites for employment uses in rural areas (as above).

In addition to the above, the site measures 4.45 ha in size and comprises two distinct levels in topography. The eastern half of the site sits on a similar level to the B4081 whilst the western half sits at a lower level encompassed by steep slopes and dense tree planting. Immediately north, east and west is existing woodland and along the site's southern boundary lies the B4081. Further south lies Lapstone Barn, a wedding venue. Outside the site's south western corner is an existing property used as self-catered holiday accommodation. An existing access into the site is located towards the site's south eastern corner providing direct access onto the B4081. Another highway access is located further north along the B4081. In the surrounding context towards Chipping Campden is a local PROW and bridleway network.

The B4081 in a north easterly direction provides direct access to Chipping Campden (approximately 1.3 miles in distance). Chipping Campden comprises several services and facilities including a church, shops, cafes/restaurants, a Co-operative, Chipping Campden school and theatre. It also contains several bus stops, the closest to the site being on Westington Corner which provides regular services Monday to Saturday to Stratford-upon-Avon, Blockley, Moreton-in-Marsh train station and Mickleton. Chipping Campden also contains a national cycle route.

In a south westerly direction the B4081 provides direct access onto the A44 which northbound provides access in Broadway (approximately 4.3 miles in distance from the site) which also contains a variety of services and facilities; and southbound provides access to Moreton-in-Marsh (approximately 6.3 miles in distance from the site) again containing a variety of services and facilities including a train station.

In terms of the site's designations, the site sits within the Cotswold National Landscape and within a low risk zone for flooding (Flood Zone 1). A group Tree Preservation Order covers trees that run along the site's southern

boundary adjacent to the B4081 (ref. 06/00078/TPO) which will be retained as part of any future development. There are no historic or ecological designations attached to the site. There is therefore a low level of constraints attached to the site.

Site Deliverability

Paragraph 85 of the NPPF state that *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."*

Paragraph 69 states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing and employment land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) *"Specific, deliverable sites for five years following the intended date of adoption; and*
b) *Specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the plan period."*

Annex 2 within the Framework defines 'deliverable' as the following:

> *"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the Site within five years."*

The following demonstrates the deliverability of the Site in its entirety as per the definition above.

Available

The site comprises previously developed land and is being actively promoted by the landowner. There are no known legal arrangements, complex land ownerships or significant constraints which would prevent the site coming forward in a timely manner or limit development. The site can, therefore, be considered to be developable and available.

Suitable

The site has no physical constraints that would prevent or delay development coming forward. The site is suitably and sustainably located for the mixed use development proposed with the opportunity to deliver enhanced sustainable accessibility to services and facilities via sustainable modes of transport and key highway infrastructure. Accordingly, the site is clearly a suitable location for the type of mixed use development proposed.

Achievable

This site sits within the open countryside but within close proximity to Chipping Campden and key, local highways infrastructure. The proposed allocation will enhance the vitality of Chipping Campden and inherently support the facilities and services within it. As demonstrated throughout this representation, a mixed use

development of this nature at the site represents a viable future use which can be delivered quickly. As such, development of the site can be considered achievable within a 5-10-year period.

Response to the emerging Neighourhood Plan consultation

Vision and objectives

The following sections seeks to answer question 1 of the consultation response form.

From reviewing the emerging Neighbourhood Plan consultation document it is considered that the proposed redevelopment of this site aligns with its proposed vision and objectives.

The proposed vision has been broken down below, enabling us to demonstrate how the proposals will meet its aspirations:

- *"A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings."*

The proposals at Westington Quarry will retain and enhance the creativity and commerce elements of Chipping Campden by expanding upon its employment offering through the delivery of offices and workshops on site. There is also opportunity to enhance the 'cultural' aspect by tailoring the offering to the 'arts and crafts' industry. As per the vision document, the Campden Estate is developing a collaboration with one of the leading UK universities of the creative arts alongside one of the UK's leading creative branding agencies. The proposals intend to offer a workspace on site that will underpin this concept.

We also recognise the importance of the beauty of this part of the district, comprising the Cotswold National Landscape as well as a number of heritage assets. Given Westington Quarry sits within the Cotswold National Landscape, the proposals have been landscape led. Noting the existing state of the site, the proposed development will conserve and enhance this part of the designated landscape, a clear benefit to the scheme. Consequently, the site's redevelopment will further enhance the beauty of this part of the district.

- *"A society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work."*

Each element of the proposals will bring a considerable number of local job opportunities for the area both in the hospitality industry as well as provide commercial floorspace that can be accommodated by existing businesses and new start-up businesses. As well as diversifying the employment opportunities within this part of the district, the proposals also have the ability to attract a younger population to Chipping Campden who can help support existing services and facilities within the town and more generally in the North Cotswolds.

- *"Fulfilling activities for all our residents and amenities for all visitors to the area."*

The proposed spa facility will be separate from the hotel. Whilst hotel guests will be able to use its facilities, so will users outside the hotel including the existing local community within the town. As part of the facility there will also be a gym on site that will support the proposed commercial use on site as well as be open to the wider community.

Consequently, we support the emerging Neighbourhood Plan's proposed vision. Naturally, we are also supportive of the proposed objectives that help to achieve this vision. Those that directly relate to the proposals at Westington Quarry include the 'environment and sustainability', 'economy', 'design', 'facilities, services and amenities' and 'traffic and transport' objectives. In particular, we consider the proposed development will *"strengthen the vitality and viability of the town centre"* by encouraging further footfall for the town through the provision of tourist attractions and employment opportunities on site. The consultation recognises that the tourism economy is important contributor for the economy of Chipping Campden. We wholly agree with the following statement within the consultation document that supports this:

> *"The visitor economy is crucial to the well-being of permanent residents because their trade keeps small local businesses open and boosts the local economy to provide for more eateries, pubs and cafes than would normally be possible in such a small settlement. Providing for and supporting tourism is critical to the continued success of Chipping Campden town centre."*

However, we note that the consultation document goes onto state:

> *"However, tourism brings negative impacts as well and these must be managed. Overnight visitors are better located in the town centre where they can walk to shops and hostelries; and existing shops, which create the vibrant and enjoyable town centre experience and create its character, should be protected."*

Whilst Westington Quarry sits outside Chipping Campden's town centre, it is not considered the proposed uses would negatively impact on the town centre. Whilst Figure 13 of the consultation document estimates the amount of self-catered accommodation and hotels in Chipping Campden, the subject proposals comprise a hotel and spa use that is unique to the local area. Set within a naturalistic landscape, as demonstrated by the vision document, the proposals will offer a tranquil and calm environment that will be seen as a destination in its own right. This diversifies the tourism offer within the local area. Notwithstanding this, as mentioned above, sustainable connectivity is a key principle incorporated into the scheme so the future users of the site have access to the existing services and facilities within the town centre, helping to increase the vitality and viability of the town. As such, the site is not isolated from the town centre. Rather, the aim is to provide the ability for guests, both day and night, to access to the town centre sustainably, ensuring it remains a vibrant place. Consequently, the redevelopment of Westington Quarry would not harm the role of the town. In addition, the sustainable transport opportunities help support the Neighbourhood Plan's objective to *"improve the facilities and safety for cyclists and pedestrians."*

Similarly, the commercial development proposed does not harm the role of the town centre, providing a workplace for existing companies and new, start-up companies, with a particular focus on providing a space that the 'cultural' industry can benefit from. Whilst offices are technically a 'town centre use', there is national planning policy support for employment uses within rural areas that are often found outside of town centres. This relates to Paragraph 89 of the NPPF (quoted above) and paragraph 88:

> *"Planning policies and decisions should enable:*
>
> - *The sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;*
> - *Sustainable rural tourism and leisure developments which respect the character of the countryside."*

Conversely, weight should be placed on the fact that the proposed hotel and spa facility will *"improve the town's tourism offer"* whilst the proposed offices and workspaces will *"encourage start-up businesses"*, two objectives

proposed within the consultation document. Consequently, the hotel and spa will ensure that the local community has appropriate access to sports/leisure facilities.

Altogether, the proposals meet the primary economic objective to *"protect and develop the town's economy."* This ties in with the National Planning Policy Framework which places *"significant weight"* on *"the need support economic growth and productivity, taking into account both local business needs and wider opportunities for development"* and to help support a prosperous rural economy, also echoed in the current and emerging Cotswold Local Plan.

This matter is considered even more important when reading this against the Census 2021 statistics which demonstrates Chipping Campden as having a *"lower level of economic activity than for England"* as recognised by the Neighbourhood Plan consultation document. Chipping Campden has 49% of the population as economically active compared with 57% for England. There is clearly opportunity to increase the job prospects within this part of the district, which the redevelopment of Westington Quarry can assist with.

To conclude, the proposals at Westington Quarry tie in with the proposed vision and objectives of the emerging Chipping Campden Neighbourhood Plan and therefore, we respectfully request that the site is seen as a proposed allocation within the Neighbourhood Plan or at least recognised as a site that can accommodate employment generating development.

Landscape and ecology

With regard to landscape, Figure 5 of the consultation document identifies a key view just west of the site directed towards Chipping Campden north east. This view is a topographic highpoint but bounded by dense tree

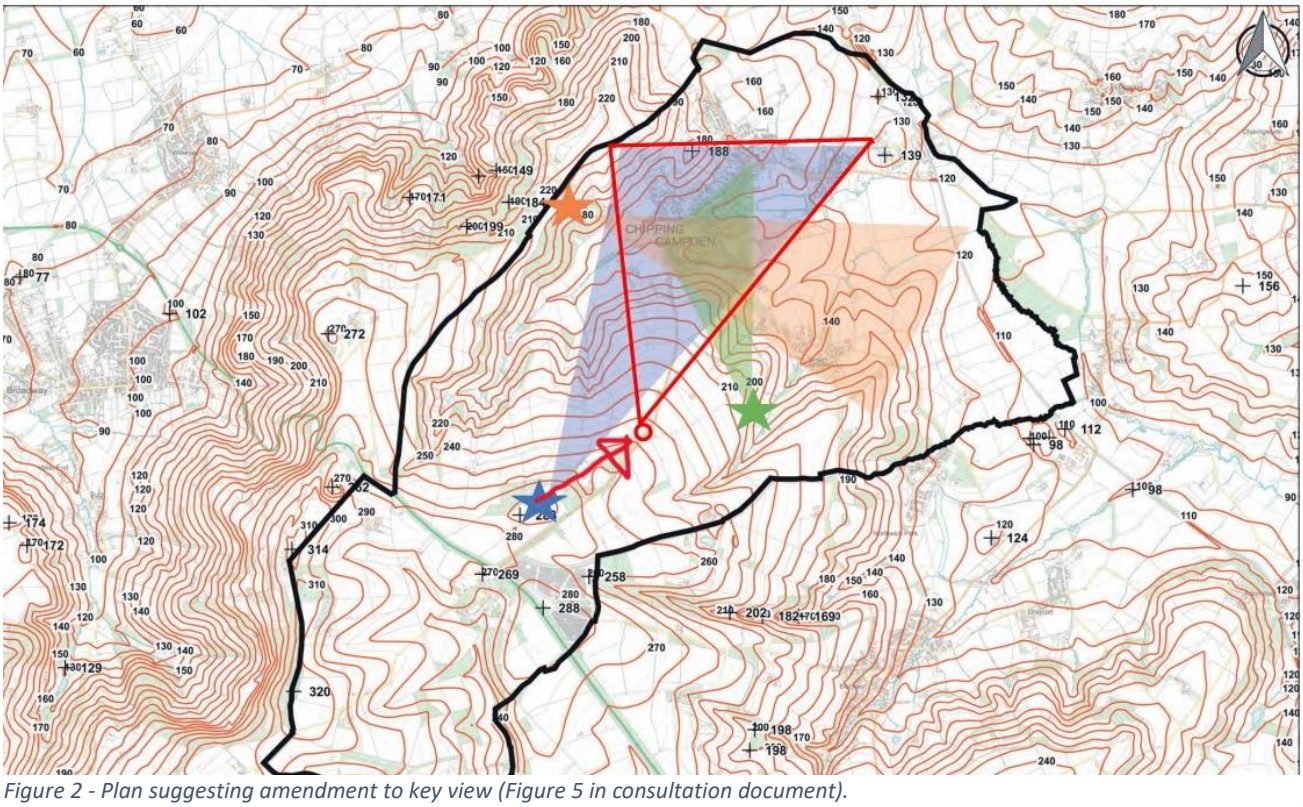


Figure 2 - Plan suggesting amendment to key view (Figure 5 in consultation document).

cover so there is no long distance view from this location. Rather, we advise that this key view is relocated to the entrance of Stanleys Quarry and Westington Hill where the view northwards opens up (see Figure 2).

With respect to ecology, it is noted that Westington Quarry forms part of a Nature Recovery Priority Area as identified at Figure 15 of the consultation document. A separate representation has been prepared by Carter Jonas on behalf of Campden Estate which responds to emerging Policy 5 that deals with the purpose of the proposed Nature Recovery Priority Areas and the delivery of Biodiversity Net Gain (BNG). Overall, the Campden Estate support the principle of recovering biodiverse areas and delivering BNG but suggest that this is worked through with Gloucestershire County Council who are the responsible authority for preparing the Nature Recovery Priority Areas within Chipping Campden and that further justification should be put forward to designate such areas within the Neighbourhood Plan process.

Conclusions

Overall, the site known as Westington Quarry should be allocated for a mixed-use development comprising a hotel (Use Class C1), a spa facility (Use Class E), an employment work hub and flexible office/workshop space (Use Class E) and live/work units (Sui Generis) within the forthcoming Neighbourhood Plan, or at least recognised as a site that can accommodate employment generating uses.

We would welcome a further conversation with the Neighbourhood Plan group if this would prove useful.

In the meantime, I trust this representation will be considered as the emerging Neighbourhood Plan progresses.

Yours Sincerely



Appendix 1 – Site location plan



NOTES

DO NOT SCALE FROM THIS DRAWING.
ALL DIMENSIONS TO BE CHECKED ON SITE.
ALL OMISSIONS AND DISCREPANCIES TO BE REPORTED TO THE ARCHITECT IMMEDIATELY.
DRAWINGS TO BE READ IN CONJUNCTION WITH ENGINEER'S DRAWINGS AND SPECIFICATION.

N

0 50m

Red Line Boundary (Ecological Assessment)

Ownership Boundary

Revision description	Date	Check	Rev
Red Line Boundary Issue (Ecology)	08/05/24	BOD	A

WOLDON

112 Great Western Studios
Alfred Road London W2 5EU
T: 020 7998 1525

The Apple Store
Chipping Campden
T: 01386 257797

studio@woldon.com
www.woldon.com

Project
Westington Quarry

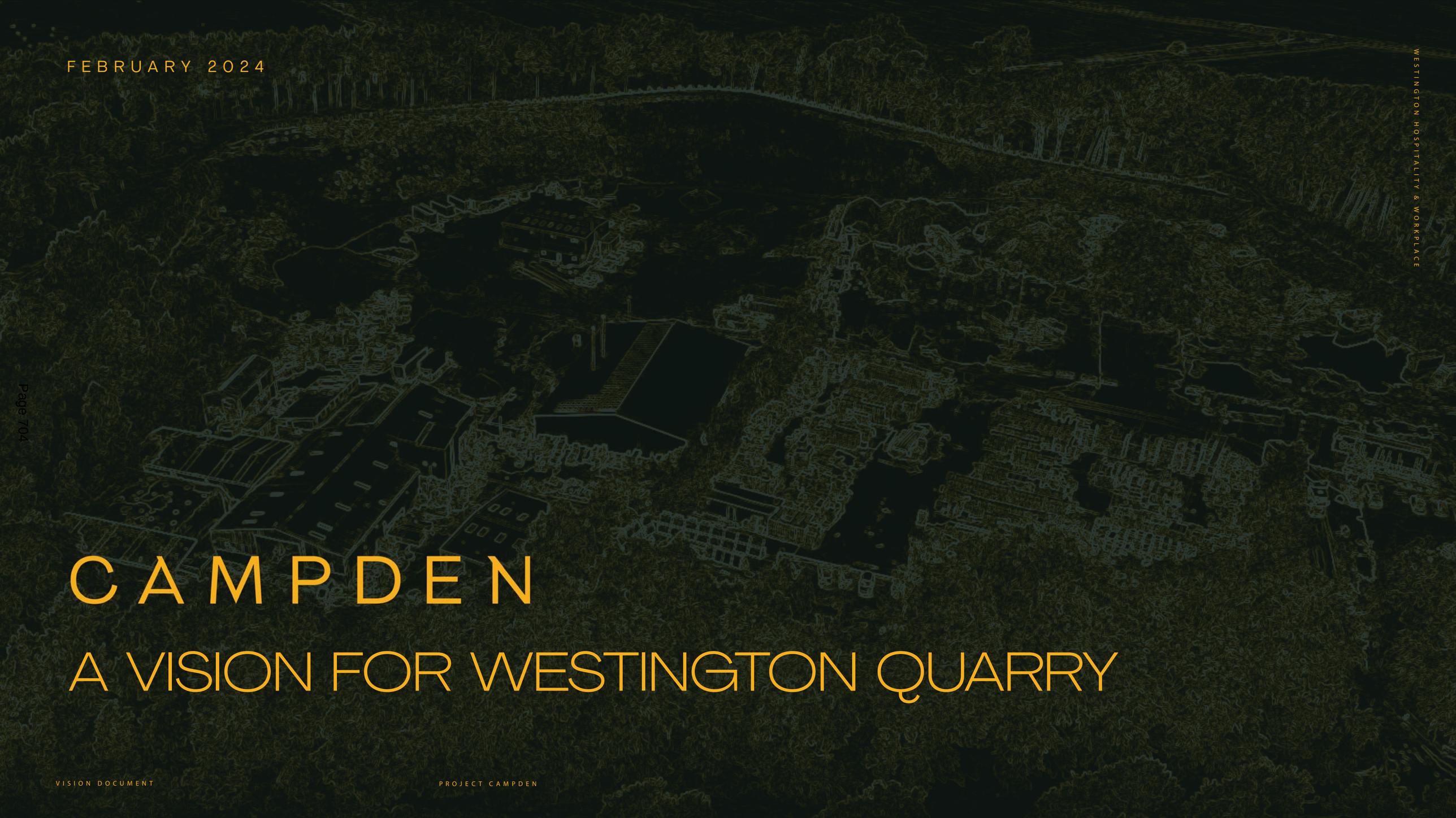
Drawing
Location Plan

Drawn	Date	Scale
AP	May 2024	1:1000 @ A1 1:2000 @ A3

Job number	Drawing number	Revision
1909	X_01_000_002	A

Appendix 2 – Concept Document

FEBRUARY 2024



CAMPDEN

A VISION FOR WESTINGTON QUARRY

WESTINGTON HOSPITALITY & WORKPLACE

CAMPDEN

WOLDON

EXTERIOR
ARCHITECTURE

morgan elliot
planning

DESIGNING
A BETTER TOMORROW
FOR THE GREATER GOOD

01 —
INTRODUCTION

1.1 - LOCATION
1.2 - QUARRY & ESTATE
1.3 - PUBLIC RIGHTS OF WAY
1.4 - SITE ANALYSIS

02 —
DESIGN DEVELOPMENT

2.1 - CONCEPT VISION
2.2 - LAYOUT OPTIONS
2.3 - LANDSCAPE CONCEPT
2.4 - ARCHITECTURAL CONCEPT
2.5 - HOTEL & SPA VISION
2.6 - PRECEDENTS: HOTEL
2.7 - PRECEDENTS: SPA
2.8 - PRECEDENTS: WORKPLACE

03 —
WOLDON PREVIOUS EXPERIENCE



The Campden Estate is defining a vision to breathe new life into the former quarry located on Westington Hill, above Chipping Campden. Proposals build on the industrial history of the site, producing a distinct vernacular architecture within a vision for a restored landscape.

The Estate's ambition is to transform this existing site of local employment through a development in which hospitality (hotel and spa) and workplace act in synergy to create a vibrant and sustainable destination.

The development will bolster the local industry for leisure and tourism, providing a sustainable hospitality offering that is rooted in the natural environment. In tandem, it will provide a destination for regenerative commerce through the provision of flexible workspace.

The proposal represents a unique opportunity to promote the rural economy within the district with a visionary, sustainable development through a celebration of natural, manmade and human capital.

The Campden Estate embodies a spirit of visionary optimism. We believe we can have a positive impact on society. Acting with courage and intent, this outlook enables us to see new possibilities in our own lives.

CAMPDEN

WE ACT WITH
IDEALISM AND INSPIRATION

At the heart of the 1,700 acre Campden Estate lies Campden House, a Grade II* listed house dating from the early 17th century, situated beside a Grade II* Tithe Barn, further listed outbuildings and landscaped garden. The upkeep of these heritage assets presents a significant challenge, now with an expanding conservation deficit.

The Estate's development of Westington Quarry provides a unique opportunity to provide ongoing financial sustainability for the Estate, facilitating the longer term remedy of this conservation deficit.

The Campden Estate was purchased in 1972 by Philip Smith, son of William Henry Smith, 3rd Viscount Hambleden and chairman of W.H.Smith & Sons. Today the Estate is run by Lord Hambleden's grandson, Thomas Smith, co-founder of RIBA Chartered Practice Woldon Architects Ltd.

'Campden House has a chaste yet dignified manorial character … a delightful surprise in this very hidden little valley'.
Jeremy Musson



The metropolis and the regions have long retained deep ties and dialogue in skills and thought, especially in the Cotswold Hills. A prime example of this is the Guild of Handicraft, led by architect C.R.Ashbee, which moved from London in 1902 to settle in Chipping Campden.

The output of the Guild and its influence within the Arts and Crafts Movement over the ensuing decades is well documented. This process of interaction between the metropolis and regions continues to this day.

The Campden Estate is developing a collaboration with one of the leading UK universities of the creative arts alongside one of the UK's leading creative branding agencies.

This collaboration will underpin the thinking and resources to be accessed in the workspace by existing firms wishing to rebrand for net zero alongside new brands founded on regenerative principles.



A CATALYST OF CHANGE

STRATFORD-UPON-AVON	- 12 MILES
CHELTENHAM	- 20 MILES
CIRENCESTER	- 30 MILES
BIRMINGHAM	- 37 MILES
OXFORD	- 37 MILES
LONDON	- 90 MILES

LOCATION: CHIPPING CAMPDEN









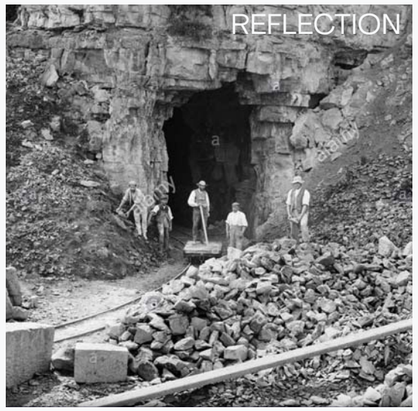
WESTINGTON HOSPITALITY & WORKPLACE

FORESIGHT
LOOKING OVER THE HORIZON

Westington Quarry lies approximately 1.5 miles south of Chipping Campden, a short distance from the A44.

Quarrying activities, evident on a 1799 Enclosure map, have now ceased, with substantial former factory buildings and level paved yards remaining across a nine acre site directly accessed off the B4081.

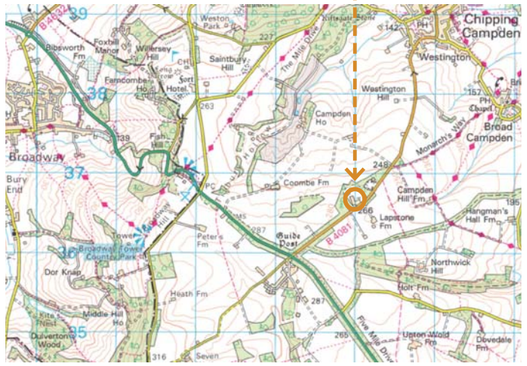








WESTINGTON QUARRY





FORESIGHT
LOOKING OVER THE HORIZON

With the site's proximity to Chipping Campden, there is direct access onto the Cotswold Line cycle route in addition to the Cotswold Way footpath, running the length of the Cotswolds National Landscape, and other Public Rights of Way.



Cotswold Way Route Map:
Cotswold Way Association



EXTERIOR ARCHITECTURE





HIGHWAYS ACCESS

ACCESS ON SITE



PLACE
PREPARATION

WESTINGTON

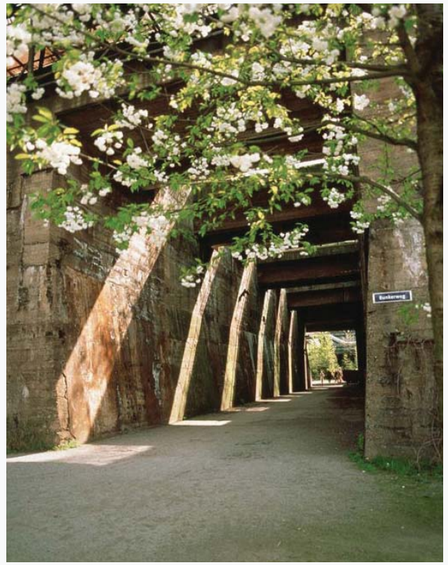
INSPIRING REGENERATIVE COMMERCE

WE ARE DISCIPLINED AND DETERMINED
WE ACT WITH IDEALISM AND INSPIRATION
WE ARE SMALLER THAN OUR VISION

Industrial features





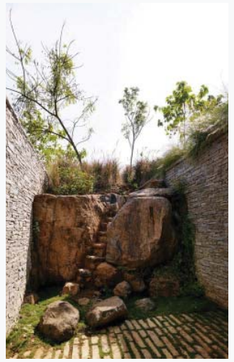






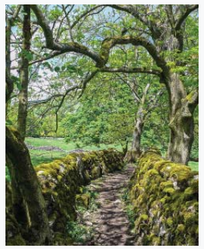












Cotswold - Area of Outstanding Natural Beauty

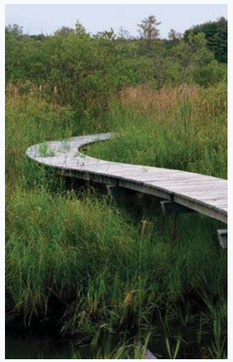








Incorporating local site materials as natural interventions





Natural paths and interventions



UNIQUE INSIGHTS
CHARISMA AND ENERGY

All images used in this presentation remain the property of the copyright holder(s) and are used for the purposes of this presentation only.

EXTERIOR ARCHITECTURE



CONTINUOUS RENEWAL OF THE HIGHEST STANDARDS

All images used in this presentation remain the property of the copyright holder(s) and are used for the purposes of this presentation only.

EXTERIOR ARCHITECTURE



Enhancing local ecosystems



Industrial heritage



Grey to Green SUDs, wetlands



Celebrate green character

Incorporate industrial heritage



Elevated boardwalks to immerse with nature



RE-WILDING AND REGENERATION

Revealing past years of history

- Spaces to reflect & remember & learn.
- Celebrate local biodiversity and planting. With a focus to re-wild to reference preindustrial times.

Views within and out of the site

- Highlight key views with feature trees.
- Frame and enhance views out to the wilder site.
- Celebrate rocky elements and mining topography with the landscape.
- Opportunities to sit beside the water.
- Opportunities to walk and explore the site.

CELEBRATE THE HISTORY OF THE AREA

Industry

- Incorporate equipment and materials within the landscape.
- Furniture and programme of spaces to provide a range of activities and functions.
- Inherently playful landscape

Materiality

- Reference to the mining industry through material choices such as site furnishings

FUTURE-PROOFING

Area of Outstanding Natural Beauty

- Align with the future plans of the wider Cotswolds AONB
- Meet the values; welcoming, expert, collaborative, creative, positive.

SUDs and Water Management

- Site wide drainage strategy
- Flood mitigation and alleviation

Oasis that connects People to Nature

- Spaces to rest, grow, interact, work within the landscape
- Future-proof buildings so they are adaptable to further energy efficiency measures

CENTRAL PHILOSOPHY
CATALYST OF CHANGE

All images used in this presentation remain the property of the copyright holder(s) and are used for the purposes of this presentation only.

EXTERIOR ARCHITECTURE

OPTION 1

OPTION 2

OPTION 3











CENTRAL PHILOSOPHY
ABSOLUTE CONVICTION

PROJECTING CHARISMA AND ENERGY















A CENTRAL PHILOSOPHY


















N

A CONTINUAL RENEWAL OF THE HIGHEST STANDARDS

All images used in this presentation remain the property of the copyright holder(s) and are used for the purposes of this presentation only.

EXTERIOR ARCHITECTURE







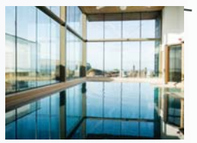
DRIVING STRATEGY
AND UNIQUE INSIGHTS



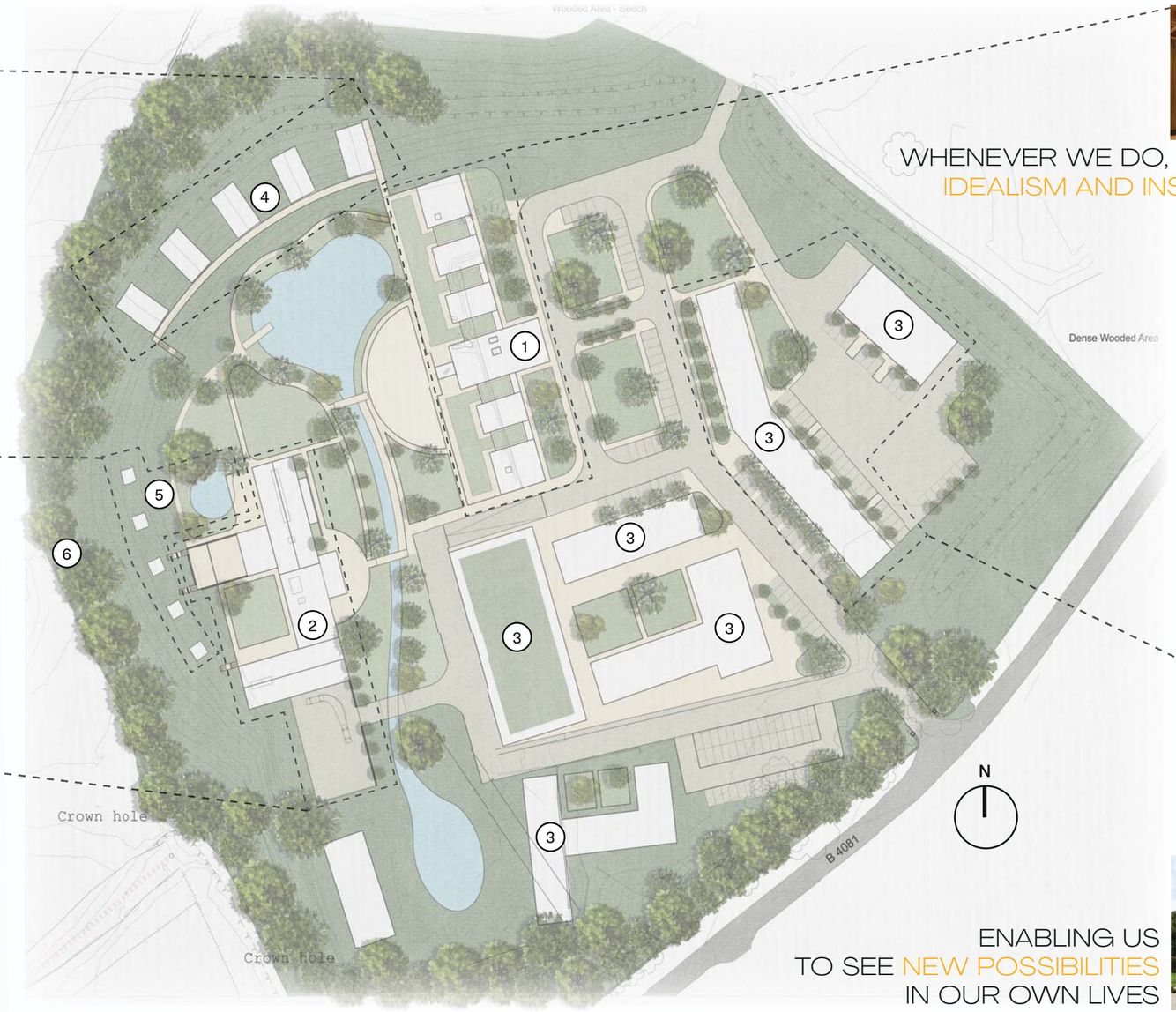




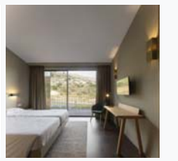














WHENEVER WE DO, IT IS WITH
IDEALISM AND INSPIRATION

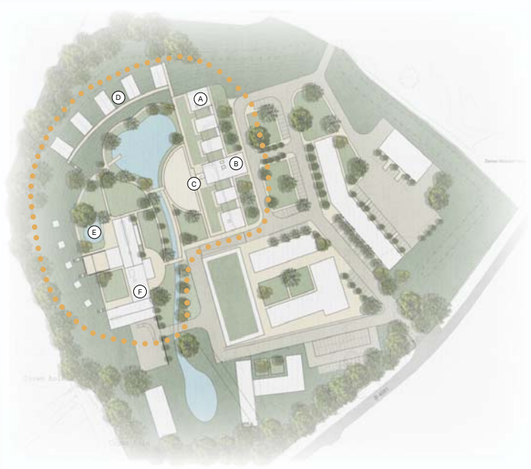
KEY:
1 - HOTEL WING
2 - SPA AND LEISURE
3 - MIXED USE BUILDING
4 - ACCOMMODATION
5 - NATURAL POOL
6 - SAUNA HUTS

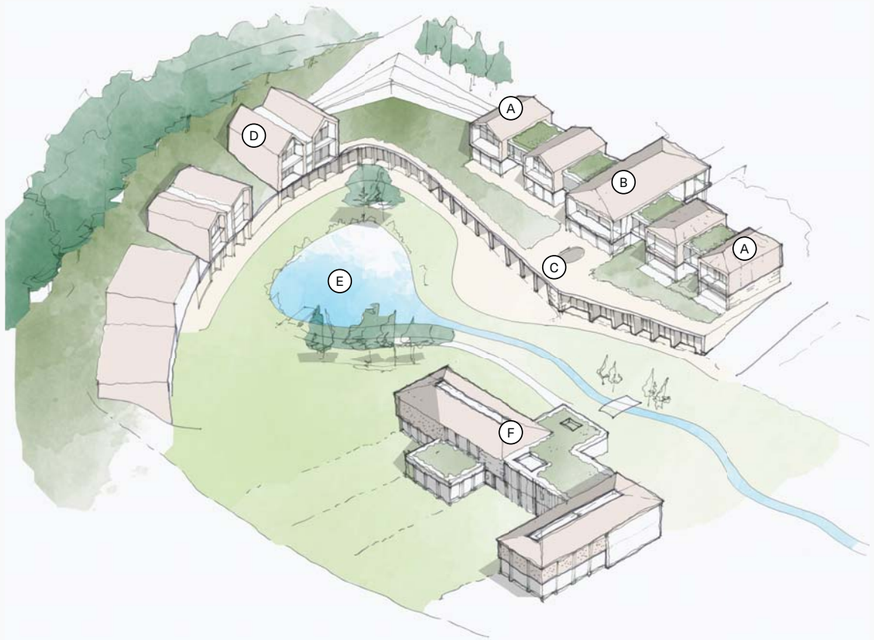






ENABLING US
TO SEE NEW POSSIBILITIES
IN OUR OWN LIVES





KEY:
A - HOTEL WING
B - HOTEL ENTRANCE AND LOUNGE
C - GREEN ROOF TERRACE WITH RESTAURANT
D - HOTEL SUITES
E - POND AND EXTENSIVE LANDSCAPE
F - SPA AND LEISURE

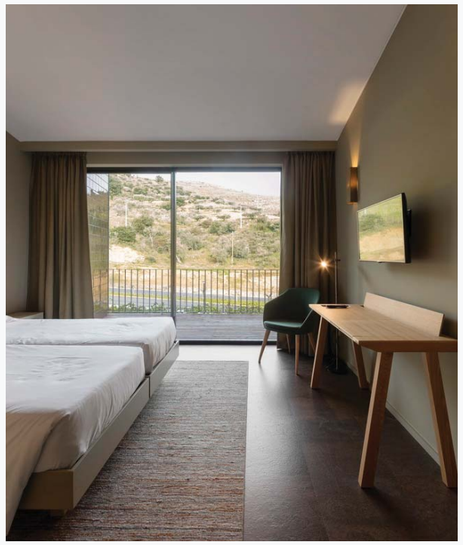


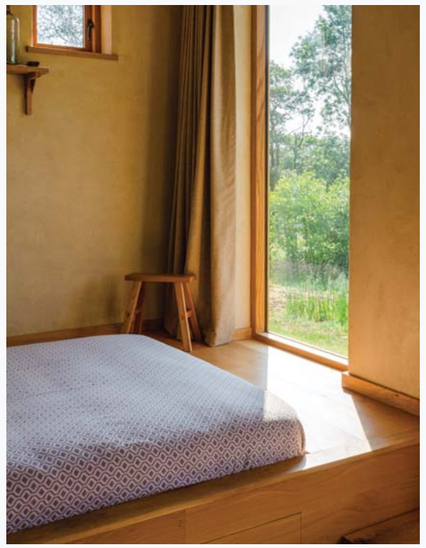
INSPIRING OUR
BETTER FUTURE







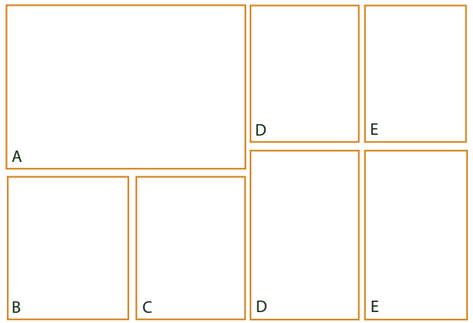






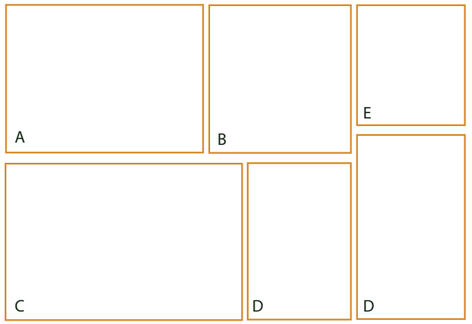






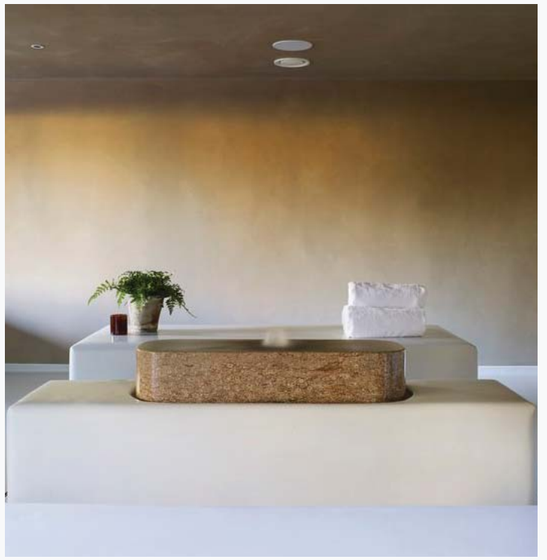
A - CASA RURAL, RCR ARQUITECTES
B - LONGROIVA'S HOTEL & THERMAL SPA LUÍS REBELO DE ANDRADE
C - ENGLISH FARM CABIN, OUT OF THE VALLEY
D - HOTEL HOSPES, EQUIP XAVIER CLARAMUNT
E - THE ALICE HAWTHORN HOTEL ROOMS, DE MATOS RYAN

INSPIRING OUR
BETTER FUTURE



A - SOHO FARMHOUSE
B - THYME
C - ALFRISTON SWIMMING POOL, MORRIS +COMPANY
D - BEDRUTHAN HOTEL& SPA
E - BLACKBIRD HOTEL, RDMA





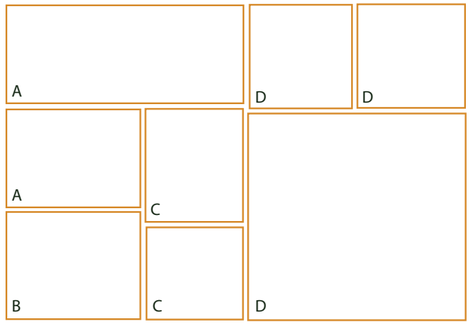








INSPIRING OUR
BETTER FUTURE



A - FARM ED,
TIMOTHY TASKER ARCHITECTS
B - HYDE HALL, CULLINAN STUDIO LTD
C - ELKSTONE, BLAKE ARCHITECTS
D - THE ALICE HAWTHORN HOTEL ROOMS,
DE MATOS RYAN

















INSPIRING OUR
BETTER FUTURE

NEW HOUSE IN LISTED SETTING - 3 X RIBA AWARD WINNER 2018

Nevill Holt, Leicestershire - RIBA Regional award winner, Conservation award winner and Project architect award winner











A New House and Garden
Within the grounds of Grade I listed Nevill Holt lie three historic walled gardens dating from the seventeenth century. Recently restored kitchen and Italianate gardens are accompanied in the third enclosure by a new house designed by Woldon Architects.

Contemporary Response to Site and Materials
Replacing a tired 1960s bungalow, the new south-facing house takes on a symmetrical form, standing clear of the surrounding historic walls.
The material palette draws inspiration from the main hall with a series of hand-crafted bronze roofs set on ironstone facades and framed by ponds. The stone is worked by hand and carefully selected from quarries and reclaimed sources.

High-Quality Low-energy Detailing
A fabric-first approach to construction and careful detailing set a high standard for the quality of the building work and finishes. Together with the use of an air source heat pump this provides a comfortable yet low-energy building.

WINNER
RIBA EAST MIDLANDS
AWARD
2018





VENUE BUILDING AT GRADE I LISTED COUNTRY HOUSE

Cheshire











Masterplan and New Hospitality Building
Woldon developed an Estate masterplan & designs for a new 750sqm venue building on a former stable yard site beside a Grade I listed building. The venue building is to house a wedding business along with corporate and charity events.

Research and Analysis
The designs evolved from extensive historic analysis of the house & site to understand its evolution & character. Special emphasis was placed on use & flow around the house & grounds in order to inform the proposed masterplan, with consideration for pedestrians, traffic &servicing requirements.

Organisational Analysis and Technical Brief
The arrangement of existing programmes & strict operational requirements presented a number of limitations & opportunities for the design.

Site Information
A substantial amount of site information was gathered in
order to manage risk and assist in the development of a robust construction cost budget for further design development.





JURASSIC COAST LEISURE DESTINATION
East Devon, AONB











Vision and Masterplan
Woldon have been appointed to devise a masterplan vision for the 22 acre site; creating a commercially sustainable future. Designs deliver significant benefits to the local residents, wider community and owners.

The existing site contains a number of outdated properties set in and around a cliff top landscape. The whole site sits within the East Devon Area of Outstanding Natural Beauty (ANOB). The existing golf club facilities are under utilised and have limited local appeal. Uniquely the South west Coast path runs through the golf course and has untapped commercial potential to support business on site.

Capture the View
The proposals include exciting architectural and landscape design that capture the stunning views open the site to visitors. Public spaces welcome weary walkers with an inspiring place to refresh and dwell whilst offering alternative strolls into nature and sculpture trails.







HOTEL & HOSPITALITY
Berkshire











This project brings back to life a coaching inn that had been closed for a number of years. Working with Oakman Inns to produce a quadrangle of buildings, knitting two new hotel wings into the existing buildings, with the need to make a compact statement on this site within the Greenbelt on the outskirts of Ascot.

The new buildings use a cross laminated timber (CLT) structure and a simple palette of materials - white brickwork, black timber , zinc roof - to bring a modern and high quality dimension to the whole and complement the language of the existing Inn.





WESTINGTON

Appendix 2 – Previous representation responding to draft Policy 5 (Regulation 14 consultation)

Representations to the Chipping Campden Neighbourhood Plan

Regulation 14 Consultation

1 Introduction

1.1 The following representation is submitted on behalf of the Campden House Estate ('the Estate') which extends to 677 hectares. The Estate lies wholly within the administrative area of Cotswold District Council and four parishes (Chipping Campden, Weston-Subedge, Willersey and Saintbury). Mr Thomas Smith is the owner and resides on the Estate.

1.2 The Estate commends the work that has been undertaken by the team preparing the Chipping Campden Neighbourhood Development Plan 2023-2031 (CCNDP) and in general are supportive of its contents. In particular, the Estate supports the recovery of biodiverse areas and BNG as a principle.

1.3 However, they are concerned by and object to the scope of Policy 5 and associated Figure15 (page 74) and Table 7 (page76), Key Diagram (page 10), Appendix 2: Natural Environment (page 88, 89 and 91), Appendix 7: Local Nature Recovery Areas (11 The Gate House/B4081/Westington Quarry (page 129) and 12 Hare Park Plantation (page 130)).

2 Local Nature Recovery Strategies (LNRS)

2.1 It is not clear from the map at Figure 15 (page 74) and Appendix 2 (2 River Cam and Campden Wood (page 125), 3a Leasows Farm (page 125) and 11 The Gate House/B4081/Westington Quarry (page 129)) whether the areas identified are of existing ecological value or are areas identified to provide green corridors between areas of ecological value.

2.2 The first paragraph on page 73 of the CCNDP states, "*the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared.*" The Estate is concerned by this approach especially when read in conjunction with page 75 of the CCNDP as it conflates the purposes of local nature recovery strategies (LNRS) and development plan documents.

2.3 In the first paragraph on page 75 of the CCNDP it states, "*It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed*". The CCNDP goes on to state in the second paragraph on page 75 that, "*DEFRA guidance states that the priorities identified by every local nature recovery strategy should reflect local circumstances, including the most important issues to local people and organisations. The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy.*" However, we contend for the reasons explained in the following paragraphs that the CCNDP is not the appropriate document for identifying sites for Local Nature Recovery Strategies or 'receptor' sites for Biodiversity Net Gain.

2.4 Section 104 of the Environment Act 2021 sets out the requirement for LNRS to cover the whole of England. DEFRA has identified 50 strategy areas where a LNRS is required and have allocated Gloucestershire County Council (GCC) as the responsible authority[1] for preparing the LNRS in the area that includes the parish of Chipping Campden. National guidance is contained in the Local Nature Recovery Strategy Statutory Guidance, DEFRA March 2023.

2.5 Page 9 of the CCNDP identifies in summary form those groups that the team behind the preparation of CCNDP has consulted. It includes, "*Meetings with various local landowners 30.8.2014-22.9.2015*", however the Estate is not aware of engagement from the CCNDP team that identified land within the Estate for inclusion in the LNRS.

2.6 Paragraph 89 of the 2023 DEFRA guidance states, "*If the responsible authority knows that a landowner opposes a potential measure on their land and is very unlikely to choose to carry it out, it would be better to explore alternatives or include other more suitable measures before public consultation. This is particularly important if they propose a location due to its potential to join up areas of habitat to create a wider network. If objections from landowners only become clear at public consultation, the responsible authority should try to accommodate their views where this does not undermine the coherence and ambition of the strategy as a whole.*"

[1] Appointed by the Secretary of State to oversee the preparation of the LNRS in an area as set out by Section 105 of the Environment Act 2021.

2.7 Until GCC as the responsible authority for the LNRS has engaged with the Estate we are unable to assess the implications of being identified within a LNRS. Therefore, we object to the inclusion of the Estate's land in the LNRS.

2.8 Additionally, the Estate is concerned by what appears to be an imposed merging of the roles of the LNRS and the market for BNG units, without meaningful engagement with and commitment from the land managers whose land has been identified in Figure15 (page 74) and Table 7 (page 76), Key Diagram (page 10), Appendix 2: Natural Environment (pages 88, 89 and 91), Appendix 7: Local Nature Recovery Areas (2 River Cam and Campden Wood (page 125), 3a Leasows Farm (page 125) and 11 The Gate House/B4081/Westington Quarry (page 129)) of the CCNDP.

3 Biodiversity Net Gain (BNG)

3.1 Separate from the LNRS, biodiversity net gain (BNG) is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). It is recognised that the CCNDP was drafted prior to the Department for Levelling Up, Housing and Communities (DLUHC) publishing a new Planning Practice Guidance (PPG) section on how councils and developers can demonstrate BNG (https://www.gov.uk/guidance/biodiversity-net-gain). The PPG section on BNG was published on 14 February 2024 with the latest of subsequent updates dated 1 May 2024.

3.2 Except for certain categories of development, developers must deliver 10% BNG in respect of their development sites. If developers cannot achieve BNG on their own sites, they will have to make off-site gains by using off-site biodiversity units; thus, creating a market in BNG units. As a 'land manager' defined by the guidance, the Estate can choose whether to identify areas of land for the purpose of BNG and to sell BNG units to developers. In order to sell BNG units, there are several steps that land managers need to abide by. One of these steps is to register the BNG units as a biodiversity gain site on a public national biodiversity gain sites register. Selling in the BNG market is a choice for land managers and needs to be considered alongside the wider objectives and operational requirements of the estate. Therefore, the Estate considers it misleading for the CCNDP to identify 'nature recovery priority areas' and refer to them in the way it has on pages 73 and 75, Table 7 and Appendix 2 and Appendix 7.

3.3 In the final paragraph on page 75 of the CCNDP it states, "*It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund[2], agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gains contributions, probably managed through the Nature and Climate Fund.*" It appears from the Gloucestershire Nature and Climate Fund (GNCF) website that it is a not-for-profit organisation established to support landowners, developers and local planning authorities through the biodiversity net gain process. However, this is only one of the three types of options available to land managers to sell BNG units. The Estate is concerned by the influence the CCNDP will have as a statuary development plan document in the market for BNG units. Additionally, developers requiring off-site BNG units would, with reference to Figure 15 of the CCNDP, expect to find the corresponding sites on the national biodiversity gain sites register.

3.4 Before land managers can register a gain site, they must have a legal agreement. This could be a planning obligation with a local authority or a conservation covenant with a responsible body. The legal agreement must secure habitat enhancement and maintenance for at least 30 years. It details the habitat works being committed to and the outcomes to be achieved. The procedures and processes governing BNG are complex and whilst the sentiment to improve ecological outcomes by those behind the CCNDP should be commended, including BNG in the CCNDP is unnecessary and inserts confusion for landowners and developers.

3.5 The third paragraph on page 75 of the CCNDP states, "*Figure 15 and the more detailed evidence in Appendix 2 and Appendix 7 shows that there are already existing habitats that could benefit from protection and improvement, marked 1-13. Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each area.*" However, Appendix 2 (page 91) does not provide detail of the "rare and protected species locations" ie what the rare/protected species are. It is also noted that the data is from July 2017. The Chartered Institute of Ecology and Environmental Management (CIEEM) Advice Note on the Lifespan of Ecological Reports and Surveys, 2019 advises that data that is more than three years old is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated. The Key on the map on page 89 of the CCNDP is confusing in it reference to "Chipping Campden NDP – Green Space Habitat Features" and "Appendix 8: Local Green Spaces".

[2] GNCF – Gloucestershire Nature + Climate Fund (www.glosncf.com)

Classification: Confidentiality - Business Data

To avoid confusion, we suggest that the description on the Key and the layer on the map at page 89 are deleted.

3.6 It is clear from the Environment Act 2021, the Town & Country Planning Act 1990 and associated regulations and guidance that it is not appropriate for neighbourhood plans to include strategic land use strategy or policies. BNG is strategic policy.

4 Amendments

3.7 The Estate considers that the following suggested amendments will assist in moving forward to submission and examination of the CCNDP. The Estate supports the recovery of biodiverse areas and BNG as a principle, but suggests that this is worked through with GCC and that further justification is provided as to why these areas have been deemed suitable as LNRAs.

3.8 Delete the last sentence of the first paragraph and the first and last sentences of the last paragraph on page 73:
"~~In this case, the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared~~."
"~~The strategy area is the neighbourhood area.~~"
"~~Figure 15 shows potential areas of importance.~~"

3.9 Amend the second sentence of the last paragraph on page 73 as follows:
"Appendix ~~7~~ 2 provides detailed habitat maps . . . ."

3.10 Delete land within the Estate from areas 2, 3a and 11 on Figure 15 (page 74), Table 7 and Appendix 7 (detail 2 and 3a on page 125 and detail 11 on page 129) and the Key Diagram (page 10).

3.11 Delete the last sentence of the first paragraph on page 75:
"~~It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed to be finally determined at the planning application stage, when details of a specific proposal can be fully explored~~."

3.12 Delete the last sentence of the second paragraph on page 75:
"~~The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy.~~"

3.13 Delete the penultimate and last sentences from the last paragraph on page 75:
"~~It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund , agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund.~~"

3.14 Delete Policy 5 in its entirety.

3.15 If Chipping Campden Town Council wishes to put forward the areas identified in Figure 15 and Appendix 7 to GCC, there is a separate process for doing so.

3.16 Delete "Chipping Campden NDP – Green Space Habitat features" on the Key and the layer on the map at page 89 (part of Appendix 2).

3.17 Number the red star symbols on the map at page 91 (part of Appendix 2) and provide table listing the protected species associated with each red star. If no supporting information as to the precise location, the associated species and manner in which the evidence was obtained can be proved then we request that the red start symbols be removed as it would not be appropriate to retain them under such circumstances.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable):

Date: 13th August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to? Annex A Reg15 Draft CCNDP 040325

Paragraph number: Section 4 Community Concerns and Aspirations - Pages 41/45

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support X Support with modifications ☐ Oppose X Have comment ☐

Please give details of your reasons for support or opposition or make comments:

- I support the points raised in the community concerns. However heavy goods vehicle traffic is not just a through traffic issue in the town. HGV traffic has a massive detrimental effect to the community on the outskirts of the town, namely Station Road and Castle Gardens, which I feel has been largely ignored by the town council. Therefore, I support a comprehensive review of the HGV routes and traffic management improvements which at least for HGV should be more than just signage (which is ignored by HGV's). We could be more ambitious and consider a new road linking the Bratches development and the Campden Business Park. This could help keep HGV's out of the town centre and provide another route for school parking traffic, new health centre and indoor sports centre, and alleviate and issues around the Arms houses and Cidermill lane.

- A new railway station would be a significant asset to the town, not just for residents and tourists but also the workforce at the Campden Business Park and Campden BRI.

- I support the creation of new public parking for the town, but the development of the health centre, primary school and leisure centre should provide adequate parking (with provision for growth). I would also submit that any new infrastructure should also support the provision of sustainable energy generation such as solar panels on the car park. It can be sympathetically designed to fit in with the environment, and could provide lower energy costs for the new facilities. Also, the new infrastructure should provide the opportunity to install electric charging points for cars. My final point on this section is the need to provide proper secure facilities for bike storage in all of the parking areas in the town. The more facilities we have to reduce car traffic the better.

- The current doctors surgery is in dire straits and the need to create a comprehensive medical centre should be a priority. The opportunity exists to create in a new medical centre, diagnostic facilities that can benefit not only the local community but also the wider north Cotswold area, an example of this Stowe surgery that has ultrasound diagnostic facility.

- The Indoor leisure centre is an excellent ambition with I would support, with the proviso that any facilities factor in the demographics of the community (average age 51). For example, indoor facilities could include several Pickleball Courts a sport is known for its inclusivity, with players of all ages and fitness levels participating together. The average age of pickleball players in the UK is 50+ , and a 52:48 split between men and women. To have a viable leisure centre there is a need to ensure it's used fully during the day, which means catering for 'time rich' members of the community. I am sure there would be an opportunity for public/private funding for an Indoor centre given the massive push to increase health and mental fitness in communities such as Chipping Campden.

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

COTSWOLD
District Council

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025.** There are a number of ways to make your comments:

Complete an electronic response form

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our privacy notice. Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable): Brodie Planning Associates - Director

Date: 12 August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: n/a

Policy reference: Policy 6: Local Green Spaces (draft LGS shown at Figure 17)

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☐ **OPPOSE X** Have comment ☐

Please give details of your reasons for support or opposition or make comments:

I write on behalf of the landowners in **OBJECTION** to **draft LGS designations reference LGS19 and LGS22**.

Each land parcels as shown in Figure 17 of Policy 6 are discussed in turn below:

LGS19 – The Hoo West

Firstly, I need to draw the examiners attention to the fact that the landowners have not been advised or consulted in respect of draft LGS designation ref LGS19. The Consultation Statement submitted as part of the Regulation 15 submission includes representations received as part of the Regulation 14 consultation. A representation made by Morgan Elliot Planning on behalf of Mr McKenzie in regard to draft designation ref LGS20 The Hoo East (now referenced as LGS 19 The Hoo East in the Reg 16 consultation) clearly states as shown under *Question 7 – Policy 6 (Local Green Spaces)* (page 55) that "With regard to LGS20 The Hoo East, the ownership details regarding the site are incorrect and Mr McKenzie does not own the full extent of the site." The response provided by the NDP steering group makes no mention of this statement and no attempt has been made to contact the actual landowner, nor communication received to correct this error as clearly pointed out in above-referenced Reg 14 representation. This has prejudiced the landowner.

Secondly, I draw to the attention of the examiner that an outline planning application on part of the land identified as draft LGS19 is currently being considered by the local planning authority under reference 25/01194/OUT (Land Parcel North Of Olimpick Drive Chipping Campden) for the erection of 30 new houses; 40% of which are affordable homes.

Paragraph 107 of the NPPF (December 2024) sets criteria for the designation of Local Green Space which states “designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) local in character and is not an extensive tract of land.”

Contrary to the views expressed in the LGS assessment (Appendix 6, Reg 15 version CCNDP), draft designation LGS 19 does not meet the criteria set out under Paragraph 107. As such, the designation of this land as LGS would be contrary to national planning policy.

In regard to being demonstrably special or holding particular local significance, the land identified as LGS19 forms part of the open countryside that surrounds the market town of Chipping Campden; a network of agricultural fields. This wider surrounding landscape is already protected for its scenic beauty through designation as a Natural Landscape (the Cotswolds National Landscape) (formerly AONB). The settlement of Chipping Campden and surrounding countryside is washed over by this national designation. The importance of this land as local green space has been overstated in my opinion in an attempt to block areas considered under threat from future development. This restrictive (rather than positive) planning strategy is wholly inappropriate and contrary to local strategic policies for growth and national planning policy. In particular paragraph 106 of the NPPF which states that “Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes jobs and other essential services”.
A restrictive rather than positive approach is further evidenced by the lack of any housing policy/policies in the draft Plan. The lack of housing policy fails to recognise the national housing crisis and the Government’s intention to significantly boost the supply of new homes. This is particularly pertinent in the Cotswold District who have a significant shortfall in housing land supply, currently only able to demonstrate 1.1 years supply and woeful unmet affordable housing need. Chipping Campden is identified in the adopted Local Plan as a 'Principal Settlement' (Local Plan Policy DS1) wherein the growth of new housing and employment land will be focused. This failure to address the matter of housing places sole reliance on strategic policies to meet housing need up until 2031. Information gathered from consultation highlights ‘housing’ as a key issue for local people. Therefore, it is reasonable to state that the approach taken in the draft Plan to housing (or rather lack of) is not in general conformity with strategic policies, the NPPF nor

reflects the views of residents. A NDP should be an evidence-based document which it fails to be in regard to housing.

LGS22 – The Craves

Paragraph 107 of the NPPF (December 2024) sets criteria for the designation of Local Green Space which states "designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) local in character and is not an extensive tract of land."

Contrary to the views expressed in the LGS assessment (Appendix 6, Reg 15 version CCNDP), draft designation LGS22 does not meet the criteria set out under Paragraph 107. As such, the designation of this land as LGS would be contrary to national planning policy.

It is accepted that a footpath crosses the field (Footpath 15) and there are two headland footpaths that run partially along the northern (Footpath 14) and southern (Footpath 16) boundaries, but this is not reason enough for this land to be of particular importance or demonstrably special. The NPPG is clear that "Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation." (Paragraph: 018 Reference ID: 37-018-20140306: Revision date: 06 03 2014).
In addition, the NPPG states "There are no hard and fast rules about how big a Local Green Space can be because places are different, and a degree of judgment will inevitably be needed. The total area of the field known as the Craves amounts to 7 acres. When considered against the immediate local context this amounts to an area of considerable size, a large area or extensive tract of land which would fail to comply with the designation criteria set out in Paragraph 107 of the NPPF. Although this land lies within the form of the settlement and not adjacent to the settlement where a LGS designation might be likened to a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.' [Paragraph: 015 Reference ID: 37-015-20140306; Revision date: 06 03 2014]. Equally, a blanket designation of the land known as the

Craves would not be consistent with or appropriate as a ‘back door’ approach to protect this land from future development or as a strategic gap by any other name.

Housing: the national shortage and local shortfall

A policy or policies on the supply of housing is lacking and should be included. Whilst there is no requirement for a NDP to contain policies on housing it is ill-advised for the draft Plan to be silent on this matter for the following reasons:

It is evidently clear from the engagement/consultation that has taken place, that local people want to influence the type and location of new housing. Many local families and young (economically active) people cannot stay in or move to the area because property prices are unaffordable, and the range of existing housing type acts perpetuates this issue. This is evident by an ageing population above the national average and a woeful unmet affordable housing need. Chipping Campden's is essentially becoming a retirement settlement. This is directly contrary to the Vision of the NDP which seeks *to maintain a vibrant community to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents…* and fails to fulfil the objective identified in the draft Plan *To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside.* Moreover, the lack of any housing policy is contrary to local strategic and national planning policy.

The lack of housing policy fails to recognise the national housing crisis and the Government’s intention to significantly boost the supply of new homes. This is particularly pertinent in the Cotswold District who have a significant shortfall in housing land supply, currently only able to demonstrate 1.1 years supply and woeful unmet affordable housing need. Chipping Campden is identified in the adopted Local Plan as a 'Principal Settlement' (Local Plan Policy DS1) wherein the growth of new housing and employment land will be focused. This failure to address the matter of housing places sole reliance on strategic policies to meet housing need up until 2031. Information gathered from consultation highlights ‘housing’ as a key issue for local people. Therefore, it is reasonable to state that the approach taken in the draft Plan to housing (or rather

lack of) is not in general conformity with strategic policies, the NPPF nor reflects the views of residents. A NDP should be an evidence-based document which it fails to be in regard to housing.

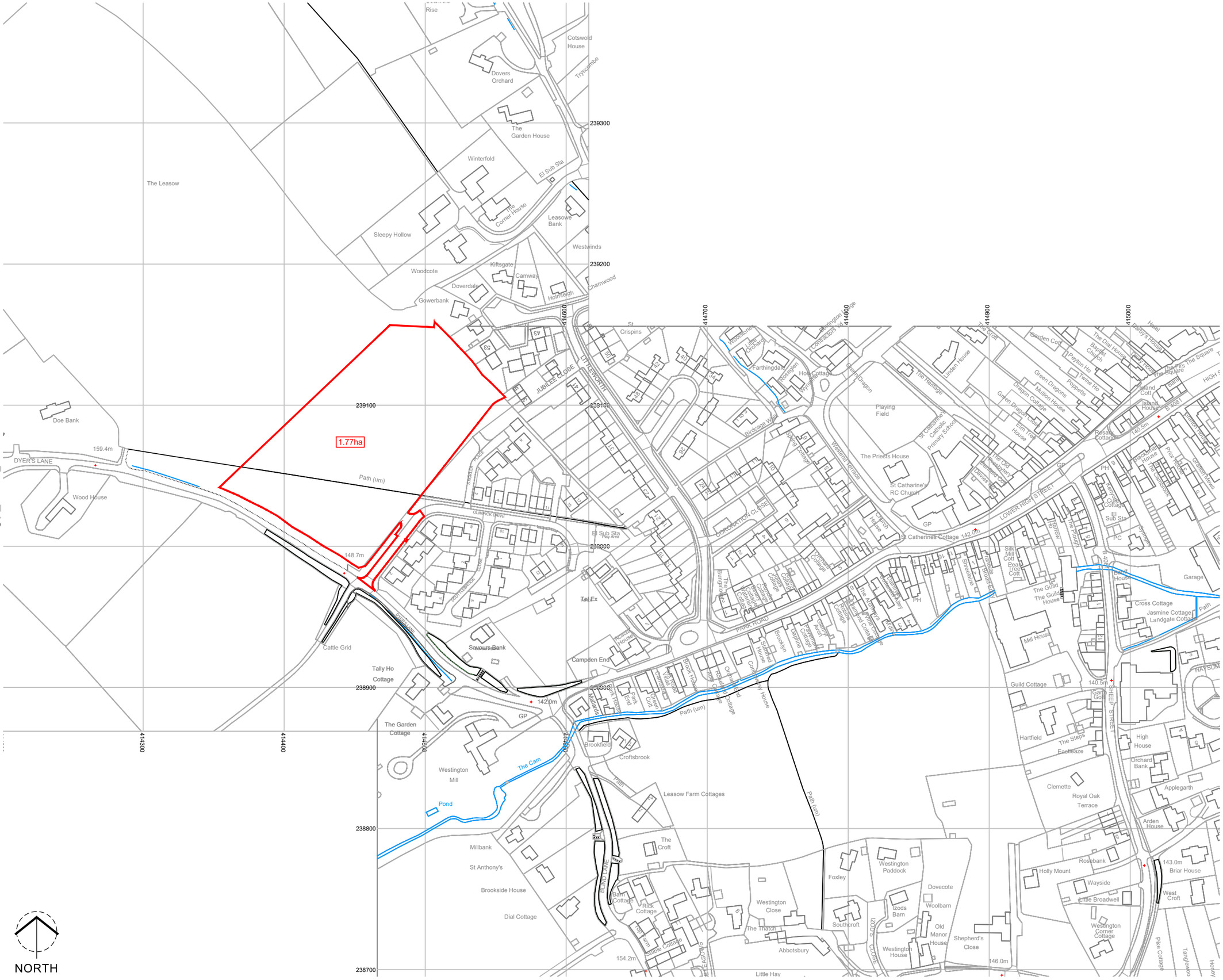
Suggested improvements or modifications

1. Modify draft Plan to omit the draft LGS19 designation. Or should the examiner consider otherwise, omit land immediately adjacent to the settlement known as Land Parcel North Of Olimpick Drive Chipping Campden subject to application reference 25/01194/OUT. The submitted site location plan (drg. no. 2030-03-100) is enclosed for the examiner's attention.

2. Modify draft Plan to omit the draft LGS22 designation.

3. Include policy/policies on housing.

rev	date	description
-	-	-


1.77ha
239100
239200
239300
238900
238800
238700
414300
414400
414600
414700
414800
414900
415000
Rise
Cotswold House
Dovers Orchard
Tryscombe
The Garden House
Winterfold
El Sub Sta
The Leasow
The Corner House
Leasowe Bank
Sleepy Hollow
Westwinds
Woodcote
Kiftsgate
Camway
Doverdale
Holmleigh
Chamwood
Gowerbank
St Crispins
JUBILEE CLOSE
CUTTLEWORTH
Woodstones
Little Orchard
Farthingdale
Rosseglen
Hop Cottage
Birdcage Walk
Playing Field
The Priests House
St Catharine's RC Church
St Catharine's Catholic Primary School
The Hermitage
Lindern House
The Croft
Garden Cott
Baptist Church
The Dial House
Quarry's House
Hotel
The Square
Peyton Ho
Green Dragons
Poppetts
Twine Ho
Millison House
Dragon Cottage
Green Dragon Cottage
Elm Tree House
Island Cott
Island House
Bank
B 4081
Rosary Cottages
Doe Bank
159.4m
DYER'S LANE
Wood House
Path (um)
148.7m
Cattle Grid
Tally Ho Cottage
Savours Bank
Campden End
142.0m
GP
The Garden Cottage
Brookfield
Croftsbrook
Westington Mill
The Cam
Pond
Path
Leasow Farm Cottages
Millbank
St Anthony's
Brookside House
Dial Cottage
The Croft
Barn Cottage
Rick Cottage
Stable Cottage
Old Farm
154.2m
BLIND LANE
Westington Close
The Thatch
Abbotsbury
Little Hay
Foxley
Westington Paddock
Dovecote
Woolbarn
Izods Barn
Southcroft
Old Manor House
Westington House
Shepherd's Close
146.0m
Olympick Drive
Coronation Close
Wreaford Terrace
Ring Cottage
Tel.Ex
Rose Cottage
Brook House
Orchard Cottage
Rosefield Cottage
Park End
Park Terrace
Mallards
Willow Road
Corner Cottage
Brooklyn
Daphne
Sunnybank
Corner Bay House
Orchard Bank
Rose Cottage
Blandford Cottage
The Apple Tree
Westcroft
Bridge Cottage
Dormers Cottage
Corner Cottage
Bridge House
Tudor Cottage
Bridge Cottage
Dormers
Corner Cottage
Bridge Cottage
Tudor Cottage
Bridge Cottage
Corner Cottage
Dormers Cottage

COTSWOLD
District Council

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025.** There are a number of ways to make your comments:

Complete an electronic response form

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our privacy notice. Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Date: **TBC**

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: **YES**

Part B

Which part of the document does your representation relate to?

Paragraph number: **Figure 9 – Town Centre boundary**

Policy reference: **Policy 1**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support with modifications

Please give details of your reasons for support or opposition or make comments:

The proposed Town Centre Boundary excludes the former Cutts garage building. There is no justification for this exclusion, and it should be reinstated to reflect the Town Centre Boundary in the adopted Local Plan and the proposed redevelopment of the site for retail purposes.

Attached to this representation is a location plan showing the former Cutts garage building with associated parking areas, drawing reference 2692 SK63A. The site operated a Ford Dealership (sales, service / repair and bodywork) for 101 years until 2022, providing employment for many people. The site has been unused since 2022, although one of the outbuildings has been converted to a Post Office under application reference 22/01771/FUL.

The adopted Local Plan provides a Town Centre Boundary for Chipping Campden. The boundary includes the whole of the former Cutts Garage site, as depicted by the red line on the map below:



extract from the Cotswold District Local Plan Interactive Proposals Map

The Neighbourhood Plan proposes to modify the Town Centre Boundary, removing the site of the garage building whilst maintaining the inclusion of the two areas of car park to either side, such that the Town Centre Boundary will match more closely the Conservation Area boundary (the blue line on the plan above).

There is no reference or explanation in the Neighbourhood Plan as to why the Cutts garage building is to be excluded from the long established town centre boundary. The exclusion does, however, continue from previous consultation drafts of the Plan. Respondents to those documents asked why the land was excluded, with the Campden Society saying it is incoherent to include the two separate parts of the Cutts yard but exclude the building, and one respondent suggesting the site would be a good location for a Co-op with parking. The Neighbourhood Plan team commented only that:

> *'further extension to include Cutts Yard is not included because there is insufficient justification'*
>
> and
>
> *'town centre boundary not changed further because there is insufficient justification'*

These responses make little sense given that the site already lies within the Town Centre Boundary (in the adopted Local Plan). It's continued inclusion would not be a 'further extension', merely the retention of the status quo.

Section 7 of the National Planning Policy Framework (2024) is titled 'ensuring the vitality of town centres'. It requires authorities to set a settlement hierarchy, and to identify town centres. Paragraph 90 of the Framework states that a positive approach should be taken to the growth, management and adaptation of town centres, allowing them to grow and diversify in a way which can respond to rapid changes in the retail and leisure industries, meeting the anticipated needs for a range of town centre uses including retail over a 10 year period. It also notes that town centre boundaries should be kept under review.

Policy EC7 of the adopted Cotswold District Local Plan accords with this guidance, setting out the retail strategy for the District, and confirming that the Council will support proposals which maintain and enhance retail provision and the wider health of the centre. It sets a retail hierarchy, with Chipping Campden identified as a 'Key Centre', with development supported within the defined centre. Policy EC8 continues that the preferred sequence of locations for main town centre uses in Principal Settlements is centre – edge of centre – out

of centre. The policy continues that only where there are no suitable sites available within the centre should other locations be considered.

Chipping Campden is an important settlement, second in the town centre hierarchy only to Cirencester. The District Council considered carefully the extent of the Town Centre Boundary when preparing the now adopted Local Plan, presumably concluding that the use of the site as a car sales business was a suitable town centre use, generating employment and enhancing the vitality and viability of the town centre.

Given the Framework requirements above, the Neighbourhood Plan is an appropriate place to reconsider the extent of boundaries, based on a current assessment of uses,. However it must consider the future viability of the town centre as well as the current extent of uses, and allow for new development to ensure that viability is maintained and enhanced. It must not change boundaries without justification. There is no justification for the exclusion of the Cutts site.

The Neighbourhood Plan team indicate there was 'insufficient justification' to include the garage site within the Town Centre Boundary. This is an inaccurate approach. The starting point should be its continued inclusion, as a vacant site, unless there is reason to remove it.

In this case, the owner of the Cutts Garage site is now [redacted] who is proposing the construction of a new retail store [redacted]. A formal request for pre application advice was submitted to the District Council in 2020 (reference 20/02153/PAYPRE), proposing a supermarket and three holiday cottages. A public consultation event was held in November 2024, advertised in the Campden Bulletin and attracting around 150 people. A planning application has now been submitted to the District Council for a supermarket and three dwellings, Planning Portal reference PP-14167317. Attached to this document is the proposed site plan, reference 2692-050B. Other documents are available upon request or will be available for download from the District Council's website once the application is validated.

This provides clear evidence that it is appropriate for the site to remain within the Town Centre Boundary, providing the opportunity for the enhancement of the town.

It is noted that the pre-application response supported the principle of a supermarket on the site. There have been no substantive changes in policy since the pre-application response was received and thus no reason to consider the principle will now be found unacceptable. At the public consultation event the prospect of a new supermarket was well received.

Chipping Campden currently only has convenience store provision, with no supermarket, and the draft Neighbourhood Plan acknowledges that most people only use the town for 'top up' grocery shopping, relying on their cars to travel to larger settlements (mostly Evesham or Stratford upon Avon) for heavier weekly shopping.

Policy 1 includes objectives to protect and develop the town's economy, to strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail available, and to improve facilities for car parking. The redevelopment of the Cutts site as proposed will meet all three of these objectives, providing additional parking, and a new retail store to reduce the need for residents to travel to other centres for larger shops. This benefits not only the vitality and viability of the town centre, but also the sustainability of the settlement.

In light of this assessment, the Town Centre Boundary shown in the adopted Local Plan should be reinstated to include the Cutts site to ensure its future retail redevelopment.

Enc Location Plan reference 2692 SK63A
Proposed Site Plan reference 2692-050B

What improvements or modifications would you suggest?

The Town Centre Boundary should be amended to include the former Cutts garage, reflecting the boundary in the adopted Local Plan. The following plan shows the existing boundary outlined in red which should be retained:





MRT ARCHITECTS

[redacted]

Site Location Plan

Food Store at Sheep Street, Chipping Campden

[redacted]

1:1250 @ A3

04.2025 2692.SK 63A



Site Layout Plan

1 : 200

Rev	Description	Date
B	Updates to site layout	06.05.2025
A	Updates to site layout, plans and elevations	11.04.2025

0 10 20 30 40 50 60 70 80

This drawing may have been reduced - Original Scale 80mm

© Copyright 2017 Marson Rathbone Taylor LLP

This drawing is the copyright of Marson Rathbone Taylor LLP and may not be copied in whole or in part or used for any other purpose other than that for which it is supplied without express written consent. Contractors MUST ensure that they have the latest issue drawing before they commence work on site.

Do not scale off this drawing, use only figured dimensions and report any discrepancies or omissions to the Architect / Contract Administrator immediately.

MRT ARCHITECTS
RIBA
Chartered Practice

[redacted]

PROJECT
Food Store at
Sheep Street, Chipping Campden, GL55 6DX
For Warners Retail (South West) Ltd

DRAWING
Proposed Site Layout Plan

PROJECT DRAWING NUMBER		DRAWING STATUS	
2692 / 050		Planning	
REVISION	SCALE @ A1	START DATE	DRAWN BY
B	1 : 200	Mar 2025	SL

This drawing has copyright and may not be copied in whole or in part or used for any other purpose other than that for which it is supplied without express written consent.

© Copyright 2012 Marson Rathbone Taylor - Architects

Rep #23 - Resident

[redacted]

Dear Sirs,

I understand you are seeking comments on the Chipping Campden Neighbourhood Plan.

There are some points in the plan that I think perhaps give the wrong emphasis in places particularly on holiday lets where I would welcome a greater degree of control through some form of licensing / permissions.

I regard the green spaces as an essential part of the plan.

Other than that I welcome the fact that the plan is near to being adopted after more than 10 years in preparation.

Please would you keep me informed of progress.

With kind regards,

[redacted]

Date: 14 August 2025
Our ref: 518390
Your ref: Chipping Campden Neighbourhood Plan

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
[redacted]

Cotswold District Council

BY EMAIL ONLY
neighbourhood.planning@cotswold.gov.uk

Dear Sir/Madam

Chipping Campden Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 04 July 2025.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully
[redacted]
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here[2]. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here[3].

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic[4] website and also from the LandIS website[5], which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework[6] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[7] sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

[1] http://magic.defra.gov.uk/
[2] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[3] https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making
[4] http://magic.defra.gov.uk/
[5] http://www.landis.org.uk/index.cfm
[6] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[7] http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here[8]), such as Sites of Special Scientific Interest or Ancient woodland[9]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here [10]) or protected species. To help you do this, Natural England has produced advice here[11] to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land [12].

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance[13]).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

[8] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[9] https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences
[10] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[11] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals
[12] https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land
[13] https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory Biodiversity Metric and is available as a beta test version.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable):

Date: 14.08.2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: Section 6. Appendix 7 Local Green Spaces. Local Green Space 21 - The Cley.

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ✓ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

I strongly support the inclusion of The Cley as a designated Local Green Space. I live on Grevel Lane, with our garden backing directly onto The Cley, and over the past two years, my young children and I have witnessed an extraordinary variety of wildlife. It truly is a haven for nature.

We've observed badgers, foxes, hedgehogs, deer, stoats, bats, owls, partridges, pheasants, green and spotted woodpeckers, sparrowhawks, and even peregrine falcons — not to mention a vast array of insects and garden birds. This level of biodiversity is rare and precious, especially at a time when England is losing wildlife species at an alarming rate. Protecting spaces like The Cley is essential for preserving our natural heritage.

In addition to its ecological value, The Cley plays a vital role in protecting our community. Being downhill from The Hoo, we experience significant water runoff, which would be far worse without the natural flood defence provided by the trees and vegetation. The woodland helps absorb and slow the flow of water, reducing the risk of flash flooding. The trees also contribute to cleaner air, which is a noticeable benefit for those of us living nearby.

What improvements or modifications would you suggest?

It would be wonderful if the landowner considered planting wildflower meadows to further support pollinators and enhance the beauty of the area.

Please make sure any additional pages are clearly labelled

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Date: 14/08/2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to?

Paragraph number: Section 6, Appendix 7. Local Green Spaces, Local Green Space 21. - The Cley (page 158)

Policy reference: Annex A. Regulation 15 Draft CCNDP 04.03.25

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

There are several reasons for The Cley to be designated a Local Green Space. The Biodiversity on the land is truly staggering. We have long term, current and active sightings of Badgers, Peregrine Falcons, Sparrow Hawks, Tawny Owls, Pipistrelle Bats, Muntjac Deer, Stoat, Field Mice, Rabbit, Fox, Hedgehogs, Green Woodpeckers, Greater Spotted Woodpecker and many more. The Deciduous Woodland in The Cley is key to providing the habitat for the animals mentioned and more. Deciduous woodland is designated as a priority habitat under Section 41 of the Natural Environment and Rural Communities Act 2006 in England. This means it is considered a habitat of principal importance for conserving biodiversity in England. The woodland and wild grassland also serve as a flood defence to the town. The trees hold a huge amount of water and their roots slow the flow of water off The Hoo and into the town. The grassland and dense undergrowth stabilise the soil and reduce chances of flash flooding. The Cley acts as a natural barrier on the hillside between The Hoo and Aston Road. The Cley will hold enormous volumes of water during wet periods, allowing a slow release via natural evaporation and absorption. The Cley also has fantastic aesthetic value for the town. It frames Aston Road enhancing the beauty and appeal of the neighbourhood, contributing to a sense of place. It also borders

the very popular public footpath between Aston Road and The Cotswold Way, exposing walkers to the rich biodiversity within The Cley.

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

[redacted]

One of the changes brought about by the Localism Act was to encourage Chipping Campden Town Council to develop a Neighbourhood Development Plan (Plan) to reflect the needs and priorities of residents of Chipping Campden and ultimately the electors. The Plan was to be resident led and if formally adopted by the 2020 (1st April 2025) voters registered becomes a legally binding document used when future applications for development submitted to a higher authority trigger publication of the application which will enable anyone to respond and where there is an adopted plan in place it will be used by developers, planning and conservation officers and others to consider the application. For example, applications are required for building works, advertising, change of use, cutting of trees, a boards and so on.

I have read the Plan in the library and believe it does not conform.

The Plan Trying to respond I find there are no paragraphs as required to refer to on the form for a response.

I can see as can others and the Examiner that in particular Cotswold District Council can be seen to have a routine or practice to produce legally binding documents on A4, in black and white, with paragraph numbers, with one column and few photographs. See Local Plan in force. This document does not conform to other Cotswold District Council legally binding documents.

Even though only a draft the Plan is a document to be formally voted upon by 2020 voters and if approved will become a legally binding document.

As a proposed legally binding document it includes commercial footnotes of advertisements see (page 55 footnote 6) has 80 or more photographs, on landscape has no paragraph numbers and does not conform to the

routine or practice of Cotswold District Council or indeed Gloucestershire County Council documents intended to be legally binding. As a binding legal document it is intended to be read by developers, planning and conservation offices and others and it would be reasonable for the Examiner to examine whether the Plan as presented can if formally adopted is fit to be used. In my view the Plan is really not fit for the purpose of being used as a binding legal document. As well as commercial advertisements there is no housing land allocated for use in the future. Indeed, the housing at Aston Road on page 35 has lost its outline planning application and the wording which could have been amended ages ago to state housing in the future on this land would be agreeable has not been altered. It should be altered to conform to Cotswold District Council's legally binding documents to be easily used by developers, planning and conservation officers and others.

Page 4 The plan with the red line should be enlarged so the red line of the boundary of the parish is clear and a plan including the development boundary could only be helpful to those reading and responding to the Plan if one was included.

Para 2 Responses from 5 November 2013 have not been displayed. Few genuine resident responses to what development the resident believes should be or should not be are found in consultation bundle. The Plan fails to address clearly as required where residents wish development to take place and where they do not. Whether developments are of a high quality or not is not the subject of the Plan but in the design guide.

Page 10 Irrelevant. The red line parish boundary on page 4 is sufficient. The development boundary is still missing. The national cycle network irrelevant.Should be removed.

Page 11 The red line drawn around the parish boundary is far better on page 4. Pellegram one just repeats. The words to the left are included in a seperate document in any event and are irrelevant. Page should be removed.

Page 13 The town is no longer referred to as the jewel of the cotswolds in any document of Cotswold District Council.

I suggest on the penultimate line "where" should be "while" the historic legacy is preserved?

Page 14 and 15 Objectives

Paragraph 1 As the objective of the Localism Act is to influence the location of future development

Where future development land is proposed is lacking .

I propose:

The proposed Dr surgery has been lost with the Aston Road development outline planning permission expiring. However, Cutts building and yard off Sheep street could be so developed if included in the Plan

The land between Calf Lane and the Cam owned by Landmark trust if agreed could be drained and developed to use as a paid car park for those working in the town.

Where residents do not wish development is not clearly spelled out specifically but I believe the list Green Spaces page 88 may intend and should say so.

Land beside the river Cam

Outside existing development boundary

Page 18 OverView.

The jewel of the cotswolds should be removed as clearly it is no longer considered by CDC to be so described in the Local Plan.

The fact that every building on the High Street is listed except the Baptist Church should be clarified and the two paragraphs highlighted could be moved to Objectives page 14 . The remainder does not relate to development. The Music festival does not relate to development and should be removed as well as the paragraph on walking to public footpaths which are covered by the need for an application to if a developer intends to alter.

Page 20 Pellegram map of historic features. It is far too small to be relevant. Does not indicate where the historic features referred to in the column on the right are. Please remove. There is another page 22 which again fails to indicate all the historic features referenced in the column. Remove too. There is indeed more plans further on.

Page 21 Chipping Campden

Page 22 see 20

Pages 26 to 27. Are these pages trying to explain that any development concerning the highlighted heading have sufficient exposure and any more development will be too much. Why not say so? Alter or remove.

The area of flooding by the river Cam could easily be identified as an area not wished to be developed page 14. The map does not assist and should be removed and woodlands would be covered by any application to develop. Remove as Irrelevant.

Page 31 32 33 34 Population characteristics are surely irrelevant. Were there responses that wish development of affordable housing, or housing with only one bedroom or flats. Did such response set out the proposed e in the future? If not I feel these pages are irrelevant.

Pages 30 31 32 34 Population characteristics are irrelevant as do not disclose where future housing is sought to be built. Remove

Page 35 and 36 Obviously should have been updated and amended by Dr Pellegram or Council to where residents wish development to be in the future now the outline planning permission has been lost.

Pages 44 and 45 Community Aspirations Dr Pellegram has stated parking cannot be something sought by residents (page 60 Consultations)but left to Gloucesthire county Council. None of the aspiration listed include where development is proposed to meet the aspiration. I

Page 46 Is a map by Dr Pellegram really needed? Remove.

Page 48. Is this really required as refers to Local Plan to which this Plan is stated to conform. Remove. The footnote at the bottom is incomplete.

Page 51 Sustainable Development No explanation is to relevance of white spaces. There is really no reference to sustainability in the policies referred to.

Page 52 to 63 Chipping Campden Town Council.Objectives The advertisement footnote 6 to Airnb should be deleated despite Dr. Pellegram response JK p 60 in Consultation. Change of use requires a planning application and in the case of the town center High Street usually listed building consent as well. Uses in 2023 seem already outdated for 2025 and could perhaps be better defined and the whole section reduced. On p 57 the Town Council seeks to enlarge the town center boundary which cannot be within the powers of the examiner.h There is still no map of the development boundary. The map of abnb accommodation seems out of place as the Plan is for where proposed development is to take place and the Plan is clear no application is required for a change of use to airb and b .

The Plan could and does not address the look of abandonment of the Kings Hotel in the Square on the High Street with a notice to Covid fixed to the door and what future development the Plan intends for the hotel.

Pages 64 to 69 Irrelevant. What development is proposed? Remove.

Pages 70 to 72. There is a Design Guide. Remove.

Page 73 Policy 3 Design of the built and natural environment.

Page 74 to 76. Non designated. As already mentioned most are preserved and protected by Heritage England .

85 Green Spaces are where those responding wish to see no development and again I wish it was found in Objective. The Westington Green is registered common land.

Pages 90 to 93 Already out of date. Why include.

Page 95 The colours cannot be seen. Amend or remove.

Page 96 – 99 useful

Pages 101to 123 This would be useful if it included permitted use or an alteration with listed building consent found under the building on Cotswold District Council web site rather than what those looking perceive as a permitted use

page 133 to 163 Need editing as includes blank pages and pages that are divided

I wish to be informed of the decision.

[redacted]

14 August 2025

[redacted]

I emailed comments yesterday 14.08.25 at 17.20 and wish to add/make another comment due to the content of email from Mr Walker in reply to mine.

I attach Plan from Chipping Campden Town Council records and note it says submitted 25 February on the cover.

The 80 or so photographs have been removed and the Plan has paragraphs and accords with my comments on my earlier comment and the routine/practice of Cotswold District Council as regards documents intented to become binding legal documents.

I believe this has been submitted to CDC and the matter should be looked into by the team . It seems to be the same as in the library but as I have said without the photographs and readable by developers, planning and conservation officers and others. The Examiner should certainly be made aware

[redacted]

15 August 2025 at 11.21

attached
Plan
Email from and to Mr Walker

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Date: 14th August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: 106, 107, 108

Policy reference: Policy 6: Local Green Spaces

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

We fully support the Local Green Space Policy in order to be consistent with the stated aim of the Neighbour Development Plan to retain Chipping Campden as 'The Jewel in the Cotswolds' whilst meeting the objectives of the Environment and Sustainability Policy.

What improvements or modifications would you suggest?

None

Please make sure any additional pages are clearly labelled

COTSWOLD
District Council

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025.** There are a number of ways to make your comments:

Complete an electronic response form

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our privacy notice. Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable): The Campden Society; Committee Member

Date: 15 August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: 5(d); 4(a); 6.3

Policy reference: **1. Town Centre**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☑ Oppose ☐ Have comment ☑

Please give details of your reasons for support or opposition or make comments:

Town Centre boundary

Although we note the comments made by CDC in relation to the change in use at the former Lloyd's Bank, we remain of the view that the Pharmacy is an essential Town Centre service site, and so we still support the extension of the Town Centre boundary as proposed in the draft NDP. However, we are also still of the view that the boundary should be extended at the other end of Town (the figure on page 97 of the NDP) to include the part of what is known as Cutts Yard that is not currently included, i.e. the garage building. In our view, it would be incoherent to include two separated parts of Cutts Yard but not the central connecting part.

Town Centre accommodation for the elderly

While we agree that accommodation close to or within the Town Centre well adapted for the use of the elderly would be an advantage, we do not agree that conversion of upper floors of commercial Town Centre premises is likely to provide such suitable accommodation for the elderly. While the locations concerned are obviously ideal, the accesses to the upper floors of what are almost all if not all listed buildings do not lend themselves to being suitably adapted for the use of the elderly.

Residential property used as short term let visitor accommodation

We agree that visitor trade is important in supporting the mix and range of facilities in the Town Centre. Further, the NDP notes on p52 that many of the residential use Town Centre properties are short term let (e.g. Air BnB), and that if the number of such properties is allowed to grow too far (in our view, any further than the current level), that would have a very negative impact on the vitality of the Town Centre, to the detriment of the residents and visitors alike. In our view the same point applies outside the defined Town Centre but within the Development Boundary. We also note that the data on pg31 highlights the lack of privately rented accommodation (long-term lets) compared to the national average.

We strongly support the suggestion made in the NDP that the creation of new non-serviced visitor accommodation (short-term let properties) throughout the area covered by the NDP_ (i.e. not just in the Town Centre) should be resisted to the extent that relevant provisions in Planning Regulations provide a basis for such resistance.

Change of use in the Town Centre

In the above context particularly, but also relevant to Policy 2, one important reference point for judging the appropriateness of a change of use application is the impact on the vibrancy (or also "vitality") of the High Street (or also "Town Centre"). Judging that impact is highly subjective unless some appropriate criteria are established. Nonetheless, short-term lets are likely to remain vacant for parts of the year. Vibrancy, in our view, should be considered throughout the year. As noted in our comments on Policy 2, in our view all applications for a change of use away from a Town Centre use (eg from Commercial to residential) should be resisted; all such changes diminish the vitality and vibrancy of the Town Centre.

Parking Provision

As noted in the draft NDP, it is not possible to draw strong conclusions from the results of the Parking Survey. We support the principle of finding out what are the views of residents in relation to parking. However, in our view, the process would be more successful and usable if it was in the context of the development of a wider strategy covering both transport (public and private), an active travel policy and parking in the neighbourhood. Further, the draft NDP suggests that the Town needs a new car park for cars and coaches. The great majority of visitors do not arrive by coach, and it is not clear that it would be positive for the Town if the number that do so were to increase. Coach visitors do not remain in the town for more than a few hours and do not generally use hospitality venues and the economic benefit to the town is much less than visitors who stay overnight. We therefore support the principle of a new car park for cars.

In that context, we strongly support the move towards changing the existing school car park to one for general public use, while acknowledging that this will only happen in the context of the wider Aston Road development going ahead; we acknowledge that the initial planning application for this development has lapsed, but we expect that it will be re-born as such a development clearly has significant advantages for the Town, including providing new housing that contributes to the Local Plan targets. If this does go ahead, and the provision of a new Town car park is combined with some restriction on High Street parking (e.g. short term and residents only), it is essential that particular provision is made for those who work in the various commercial and retail premises in the Town Centre to be able to use the new public car park either free of charge or at heavily discounted rates (e.g. an annual easily affordable pass).

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(e); 4(e); 4(d)

Policy reference: **2. Community Facilities and Infrastructure**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☑ Oppose ☐ Have comment ☑

Please give details of your reasons for support or opposition or make comments:

Doctors' Surgery

We note the presumption under Local Plan EC8 is that it is not appropriate to move the Doctor's Surgery away from the Town Centre (recognising that the current Surgery is not within the Town Centre as defined but is close by). We are concerned that there seems to be a presumption that a new Surgery would be part of the Aston Road development plan although the advantages of such a move have not in our view been demonstrated to outweigh the disadvantages, in particular in relation to how patients access the Surgery. The NDP notes an aspiration to relocate St James's Primary School to a site off the Bratches. If that goes ahead, the vacated current school site would seem a better location for a new Surgery, being large enough and more central to the Town. Noting that the site of St James is probably Diocesan property and will therefore be subject to the constraints of disposal under Diocesan governance regarding gaining the maximum values of the asset.

Public Transport

The re-opening of the Train Station is noted as an aspiration and supported by the Town Council and is supported by the Campden Society. We note however that the reference to such re-opening is not included in the proposed revisions to the Local Plan. This is an example of the in our view disingenuous separation of the CCNDP and the Local Transport Plan; we acknowledge this is a matter not in the power of the Town Council to rectify. However, if it is possible in the context of the regulations around the CCNDP to include more about the transport needs of the community, especially in the context of the move towards zero carbon, we would strongly urge that such comment should be included. The case for re-opening a train station at the old site outside Chipping Campden is strengthening and should perhaps be better reflected in this section under a Public Transport heading on Page 62 alongside bus-stops. It should also feature as a separate section under Public Transport in Appendix 4. The development of a railway station, and the land around this could provide a real opportunity to the economic and social development of our market town. Greater emphasis should be given in the CCNDP document for the planning and development of public transport services. There

is little reference here to public transport links. There is some reference to this in the Community Concerns/Aspirations section (pages 39-42), but these are omitted in Table 6 and Appendix 4. The CCNDP shows a photograph of the Hedgehog bus (a volunteer-led initiative) but fails to make any reference to the current commercial public transport bus services franchises. Nor is there any reference to the need to preserve and provide appropriate bus stop facilities within the town centre. These need to be provided and be accessible within Chipping Campden, particularly given that we are all expected to see less reliance on private car usage.

Additional items

The following items should be added to Table 8: • bus-stops • public footpaths • EV charging points, or potential EV charging point sites • litter bins • amenity spaces such as areas of green space such as verges, patches of green space and grassed roundabouts.

The description for Campden Home Nursing should include 'Bereavement Services for bereaved children and adults'

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(f)

Policy reference: **3. Design Code and Built Environment**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

We acknowledge the edits that have been made to the Guide and we are generally in agreement with the revised document,

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(g); 6.5

Policy reference: **4. Non-designated Heritage Assets**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☑ Oppose ☐ Have comment ☑

Please give details of your reasons for support or opposition or make comments:

The Campden Society put forward a list of additional features throughout the Town which it submitted should be added to the list at pg 71 and appendix 6. The Town Council responded that it was not willing to consider any additional items. We submit that the Council should revisit the stance. There is no good reason not to entertain suggestions for additional features. The additional features proposed by the Campden Society are set out on pgs 136 and 137 of the Chipping Campden Parish Neighbourhood Plan Consultation Report February 2025.

There should be a watching brief for new assets with designated authority for such brief.

We concur with the items listed and we note that there is no clear definition of what constitutes a heritage asset. We suggest the TC draws up a Local Heritage List following Historic England Advice Note 7 or similar. The TCS also suggests that the TC have a watching brief on any contemporary and new installations that may qualify. Here is a list of other Non-Designated Heritage Assets which we feel contribute to the unique character of the town which we would like added. This list includes already identified and numbered NDHAs where useful. Street Furniture and Environment.

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(h); 6.2; 6.6

Policy reference: **5. Biodiversity Net Gain and Environment**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☑ Oppose ☐ Have comment ☑

Please give details of your reasons for support or opposition or make comments:

We agree with the wording of Policy 5 but would add further detail. We suggest that the list of target sites suitable for biodiversity net gain complied by GWT should be supplemented with local knowledge noting opportunities for BNG in the town's natural setting including the management of grass verges and nominated Local Green Spaces; and that the LNRAs should be linked into wildlife corridors, if possible, e.g. Areas 1 & 2 should be linked along the water course of the Cam.

We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature/Climate Resilient Water Management) addressing the mitigation of increasing Flood Risk in the town due to rainfall intensity due to the Climate Emergency. Any new development which doesn't fully address – and future proof – this increasing risk (including management of waste water) should be opposed. We also suggest that the importance of the remaining open ditches in the town is noted and that these should not be covered. In addition, the contribution of the nominated LGS to the town's natural flood management should be noted.

We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature) addressing Light Pollution in the town to the effect that any new development should guarantee it doesn't increase this pollution but instead conserves and enhances the town's natural setting and biodiversity.

We suggest that the guidance is given a more practical focus. For example, ref point 2 a clear commitment not to build on flood plains or in areas where there is a known flooding risk.

We note that there are no designated Gloucestershire Wildlife Trust Wildlife Sites within the list on Table 7. GWT notes 850 Local Wildlife sites on their website and we would hope that Chipping Campden could be a part of that.

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(i); 6.7

Policy reference: **6. Local Green Spaces**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☑ Support with modifications ☐ Oppose ☐ Have comment ☑

Please give details of your reasons for support or opposition or make comments:

We continue to support the designation of all the 22 sites named in the NDP as Local Green Spaces.

Noting comments made in the Consultation particularly in relation to site 22, The Craves,:

1. The site is visible from within the Town (not only from within the site itself), and from outside the Town as well.
2. We support the response noted by the Town Council in the Consultation, which is quoted below:

"Site 22 is The Craves. The land parcel does not meet the threshold of a large tract of land. This has been considered in case law. It is understood to be considerable larger, at around 25Ha, if considered as a stand-alone factor affecting the designation of a Local Green Space. The Regulation 14 version of the CCNDP Local Green Spaces Appendix 8 contains an entry for site 22 The Craves. An explanation is provided as to the historic significance, the use by the public and the contribution the site makes to the setting of the town which was prepared by CCTC. CCTC wishes to maintain this proposed designation. Appendix 8 also contains accurate site outlines for each proposed local green space. It acknowledges the previous objections that have been made to the proposal for designation. Notwithstanding these objections, CCTC has resolved to maintain NDP proposals to designate these sites as Local Green Spaces."

Noting comments made in the Consultation particularly in relation to sites 20 (The Hoo East) and 21, (The Cley):

1. : We support the response noted by the Town Council in the Consultation, which is quoted below, although the comment regarding the separation of the two sites by Hoo Lane applies to sites 19 (Hoo West) and 20 (Hoo East):rather than site 21 (The Cley).

"With regard to the question of whether these sites form extensive tracts of land, it is understood that this may not be the case, purely considering their size. The two sites are divided from each other by Hoo Lane and a wide strip of development and are considered by CCTC to be of different character and are therefore different sites providing different benefits and having different significance to the local community. The value/significance of the spaces is explained in site entries for site 20 and site 21 in Appendix 6 which were prepared by CCTC. In other respects, CCTC have reviewed the comments received and have resolved not to delete these sites and maintain their proposals for designation for the reasons set out in the appendix."

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(a); 5(b)

Policy reference: **Other comments**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☐ Oppose ☐ Have comment ☑

Please give details of your reasons for support or opposition or make comments:

Private Management Companies established in new developments

TCS would like to see an end to the inequitable reliance by both local councils and developers in setting up management companies for new developments. New residents are effectively forced into business relationships with their neighbours to pay for services that they already pay for in their community charge taxes. For example, the failure by the Local Authority to adopt new roads built, to pay for street lighting and other maintenance charges such as for the maintenance of green spaces.

It is an inequitable situation between the services residents receive outside such developments and those within new developments when both pay the same level of Council Tax. Ultimately, if councils want new development and new housing to happen, the concomitant costs of the public services that arise from such developments needs to be factored in to Local Authority finances.

Social/Affordable Housing

The draft CCNDP does comment that there is a lack of social housing that needs to be addressed. It also notes that a large proportion of the properties built over the most recent 5-year period have been larger (4+ bedrooms), with many being under occupied per the most recent census. Drawing a distinction between market demand and need, the data indicates that more larger and fewer smaller dwellings have been built than have been needed. We note in this connection the direction of travel indicated by the proposed revisions to the Local Plan, i.e. that while acknowledging that the market demand for larger dwellings in the North Cotswolds generally is high, the focus on the building of new dwellings should nevertheless be on meeting need rather than market demand.

In that context, and in our view consistent with the requirement that the CCNDP should support sustainable development, we would like to add to Page 41 of 76 a positive endorsement of the principle of building > 100 dwellings off Aston Road, subject to conditions. These should include:

1. the size and tenancy of the proposed dwellings
2. a firm commitment to design excellence not just compliance with the Design Guide.
3. Urban Planning that includes shared green spaces that are well thought through and include and benefit the whole development.
4. We proposed that GCC enter into a development agreement with a developer in order to retain control of the design until the development is complete. This is known to have commercial benefit as it raises the standard of design and build
5. Zero carbon development, including solar panels and ground source pumps) • active flood risk management and SUDS
6. Focus on Active Travel in the development
7. Biodiversity Net Gain measures including minimising light pollution.
8. All public areas of the development to be adopted by GCC (and not retained by the developer) as part of the planning consent.

As part of the TCS response to the consultation on the draft CCNDP we included the letter that TCS wrote to GCC in response to the consultation on the Aston Road proposal. In relation to the nature and tenancy of new residential building, we would suggest, consistent with the proposed revisions to the Local Plan, that:

1. Any new building outside the existing Development Boundary should be 100% affordable
2. Any new building development of more than 10 dwellings should include 40% (calculated on the basis of gross internal area) either First Homes or homes for social rent
3. Viability Statements justifying non-compliance with the above should only be accepted in cases where there have been very significant and unforeseeable changes in the relevant circumstances. We understand that may mean that the relevant land is worth less than was thought, or possibly less than a Developer paid for it – that is part of a developer's risk.

Social/Affordable Housing

The draft CCNDP does comment that there is a lack of social housing that needs to be addressed. It also notes that a large proportion of the properties built over the most recent 5-year period have been larger (4+ bedrooms), with many being under occupied per the most recent census. Drawing a distinction between market demand and need, the data indicates that more larger and fewer smaller dwellings have been built than have been needed. We note in this connection the direction of travel indicated by the proposed revisions to the Local Plan, i.e. that while acknowledging that the market demand for larger dwellings in the North Cotswolds generally is high, the focus on the building of new dwellings should nevertheless be on meeting need rather than market demand.

In that context, and in our view consistent with the requirement that the CCNDP should support sustainable development, we would like to add to Page 41 of 76 a positive endorsement of the principle of building > 100 dwellings off Aston Road, subject to conditions. These should include:

9. the size and tenancy of the proposed dwellings
10. a firm commitment to design excellence not just compliance with the Design Guide.

11. Urban Planning that includes shared green spaces that are well thought through and include and benefit the whole development.
12. We proposed that GCC enter into a development agreement with a developer in order to retain control of the design until the development is complete. This is known to have commercial benefit as it raises the standard of design and build
13. Zero carbon development, including solar panels and ground source pumps) • active flood risk management and SUDS
14. Focus on Active Travel in the development
15. Biodiversity Net Gain measures including minimising light pollution.
16. All public areas of the development to be adopted by GCC (and not retained by the developer) as part of the planning consent.

As part of the TCS response to the consultation on the draft CCNDP we included the letter that TCS wrote to GCC in response to the consultation on the Aston Road proposal. In relation to the nature and tenancy of new residential building, we would suggest, consistent with the proposed revisions to the Local Plan, that:

4. Any new building outside the existing Development Boundary should be 100% affordable
5. Any new building development of more than 10 dwellings should include 40% (calculated on the basis of gross internal area) either First Homes or homes for social rent
6. Viability Statements justifying non-compliance with the above should only be accepted in cases where there have been very significant and unforeseeable changes in the relevant circumstances. We understand that may mean that the relevant land is worth less than was thought, or possibly less than a Developer paid for it – that is part of a developer's risk.

What improvements or modifications would you suggest?

See comments above

Representation to the Chipping Campden Neighbourhood Plan

Regulation 16 consultation

Please find below comments from **Cotswold District Council** (CDC) on the Chipping Campden Neighbourhood Plan (the Plan).

CDC acknowledges the work that has been put in by the team behind this Plan and commend the team on a well presented and attractive document, which should engage residents and other stakeholders.

The following comments, observations and suggested amendments have been written to try to identify either points which may not meet the Basic Conditions against which the NDP will be assessed, or where the wording used may be open to interpretation during the development management process.

The following submission largely duplicates that from the Reg 14 representation. CDC continues to support the general aspirations of the Reg 16 NDP. We are aware that work has been done to enhance the plan since Reg 14, although there are areas we consider need resolving, as noted in our earlier position.

---

p.14, Objectives, Environment and Sustainability. The second objective here - 'to conserve and enhance the natural setting that characterises the town' feels like it would be equally applicable to the village of Broad Campden. We would suggest a light touch review to ensure the wording is inclusive of the two settlements/parish hinterland where applicable. Picking up on this, we commend the summary information pp20-22 celebrating the distinction between the village and the town.

p.15 and beyond, reference to Cotswold Area of Outstanding Natural Beauty. The Cotswolds AONB is now formally referred to as the Cotswold National Landscape – so this paragraph and subsequent references should be updated for clarity.

p.19 fig 2, p.21 fig 3, p.22 fig 4 – noting that there is explanation in the supporting text, it would be useful if a key could be added to these maps to enhance comprehension.

We note that fig 2, and fig 3 have had a key added.

Pp19-20 The reference to historic "features of Chipping Campden" actually refers to designated heritage assets – listed buildings, SAMs, Con Areas and the like. 'Features' is a word usually used to refer to parts of assets e.g. 'the windows form a significant feature of the listed building', so we'd suggest a rewording. This section does not cover non-designated heritage assets – some brief reflection on the positive impact of such could round out the pen picture of the town and provide a neat 'hook' in this introduction to the focus of policy 4. Last point still to be resolved

p.26 Final paragraph, correctly states – 'There are no special designations such as sites of scientific interest in the parish though they are immediately outside.' However, we note that there are some key wildlife sites within the parish – perhaps these could be referenced to enhance this section. Alternatively, the text could be adjusted to note that there are no nationally designated sites.

p.34 First paragraph, suggests that development on greenfield land is a consequence of poor use of previously developed land (PDL). We question the validity of this statement – the simple fact is that there is a limited supply of PDL within the neighbourhood area and the wider district– and much of the land that might be considered PDL does not sit in comfortable proximity to existing settlements (for example old airfields).

p.44 Figure 8. We'd recommend a legend for this map, to be clear that these points are intended to be indicative, rather than allocative, in nature. still to be resolved

Policy 1: Chipping Campden Town Centre

It would help if the paragraphs and policy clauses of the NDP were numbered for ease of reference.

p 55 final paragraph, and **clause one of the policy** states that appendix 3 should be considered as a 'baseline' for Local Plan Policy EC8. We're unclear what this means in practice - where and for what purpose does Policy EC8 use a baseline? (p63) unsure this has been addressed

p.56 Paragraph 6. The wording rather infers that Local Plan policy drives permitted development rights, rather than these rights being directed by national regulation. (para 5, pg 59)

p.57, Paragraph 1 notes correctly that movement between short-term lets and principal residential use is not subject to planning control, but it may be worth noting that Government consulted last year of introducing a new use class, and recently in February issued a press release suggesting this would be taken forward. We may not see further movement on this within the formative period of the neighbourhood plan, but can expect to see progress certainly within the plan period, so a reference might be useful - Short-term lets rules to protect communities and keep homes available - GOV.UK (www.gov.uk)

p.57, paragraph 2, final sentence. We'd suggest avoiding imperative language outside of policies - this sentence is phrased to provide direction, but doesn't have weight outside of a policy.

p.60 Policy 1, Clause 2. The adopted Local Plan Key Centre boundary has been tested through an examination in public and has been found to be justified and 'sound'. Whilst, in principle, an alteration to the town centre boundary could be made by an NDP, it is incorrect for Policy 1 to say that the boundary is not justified.

Annex 2 of the NPPF (December 2023) provides the following definition of a town centre and main town centre uses:

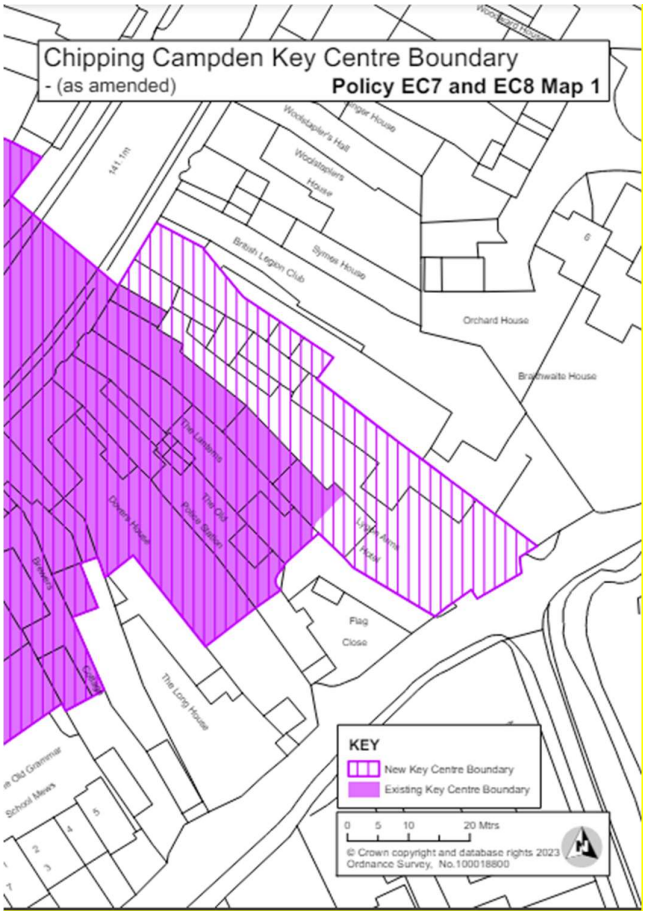
> ***Town centre:*** ***Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area****. References to town centres or centres apply to city centres, town centres, district centres and local*

> *centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.* (added emphasis)
>
> ***Main town centre uses:*** *Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).*

Note, main town centre uses do not include C3 dwellings.

We're sympathetic to the case to protect the pharmacy. However, the pharmacy appears to be the only main town centre use within the proposed boundary extension. What's more, the pharmacy is detached from the existing town centre boundary by a number of properties in residential use and is around 80 metres from the nearest main town centre use. Grevel House, although listed, is in residential use.

The recent Cotswold District Local Plan Regulation 18 consultation included a proposal to alter the Chipping Campden Key Centre boundary in the same general area that the NDP seeks to change the boundary (see map below). This was to incorporate Lloyds Bank and the whole of the Lygon Arms building. However, we note that planning permission was granted on 6th December 2023 to convert and extend the former Lloyds Bank building to create five dwellings (ref: 23/02678/FUL). This now adds to the number of residential properties between the core of main town centre uses and the pharmacy.



The pharmacy is classified as social and community infrastructure, as defined by Policy 2 below. It is also classified as social and community infrastructure in accordance with Local Plan Policy INF2. It therefore already has some policy protection from changes of use to alternative uses, which is the reason for extending town centre boundary.

In summary, we do not consider the proposed extension to the town centre boundary to be consistent with the NPPF definition of a town centre. The town centre boundary must reflect the extent of the town centre that is predominantly occupied by main town centre uses. However, the proposed boundary includes a high proportion of residential uses.

p.63 Policy 1, Clause 3. We understand the ambition, but we wonder how the test in the clause would be interpreted. How does allowing visitor accommodation damage 'vibrancy'? Visitor accommodation could easily be argued to be more vibrant than residential!

We wonder whether a workable alternative might be along the lines of policies seeking to prevent overconcentration of Houses of Multiple Occupation (HMOs). There are quite a few examples, principally from university towns - Cirencester NDP has presented a policy at a recent Regulation 14 consultation you might wish to consider. On a point of detail, visitor accommodation, in the form of hotels, is considered already as a town centre use

As observed at p.59, the planning regime currently does not currently recognise short term lets as a use class, so a rather narrow reading of ‘visitor accommodation’ may need to be taken. It is difficult to draft policy to take account of changes yet to come, but it may be

worth expanding on the reference here either in the policy or supporting text to be clear that short term lets should be read into the definition if they are recognised as a new use class – see DLUHC press release 19 Feb 2024 - https://www.gov.uk/government/news/short-term-lets-rules-to-protect-communities-and-keep-homes-available.

Comment noted, Government update did not progress.

p.63 Policy 1, clause 4. What does 'to alleviate congestion' add to the policy? It is unclear from the current wording whether this applies to the school site and 'elsewhere', or to 'elsewhere' only. We suggestion deletion of this wording - congestion and parking capacity are two disparate issues – and providing parking may well attract traffic movement and increase, not decrease congestion.

Yet to be resolved

p.65 Table 6. The removal or installation of defibrillators isn't generally going to require a planning determination, so planning policy will rarely be an effective tool to retain these facilities. We note that the emerging Local Plan policy SD4 (3) as drafted looks to introduce a requirement on major developments to install defibrillators.

Elsewhere in the table, a number of shops are identified, and a private spa facility. The nature of the commercial offer at these locations could change substantially without requiring development consent – the table can exist at a statement of current fact, but please be aware the policy will not prevent loss of these facilities where development consent is not required.

Comment noted see page 64 ''some infrastructure…''

Policy 2: Social and community infrastructure.

p.67 We support the identification of assets that could be considered under INF2. However, a number of the assets would not require development consent for the community benefit to be lost/changed. Commercial properties with a current use considered to be of community value could easily change to another commercial use - dentist, post office, Co-op, optician. It may be helpful to reflect this fully in supporting text, to manage community expectations.

Partially amended in line with comments – last paragraph p64

Please explain how this list is pertinent to EC8. – unsure this has been addressed

p.69 Policy 2: Social and community Infrastructure, clause 2. What are the criteria for suitability? We already recognise this as a legitimate land use, so how does this affect any decisions? Perhaps consider - proximity to the town - to enable active travel - parking and road access, to improve access, tranquillity, retention of tree cover.

Partially amended in line with comments

p.70 Building with Nature is a benchmark for green infrastructure rather than biodiversity net gain and therefore its use will not necessarily assist in delivering BNG.

It should also be noted that there is now a national GI framework prepared by Natural England, with its own design guidance.

https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design%20Guide%20-%20Green%20Infrastructure%20Framework.pdf

p67, para 6 Add in the presumed missing word ‘little’ to the last sentence. ‘There is **little** that the planning system can do when the occupants of commercial premises vacate’

Policy 3: Design of the built and natural environment.

Comments on the Design Code at the end of this document

p.73 The intention is sound, but the wording is unclear when this requirement actually applies - we would suggest 'Planning Proposals requiring D&A...’ or similar.

Building with Nature is a great initiative, but it is a commercial product and therefore should not be the only alternative is deciding whether GI is well-designed. Suggest change in wording to -

> ‘Planning...and should be designed in accordance with Natural England’s Green Infrastructure Planning and Design Guide and the Building with Nature standards or equivalent.’

Natural England GI framework is free to use – missing reference to Natural England

Policy 4: Non-designated Heritage Assets.

p.74 The text refers to features and also assets – normally features are part of an asset. While there is no reason why some of these smaller objects such as post boxes cannot be defined as assets (designated or non-designated), it is more problematic when you get down to those small features that form part of a wider building or asset, such as a boot scraper as these have no planning control.

It is somewhat confusing that the NDP sets out a list of criteria for NDHAs, but also refers to the criteria in the Local Plan. it would provide more consistency and robustness if the NDP simply used the Local Plan criteria.

p.76 CDC welcomes the inclusion of an NDHA policy – it is a great way to celebrate local assets, and to seek to give them appropriate recognition in any planning determinations. However we note a lot of the features singled out are fixtures on buildings which have heritage listing already, and thus cannot be NDHAs. This means that those features /fittings are already protected by the listing - important fixtures and fittings will require LBC for their removal – as the plan recognises at p74 p.56. This is already a higher degree of protection that an NDHA policy can confer.

In addition, some modern assets have been included such as the Millennium sign and the Cotswold Way marker. Although obviously of great community importance they cannot really be considered as a NDHA.

We can’t see how the Plan can directly offer more protection to already listed assets, beyond their existing statutory listing, and the design guide which should help protect the wider setting, but the evidence base, cataloguing the sundials and boot scrapers could sit in the Plan to highlight these unusual features, telling the unique story of Chipping Campden, and raising awareness amongst owners and the general public that they are listed and thus protected. On that point, we commend the clear and visually appealing information shared at Appendix 6. We encourage you to provide a location map for these assets/features. This will enable all parties and particularly the LPA to be sure that these NDHAs are fully taken into account in the planning process.

If they are features of non-listed buildings (and therefore not covered by the LBC regime), the removal of some of these features e.g. a bootscraper, would not be development and therefore their removal would not form part of the planning process. It may be appropriate to put those building forward as NDHAs and identify those features specifically – it would go to the justification of their inclusion as NDHAs, and explain the particular features most worthy of preservation where possible.

Reference to this suggestion could be made clearer

It would be useful to make an addition to the text that states that additional NDHAs may be identified in the future, for example through the planning process.

Could still be added to at the end of paragraph 74.

Policy 5: Environment and Biodiversity Net Gain

p.72 This will have to be updated to reflect the implementation of the Environment Act and also ongoing work on the Gloucestershire Local Nature recovery Strategy.

The text states that 10% BNG applies to all development – this is not strictly correct, there are several exemptions, for example householder applications.

The text is slightly confusing in places – is the NDP providing information that is being fed into the countywide LNRS or putting forward a nature recovery strategy of its own? There are already nature recovery plans for the Cotswolds National Landscape and the Cotswold Water Park, so there is no reason why a parish level nature recovery plan is not appropriate, noting that it should definitely feed into the county-wide work. We suggest it would be better not to call it a 'nature recovery strategy' as that may create confusion with the county level work. There is a lot of detail here, for example it may not be necessary to mention the national guidance particularly given its focus on local nature recovery strategies rather than local nature recovery per se. We suggest some changes to the text below:

> The Environment Act also introduced Local Nature Recovery Strategies (LNRS). These ~~National guidance on local nature recovery (LNR) was issued by DEFRA on 23 March 2023 and continues to be provided in advice notes and other materials. Local nature recovery strategies~~ are a nationwide system of spatial strategies to help reverse the decline of biodiversity. ~~There will be approximately 50 strategy areas covering the whole of England with no gaps or overlaps. Preparation of each strategy will be locally led by a 'responsible authority', in this case~~ Gloucestershire County Council (GCC), as the "responsible authority" is preparing the Gloucestershire LNRS, and has commissioned the Gloucestershire Local Nature Partnership to assist with this work. ~~will be working with Gloucestershire Wildlife Trust (GWT) and the Gloucestershire Environmental Records Centre to deliver the LNR for Chipping Campden~~. As the responsible authority, GCC ~~will be~~ is required to work collaboratively with other local organisations including parish councils with input encouraged from across the public, private and voluntary sectors to establish shared proposals for what action should be taken and where.
>
> ~~In this case,~~ the CCNDP is setting out a series of sites (fig 15), which are the optimum locations within the parish to deliver nature recovery, because either they

are already important for biodiversity in their own right, for their ecological connectivity function or because they have good potential to increase in biodiversity value or connectivity. These are based on data provided by the Gloucestershire Wildlife Trust. (appendix 7) a ~~local land use strategy for inclusion in the wider LNR strategy when that is prepared. Section 106 of the Environment Act 2021 requires that all local nature recovery strategies must contain a statement of biodiversity priorities and local habitat map and lists what both must include. In this case, the LNR strategy has not been prepared and in anticipation, the Town Council has commissioned the Gloucestershire Wildlife Trust, to prepare maps of habitats and ecological data for local input into the preparation of the LNR, probably as part of the local habitat map for Gloucestershire. The Environment Act 2021 requires that all statements of biodiversity priorities set out: • a description of the strategy area and its biodiversity • a description of the opportunities for recovering or enhancing biodiversity in the strategy areas • the priorities for recovering or enhancing biodiversity • proposals as to potential measures relating to those priorities The strategy area The strategy area is the neighbourhood area.~~ Appendix 7 provides detailed habitat maps describing the local baseline which is being put forward for inclusion ~~may be included~~ in the ~~LNR strategy for~~ Gloucestershire LNRS. ~~The maps show areas of particular importance for biodiversity, either because of their existing designations, they are locally important or have potential for improvement. Figure 15 shows potential areas of importance.~~

Partially amended in line with comments

p.80 paragraph 4. It is not clear if the map at fig 16 is simply showing all the areas that are included within the relevant appendix. Might be helpful to distinguish between areas that are of existing ecological value and those that would be suitable for enhancement.

May need further work to clarify this information

p.75 paragraph 1. It is not clear why there is a reference to planning permission - It is not necessary at the application stage (or at determination of the application) for the applicant to be completely clear where they will deliver their BNG –they can simply say that it will be delivered off site, although the LPA are encouraging applicants to provide as much information as possible.

BNG delivery will not be limited to the Gloucestershire Nature and Climate Fund. These paragraphs need re-working to make them clearer. Is the NDP the appropriate place to set out areas that the local community want to put forward for inclusion in the county wide LNRS? It is very valuable information but we wonder whether it should be in the NDP – given that it needs to be taken forward through other avenues.

We suggest re-wording:

Opportunities and priorities for recovering and enhancing biodiversity

Not only should the sites identified on figure 15 be included within the Gloucestershire LNRS but they also provide the most ecologically meaningful local locations for any off-site Biodiversity net gain that arises from development within the Parish to be located. ~~DEFRA advice is that some changes in land use or management may require a separate consent before they can be undertaken, such as planning permission. Responsible authorities do not need the relevant consents to~~

~~be in place before including areas that could become of particular importance in their local habitat map. It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed to be finally determined at planning application stage, when the details of a specific proposal can be fully explored. DEFRA guidance states that the priorities identified by every local nature recovery strategy should reflect local circumstances, including the most important issues to local people and organisations. The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy. Figure 15 and the more detailed evidence in Appendix 2 and Appendix 7 shows that there are already existing habitats that could benefit from protection and improvement, marked 1-13~~. Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each of the locations identified in fig 15.~~area~~. It is important to note that identification as a local nature recovery area on figure 15 does not preclude development. Existing land use policies will remain in place. The delivery of off-site BNG at these nature recovery areas could be via the Gloucestershire Nature and Climate Fund or other mechanisms. However there are also other sources of funding that could support nature recovery, for example ~~What will change however is that the identified sites will be put forward as local nature recovery strategy options. It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund1 ,~~ agri-environment schemes ~~or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund.~~

Partially amended in line with comments

p.84 Policy 5: Environment and Biodiversity Net Gain

Noting the extensive comment on the Reasoned Justification, please be assured that we welcome the ambition in this policy - and the intention to wrestle with this issue. We haven't had other NDPs in our area pick this up this extent, so we're keen to help you make the most of this.

The first section of the policy as drafted is not a land use policy, as it is simply stating that these areas will be put forward as suggestions for inclusion in the county wide LNRS – and indeed they may or may not be included in the final LNRS, dependent on a range of evidence.

It is also important to bear in mind that even where areas are identified in the LNRS they are not necessarily where off-site BNG will happen. They are likely to affect the BNG scores by providing strategic significance multipliers but that does not force the BNG to those locations. Strategic significance multipliers for Gloucestershire are set out in our BNG guidance - https://www.cotswold.gov.uk/planning-and-building/wildlife-and-biodiversity/biodiversity-net-gain-bng/

That said, we aren't convinced that it is within the legal purview of a neighbourhood plan to designate land as a Local Nature Recovery area - these areas will be designated in the Local Nature Recovery Strategy – if that is what they end up being called in the strategy, which isn't a district level planning function. That document should take account of parish

views and the evidence base, so we think the evidence and intention can absolutely be presented in the NDP, but we aren't convinced that this clause can go forward as policy.

'Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows:

(a) Contact Cotswold District Council to determine whether work has been done towards the preparation of the Gloucestershire Local Nature Recovery Strategy regarding the proposal site, its relationship with the Gloucestershire Local Nature Recovery map, and seek advice on how best to deliver local nature recovery and biodiversity net gain within that context.'

This is not policy, so much as explanatory text. A Local Planning Authority could not refuse an application because the applicant had not done this. We'd suggest you move this to the supporting text.

(b) Where biodiversity net gain cannot be delivered on site, applicants must work with Cotswold District Council to identify ways that off-site biodiversity net gain can be delivered in Chipping Campden Parish.

We suggest a rewording, to make sure this is a test to be satisfied at the time of planning determination – something along the lines of "Where BNG cannot be delivered on the development site, off-site BNG should be delivered within Chipping Campden Parish unless sufficient justification is provided to show that this is not possible." There is a risk that this policy will not meet the Government guidance, as the BNG metric already includes a factor for proximity to the development site. This point notwithstanding, we believe it is an appropriate policy issue for an NDP, and we have tried to emphasise this issue in the Local Plan Reg. 18 consultation biodiversity policies -

> Off-site BNG should be delivered in locations that contribute to the Gloucestershire Nature Recovery Network and that are as close to the development site as possible.

(c) Where off-site biodiversity gain is proposed, this should be focused on the nature recovery areas shown in Figure 15 or the Gloucestershire Local Nature Recovery Map.

Perhaps absorb this into the policy above –

"Where BNG cannot be delivered on the development site, off-site BNG should be delivered within the Chipping Campden Local Nature Recovery Areas as the first option or elsewhere within Chipping Campden Parish or in locations that contribute to the Gloucestershire Local Nature Recovery Strategy unless sufficient justification is provided to show that this is not possible.

(d) Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary.

That is not required as it forms part of the legal requirements for BNG anyway

(e) Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered.

That is implicit – BNG is a requirement, and the policy already stresses the preference for 'on-site' or local and is also covered in the clauses above.

(f) Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.

That is not required, you cannot deliver off-site BNG unless the land-owner is partner to that process so this clause is not necessary.

clause (f) removed – partially amended in line with comments

Policy 6: Local Green Spaces

p.85 and Appendix 8.

This is a relatively large number of sites, which collectively may be considered to almost encircle the town and constrain growth - which may undermine the process.

We note that a number of sites are already subject to constraints making development challenging - for example development on the Bratches Allotments, Bowling Green and Cricket pitch would require alternative provision to be made, so amenity is protected already, as you have noted. You may wish to consider and articulate the extent to which these sites are demonstrably special, beyond this amenity value.

Sites 19 and 20, individually and together are large tracts of land on the periphery of the town, without extensive formal access rights, and subdivided by a number of field boundaries. NPPF para 106 c) requires that an LGS is 'local in character and is not an extensive tract of land'. Typically, sites which are primarily agricultural in nature require a strong justification to meet the NPPF criteria. Please see Planning Practice Guidance, Paragraph: 011 Reference ID: 37-011-20140306 and Paragraph: 015 Reference ID: 37-015-20140306, https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space.

We would strongly encourage you to ensure site owners are aware of these proposal – the onus is upon the qualifying body to consult with the site owners – and examiners have upon occasion sought confirmation of this. Paragraph: 019 Reference ID: 37-019-20140306 https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

There are a few sites where ownership appears uncertain - predominantly these are the smaller verges and informal public open space. We do not object to their inclusion but note that given their important function within the townscape/conservation areas, there's little risk to these sites from development.

partially amended in line with comments

Appendix 2

These maps are not easy to read even when zoomed. The maps are dated 2017 - information of this type is being constantly updated so it is highly likely that if this map was requested again that it would be different. Noting the challenge of trying to reference data that is regular updated, one option might be to acknowledge that the map is likely to be out of date / become outdated, and to be clear that the data will change over time.

Chipping Campden Design Guide

p.5. We note that the Design Guide references MHCLG as the sponsoring Government department. MHCLG was rebranded as DLUHC, the Department for Levelling Up, Homes and Communities in 2021.

p.9. The national design guide is no longer a draft.

We would expect to see reference to the National GI Framework prepared by Natural England, with its own design guidance.
https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design%20Guide%20-%20Green%20Infrastructure%20Framework.pdf

We encourage you to add web references for all this documents to make access easier.

p.13. As per our comment on the main NDP document, please change AONB references to National Landscape.

The design guide seems very focused on architectural design, rather than landscape/ecological etc design.

p.43. p 45 We would encourage some consideration of decarbonisation as well as energy efficiency.

partially amended in line with comments – no reference to decarbonisation

p.40. p 42 We wonder if the photos are all meant to be exemplars, or simply examples of particular design features – e.g. the stone mullion windows in the photo on this page are not great. There are other examples where the images do not show necessarily show great design but are illustrative. Perhaps there is some scope to reflect this nuance in the picture referencing, to encourage developers to respond to context and the direction of the design guide, and improve on current practice, rather than replicate the acceptable.

Clarity may still be required

Contact:

Neighbourhood Planning

Cotswold District Council
Council Offices
Trinity Road

Cirencester
Gloucestershire
GL7 1PX

Rep #31 - Historic England

[redacted]

Dear Neighbourhood Planning team

Thank you for your Regulation 16 consultation on the submitted version of the Chipping Campden Neighbourhood Plan.

I can confirm that there are no issues associated with the Plan upon which we wish to comment.

Our advice relating to the Regulation 14 consultation exercise is attached for information.

Kind regards

[redacted] | Historic Places Adviser

[redacted]

Historic England

Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have recei
Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. For information

[redacted]

[redacted]

Dear [redacted]

I write following up your exchange of communication with my colleague [redacted] below.

The recently ended consultation on the draft Neighbourhood Plan for Chipping Campden came to our attention a short while ago and so we sought to enquire whether this was an exercise which we needed to be formally involved in.

Having looked at the Plan's website we note that although not specifically referred to as a Regulation 14 consultation, reference is made to the pre-submission stage which the Plan has reached, and that comments made will be used to revise the Plan as appropriate prior to its submission to Cotswold District Council for Examination.

It is for the relevant community to exercise discretion in determining whether the interests of Historic England are likely to be affected by the policies and proposals which the Plan aspires to, and to decide whether or not to consult us accordingly. At the same time, our experience has shown that Examiners can sometimes be a little twitchy on learning that the statutory agencies have not been consulted at the formal consultation stages in a Plan's preparation, and have been known to ask for us to be consulted during the Examination process, obviously causing undesirable extra work and delay.

In the case of the Chipping Campden Plan, we did have sight of an advanced draft of the Plan as part of the District Council's consultation on the associated SEA Screening in February this year. At that time we identified that there were no headline issues which we wished to flag up, nor were there likely to be matters upon which we would be likely to wish to comment on assuming the Plan went forward essentially unchanged.

Having now considered the version of the Plan which formed the basis of the recent consultation I can confirm that there are indeed no significant issues associated with the Plan upon which we wish to comment. We note its limited schedule of policies but that these are ably developed and supported by a detailed understanding of the town and its context, and especially its unique historic character.

We are therefore pleased to observe the complimentary production of the Design Code referred to in Policy 3 on Design and again in Appendix 5. This should help enormously in ensuring that new development does conserve and enhance the town's unique townscape, the desirability of which is highlighted on p38 which sets out issues which earlier community consultation identified.

That feedback also identified the need for a Community Design Statement. It is not clear whether the Design Code recently produced is meant to address this need entirely. P38 also refers to the importance of the townscape not being spoiled by inappropriate uses which can affect the area's attraction to tourists and damage the local economy. There may therefore be an opportunity to

consider whether there are other local issues, such as public realm design and management for example, which could also benefit from locally informed and tailored policy or guidance.

In the context of the Neighbourhood Plan this of course is a matter entirely for the discretion of your community.

Otherwise, we would only want to congratulate your community on its Plan, and wish it well in the subsequent stages to getting it made.

Kind regards

[redacted] | Historic Places Adviser

[redacted]

SFPLANNING

23 July 2024

Neighbourhood Planning,
Cotswold District Council,
Trinity Rd,
Cirencester
GL7 1PX

By email: Neighbourhood.Planning@cotswold.gov.uk

Dear Sirs

Chipping Campden Neighbourhood Plan – Regulation 16 consultation
Representation on behalf of landowner interests at Springhill Industrial Estate

1. This representation is made by SF Planning Limited in response to the Chipping Campden Neighbourhood Plan Regulation 16 pre-examination consultation 2025 (the NDP document), on behalf of the owners of 4.95ha land at Springhill Industrial estate, Chipping Campden, GL56 9TP as shown edged approximately in red on the plan below. Their site falls within the neighbourhood plan area.



Figure 1 - Red line showing our client's site edged approximately in red for identification purposes only.

[redacted]

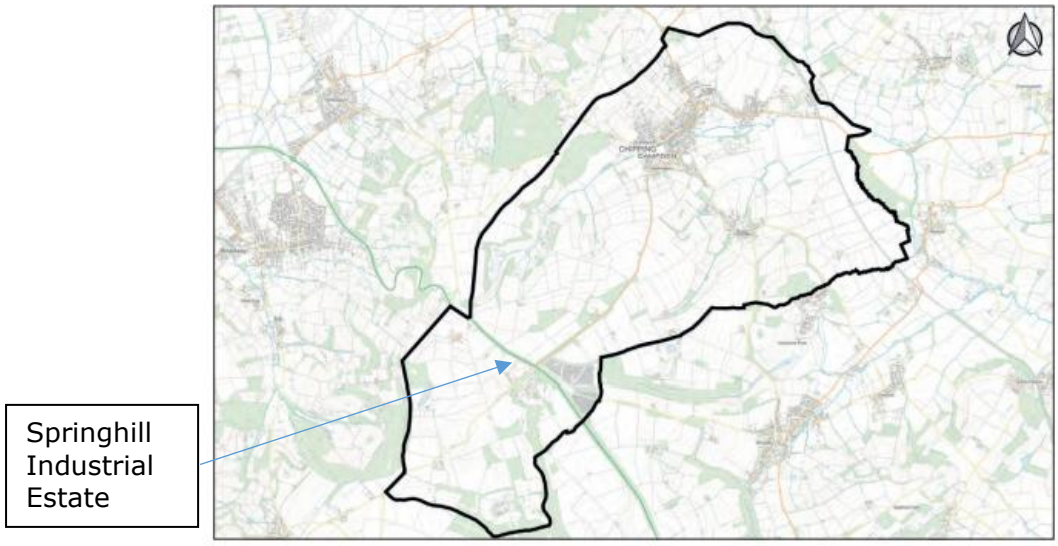


Figure 2 - Extract from NDP document showing Neighbourhood area.

2. As submitted previously, our client's site is an established industrial estate with a long history of employment use and development, comprising various industrial buildings and businesses, including an oil distribution depot, storage tank manufacture and repair facility, and a waste oil storage depot. The site also includes a worked-out quarry that has been repurposed for industrial use.

3. The industrial estate benefits from existing infrastructure, including access roads and utilities including fast broadband, which support the current businesses operating on the site.

4. As the Town Council are aware, our client has submitted representations in respect of both the Cotswold District Council (CDC) local plan review and the Regulation 14 Chipping Campden neighbourhood plan. Both of these representations set out the importance of the site as established employment land which merits safeguarding under the local plan. Both representations are attached to this letter.

5. The Town Council response to our representation on the regulation 14 draft NDP is shown below (figure 3)

representations were made	
SF Planning on behalf of the landowners of Springhill Industrial Estate	
The representation is promoting a site for employment development. This site is being promoted though the local plan review. The representation makes the case that the CCNDP should address and protect employment sites outside the town centre.	In relation to employment, the CCNDP focuses on the town centre not as allocations (which is proposed here) but to manage existing development over specific matters (retention of town centre uses, extent of the town centre boundary, short term holiday lets, support for additional parking) and not to allocate or protect land for employment use. Though this is possible to do in an CCNDP, consultation did not identify this as a priority.
The representation also mentions in para. 12 that the client owns some of the land identified for local nature recovery. Safety issues on the quarry face may make nature recovery difficult.	This is a long-term policy and the use of the land may change over the longer term. The policy is not directive or restrictive and so the identification of this location's potential in the CCNDP will be retained.

Figure 3 – extract from page 50 of the Neighbourhood Plan Consultation Report, February 2025.

Employment land safeguarding

6. Notwithstanding the comments from the Town Council, we remain firmly of the view that the NDP is an excellent opportunity to recognise the importance of the Springhill Industrial Estate as a local employment site and part of the local economy and safeguard it for future growth. Also, its location outside the town centre ensures that employment traffic does not exacerbate the existing town centre traffic situation.

7. Clearly, the NDP cannot be all things to all people, however the need to enhance the local economy at a challenging time for employers needs to be recognised and planning has a role to play in this. The NDP should therefore allocate or dedicate the land for employment uses. Its contribution to the local economy, and its potential for future employment growth make it a valuable asset that should be safeguarded.

8. We are unsure as to which consultation identified the safeguarding of employment land as low priority but note that our previous consultation submission highlighted it as being a high priority due to the need for the neighbourhood plan to support economic development and we continue to believe that it should be a high priority.

9. Just because the current draft of the local plan does not allocate sites (including employment sites), this does not mean that it should not. This is a prime opportunity to correct what we consider to be a significant oversight. Locality outline the benefits of site allocations at page 31 of their document neighbourhood planning: how to assess and allocate sites for development:

   "A site allocation can be used to shape development in a neighbourhood area and is also an important tool to communicate expectations and aspirations. For a community, it can be a way of understanding and expressing the shared vision and objectives of the residents and businesses living and working in a neighbourhood area. It can be a way of communicating the levels of development and supporting infrastructure that would be accepted in an area and the design principles that should be followed. For a landowner or developer, it provides certainty over what is expected from development, including the design and community facilities that are sought through new development."

10. There is a wealth of research confirming that young people leaving school are most likely to want to live in areas where they have access to employment opportunities and are more likely to stay in an area where they grew up if they have access to the services, jobs and facilities which meet their needs. It is the Town Council's vision for Chipping Campden to realise the potential of young people (page 13 of the NDP) however the NDP itself runs contrary to this, having only a very narrow focus only on the town centre of chipping Campden and not

on employment sites within other parts of the parish or indeed on other services and facilities (for example in Broad Campden). Without furthering the reach of the NDP, this has the potential to be a significant lost opportunity to boost the local economy across the whole parish and not just in the town of Chipping Campden.

11. The NDP suggests that it is a plan for all residents but then fails to give due recognition to locations outside of Chipping Campden town centre which is, in our view, a significant oversight.

12. The NDP recognises the importance of the BRI site and to the business park to the east of the town, stating on page 26 of the NDP that "*the impact of the BRI and the opportunities for growth and innovation on the Business Park, allow for the local economy to grow, thrive and innovate. Much of Chipping Campden's economy is tied to the success of these enterprises."* The same could be said for our client's site, forming an important part of the local economy so it is alarming that the NDP does not do more to protect or even recognise local employment sites in the parish.

13. There is a question as to whether the NDP is consistent with local and national policies. For example, the CDC local plan at paragraph 9.2.7 states;

    "The aim, therefore, is to maintain and enhance the role of established employment sites, where they are well located, through the development of further employment uses and the prevention of changes to other uses".

14. Nationally, the NPPF contains the following policies in relation to neighbourhood planning, which the Town Council should comply with when preparing the NDP:

NPPF paragraph no.	Text
PARAGRAPH 13.	The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.
PARAGRAPH 30.	Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies
PARAGRAPH 85.	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic

	growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future
PARAGRAPH 88.	Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings; b) the development and diversification of agricultural and other land-based rural businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside; and d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

15. In summary, we remain of the view that the retention and potential expansion of the Springhill Industrial Estate still aligns with the principles of sustainable development by providing employment opportunities for the area and supporting the longer-term vitality and viability of the local economy.

16. As mentioned previously (although our client has not heard anything to date), our client is happy to have discussions with the Town Council about the parameters of the site and the potential for growth and how it could support the local economy as the NDP progresses. This would assist in the policy wording.

Local Nature Recovery Sites

17. We have previously submitted a response to the Town Council which confirms that one of the Local Nature Recovery (LNR) sites is within or adjacent to our client's land (a woodland area along the A44). Our client shares the goal of retaining the woodland however, this land secures the quarry face close to the A44 so is needed primarily for safety reasons. This restricts the ability to further enhance the woodland and facilitate nature recovery and therefore our client considers that it would not be appropriate to designate this section as a LNR site.

18. The NPPF at paragraph 196 requires planning policies and decisions to ensure that;

    "a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation)"

19. The NDP evidence base does not include an assessment of the impact of the LNR policy on land stability. This is a risk which persists from the historic use, not the use going forward as the consultation response would suggest. In order for the plan to be consistent with local and national policy; the Town Council should commission a survey and assess the overall impact prior to submitting the NDP for examination.

20. An assessment should also look at the impact of the LNR on operations at this already established industrial site in order to meet the basic requirements.

21. Please contact me should you find it helpful to discuss the information included in this submission.

Yours faithfully

[redacted]

SF Planning Ltd.

COTSWOLD
District Council

Identified Supplier
Template

Enquiries to: Mark Harrison
Senior Planning Policy Officer
mark.harrison@cotswold.gov.uk

1st December 2025

RE: Invitation to Quote Letter

Dear Planning Consultant,

This is an invitation to quote for the examination of the Chipping Campden Neighbourhood Plan, which proposes 6no policies, and has 32no Reg. 16 representations.

If you wish to submit a quotation, I kindly ask you to read the *Specification* and complete questions 1-10 on the *Award Criteria/ Pricing Schedule* below.

Draft decision to procure an examination is to be made on Thursday 11th December; CDC allows 5 clear working days for 'call-in' of the decision. Therefore, if not called-in, bids will be invited from Friday 19th December.

We are allowing 3 weeks for bids to be submitted via-email meaning a deadline of 12pm on Friday 9th January 2026. CDC, in collaboration with Chipping Campden Town Council, will assess the bids and hopefully make an appointment later in January.

You may factor this timeline into your response to questions 8-10 below.

If you have any queries please do not hesitate to make contact with me using the details at the end of this letter.

Yours faithfully,

Mark Harrison BSc(Hons) MA MRTPI
Senior Planning Policy & Neighbourhood Plans Officer
Planning Policy and Infrastructure
Cotswold District Council

P: Cotswold District Council, Trinity Road, Cirencester, GL7 1PX
E: mark.harrison@cotswold.gov.uk

Specification

Schedule A: Contract Requirements

To carry out the independent examination of the Chipping Campden Neighbourhood Plan in accordance with paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as applied by section 38A of the Planning and Compulsory Purchase Act, 2004), and to provide a written report making recommendations in accordance with paragraph 10 of Schedule 4B to the Town and Country Planning Act 1990.

Schedule B: Contract Price

A daily rate of [insert price] plus VAT (based on a 7.0 hour day), plus reasonable expenses to total [insert price].

Appointment is considered outside IR35 on the basis that the examiner must be independent of Costwold District Council ("CDC"), CDC are not in control of how, when or where the examiner works, the examiner could reasonably be substituted if required, there is no expectation to offer continuous work, and the examiner is not required to exclusively work for CDC.

There may be a different and separate IR35 arrangement between the examiner and their planning consultancy.

Payment will be raised via Invoice following delivery of the Examiner's Report to the standard specified in Schedule A.

Schedule C: Contract Period

Schedule A will take [insert number] days, unless a longer period is agreed in writing by Cotswold District Council.

Work is expected to being in week beginning [insert week, month, year] and be completed before or during week beginning [insert week, month, year].

Award Criteria/ Pricing Schedule

Quotations will be assessed and the score divided between quality (split into qualifications and experience), cost and timescales. A 25:25:25:25 ratio will be used when assessing using these matrices. Assessment will be made on responses to the questions below.

Any quotes exceeding £30,000 will automatically fail as it will no longer comply with CDC's procurement process.

Qualifications

1. **Please outline your qualifications in regards Town Planning (including RTPI or other professional membership)...**

2. **Please outline your experience in Neighbourhood Planning...**

Experience

3. **Please outline a list of Neighbourhood Plans examined in the last 5 years. Please attach or copy links to Examiner Reports if you wish/ are able.**

4. **Please outline your particular areas of expertise or specialisms in Neighbourhood Planning with relevant examples in previously examined Neighbourhood Plans, and how this may benefit examination of the Chipping Campden Neighbourhood Plan.**

Cost

5. **Please indicate your daily rate as per Schedule B above.**

6. **The work set out in Schedule A will take how many days ... resulting in a total cost of ... plus VAT.**

7. **Please quote your expenses to add to the total.**

Timescale

8. **The work as set out in Schedule A above can begin in the week beginning...**

9. **And should be completed before or during the week beginning...**

10. **Please set out any reasons, such as other projects or submitted quotations, and how they may result in these timescales changing...**

Submission Requirements

Suppliers must submit the following:

1. Quotation – *responses to questions 1-10 above*

2. Company Details – *name, address and point of contact, company number, VAT registration number, SME*.

3. Confirmation of Compliance – *confirmation that your proposal meets the requirements set out above in Schedule A (this can be evidenced through responses to questions 1-10)*.

4. Insurance requirements *(Public Liability Insurance (third party) minimum £5M ; Employers Liability Insurance, minimum £5M; Professional Indemnity Insurance, minimum of £1M and Product Liability Insurance, minimum of £5M) , compliance with legislation, health and Safety*.

Quotation Terms

· *This is an Invitation to Quote, not a formal tender, and does not commit the Council to any purchase*.

· *We reserve the right to accept or reject any quotation*.

· *Late submissions may not be accepted*.

· *The contract will be awarded based on the Most Advantageous Tender (MAT)*

· *The contract will be subject to the Councils standard terms and conditions, unless specified otherwise*.

Terms and Conditions of Contract for Services

1 Interpretation

1.1 The following definitions and rules of interpretation apply in the Contract (unless the context requires otherwise):

Business Day: a day, other than a Saturday, Sunday or public holiday in England.

Commercially Sensitive Information: the information listed in the Quotation comprising the information of a commercially sensitive nature relating to the pricing of the Services, the Contractor's intellectual property rights or the Contractor's business operations which the Contractor has indicated to the Council that, if disclosed by the Council, would cause the Contractor significant commercial disadvantage or material financial loss.

Confidential Information: means any information (however recorded or preserved) disclosed by a party to the other party in connection with this Contract, which is:

(a) information that would be regarded as confidential by a reasonable business person relating to:
   (i) the business affairs, customers, suppliers or plans of the disclosing party; and
   (ii) the operations, processes, product information, know-how, designs, trade secrets or software of the disclosing party;
(b) information developed by the parties in the course of providing the Services under this Contract;
(c) Commercially Sensitive Information.

Contract: means the agreement between the Council and the Contractor incorporating the RFQ, the Quotation, the Order and these terms and conditions.

Contractor: the consultant, person, firm or company to whom the Contract is issued

Council: [Cotswold District Council] [Forest of Dean District Council] [West Oxfordshire District Council] [Publica Group (Support) Limited]

Council Property: all documents, books, materials, records, correspondence and information (on whatever media and wherever located) relating to the business of the Council or its customers and business contacts, and any equipment, keys, hardware or software provided for the Contractor's use by the Council during the Engagement, and any data or documents (including copies) produced, maintained or stored by the Contractor on the Council's or the Contractor's computer systems or other electronic equipment during the Engagement and relating to the provision of the Services.

Data Protection Legislation: all applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR, the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations 2003 (*SI 2003/2426*) and the guidance and codes of practice issued by the Information Commissioner or other relevant regulatory authority and applicable to a party and **Controller**, **Personal Data**, **Processing**, **Processor** shall be interpreted as defined in the Data Protection Legislation.

Deliverables: any outputs of the Services and any other documents or materials provided by the Contractor to the Council as more particularly described in the RFQ and the Quotation and any other documents and materials provided by the Contractor to the Council in relation to the Services .

Engagement: the engagement of the Contractor by the Council on the terms of the Contract.

Intellectual Property Rights: patents, rights to Inventions, copyright and related rights, moral rights, trademarks, business names and domain names, goodwill and the right to sue for passing off, rights in designs, database rights, rights to use, and protect the confidentiality of, confidential information (including know-how and trade secrets) and all other intellectual property rights, in each case whether registered or unregistered and including all applications and rights to apply for and be granted, renewals or extensions of, and rights to claim priority from, such rights and all similar or equivalent rights or forms of protection which subsist or will subsist now or in the future in any part of the world.

Invention: any invention, idea, discovery, development, improvement or innovation made by the Contractor in the provision of the Services, whether or not patentable or capable of registration, and whether or not recorded in any medium.

Order: the purchase order forming part of this Contract

Quotation: the Contractor's response to the RFQ.

RFQ: the Request for Quotation or invitation to tender, and any other documents (or parts thereof) specified therein, issued by the Council setting out the Council's requirements in respect of the Services

Services: the services or project to be provided by the Contractor as described in the RFQ and where applicable the Order including any Deliverables.

UK GDPR: has the meaning given in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018.

The headings in the Contract are inserted for convenience only and shall not affect its construction.

1.2 A reference to a particular law is a reference to it as it is in force for the time being taking account of any amendment, extension, or re-enactment and includes any subordinate legislation for the time being in force made under it.

1.3 Unless the context otherwise requires, words in the singular shall include the plural and in the plural shall include the singular.

2 Provision of Services

The Council shall engage the Contractor and the Contractor shall provide the Services in accordance with the Contract.

3 Time of Performance

3.1 The Contractor shall perform the Services in accordance with the timescales set out in the RFQ.

3.2 During the Engagement the Council may:

(a) by written notice require the Contractor to execute the Services in a particular order

(b) require the Contractor to submit detailed programmes of work and progress reports for the Services.

3.3 If the Contractor fails to deliver the Services within the time specified in the RFQ the Council shall not be obliged to accept or pay for the Services and may terminate the Contract with immediate effect without prejudice to any other rights or remedies which the Council may have hereunder.

4 Duties and Obligations

4.1 The Contractor shall complete the Services, including any Deliverables with reasonable skill, care and diligence in accordance with the Contract.

4.2 The Contractor shall provide the Council with such information and reports as it may reasonably require in connection with matters relating to the provision of the Services, including the Deliverables (if any) at such intervals and in such form as the Council may from time to time require.

4.3 Unless specifically authorised to do so by the Council in writing, the Contractor shall not:

(a) incur any expenditure in the name of or for the account of the Council; or

(b) hold itself out as having authority to bind the Council.

4.4 The Contractor shall comply with all professional standards of safety and comply with the Council's health and safety procedures from time to time in force at any Council premises where the Services are provided and report to the Council any unsafe working conditions or practices at such premises.

5 Equality/Human Rights

5.1 The Contractor shall comply with the Equality Act 2010 including any codes of practice issued thereunder and shall assist the Council to monitor the equality of the provision of the Services which may require the Contractor to complete a questionnaire and/or provide information to the Council on the extent and quality of the Contractor's equalities and diversity policies and practice.

5.2 The Contractor shall notify the Council forthwith in writing as soon as it becomes aware of any equalities investigation or proceedings brought against the Contractor.

5.3 The Contractor shall (and shall use its reasonable endeavours to procure that its staff shall) at all times comply with the provisions of the Human Rights Act 1998 in the performance of this Agreement as if the Contractor were a public body (as defined in the Human Rights Act 1998)..

5.4 The Contractor shall undertake, or refrain from undertaking, such acts as the Council requests so as to enable the Council to comply with its obligations under the Human Rights Act 1998

5.5 If the Contractor fails to meet its obligations set out in this clause and after having been given the opportunity to improve the Council may terminate the Contract.

5.6 The Contractor shall indemnify the Council in respect of all costs, claims and demands arising from a third party claim resulting from the Contractor's failure to comply with its obligations under this clause

6 Prevention of Bribery

6.1 The Contractor shall:

(a) comply with all applicable laws, regulations, codes and sanctions relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010;

(b) comply with any relevant industry code on anti-bribery as the relevant industry body may update them from time to time;

(c) promptly report to the Council any request or demand for any undue financial or other advantage of any kind received by the Contractor in connection with the performance of the Contract;

(d) ensure that all persons associated with the Contractor or other persons who are performing services in connection with the Contract comply with this clause 6; and

(e) ensure that it has in place adequate procedures to ensure compliance with this clause 6.

6.2 The expressions "adequate procedures" and "associated" in clause 6 shall be construed in accordance with the Bribery Act 2010 and all documents published under it.

6.3 The Council may terminate the Contract and recover any losses if the Contractor, its employees, directors, agents, representatives or anyone acting on the Contractor's behalf do any of the following things:.

(a) fail to comply with clause 6.

(b) offer, promise or give a bribe (as defined by the Bribery Act 2010) to the Council or any of its employees or members whether prior to or after the date of this Contract concerning the negotiation, the entering into, the terms and conditions of or the performance of this Contract (even if the Contractor does not know what has been done); or

(c) commit any fraud in connection with this or any other Council contract whether alone or in conjunction with Council members or employees

7 Anti-slavery and human trafficking

7.1 In performing its obligations under the agreement, the Contractor shall:

(a) comply with all applicable anti-slavery and human trafficking laws, statutes, regulations from time to time in force (Anti-Slavery Laws) including the Modern Slavery Act 2015 and any anti-slavery policy of the Council of which the Contractor has been notified;

(b) include in contracts with its subcontractors anti-slavery and human trafficking provisions that are at least as onerous as those set out in this clause; and

(c) notify the Council as soon as it becomes aware of any actual or suspected breach of this clause 7;

7.2 The Contractor represents and warrants that it has not been convicted of any offence involving slavery and human trafficking or been the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence of or in connection with slavery and human trafficking.

8 Environmental

The Contractor shall in its provision of the service use working methods, equipment, materials and consumables, which minimise environmental damage. In particular the Contractor shall ensure that it is familiar with and fully complies with the environmental obligations laid down in the Council's [(for WOX) Climate Change Strategy and Carbon Action Plan] [(for CDC) Climate Emergency Strategy] [(for FDDC) Climate Emergency Strategy and Action Plan] and available on the Council's website, and that it will support and assist the Council in meeting the aims laid down in it (where appropriate).

9 Price, Fees, and Payment

9.1 Payment shall be due in accordance with the Contract provided that the Services have been supplied in accordance with the Contract to the Council's satisfaction and after receipt of detailed invoices showing VAT where applicable.

9.2 Where the Council has agreed to pay the Contractor fees on a time spent basis rather than a fixed contract price:

(a) the Council shall pay to the Contractor the fees at the rate specified in the Quotation (or the Order if a different rate is specified therein); and

(b) the Contractor shall bear their own expenses incurred except for any expenses previously agreed between the parties and confirmed in writing by the Council.

9.3 Wherever under the Contract any sum of money is recoverable from or payable by the Contractor, that sum may be deducted from any sum then due, or which at any later time may become due, to the Contractor under this Contract or under any other agreement or contract with the Council

9.4 Payment in full or in part of the fees claimed under clause 9 shall be without prejudice to any claims or rights of the Council against the Contractor in respect of the provision of the Services.

10 Contractor's Personnel

10.1 If the Council gives the Contractor notice that any person is not to become involved in or is to be removed from involvement in the performance of the Contract, the Contractor shall take all reasonable steps to comply with such notice and if required by the Council the Contractor shall replace any person removed under this clause 10 with another suitably qualified person and procure that any pass allowing access to Council premises issued to the person removed is surrendered. The decision of the Council shall be final and conclusive.

10.2 If required by the Council, the Contractor shall give to the Council a list of names and addresses of all persons who are or may be at any time concerned with the Services or any part, specifying the capacities in which they are so concerned, and giving such other particulars and evidence of identity and other supporting evidence as the Council may reasonably require.

10.3 The Contractor shall bear the cost of any notice, instruction or decision of the Council under this condition.

11 Assignment and Sub-Contracting

11.1 The Contractor shall not assign, novate or sub-contract the whole or any part of this Contract without the Council's prior written permission.

11.2 The Council shall be entitled to novate, assign or subcontract this Contract or any part of it to any other body which substantially performs any of the functions that previously had been performed by the Council.

12 Confidential Information

12.1 Except to the extent set out in this clause or where disclosure is expressly permitted, each party shall treat the other party's Confidential Information as confidential; and not disclose the other party's Confidential Information to any other person without the owner's prior written consent.

12.2 Clause 12.1 shall not apply where:

(a) such disclosure is required by law; or

(b) such information was in the possession of the party making the disclosure without an obligation of confidentiality prior to its disclosure by the information owner;

(c) such information was obtained from a third party without obligations of confidentiality;

(d) such information was already in the public domain at the time of disclosure otherwise than through breach of this Contract;

(e) such information was independently developed without access to the other party's Confidential Information

12.3 The Contractor shall not, and shall procure that any of its officers workers or agents do not, use any of the Council's Confidential Information received otherwise than for the purpose of providing the Services.

12.4 Nothing in this clause 12 shall prevent the Contractor (or any of its officers, employees, workers or agents) or the Council (or any of its officers, employees, workers or agents) from:

(a) reporting a suspected criminal offence to the police or any law enforcement agency or co-operating with the police or any law enforcement agency regarding a criminal investigation or prosecution; or

(b) doing or saying anything that is required by HMRC or a regulator, ombudsman or supervisory authority; or

(c) whether required to or not, making a disclosure to, or cooperating with any investigation by, HMRC or a regulator, ombudsman or supervisory authority regarding any misconduct, wrongdoing or serious breach of regulatory requirements (including giving evidence at a hearing); or

(d) complying with an order from a court or tribunal to disclose or give evidence; or

(e) making any other disclosure as required by law.

13 Publicity

The Contractor shall not, without prior written consent of the Council:

13.1 make any press announcements or publicise the Contract or its contents in any way; or

13.2 use the Council's name or logo in any promotion or marketing or announcement of orders, except as required by law, any government or regulatory authority, any court or other authority of competent jurisdiction

14 Data Protection

14.1 The Contractor will deliver effective and appropriate services having due regard to Data Protection principles and will comply with its duties under the Data Protection Legislation.

14.2 Where the Contractor processes data under this Contract, the Contractor and the Council acknowledge that for the purposes of the Data Protection Legislation, the Council is the Controller and the Contractor is the Processor.

14.3 The scope, nature and purpose of the Processing by the Contractor, the duration of the Processing and the types of Personal Data and categories of data subject are set out in the Data Processing Schedule below.

14.4 The Contractor shall, in relation to any Personal Data processed in connection with the Engagement:

(a) process that Personal Data only on written instructions of the Council;

(b) keep the Personal Data confidential;

(c) comply with the Council's data protection policy and data retention guidelines;

(d) comply with the Council's reasonable instructions with respect to processing Personal Data

(e) not transfer any Personal Data outside of the UK;

(f) assist the Council in responding to any data subject access request at nil cost to the Council and to ensure compliance with its obligations under the Data Protection Legislation with respect to security, breach notifications, privacy impact assessments and consultations with supervisory authorities or regulators;

(g) notify the Council without undue delay on becoming aware of a Personal Data breach or communication which relates to the Council's or Contractor's compliance with the Data Protection Legislation;

(h) at the written request of the Council, delete or return Personal Data (and any copies of the same) to the Council on termination of the Engagement unless required by the Data Protection Legislation to store the Personal Data; and

(i) maintain complete and accurate records and information to demonstrate compliance with this clause 14.

14.5 The Contractor shall ensure that they have in place appropriate technical or organisational measures, to protect against unauthorised or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to, Personal Data, appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures.

14.6 Such measures may include, where appropriate:

(a) pseudonymising and encrypting Personal Data;

(b) ensuring confidentiality, integrity, availability and resilience of its systems and services;

(c) ensuring that availability of and access to Personal Data can be restored in a timely manner after an incident; and

(d) regularly assessing and evaluating the effectiveness of the technical and organisational measures adopted by it.

14.7 The Council does not agree to the Contractor appointing any third party processor of Personal Data under the Contract.

14.8 The Contractor shall indemnify the Council for any loss, liability, costs (including legal costs), damages, or expenses resulting from any breach by the of the Data Protection Legislation and shall maintain in force full and comprehensive insurance policies.

15 Freedom of Information/Environmental Information Regulations

15.1 Notwithstanding anything to the contrary contained or implied in any documents or

negotiations leading to the formation of this Contract:

(a) the Council shall be entitled to publish and/or release any and all terms or conditions of this Contract, the contents of any documents and/or information relating to the formation of this Contract under the provisions of the Freedom of Information Act 2000 or Environmental Information Regulations 2004

(b) nothing contained in this Contract shall prevent the Council from disclosing and/or publishing under the provisions of the Freedom of Information Act 2000 or Environmental Information Regulations 2004 any term or conditions or information contained in or relating to the formation of this Contract.

15.2 The Contractor shall:

(a) co-operate with the Council and supply to it all necessary information and documentation required in connection with any request received by the Council under the said legislation.

(b) supply all such information and documentation at no cost to the Council and within seven days of receipt of any request.

15.3 The Contractor shall not publish or otherwise disclose any information contained in this Contract or in any negotiations leading to it without the Council's previous written consent unless the Contractor is bound to publish and/or disclose such information under the said legislation and such information is not exempt from such disclosure and/or publication under the provisions of the said legislation

16 Intellectual Property

16.1 Except to the extent that the Services incorporate designs furnished by the Council, the Contractor shall ensure that the provision of the Services will not infringe any patent, trade mark, registered design, copyright or other right in the nature of intellectual property of any third party and the Contractor shall indemnify the Council against all actions, claims, demands, costs and expenses which the Council may suffer as a result of such infringement.

16.2 All Intellectual Property Rights (including ownership and copyright):

(a) furnished or made available to the Contractor by the Council; and

(b) prepared by or for the Contractor for use, or intended use, in relation to the performance of this Contract

are hereby assigned to and shall vest in the Council absolutely, and the Contractor shall not and shall procure that his servants and agents shall not (except to the extent necessary for the implementation of this Contract) without prior written consent of the Council use or disclose any such specifications, instructions, plans, drawings, patents, models, designs or other material as aforesaid or any other information (whether or not relevant to this Contract) which the Contractor may obtain pursuant to or by reason of this Contract, except information which is in the public domain otherwise than by reason of a breach of this provision, and in particular (but without prejudice to the generality of the foregoing) the Contractor

shall not refer to the Council or the Contract in any advertisement without the Council's prior written consent.

16.3 The provisions of this Clause 16 shall apply during this Contract and after its termination howsoever arising.

17 Insurance and Liability

17.1 The Contractor shall indemnify and keep indemnified the Council against all actions, claims, demands, loss, liability, costs (including reasonable legal costs), damages or expenses incurred by or made against the Council, its servants or agents in respect of any losses or damage or personal injury (including death) which arises out of or in connection with the Contractor's breach or negligent performance or non-performance of this Contract.

17.2 The Contractor shall effect and have in force and shall require any sub-contractor to have in force:

(a) employer's liability insurance and public liability insurance each in a sum of not less than £5,000,000 for any one occurrence or series of occurrences arising out of one event

(b) professional indemnity insurance in a sum of not less than £1,000,000 during the Contract period and for 6 years thereafter to cover its liability to the Council under this Contract,

(c) Any additional level or type of insurance cover in such a sum as specified in the RFQ

and, on request, shall provide to the Council copies of the policies together with satisfactory evidence of payment of premiums.

17.3 The Contractor shall, on request, notify the insurers of the Council's interest and shall cause the interest to be noted on the insurance policies.

17.4 The Contractor shall comply with all terms and conditions of the insurance policies at all times. If cover under the insurance policies shall lapse or not be renewed or be changed in any material way or if the Contractor is aware of any reason why the cover under the insurance policies may lapse or not be renewed or be changed in any material way, the Contractor shall notify the Council without delay.

18 Termination

18.1 The Council may terminate the Contract with immediate effect with no liability to make any further payment to the Contractor (other than in respect of amounts accrued before the date of such termination) if at any time the Contractor:

(a) commits a material breach of any term of the Contract and (if such breach is remediable) fails to remedy that breach within 30 days after being notified in writing to do so

(b) commits repeated breach or non-observance of any of the provisions of the Contract or refuses or neglects to comply with any reasonable and lawful directions of the Council;

(c) is convicted of any criminal offence (other than an offence under any road traffic legislation in the United Kingdom or elsewhere for which a fine or non-custodial penalty is imposed);

(d) is in the reasonable opinion of the Council negligent or incompetent in the performance of the Services;

(e) takes or has taken against it (other than in relation to a solvent restructuring) any step or action towards its entering bankruptcy, administration, provisional liquidation or any composition or arrangement with its creditors, applying to court for or obtaining a moratorium under Part A1 of the Insolvency Act 1986, being wound up (whether voluntarily or by order of the court), being struck off the register of companies, having a receiver appointed to any of its assets, or its entering a procedure in any jurisdiction with a similar effect to a procedure listed in this clause 18(1)(e)

(f) (being an individual) dies or is incapacitated (including by reason of illness; accident or mental or physical incapacity) from providing the Services;

(g) commits any breach of the Council's policies and procedures;

18.2 The rights of the Council under clause 18.1 are without prejudice to any other rights that it might have at law to terminate the Contract or to accept any breach of the Contract on the part of the Contractor as having brought the agreement to an end. Any delay by the Council in exercising its rights to terminate shall not constitute a waiver of these rights.

18.3 In addition to its rights of termination under paragraph 18.1, the Council shall be entitled to terminate this Contract by giving to the Contractor not less than three months' notice in writing to that effect.

18.4 Termination under paragraphs 18.1 or 18.3 shall not prejudice or affect any right of action or remedy which shall have accrued or shall thereupon accrue to the Council and shall not affect the continued rights under any other condition or provision that either expressly or by implication has effect after termination.

18.5 Upon termination of the Contract otherwise than under clause 18.3 before the Services have been fully completed or delivered and without prejudice to any other of its rights the Council may complete the Services or have them completed by a third party and shall be entitled to deduct from any amount due to the Contractor (under the Contract or otherwise) the costs thereof incurred by the Council (including the Council's own costs). If this total cost to the Council exceeds the amount (if any) due to the Contractor, the difference shall be recoverable by the Council from the Contractor.

19 Obligations on Termination

19.1 On the date of termination of the Contract the Contractor shall:

(a) immediately deliver to the Council all Council Property created or held in relation to this Contract and original Confidential Information in their possession or under their control;

(b) except where otherwise required under Clause 22 (Audit) and subject to the Council's data retention guidelines, irretrievably delete (to the extent technically and reasonably practicable) any information relating to the business of the Council stored on any media (including but not limited to any Confidential Information) and all matter derived from such sources which is in their possession or under their control outside the premises of the Council, and

(c) provide a signed statement that they have complied fully with their obligations under this clause 19 together with such evidence of compliance as the Council may reasonably request.

20 Status

In carrying out the Services the relationship of the Contractor to the Council will be that of independent contractor and/or principal and nothing in the Contract shall render them an employee, worker, agent or partner of the Council and the Contractor shall not hold themselves out as such.

21 Force Majeure

A party shall not be in breach of the Contract or otherwise liable for any failure or delay in the performance of its obligations if such delay or failure results from circumstances beyond its reasonable control and the time for performance shall be extended accordingly. If the period of delay or non-performance continues for longer than six weeks the party not affected may terminate the Contract by giving 30 days written notice to the affected party.

22 Audit

The Contractor shall keep and maintain for six (6) years after completion of provision of the Services under the Contract or its termination if sooner records to the satisfaction of the Council of all expenditures which are reimbursable by the Council and of the hours worked and costs incurred in connection with any employees of the Contractor paid for by the Council on a time charge basis. The Contractor shall on request afford the Council or its representatives such access to those records as may be required by the Council.

23 Notices

23.1 Any notice given to a party under or in connection with the Contract shall be in writing and shall be:

(a) delivered by hand or by pre-paid first-class post or other next working day delivery service at its registered office (if a company) or its principal place of business (in any other case) .

(b) [sent by email to the following addresses (or an address substituted in writing by the party to be served):

(i) The Council: [ADDRESS].

(ii) The Contractor: [ADDRESS].

23.2 Any notice shall be deemed to have been received:

(a) if delivered by hand, at the time the notice is left at the proper address or

(b) if sent by pre-paid first-class post or other next working day delivery service, at 9.00 am on the second Business Day after posting or such earlier time that receipt of the notice can be shown to have occurred.

(c) if sent by email, at the time of transmission.

23.3 If deemed receipt under clause 23.2 would occur outside 9.00am to 5.00pm on a Business Day (Business Hours), it shall be deferred until Business Hours resume.

23.4 This clause does not apply to the service of any proceedings or other documents in any legal action or, where applicable, any other method of dispute resolution.

24 Dispute resolution

24.1 If a dispute arises out of or in connection with this agreement or the performance, validity or enforceability of it (Dispute) then except as expressly provided in this agreement, the parties shall follow the procedure set out in this clause:

(a) either party shall give to the other written notice of the Dispute, setting out its nature and full particulars (Dispute Notice), together with relevant supporting documents. On service of the Dispute Notice, the representatives of the parties responsible for the management of the Contract shall attempt in good faith to resolve the Dispute;

(b) if such representatives are for any reason unable to resolve the Dispute within 30 days of service of the Dispute Notice, the Dispute shall be referred to a director of the Council and a director of the Contractor who shall attempt in good faith to resolve it; and

(c) if the Council's director and the Contractor's director are for any reason unable to resolve the Dispute within 30 days of it being referred to them, the parties will attempt to settle it by mediation in accordance with the CEDR Model Mediation Procedure. Unless otherwise agreed between the parties, the mediator shall be nominated by CEDR. To initiate the mediation, a party must serve notice in writing (ADR notice) to the other party to the Dispute, requesting a mediation. A copy of the ADR notice should be sent to CEDR. The mediation will start not later than 60 days after the date of the ADR notice.

24.2 The commencement of mediation shall not prevent the parties commencing or continuing court proceedings in relation to the Dispute under clause 36 which clause shall apply at all times.

25 Entire Agreement

25.1 The Contract constitutes the entire agreement between the parties.

25.2 Each party acknowledges that in entering into the Contract it does not rely any statement, representation, assurance or warranty (whether made innocently or negligently) that is not set out in the Contract, and agrees that it shall have no claim for innocent or negligent misrepresentation based on any statement in the Contract.

26 Waiver

26.1 The failure by either party to exercise any right or remedy shall not constitute a waiver of that right or remedy.

26.2 No waiver shall be effective unless it is communicated to the other party in writing.

26.3 A waiver of any right or remedy arising from a breach of the Contract shall not constitute a waiver of any right or remedy arising from any other breach of the Contract.

27 Severability

If any provision of the Contract is or becomes unlawful, invalid or unenforceable it shall be deemed deleted but the validity or enforceability of the remainder of the Contract shall not be affected.

28 Amendments and Variation

No amendment or variation of the Contract shall be effective unless it is in writing and signed by the parties.

29 Third Party Rights

Except as expressly provided elsewhere in the Contract, a person who is not a party to the Contract shall not have any rights under the Contracts (Rights of Third Parties) Act 1999 to enforce any term of the Contract.

30 Governing Law and Jurisdiction

The Contract shall be governed by and construed in accordance with the law of England and Wales and each party irrevocably agrees that the courts of England and Wales shall have exclusive jurisdiction to settle any dispute or claim arising out of or in connection with the Contract