

## **Chipping Campden Neighbourhood Development Plan**

### **Examiner's Clarification Note**

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt, matters of clarification are entirely normal at this early stage of the examination process.

### **Initial Comments**

The Plan provides a distinctive vision for the neighbourhood area. The presentation of the Plan is very effective and makes excellent use of well-chosen photographs. The difference between the policies and the supporting text is very clear. The Plan also focuses on a limited number of key issues. This is best practice

I am grateful for the work undertaken by the District Council in preparing a Policies Map to support the Plan.

### **Points for Clarification**

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise issues for clarification with the Town Council. I also have a specific question for the District Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions.

### ***Questions for the Town Council***

I set out specific policy clarification points below in the order in which they appear in the submitted Plan:

#### *Policy 1*

The helpful supporting text highlights the range of issues faced by the town centre and with which the Town Centre has grappled in formulating the policy.

The initial part of the policy has an unusual format that requires the reader to access an appendix in the Plan and then refer to a policy in the Local Plan. Did the Town Council consider an alternative way of expressing its intentions?

Is there a degree of tension between the first and third parts of the policy about visitor accommodation as the former seeks to ensure its retention whereas the latter is much less positive about such uses?

In the third part of the policy how does the Town Council anticipate that the District Council would assess any the impact of such proposals on the vibrancy of the town centre?

There is an opportunity later in this note for the Town Council to comment on representation 22 which proposes an additional extension to the boundary and the comments from the District Council which challenge the proposed extension.

#### *Policy 2*

I saw the impressive range of community facilities in the town during the visit. The proposed connection between Table 6 and Policies INF2 and EC8 of the Local Plan is a practicable approach, and will avoid a duplication of policies.

*Policy 3*

Plainly design is a key consideration in the neighbourhood area. The submitted Design Guide is very impressive and will assist the ongoing local efforts to safeguard the character and appearance of the town. The overall approach taken is a very positive approach to Section 11 of the NPPF.

*Policy 4*

I saw the significance of the proposed non-designated heritage assets during the visit. As with Policy 2, the proposed connection between Appendix 5 and Policy EN12 of the Local Plan is a practicable way forward, and will avoid a duplication of policies.

There is an opportunity later in this note for the Town Council to comment on representation from the Campden Society which proposes additional non-designated heritage assets.

*Policy 5*

I note the approach taken in the supporting text and the wider ambitions of the Town Council to dovetail the contents of the Plan into the work being undertaken by Gloucestershire County Council and the Gloucestershire Wildlife Trust to prepare a Local Nature Recovery Strategy. Nevertheless, is it appropriate and/or lawful for a neighbourhood plan to propose Local Nature Recovery Areas?

In addition, to what extent have the owners of the proposed Local Nature Recovery Areas been engaged in the Plan preparation process?

Criteria a-e read as process issues rather than as land use policy matters. Please can the Town Council explain its approach to this matter and the extent to which the criteria would bring any distinctive neighbourhood area value beyond the content of existing national and local planning policies relating to biodiversity net gain.

The third part of the policy overlaps with the second question above in this part of the Note.

*Policy 6*

The proposed designation of the local green spaces (LGSs) is helpfully underpinned by the details in Appendix 7. The combination of a map and photographs for each proposed LGS is best practice. I have noted the strength of the community support for the proposed package of LGSs.

In terms of the information in Appendix 7 it would be helpful to have the Town Council's responses to the following matters:

- what are the sizes of LGSs 11/17/19/20/21/22?
- in some cases, the information suggests that no contact was made with the owners of the LGSs. Please can I have some explanation of the process that was followed and how the details relate to the information contained in the Consultation Statement on this matter?
- did the Town Council undertake any assessment of the extent to which the proposed LGSs are already protected by other factors/designations and the other matters set out in Planning practice guidance (ID: 37-011, 37-015, 37-017 and 37-018)?

It is suggested by some of the representations that, contrary to national advice in Planning practice guidance (ID:37-015), the Plan has proposed LGS designations 'as a 'back door' way

to try to achieve what would amount to a new area of Green Belt by another name'. The Town Council's response to this matter would be appreciated

There is an opportunity later in this note for the Town Council to comment on the representations from landowners that object to the designation of proposed LGSs.

### *Consultation Statement*

I note the summary in paragraphs 17-20 of the Consultation Statement. In this context please can I be sent a copy of the documents referenced in paragraphs 18-20. If possible, it would be helpful if I can have those documents separately before the overall responses to this Note.

### **Question for the District Council**

Is the Council continuing to work to the timetable for the preparation of the Cotswold Local Plan 2043 as set out in the Local Development Scheme (October 2025)?

### **Representations**

Does the Town Council wish to respond to any of the representations made to the Plan?

I would find it helpful if the Town Council responded to the representations from:

- Gloucestershire County Council (Representation 2);
- Morgan Elliot Planning (Representation 18);
- Campden Estate/Morgan Elliot Planning (Representation 19);
- Brodie Planning Associates (Representation 21);
- Representation 22 (on the former Cutts site);
- The Campden Society (Representation 29); and
- SF Planning (Representation 32).

The District Council suggests a series of revisions to some of the policies and parts of the general text of the Plan. It would be helpful if the Town Council responded to the various issues raised.

### **Protocol for responses**

I would be grateful for responses and the information requested by 3 March 2026. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

If certain responses are available before others, I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled please could it come to me directly from the District Council. In addition, please can all responses make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner

Chipping Campden Neighbourhood Development Plan.

9 February 2026