

**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.

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.

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.

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

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 Public 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
Snowhill Parish Meeting	snowhillparish@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 ' <i>Our vision for Chipping Campden, often</i>

		<i>described as “The Jewel of the Cotswolds”, is that it will continue to be:’</i>
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 about “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 13Gravel 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 remaining 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	<p>Are we intending to mention the land between Lagan “Jubilee Fields” development and Kingcombe House (along the right as one ascends Byers Lane), i.e. oppose any development here?</p> <p>PS the Hoo should be protected at all costs – all of it.</p>	The Town Council is not considering to extend the list of proposed Local Green Spaces.
10	<p>Have not given their agreement on inclusion of Badgers Fields MD01</p> <p>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]</p>	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	<p>As written earlier, how many/ratio to full time residential (second homes, Airbnb/holiday lets, rented long term/residents, empty)</p> <p>Pavement parking? Especially near Huxbys Baptist Church</p> <p>Appendix 1: Katie’s Café is gone</p> <p>Well done and thank you!!</p>	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	<p>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.</p> <p>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.</p> <ul style="list-style-type: none"> A larger housing estate – probably in the region of 926 houses and the additional strain on our infrastructure. 	<p>Noted. Figure 8 does not show a track.</p> <p>The Town Council provides its views and comments to CDC on matters relating to significant planning applications and ongoing tree preservation order matters.</p>

	<ul style="list-style-type: none"> • 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	<p>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.</p> <p>Hospital to be moved nearer</p> <p>Purchased properties must be lived in and cannot be sold for profit before two years.</p>	<p>Residents-only parking in the town centre would act against the promotion of a healthy town centre which relies on visitors.</p> <p>There is no hospital in Chipping Campden.</p> <p>Builders operate under planning conditions which may address hours of operation and construction methods which may address noise.</p> <p>Other matters raised are beyond the scope of the CCNDP.</p>
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	<i>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.</i>	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: <i>...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...</i>	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: <i>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.</i>	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 Generis 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

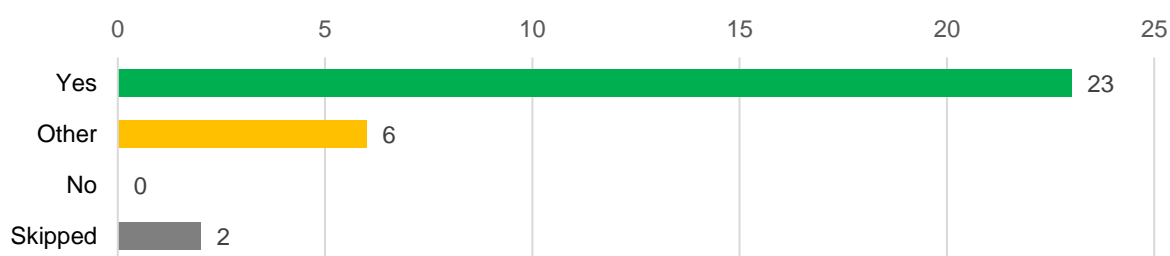
	<p>be resisted. In the above context particularly, but also relevant to Policy 2, one important reference point for judging the appropriateness of a change of use application is the impact on the vibrancy (or also “vitality”) of the High Street (or also “Town Centre”). Judging that impact is highly subjective 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).</p>	<p>suggested further extension to include Cutts Yard is not included because there is insufficient justification.</p> <p>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.</p> <p>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.</p> <p>Criticism of the parking survey results, suggesting the need for a wider transport strategy.</p>
3	<p>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.</p>	<p>Suggests rewording to point 3 to be more flexible and requiring marketing evidence before change of use.</p>
4	<p>I agree with Policy EC8</p>	<p>No action.</p>
5	<p>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.)</p>	<p>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.</p>

6	<p>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.</p>	<p>Such a wide extension would be difficult to support and likely to be objected to by the planning authority.</p>
7	<p>In para 3 remove "vibrancy of the" so it reads 'there will be no harm to the town centre'.</p>	<p>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.</p>
8	<p>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</p>	<p>Strong advocacy for retaining services like the GP surgery in the town centre to maintain vibrancy and accessibility, especially considering the ageing population. This</p>

	<p>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.</p>	<p>falls under Point 1 of Policy 1.</p>
9	<p>We agree with the wording of Policy 1.</p>	<p>No action</p>
10	<p>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)</p>	<p>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.</p>
11	<p>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.</p>	<p>The policy is focused on the town centre and not the town as a whole.</p>

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.



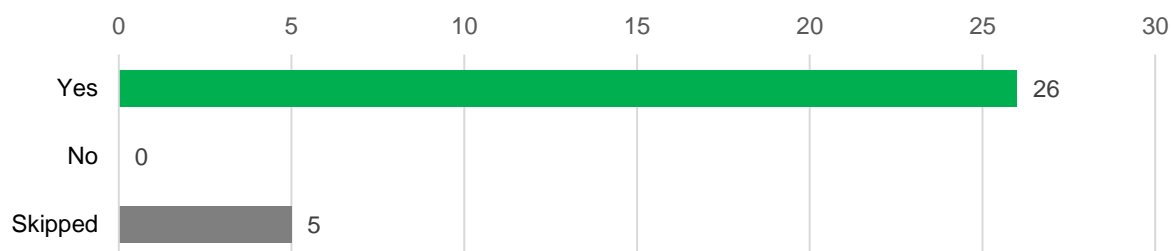
#	Comment	Response
1	Why are shops other than food shops not on here. We need to keep our commercial properties and they should not become residential. I do support the provision of suitable land for human burial - even better would be a local Woodland Burial site.	The aspiration to protect shops is 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	<p>Support for the policy noted.</p> <p>The CCNDP cannot have a commitment to reopening the railway station. This is already addressed in Table 3.</p> <p>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.</p> <p>Though the evidence on litter bins is welcome, it will not be included because they are not subject to planning control.</p> <p>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.</p>

	<p>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.</p>	
3	I agree with the infrastructure set out in Table 6 supported by Appendix 4.	No action.

4	<p>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).</p>	<p>Policy 1 protects all non-community-use class E premises.</p>
5	<p>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.</p>	<p>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.</p> <p>The CCNDP cannot have a commitment to reopening the railway station. This is already addressed in Table 3.</p>
6	<p>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.</p>	<p>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.</p> <p>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.</p>

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.

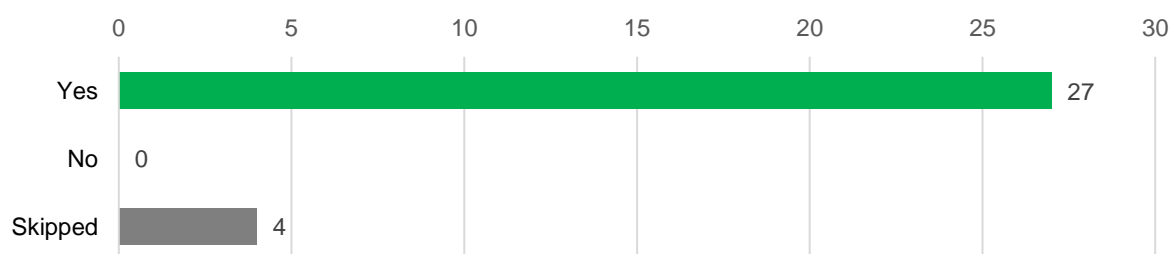


#	Comment	Outputs
1	Perhaps it should be made mandatory that new properties have some form of rainwater harvesting. It is simple technology. Solar panels should be incorporated on the right properties. Solar panels on industrial buildings should be encouraged.	These are not architectural features and 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	<p>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.</p>	<p>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.</p> <p>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.</p>
6	No comments to make	No actions.
7	<p>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</p>	<p>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.</p>

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

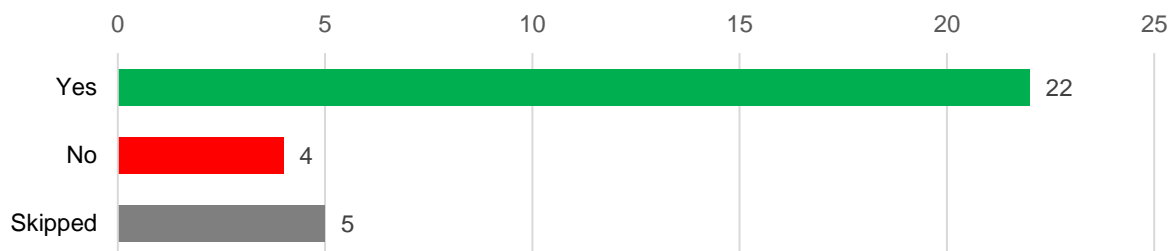


#	Comment	Outputs
1	I would add the boot scraper at Pavement Cottage in Park Road and the 'Cloud hedge' or Bakers hedge on Westington Corner at the top of Sheep street.	Additional non designated heritage assets were suggested for inclusion. CCTC has resolved not to include further suggested NDHA proposals. 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.

	<p>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.</p>	
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.



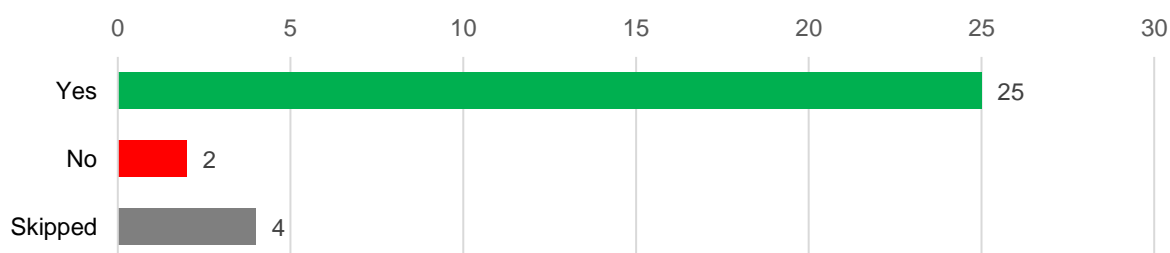
#	Comment	Outputs
1	See accompanying representation sent over email on 22nd May 2024 on behalf of the Campden Estate for further details.	Addressed Separately
2	I am very concerned about the lack of official checks on proposals when they have been passed. How can we have guarantees that developments 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.

	<p>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.</p>	<p>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).</p> <p>Reference to natural flood management, design and light pollution has been included in a new paragraph.</p> <p>Reference is already made to the Gloucestershire local nature recovery strategy.</p>
4	<p>This policy only duplicates legislative requirements.</p>	<p>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.</p>
5	<p>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'</p>	<p>This is amended within the CCNDP and appendices.</p>
6	<p>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'.</p>	<p>This is amended within the CCNDP and appendices.</p>
7	<p>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 Olimpik Drive development where</p>	<p>These comments are not relevant to the Policy.</p> <p>The CCNDP did not have a policy on these aspirations because this was not identified as important in community consultation.</p>

	<p>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.</p>	
8	<p>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.</p>	<p>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.</p> <p>Affordable Housing is irrelevant to Policy 5.</p> <p>A policy framework is in place at national level to control development in relation to flood risk.</p>
9	<p>This policy needs loosening to make it less restrictive and more likely that landowners will be encouraged to adopt biodiversity principles.</p>	<p>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.</p> <p>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.</p>
10	<p>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.</p>	<p>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.</p>

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.

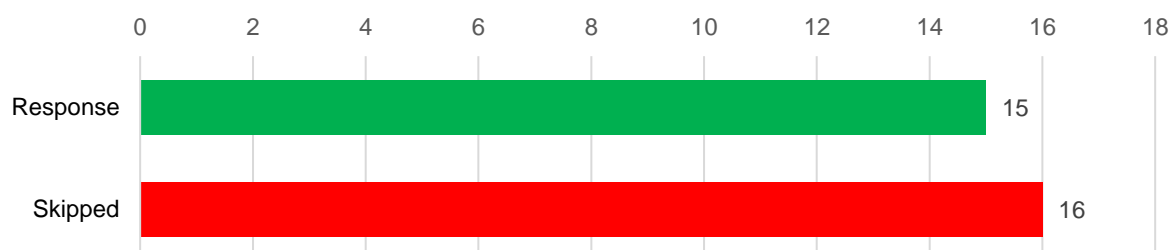
	<p>morning to birdsong. It would be devastating to lose such an area of natural beauty in the town of Chipping Campden.</p>	
<p>5</p>	<p>Policy 6 - list number 22. The Craves should not be included for the reasons previous outlined in landowner's response to CCTC letter dated 30 September 2022. A copy 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</p>	<p>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.</p> <p>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.</p> <p>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.</p>

	<p>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.</p>	
6	<p>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.</p>	
7	<p>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.</p>	

8	<p>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.</p>	
9	<p>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.,</p>	
10	<p>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.</p>	
11	<p>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.</p>	<p>This has now been reflected in the appendix entry.</p>
12	<p>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</p>	<p>Noted.</p>

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 Mummies 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	<p>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.</p> <p>Page 25. Encouraging growth of the BRI: No mention about the resultant increase in traffic (traffic jams) around Cider mill Lane</p> <p>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.</p> <p>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</p>	<p>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.</p> <p>Reference added to Campden Morris under Music & Literature.</p> <p>Table 3 of the CCNDP refers to the St James & Ebrington Primary School (singular).</p> <p>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.</p>

	<p>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. "</p> <p>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.</p> <p>What is proposed for Cutt's Yard? This would be a good location for the Coop with parking.</p>	
5	<p>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</p>	<p>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.</p> <p>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</p>

	<p>a positive endorsement of the principle of building > 100 dwellings off Aston Road, subject to conditions. These should include:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>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.</p> <p>The comments on the matter of management companies for large developments is not relevant because the CCNDP is not allocating land for housing.</p>
6	<p>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</p>	<p>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</p>

	<p>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.</p>	<p>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.</p>
7	<p>I agree with the Community Aspirations set out in Section 4.</p>	<p>Noted.</p>
8	<p>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:</p> <p>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</p>	<p>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.</p> <p>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.</p>

<p>rough draft of how this might look. I think it would make the CCNDP much more user-friendly and meaningful.</p> <p>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:</p> <p>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</p>	<p>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.</p>
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	<p>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</p>	
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	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.	<p>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.</p> <p>Text acknowledges that landowners can decide whether or not to make their land available for this purpose.</p> <p>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.</p> <p>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.</p> <p>It is argued that the approach taken in the CCNDP is consistent with the provision of local detail to support</p>

Other Resident, Landowner and Developer Comments	Response
	<p>LPA engagement in the development of LNRS and delivery of BNG, in accordance with planning practice guidance.</p> <p>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.</p> <p>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.</p> <p>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.</p>
<p>The response also raises concerns about the accuracy of the data supporting the text and policy.</p>	<p>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 on 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.</p>
<p>Morgan Elliot Planning representing Mackenzie Miller Homes</p>	
<p>The letter is promoting a site for housing development. The site is also being promoted through the local plan review.</p>	<p>The CCNDP is not allocating land for housing and the respondent is encouraged to continue to address this matter through the local plan review.</p>

Other Resident, Landowner and Developer Comments	Response
	<p>The land area under promotion does not conflict with LGS or NDHA proposals in the CCNDP.</p> <p>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.</p> <p>The response is well researched and will undoubtedly provide the Town Council with insights into the town's sub-regional role.</p>
Morgan Elliot Planning representing owners of Westington Quarry (Campden House Estate)	
<p>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).</p> <p>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.</p> <p>The respondent asked for Policy 5 to be deleted in its entirety.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
<p>The response raises concern regarding text wording.</p>	<p>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.</p> <p>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.</p>

Other Resident, Landowner and Developer Comments	Response
<p>The respondent also raised concerns that the data in support of the CCNDP was from 2017 and therefore likely to be out of date.</p>	<p>The Northwick Estate and CDC raised a similar concern and an acknowledgement has been added to the CCNDP text as follows, <i>'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.'</i></p> <p>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.</p> <p>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.</p> <p>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.</p>
<p>Carter Jonas on behalf of the Trustees of Spring Hill Estate</p>	
<p>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.</p>	<p>Refer to response above</p>
<p>Brodie Planning Associates on behalf of William and Martin Haines</p>	
<p>Q1: Criticism of how the vision is worded which is deemed to be a statement rather than a vision.</p>	<p>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.</p>
<p>Q2: Suggest additional wording to Clause 3 of policy 1.</p>	<p>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.</p>
<p>Q6 – the respondent claims that Policy 5 only repeats existing policy. This is not true and there is a specific local element.</p>	<p>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.</p>
<p>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</p>	<p>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</p>

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 land off Aston Road, Broad Campden	
The representation is promoting a site for housing development. This site is 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. 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 through 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
<p>The representation related to proposed local green spaces 20 and 21.</p> <p>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.</p> <p>With regard to LGS21 The Cley the land ownership details regarding the site area also incorrect.</p> <p>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.</p>	<p>Noted.</p> <p>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.</p> <p>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.</p>
The Campden Society	
<p>Question 1 – vision</p> <p>Vision - Yes, TCS agree with the vision statement entirely but we would like to see the inclusion of reference to housing. So perhaps:</p> <p>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.</p>	<p>The Vision wording has been amended. Reference to ‘accessible housing for all residents’ encompasses affordable housing.</p>
<p>Policy 1 - Town Centre</p> <p>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.</p> <p>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</p>	<p>Town Centre boundary is not changed further because there is insufficient justification.</p> <p>Policy 1 does not address flats above shops.</p> <p>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.</p>

Other Resident, Landowner and Developer Comments	Response
<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	

Other Resident, Landowner and Developer Comments	Response
<p>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.</p> <p>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).</p>	
<p>Policy 2 - social and community infrastructure</p> <p>We support both elements of the Policy as stated on page 65.</p> <p>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.</p> <p>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</p>	<p>Support for the policy is noted.</p> <p>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.</p> <p>The CCNDP cannot have a commitment to reopening the railway station. This is already addressed in Table 3.</p> <p>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.</p> <p>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.</p> <p>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.</p>

Other Resident, Landowner and Developer Comments	Response
<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	

Other Resident, Landowner and Developer Comments	Response
<p>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.</p> <p>The following items should be added to Table 8:</p> <ul style="list-style-type: none"> • 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 <p>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.</p>	
<p>Policy 3 – design of the built environment</p> <p>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.</p> <p>TCS have commented in detail on the draft Design Guide and we attached the table of comments to this response to the draft CCNDP.</p>	<p>Support for the policy is noted.</p> <p>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.</p>
<p>Policy 4 – non designated heritage assets</p> <p>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</p>	<p>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.</p>

Other Resident, Landowner and Developer Comments	Response
<p>have a watching brief on any contemporary and new installations that may qualify.</p> <p>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.</p> <p>Street Furniture and Environment.</p> <ol style="list-style-type: none"> 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 here 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.) <p>Historic Water Supply.</p> <ol style="list-style-type: none"> 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.) 	<p>CCTC has resolved not to accept further nominations through the CCNDP process for NDHA that would require a change to Policy 4.</p>

Other Resident, Landowner and Developer Comments	Response
<p>Traditional Stone Stiles</p> <ol style="list-style-type: none"> 1. Stone Slab Stiles <ol style="list-style-type: none"> 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 <ol style="list-style-type: none"> a) Station Rd / The Coneygree 3. Stone Animal Stiles <ol style="list-style-type: none"> a) Buckle Street / The Bank Wood - tbc <p>NB All Stone Stile data taken from CPRE Stone Stiles project.</p>	
<p>Policy 5 – biodiversity net gain and local nature recovery</p> <p>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 compiled 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.</p> <p>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.</p>	<p>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.</p> <p>Reference to natural flood management, design and light pollution has been included in a new paragraph.</p> <p>Reference is already made to the Gloucestershire local nature recovery strategy.</p> <p>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.</p>

Other Resident, Landowner and Developer Comments	Response
<p>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.</p> <p>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.</p> <p>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.</p>	
<p>Question 6 – Local Green Spaces</p> <p>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.</p>	<p>The new site has not be considered given the lack of information.</p>
<p>Question 8 – anything else</p>	<p>Various typographical errors have been amended where justified.</p>
<p>The comment suggests inclusion of a site at Aston Road as an allocation.</p>	<p>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.</p>
<p>The response suggests a number of major amendments to local plan policy</p>	<p>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.</p>
<p>The comments on the matter of management companies for large developments is not relevant</p>	<p>The issue of whether management companies are appointed to manage public areas within large developments , or whether responsibility rests with the</p>

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.	<p>A number of points are raised:</p> <p>Planning documents usually contain illustrations and photos to aid understanding. No changes.</p> <p>The CCNDP is not linked to the town council’s website and cannot make changes to the website.</p> <p>The CCNDP is NOT intended to be based on The Way Forward.</p> <p>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.</p> <p>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).</p> <p>The qualifying body is indeed Chipping Campden Town Council and not Andrea Pellegam.</p> <p>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).</p> <p>The qualifying body did not instruct Andrea Pellegam Ltd. to refer to The Way Forward which is now out of date.</p> <p>Street clutter is not something that requires planning permission and is therefore difficult to control with planning policies.</p>

Other Resident, Landowner and Developer Comments	Response
	<p>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.</p> <p>Advertising may be included in a neighbourhood plan and this matter is left to the Design Guide and the local plan to resolve.</p> <p>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.</p> <p>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.</p> <p>A CCNDP may contain policies 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.</p> <p>Parking is not something that a neighbourhood plan can address – this is a matter for the highways authority.</p> <p>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.</p> <p>The CCNDP cannot restrict long stay vehicles.</p> <p>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.</p> <p>The CCNDP cannot set Traffic Regulation Orders to control coaches.</p> <p>The CCNDP does not have evidence on which areas should be predominantly residential nor does it allocate land for housing.</p>

Other Resident, Landowner and Developer Comments	Response
	<p>Matters of building design to meet the challenges of climate change are left to the local plan to address.</p> <p>Planning policies cannot easily regulate which sort of person occupies a specific building nor encourage people to move.</p> <p>The plan does not allocate land for housing and cannot therefore provide bungalows.</p>
Response from Resident JC	
<p>The response suggests the additional designation of NDHAs comprised of water pumps and memorial plaques</p>	<p>CCTC has resolved not to accept further nominations through the CCNDP process for NDHA that would require a change to Policy 4.</p>
Response from Resident AC	
<p>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.</p> <p>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.</p> <p>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"</p> <p>The response suggests a Vision for Cutts Yard should be included.</p> <p>In relation to Policy 5 suggests widening the policy to include dark skies, key views, flood resilience and sustainable buildings.</p> <p>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.</p>	<p>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.</p> <p>The proposal to add a new clause forbidding residential conversions cannot be included because it is permitted development.</p> <p>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.</p> <p>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.</p> <p>Pedestrians take precedence in planning over cars in national policy so this will be retained.</p> <p>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.</p> <p>All of Campden is beautiful so it would not be possible to set out all the views. The most important views have been identified.</p>

Other Resident, Landowner and Developer Comments	Response
	<p>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.</p> <p>NDPs are not empowered to remove permitted development rights.</p> <p>The resources are not available to reorder the entire plan – no other responders have suggested this.</p> <p>The section on community aspirations and concerns is what the CCNDP cannot address.</p> <p>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.</p> <p>The CCNDP did not allocate land for employment because this was already done by the local plan.</p> <p>The location of primary schools is outside the control of the plan and this must first be instigated by the Education Authority (GCC).</p> <p>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.</p>

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	
<p>Archaeology comments</p> <p>a) The CCNDP is criticised because it does not summarise all designated and undesignated heritage assets.</p> <p>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.</p> <p>Education comments</p> <p>a) The response states that the plan contains proposals for additional housing. .</p> <p>b) The response points out that no decision has been made on whether a new primary school would be justified.</p> <p>Public Health comments</p> <p>The response suggests that there should be a new policy on active travel and encouraging more exercise.</p> <p>The response also suggests that there should be a housing policy (tenure and mix).</p> <p>Minerals and Waste - No comments</p>	<p>Heritage -</p> <p>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.</p> <p>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.</p> <p>Public Health - Added reference to wellbeing to the vision.</p> <p>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.</p> <p>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.</p> <p>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.</p>

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
<p>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.</p> <p>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.</p>	Noted.
<p>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.</p>	Objectives have been amended to apply to the whole parish where relevant.
<p>Picking up on this, we commend the summary information pp20-22 celebrating the distinction between the village and the town.</p>	Noted
<p>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>	References have been updated to reflect the new terminology of Cotswold National Landscape.
<p>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.</p>	A key has been added.
<p>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.</p>	Reference has been changed to ‘nationally designated heritage assets.
<p>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>	Reference to nationally designated sites included.
<p>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</p>	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.
<p>Policy 1: Chipping Campden Town Centre</p> <p>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?</p>	<p>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>
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>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.</p> <p>Annex 2 of the NPPF (December 2023) provides the following definition of a town centre and main town centre uses:</p> <p><i>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.</i></p>	<p>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</p>

Cotswold District Council Comments	Response
<p><i>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)</i></p> <p><i>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)</i></p> <p>Note, main town centre uses do not include C3 dwellings.</p> <p>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.</p> <p>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.</p>  <p>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.</p>	<p>and prevent a one-way ticket to a much-reduced centre.</p>

Cotswold District Council Comments	Response
<p>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.</p> <p>However, the proposed boundary includes a high proportion of residential uses.</p>	
<p>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!</p> <p>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</p> <p>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.</p>	<p>Reference to use class changes (potential) has been added to text.</p> <p>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.</p> <p>Not clear how HMO policy would be used in the context of short-term holiday lets.</p> <p>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>
<p>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.</p>	<p>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>
<p>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.</p> <p>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</p>	<p>Noted.</p>

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.	
<p>Policy 2: Social and community infrastructure.</p> <p>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.</p> <p>Please explain how this list is pertinent to EC8.</p>	<p>Text has been added to clarify the position with regard to defibrillators and activities within commercial sites, not requiring planning permission to change use.</p> <p>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>
<p>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.</p>	<p>Additional criteria have been added to the section on burial plots.</p>
<p>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%20Guidance%20-%20Green%20Infrastructure%20Framework.pdf</p>	<p>Noted</p>
<p>Policy 3: Design of the built and natural environment.</p> <p>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.</p> <p>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 -</p> <p><i>'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.'</i></p>	<p>In relation policy 3, CCTC has resolved not to accept changes to the current proposals in the policy.</p>
<p>Policy 4: Non-designated Heritage Assets.</p> <p>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</p>	<p>A new Figure 15 has been inserted to show the location of NDHA.</p>

Cotswold District Council Comments	Response
<p>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.</p> <p>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> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Text has been added to clarify features and assets.</p> <p>CCTC believe it is important to identify small features as NDHA that are potentially vulnerable to loss without approval.</p> <p>With regard to the proposed list of NDHA, CCTC therefore wishes to maintain the current proposals.</p>
<p>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.</p> <p>The text states that 10% BNG applies to all development – this is not strictly correct, there are several exemptions, for example householder applications.</p> <p>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</p>	<p>Suggested text changes have been included alongside other amendments to address the points raised.</p>

Cotswold District Council Comments	Response
<p>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:</p> <p>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.</p> <p>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</p> <p>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</p>	<p>-</p>

Cotswold District Council Comments	Response
<p>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>	
<p>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.</p>	<p>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>
<p>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.</p> <p>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.</p> <p>We suggest re-wording:</p> <p>Opportunities and priorities for recovering and enhancing biodiversity</p> <p>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</p>	<p>Text amendments have been incorporated and added to address the points raised.</p>

Cotswold District Council Comments	Response
<p>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>	
<p>p.78. Policy 5: Environment and Biodiversity Net Gain</p> <p>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.</p> <p>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.</p> <p>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/</p> <p>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.</p> <p>'Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows:</p>	<p>CCTC has resolved not to accept changes to the current proposals in the policy.</p>

Cotswold District Council Comments	Response
<p>(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.'</p> <p>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.</p> <p>(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.</p> <p>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 -</p> <p>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.</p> <p>(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.</p> <p>Perhaps absorb this into the policy above –</p> <p>“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.</p> <p>(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.</p> <p>That is not required as it forms part of the legal requirements for BNG anyway</p> <p>(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.</p> <p>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.</p>	

Cotswold District Council Comments	Response
<p>(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.</p> <p>That is not required, you cannot deliver off-site BNG unless the landowner is partner to that process so this clause is not necessary.</p>	
<p>Policy 6: Local Green Spaces p.82, and Appendix 8.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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.</p>	<p>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.</p> <p>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 <i>combined with</i> 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</p> <p>Comment on smaller parcels of incidental land – Noted.</p> <p>Comments on Large Tract of Land – PPG does not specify a limit on the area of land which can be designated for LGS.</p>

Cotswold District Council Comments	Response
	<p>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.</p> <p>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.</p>
<p>Appendix 2</p> <p>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.</p>	<p>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.</p>
<p>Chipping Campden Design Guide</p> <p>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>	
<p>p.9. The national design guide is no longer a draft.</p> <p>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/download/Design%20Gui de%20-%20Green%20Infrastructure%20Framework.pdf</p> <p>We encourage you to add web references for all this documents to make access easier.</p>	
<p>p.13. As per our comment on the main CCNDP document, please change AONB references to National Landscape.</p> <p>The design guide seems very focused on architectural design, rather than landscape/ecological etc design.</p>	
<p>p.43. We would encourage some consideration of decarbonisation as well as energy efficiency.</p>	
<p>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.</p>	

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

Chipping Campden Town Council
Issued via email: clerk1@chippingcampden-
tc.gov.uk

1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

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

Original message
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 0660 | 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](#)

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](http://magic.defra.gov.uk/)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](http://www.localrecordingcentres.org/).

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](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/)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.

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 outcomes¹ 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 adults². 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 Health 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 ageing 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 Accessibility 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 health. 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 Mackenzie 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.

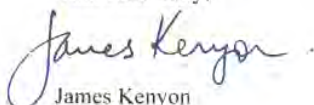
The authors also list in the consultation section "meetings with various landowners 30.8.2014 – 22.9.2015". We are not aware of any approach or meeting having taken place and therefore object to the inclusion of Northwick Estate land in the LNRS as a misrepresentation until there has been direct and 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
Estate Manager

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 Mackenzie 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.

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;

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.

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.

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.

Yours Sincerely,



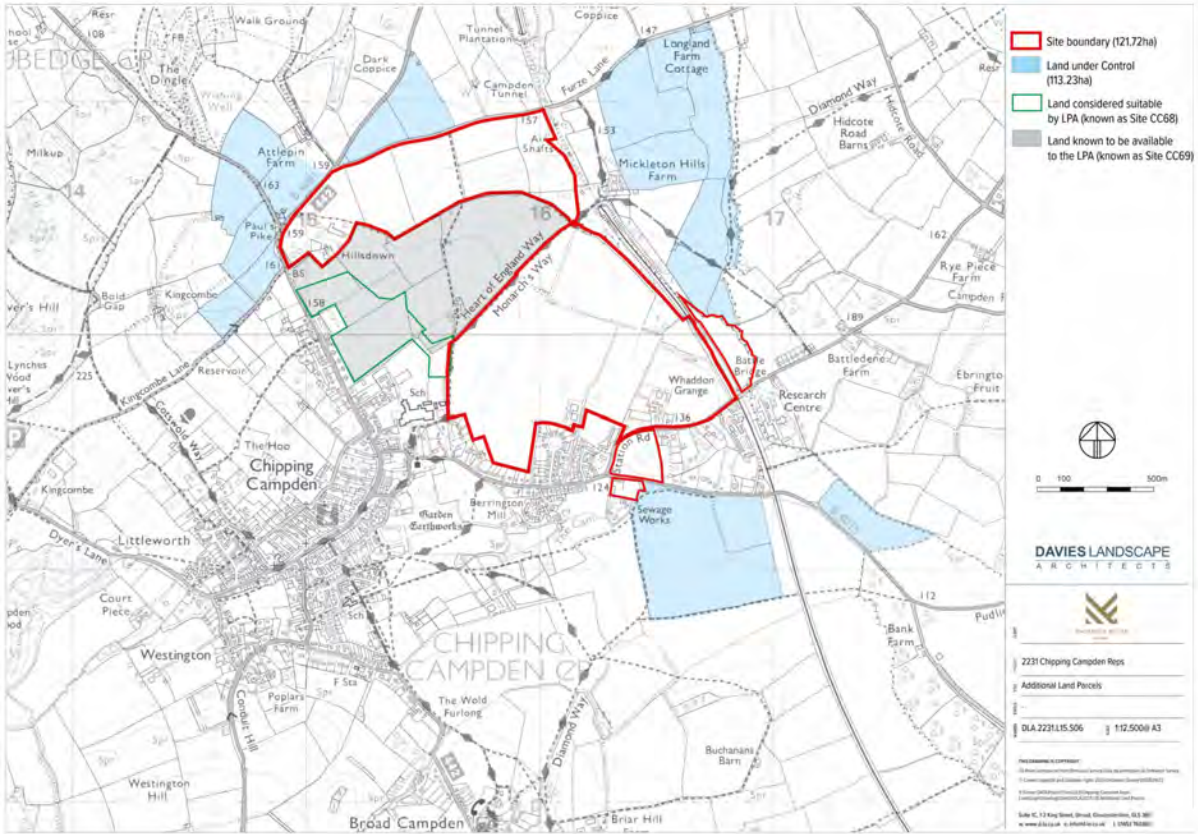
Grant Baylis BSc (Hons), MSc, MRTPI, BwN Assessor

Morgan Elliot Planning

grantbaylis@morganelliott.co.uk

Enclosed:

- *Appendix 1 – Land Availability Plan*



Morgan Elliot Planning representing owners of Westington Quarry

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 Figure 15 (page 74) and Table 7 (page 76), 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 authority¹ 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 Figure 15 (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 Fund², 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 statutory 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 its 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 star symbols be removed as it would not be appropriate to retain them under such circumstances.

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, Snowhill 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 Figure 15 (page 74) and Table 7 (page 76), 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.

- 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 authority¹ 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 Figure 15 (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.

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 Fund², 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 statutory 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 its 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)

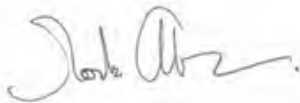
"In this case, the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared."

"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

Brodie Planning Associates on behalf of William and Martin Haines



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 prized 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

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Planning ■ Design ■ Development

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:

Page | 2

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 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.

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.



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

A handwritten signature in black ink, appearing to read 'W. Hopkins'.

Wendy Hopkins | MRTPI
Company Director

SF Planning Ltd on behalf on behalf of the owners of land off Aston Road, Broad Campden, GL55 6WB



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](https://www.instagram.com/sfplanningltd) [@sfplanningltd](https://twitter.com/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



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.

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.

Preliminary Matters

Local Green Space 20 – The Hoo East

The ownership details set out on Page 144 of the NP for Local Green 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 Green 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.

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	<p>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.</p> <p>The site, however, is not accessible and therefore it is not clear what purpose this land serves.</p>	<p>The site is not accessible and therefore it is not clear what purpose this land serves.</p>
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	<p>The 'demonstrably special to local community' should describe the ways in which the space is used or enjoyed by the community.</p> <p>The outcomes of community engagement should be useful in demonstrating that space is special to the community.</p> <p>We recognise that the NPG rely on Footpath HCC5. However, it has not been demonstrated why this is special.</p> <p>Further evidence is required to justify the extent of the land proposed.</p>	<p>Whilst the NPG includes text that includes details of the TPO and other designations.</p> <p>It is not clear how the Local Green Space Designation is demonstrably special to the local community.</p> <p>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.</p> <p>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.</p> <p>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.</p>

		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.	<p>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.</p> <p>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.</p> <p>Containing urban sprawl or protecting open countryside would not be proper uses of the designation.</p>	<p>The NPG sets out that this green space is an area of natural pasture and wild woodland, the last in the area.</p> <p>The site is not considered local in character.</p>

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

Morgan Elliot Planning

grantbaylis@morganelliott.co.uk

Planning Chambers, 3A New Church Street
Tetbury, Gloucestershire GL8 8DS

office@morganelliott.co.uk + www.morganelliott.co.uk

Registered in England 14455430

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:

	<p>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.</p> <p>Yes No Please give your alternative wording here</p>	<p>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, <i>to ensure an equitable housing policy for all the residents of the town</i>, and to provide financially rewarding work and fulfilling activities for all our residents and amenities for all visitors to the area.</p>
Q2:	<p>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?</p> <p>Policy 1: Chipping Campden Town Centre.</p> <p>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.</p> <p>2. The Key Centre Boundary is extended as shown in Figure 13.</p>	<p>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.</p>

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

		<p>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.</p> <p>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).</p>
Q3:	<p>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?</p> <p>Policy 2: Social and community infrastructure</p> <p>1. The infrastructure identified in Table 6 and</p>	<p>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</p>

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.

		<p>The following items should be added to Table 8:</p> <ul style="list-style-type: none"> • 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 <p>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.</p>
Q4:	<p>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?</p> <p>Policy 3: Design of the built and natural environment.</p> <p>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.</p> <p>Yes No Other (please specify)</p>	<p>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.</p>

<p>Q5:</p>	<p>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?</p> <p>Policy 4: The following features are designated as non-designated heritage assets:</p> <p>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</p>	<p>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.</p> <p>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.</p> <p>Street Furniture and Environment.</p> <ol style="list-style-type: none"> 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. <ul style="list-style-type: none"> • 7. TCS have carried out a survey of Litter Bins and written a report which we attach to this response. We suggest that from here 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.
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	<p>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</p> <p>Yes No Other (please specify)</p>	<p>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.)</p> <p>Historic Water Supply.</p> <ol style="list-style-type: none"> 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.) <p>Traditional Stone Stiles</p> <ol style="list-style-type: none"> 1. Stone Slab Stiles <ol style="list-style-type: none"> 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 <ol style="list-style-type: none"> a) Station Rd / The Coneygree 3. Stone Animal Stiles <ol style="list-style-type: none"> a) Buckle Street / The Bank Wood - tbc <p>NB All Stone Stile data taken from CPRE Stone Stiles project.</p>
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

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Yes No Other (please specify)</p>	<p>build on flood plains or in areas where there is a known flooding risk.</p> <p>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.</p>
Q7:	<p>. 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?</p>	<p>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</p>

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.

	<p>21. The Cley</p> <p>22. The Craves</p> <p>Yes</p> <p>No</p> <p>Other (please specify)</p>	
<p>Q8:</p>	<p>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?</p>	<p>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 <u>needed</u>. 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 <u>market demand</u> for larger dwellings in the North Cotswolds generally is high, the focus on the building of new dwellings should nevertheless be on meeting <u>need</u> rather than <u>market demand</u>.</p> <p>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:</p> <ul style="list-style-type: none"> • 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

		<ul style="list-style-type: none">• 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. <p>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.</p> <p>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.</p>

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		<p>Insert the following after the first paragraph:</p> <p>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.</p> <p>All developments, no matter the scale, should aspire to excellence in design.</p>	
2 Context and Character			
20 th 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	<p>Vernacular vs Polite. Change to “Vernacular and Polite”</p> <p>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.</p> <p>Add additional caption to Fig 14 – “the building on the right includes a regency style bay not common in the town”.</p>	<p>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.</p>
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 <i>outside</i> 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	2 nd para “it must be reminded remembered ” Is this needed? Start the para with “New development should respond...” etc	
		4 th 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.

		<p>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.</p>	This is out of an inner-city design guide and is overly dogmatic and unnecessary in this context.
		<p>Blocks Must: first two points:</p> <ul style="list-style-type: none"> • 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	<p>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.</p>	
	34	<p>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.</p>	
	34	<p>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.</p>	
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

			<p>appropriate to smaller settlements. As they have been pulled from 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.</p> <p>Land scarcity in Campden means that this guide should be demonstrating how to develop more dense housing.</p> <p>National Model Design Code provides better references for enclosure.</p>
		<p>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.</p>	
		<p>2nd bullet point</p>	
	35	<p>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.</p>	<p>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</p>

			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		
		<p>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.</p> <p>Rewrite this</p>	<p>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.</p>
Street Planting	36	<p>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</p>	
		<p>3rd bullet point Cf point about native species above Also note Secure by Design anti-crime principles</p>	

Wildlife Friendly Environment	37		
		3 rd bullet point How is biodiversity strengthened?	
		4 th and 5 th 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.	
		6 th 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	1 st para	
		3 rd 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.	
		4 th 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 <i>may</i> 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	3 rd bullet point Windows should be of sufficient size and number for abundant natural light and should meet or exceed statutory regulations.	
	40	4 th 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	5 th bullet point	

		<p>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.</p> <p>Do not agree check CDC</p>	
	40	<p>6th bullet point Delete this:</p> <p>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.</p>	<p>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.</p> <p>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.</p>
Materials	41		<p>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.</p>
Checklist	44		<p>Please indicate the source of this checklist.</p>

The Litter Bins of Chipping Campden and Broad Campden

by The Campden Society
August 2023

V5

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



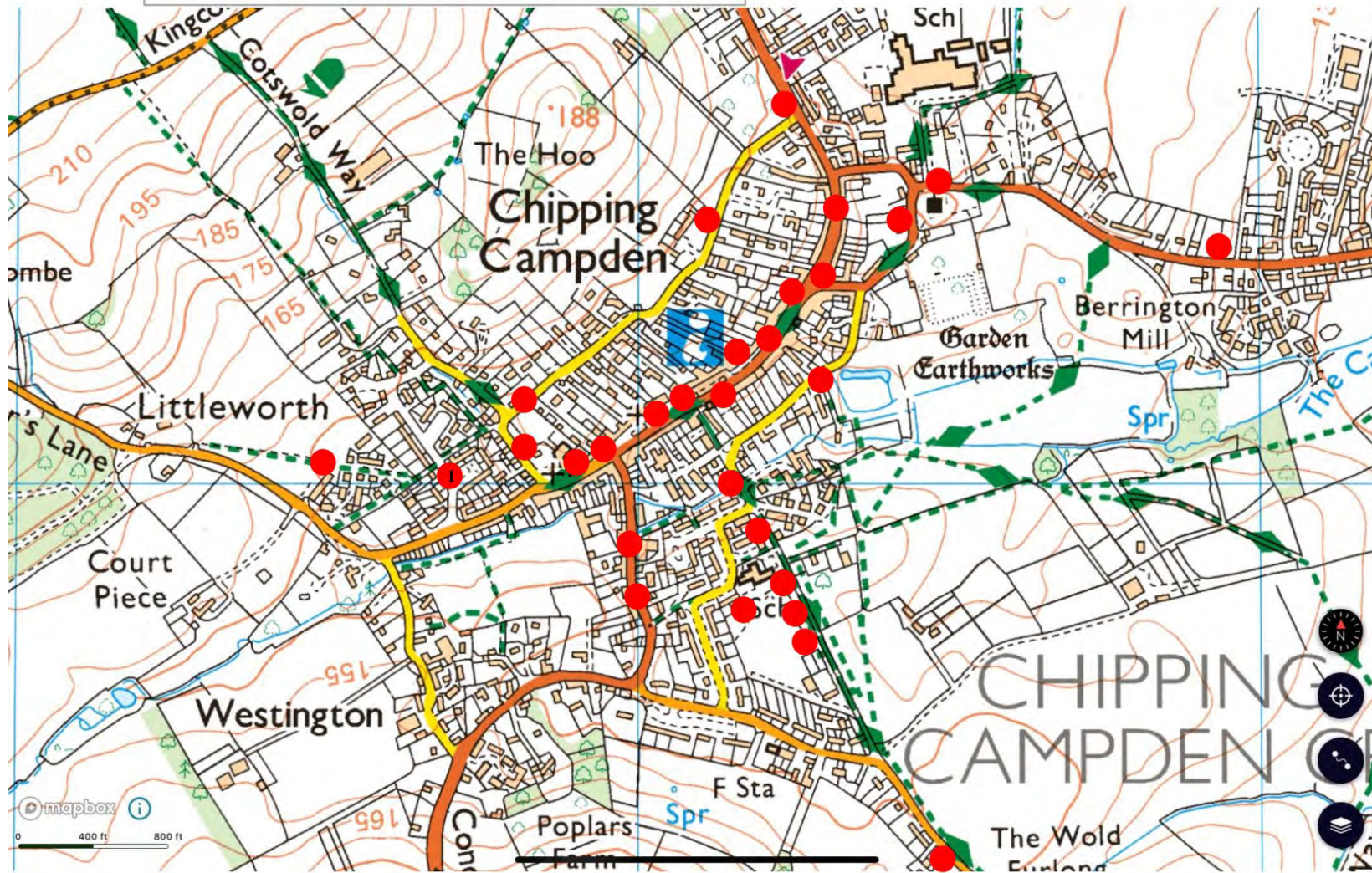
- A consistent approach to street furniture provides an uncluttered environment. This includes using the same colour as well as the same model of litter bins, albeit with variations as to fixing or other specific requirements.
- TCS propose a formed metal design in black. Black is less intrusive than 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



11 x Green with trim and column.
Type: Maelor Trafflex Round High Security
- 90 L



3 x Green with trim



5 x Plain green



4 x Green with trim and square.
All in Recreation Ground



2 x Black with trim and column



4 x Black with trim



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 occupancy.
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 publicising on their website under section 6 and 7 so as to bring to the attention of people who live, work or carry on business in 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 consultation.

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 in front 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 particularly 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



Kissel.

DESIGN.WHOOSH WITH STONE SLATES 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

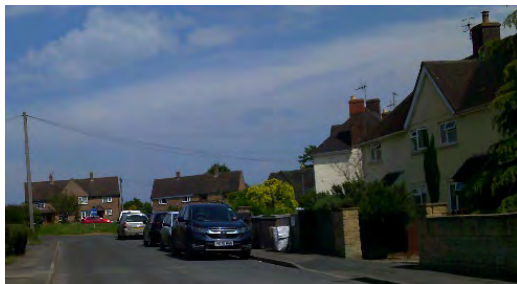
Occupants written on the highway



Calf Lane



Calf Lane



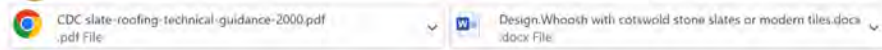
Visitor cars or too few parking spaces
Berrington Road



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



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 Compton roof.

Please acknowledge safe receipt.

Appendix Recreation Ground



2023



2023



2024



2024 still no goal post



Access from George Road
alongside trees

2024

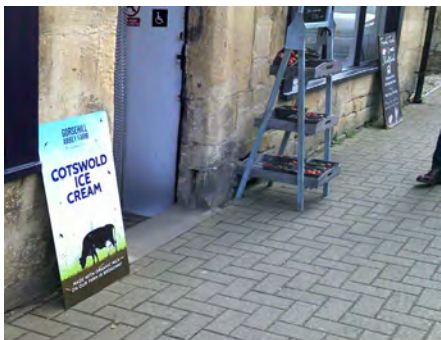
Access from George Road

2024

Space for parking

2024

Fillet and Bone GL55 6AT



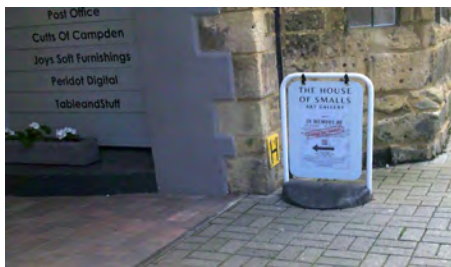
Grafton House GL55 6AT



Gallery. GL55 6AT



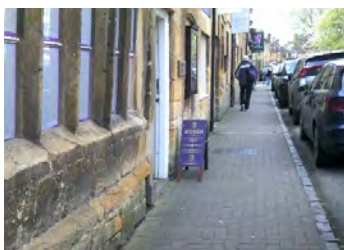
Cutts GL55 6AT



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



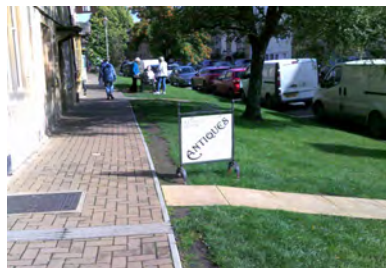
The Bay Tree GL55 6AG



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

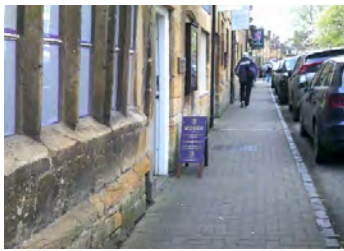
Cutts GL55 6AT



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Kendall House.GL55 6AG



Various items Various dates from 30 September 2023 to May 2024

STREETSCAPE VIEWS OF HERITAGE ASSETS

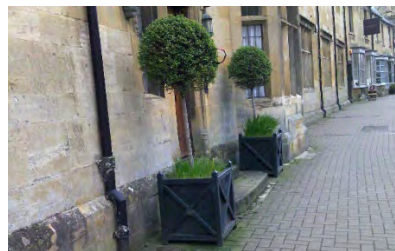
CLUTTER

Delicatessen GL55 6AL



Charles Whiston GL55 6HB

Grammar School GL66 6AL



Stuart House Antiques GL55 6HB



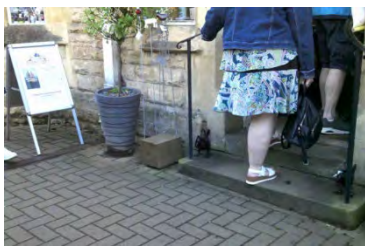
Luigi Bistro GL55 6HB

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 Wither 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 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