

Chipping Campden Parish Neighbourhood Development Plan 2023-2031

**A report to Cotswold District Council on the
Chipping Campden Parish Neighbourhood
Development Plan**

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Executive Summary

- 1 I was appointed by Cotswold District Council in January 2026 to carry out the independent examination of the Chipping Campden Parish Neighbourhood Development Plan.
- 2 The examination was undertaken by a combination of written representations and a hearing. I visited the neighbourhood area on 6 February and on 14 April 2026.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It has a focus on safeguarding its built and natural environment, and designating a package of Local Green Spaces.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Chipping Campden Parish Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
25 June 2026

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Chipping Campden Parish Neighbourhood Development Plan 2023-2031 (the Plan).
- 1.2 The Plan has been submitted to Cotswold District Council (CDC) by Chipping Campden Town Council (CCTC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. It can include whatever range of policies it sees as appropriate to its designated neighbourhood area. It has been designed to be distinctive in general terms, and to be complementary to the development plan. The Plan has a focus on safeguarding the built and natural environment of the neighbourhood area, and designating a package of Local Green Spaces.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then form a part of the wider development plan and be used to determine planning applications in the neighbourhood area.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by CDC, with the consent of CCTC, to conduct the examination of the Plan and to prepare this report. I am independent of both CDC and CCTC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 43 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan I am also required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 Having addressed the matters identified in paragraph 2.6 of this report I am satisfied that each of the points have been met subject to the contents of this report.
- 2.8 Section 98 of the Levelling-up and Regeneration Act 2023 requires that a neighbourhood plan:

- so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, must be designed to ensure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change; and
- so far as the qualifying body considers appropriate and having regard to the subject matter of the plan, must be designed to take account of any local nature recovery strategy under section 104 of the Environment Act 2021 that relates to all or part of the neighbourhood plan area.

2.9 I have addressed the matters identified in paragraph 2.8 of this report and have taken account of the information in the updated Basic Conditions Statement. I am satisfied that the submitted Plan complies with these two requirements.

3 Procedural Matters

- 3.1 In undertaking this examination I have considered the following documents:
- the submitted Plan
 - the Basic Conditions Statement.
 - the updated Basic Conditions Statement
 - the Consultation Statement.
 - the Design Guide
 - the CDC SEA/HRA Screening report.
 - the additional information received from the participants after the hearing
 - the representations made to the Plan.
 - the representations made to the updated Basic Conditions Statement.
 - CCTC's responses to the clarification note.
 - the adopted Cotswold Local Plan (2020 to 2031).
 - the Chipping Campden Site Assessments Strategic Housing and Employment Land Availability Assessment (CDC 2021).
 - the National Planning Policy Framework (December 2024).
 - Planning Practice Guidance.
 - relevant Ministerial Statements.
- 3.2 The various documents are helpfully available on the CDC's website. Wherever possible, I will refer to the document concerned for the purposes of keeping this report as concise as possible.
- 3.3 I visited the neighbourhood area on 6 February 2026 and on the day of the hearing (14 April 2026). I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in Section 5 of this report.
- 3.4 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted Plan, I concluded that there was a need for a public hearing to assess the extent to which the Plan's policies relating to the town centre and to local green spaces meet the basic conditions. The hearing was held on 14 April 2026. The hearing note is reproduced at Appendix A of this report.
- 3.5 The enactment of Section 99 of the Levelling-up and Regeneration Act 2023 on 25 March 2026 changed the basic conditions against which a neighbourhood plan is assessed. In order to address this matter CCTC produced an updated Basic Conditions Statement. Targeted consultation took place on the Update. Section 4 of this report addresses this matter alongside the broader responses to the Plan. Sections 2.8 and 2.9 of this report have addressed other matters in relation to the contents of a neighbourhood plan as a set out in Section 98 of the Levelling-up and Regeneration Act 2023.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, CCTC has prepared a Consultation Statement. The Statement is proportionate to the neighbourhood area and the policies in the Plan.
- 4.3 The Statement sets out the various activities that were held to engage the local community during the initial stages of the plan-preparation process. They included an initial meeting in 2019, the establishment of a steering group in 2022, and the organisation of Residents (2022) and Business (2023) Surveys.
- 4.4 The Statement also provide details about the consultation processes that took place on the pre-submission version of the Plan (May to June 2025). They included the preparation of a flyer and the organisation of a drop-in event.
- 4.5 The Statement sets out how CCTC responded to the comments received on the pre-submission Plan. This helps to explain the evolution of the Plan leading up to the submitted version.
- 4.6 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. CDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Feedback

- 4.7 Consultation on the Plan was undertaken by CDC and ended on 15 August 2025. This generated representations from the following organisations:
- Network Rail;
 - Gloucestershire County Council (as a landowner);
 - Gloucestershire Wildlife Trust;
 - Gloucestershire County Council;
 - Morgan Elliot Planning;
 - Campden Estate;
 - Brodie Planning Associates;
 - Natural England;
 - Campden Society;

- Cotswold District Council;
- Historic England; and
- SF Planning.

- 4.8 Twenty representations were received from residents. In many cases they offered support for the proposed local green spaces.
- 4.9 I have taken all the comments into account in preparing this report. Where appropriate, I refer to specific representations in my commentary on the various policies in the Plan.
- 4.10 A separate consultation exercise was undertaken by CDC on the revised Basic Conditions Statement which ended on 8 June 2026. This generated representations from Gloucestershire County Council, and a local resident.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Chipping Campden. In 2021 its population was 2377 persons. It was designated as a neighbourhood area on 14 February 2014.
- 5.2 The neighbourhood area lies within the Cotswold National Landscape. As Pevsner's Buildings of England describes, 'Chipping Campden is one of the most beautiful of smaller English country towns. Its gently curving High Street, lined with fine C17 and C18 houses, intermittently punctuated with grass and trees, and widening in the centre to encompass Market Place and Square, is the picture of Cotswold charm'. The other settlement in the neighbourhood area is Broad Campden. Whilst much smaller than Chipping Campden, it is equally attractive. The remainder of the neighbourhood area is attractive countryside primarily in agricultural use.
- 5.3 The built environment of the neighbourhood area is very attractive. It contains two conservation areas (one in Chipping Campden and one in Broad Campden). In addition, the parish has five Grade I, twenty-two Grade II* and 228 Grade II listed buildings. Campden House formal garden and associated medieval cultivation earthwork is a scheduled monument.

Development Plan Context

- 5.4 The development plan covering the neighbourhood area is the Cotswold District Local Plan (2011 to 2031). It sets out a vision, objectives, a spatial strategy, and overarching planning policies that guide new development in the Plan period. The Local Plan was adopted in August 2018.
- 5.5 Chipping Campden is identified as one of a series of Principal Settlements in Policy DS1 of the Local Plan. The supporting text advises that the Principal Settlements were identified as the most sustainable locations to deliver future growth, with Cirencester being the district's main centre by a very considerable margin. It also advises that the settlements were selected based on their social and economic sustainability, including accessibility to services and facilities. The availability of suitable land capable of delivering sustainable development during the Plan period also helped determine which settlements to include in the Development Strategy. Policy S16 sets out a specific development strategy for Chipping Campden
- 5.6 The Local Plan includes a series of other policies which affect the neighbourhood area as follows:
- Policy DS2 Development within Settlement Boundaries;
 - Policy EC8 Main Town Centre Uses;
 - Policy EN3 Local Green Spaces;
 - Policy EN5 Cotswold Area of Outstanding Natural Beauty;
 - Policy EN10 Designated Heritage Assets
 - Policy EN11 Conservation Areas
 - Policy EN12 Non-designated Heritage Assets

- 5.7 CDC is well-advanced with the preparation of a new Local Plan that will cover the period up to 2043. The most recent version of the Local Development Scheme indicates that the Plan will be submitted for its own examination in Winter 2026 and be adopted in Winter 2027.
- 5.8 The submitted Plan has been prepared within its wider adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in the district. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the Neighbourhood Area

- 5.8 I visited the neighbourhood area on 6 February 2026. I approached it from the Fosse Way to the east. This helped me to understand its connection to the strategic road network and its setting in the wider countryside.
- 5.9 On the way into the town I looked at the industrial and commercial uses around Station Road including Campden BRI and the industrial units off Battlebrook Drive.
- 5.10 I looked initially at the historic core of the village based around High Street. I saw the vibrancy of its retail and commercial premises. I also saw the significance of the various designated and non-designated assets in this part of the village.
- 5.11 I then looked at St James Church and The Church Rooms. I appreciated the historic setting and its relationship to Old Campden House.
- 5.12 I then looked at the various proposed local green spaces within the town, and on its edges.
- 5.13 I then drove to Broad Campden. I saw that it had a very different character to that of Chipping Campden.
- 5.14 I took the opportunity to look again at the town centre on the day of the hearing. I visited the proposed local green space at The Cley (LGS21) on that day.

6 The Neighbourhood Plan as a whole

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The Basic Conditions Statement and its Update have helped considerably in the preparation of this section of the report. They are well-presented and informative documents which are proportionate to the Plan.

6.2 As part of this process I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in December 2024.

6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are particularly relevant to the Chipping Campden Parish Neighbourhood Plan:

- a plan-led system – in this case the relationship between the neighbourhood plan and the adopted Cotswold Local Plan;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

- 6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.
- 6.7 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area. It seeks to safeguard the character and appearance of the neighbourhood area and comments on design matters. It also proposes the designation of a package of Local Green Spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice Guidance. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.10 As submitted, the Plan does not fully accord with this range of practical issues. Many of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy for the town centre (Policy 1). In the social dimension, it includes policies for community facilities (Policy 2), and for local green spaces (Policy 6). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has specific policies on design (Policy 3), on non-designated heritage assets (Policy 4) and on biodiversity (Policy 5). This assessment overlaps with CCTC's comments on this matter in the submitted Basic Conditions Statement.

Not have the effect of preventing development from taking place which is proposed in the development plan for the area of the authority

- 6.12 I have already commented in detail on the development plan context in the District in paragraphs 5.4 to 5.8 of this report.

- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Whilst the Plan proposes a series of policies relating to its built and natural environment, it does not prevent the potential for new development to come forward to implement the ambitions of Policy S16 of the Local Plan. Similarly, the implementation of the Plan will not prevent the development of the more specialised housing as addressed in Policies H2-H5 of the Local Plan. In this broader context I am satisfied that the implementation of the Plan will not have the effect of preventing development from taking place which is proposed in the development plan.

Strategic Environmental Assessment

- 6.14 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement CDC published a screening report in February 2024 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It advises that the Plan sets out a vision and planning policies to shape development in Chipping Campden up to 2031 and decision makers will need to consider the criteria of these policies when determining future applications in Chipping Campden. However, it advises that the Plan does not directly impact on land use through the allocation of sites for housing or other forms of development. On this basis, the screening report concludes that the submitted Plan is unlikely to have significant environmental effects and that full SEA is therefore not required.

Habitat Regulations

- 6.16 CDC prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. It is very thorough and comprehensive. The screening report does not identify any likely significant effects that will require Appropriate Assessment, either for the Plan alone or in combination with other plans or projects. The screening report concludes that an Appropriate Assessment is not required for the Plan as none of the policies will directly result in new built development and likely significant effects from the plan can therefore be ruled out.
- 6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no

evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan Policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and CCTC have spent time and energy in identifying the issues and objectives that they wish to be included in the Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans must address the development and use of land. Section 4 identifies a separate package of community aspirations.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. The community aspirations are addressed thereafter.
- 7.6 For clarity this section of the report comments on all the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial sections of the Plan (Sections 1-4)

- 7.8 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. The Introduction identifies the neighbourhood area (Figure 1), and specifies the Plan period. It also summarises the consultation undertaken and includes a Key Diagram.
- 7.9 Section 2 sets out a comprehensive vision for the Plan. It is very distinctive to the neighbourhood area and provide an overall context for the resulting policies. The Vision is that:

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

- 7.10 Section 2 also comments about the six objectives of the Plan.

- 7.11 Section 3 helpfully sets out the nature of the parish and its current circumstances. It helps to underpin the approach taken in several of the policies.
- 7.12 Section 4 comments about community concerns and aspirations.
- 7.13 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy 1 – Chipping Campden Town Centre

- 7.14 This is a wide-ranging policy on Chipping Campden Town Centre. It has three key elements:
- proposing that the Key Centre Boundary is extended (and as shown in Figure 13);
 - where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre; and
 - proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the town centre will be supported.
- 7.15 The Plan advises that the current key centre boundary line cuts across the High Street just a few metres short of its junction with Leysbourne, and Church Street. CCTC believes this is not consistent with key centre main uses and functionality. As such the Plan proposes that the existing key centre boundary relating to Local Plan policy EC7 is modified to better reflect the real function of the High Street, as reflected in the geometry of the junctions and the existence of a key town centre use that is currently outside control of Policy EC8, but should be included within, given its importance to the community. The revised boundary is shown in Figure 13.
- 7.16 This policy was considered at the hearing. I saw the vibrancy and attractiveness of the town centre during the visit and on the day of the hearing.
- 7.17 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. I sought CCTC's comments on the following matters:
- 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.
 - 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 it anticipate that CDC would assess any impact of such proposals on the vibrancy of the town centre?
- 7.18 I have considered these matters carefully alongside CCTC's response to the clarification note. Based on the helpful discussion at the hearing, I recommend that the policy is recast so that it delivers an update local dimension to Policy EC8 of the adopted Local Plan. In summary the recommended modified policy:

- reflects the changes in the Use Classes Order since the Local Plan was adopted;
- acknowledges the Town Council's approach towards rounding off the key centre boundary;
- is intended to supplement Policy EC8 of the Local Plan in the period leading up to the adoption of the emerging Local Plan;
- retains the support for extra car parking; and
- deletes any commentary about visitor accommodation from the policy to acknowledge the legislative issues on this matter and the way in which visitor accommodation is now an integral part of the role and character of the town centre

7.19 The modified policy has regard to Sections 6, 7 and 8 of the NPPF. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'Within the key centre boundary identified on the Policies Map, Class E uses will be supported where they will complement and enhance the retailing offer of the key centre. The loss of Class E uses in the key centre will not be supported where this would adversely affect the vitality and viability of the key centre centre or harm wider town centre investment, or cause amenity issues.

Where the loss of a Class E use is proposed, evidence should be submitted to demonstrate that the property has been continually, actively and effectively marketed for at least twelve months and that the use is no longer of commercial interest.

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

Policy 2 – Community Facilities and Infrastructure

- 7.20 The Plan advises that Chipping Campden is fortunate to have a full range of community facilities, local health services, opportunities to meet, high quality recreation for all ages, and beautiful and tranquil open spaces within the built-up areas. Table 6 and Appendix 4 list all the social and community infrastructure in the parish as the baseline of what exists and that should be protected under Local Plan policy INF2.
- 7.21 The policy has two parts. The first comments that the infrastructure identified in Table 6 and Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8. The second advises that the provision of suitable land for human burial will be supported.
- 7.22 I saw the impressive range of community facilities in the town during the visit. The proposed connection between Table 6 and Local Plan policies is a very practicable approach, and will avoid duplication of policies.
- 7.23 I have noted CDC's representation on the policy and CCTC's response to the representation. Taking account of all the relevant information, I recommend that the policy makes a reference only to Policy INF2 of the Local Plan. I have reached this

conclusion for two related reasons. The first is that Policy 1 of the Plan (including my recommended modifications to that policy) already addresses the importance of retail uses to good effect. The second is that the details in Policy EC8 of the Local Plan (and which overlap with the recommended modified Policy 1) are very comprehensive and there is no need for a neighbourhood plan to restate its approach.

- 7.24 In this context, I recommend that the reference to the grocery stores in both Table 6 and Appendix 4 are deleted and repositioned into the supporting text in the policy.
- 7.25 In relation to burial plots, the Plan highlights that a recent survey (March 2024) commissioned by CCTC confirmed that there were a potential additional 44 burial plots remaining. The Plan advises that new burial land is therefore required and will become urgent in time. CCTC has not identified potential sites. On this basis the second part of the policy takes a general and permissive approach.
- 7.26 In general terms, I am satisfied that this part of the policy takes an appropriate approach and has regard to Section 8 of the NPPF. Nevertheless, I recommend that appropriate environmental safeguards are built into the policy to bring the clarity required by the NPPF and to avoid any potential unintended consequences that may arise from its implementation in the Plan period.
- 7.27 I have noted the suggestions from The Campden Society about the way in which the policy could be broadened. However, an extended scope of the policy is not necessary to ensure that it meets the basic conditions. In any event matters such as bus stops and litter bins are beyond planning control
- 7.28 With the incorporation of the recommended modifications I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals that would affect the community infrastructure identified in Table 6 and Appendix 4 will be determined on the contents of Local Plan Policy INF2.

The development of land for human burial purposes will be supported where it safeguards the residential amenity of adjoining parcels of land.’

At the end of the section headed Objective (page 64) add:

‘Policy EC8 of the Local Plan takes a very comprehensive approach to the loss of Class A1 and other town centre related uses. On this basis grocery shops are not included in the details of Table 6 and Appendix 4. Whilst they serve a clear community purpose, they are safeguarded by a development plan policy that relates to their retail use. For clarity the community attaches a specific community benefit to the following retail uses:

- *The Co-operative*
- *Fillet and Bone*

- *The One Stop Shop*
- *Toke's*
- *Maylams'*

Delete the Shops (Groceries) heading from Table 6

Delete the Shops headings from Appendix 4

Policy 3 – Design of the Built and Natural Environment

- 7.29 The Plan advises that the Local Plan provides very strong control over building design for the district in general and further advice is available from the Cotswolds National Landscape Management Plan. It continues by advising neither of these important documents are specific to Chipping Campden or Broad Campden and for this reason, CCTC secured technical support to prepare the Chipping Campden Design Guide (as a supporting document to the Plan).
- 7.30 The Design Guide provides general advice for applicants. It provides advice on strategic design principles and on detailed design. It is an excellent example of a document of this type and brings real depth and detail to the Plan.
- 7.31 The policy comments that 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 document.
- 7.32 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.
- 7.33 I note that The Campden Society supports the policy.
- 7.34 In this broader context, I recommend the following modifications to the policy to bring the clarity required by the NPPF and to allow CDC to be able to apply its contents through the development management process:
- the inclusion of a proportionate element to acknowledge that minor and domestic proposals will be less affected by the principles in the Design Guide than larger proposals;
 - a requirement for development proposals to respond positively to the Guide rather than simply to have regard to that document; and
 - the inclusion of the missing elements within the policy (as suggested by CDC)
- 7.35 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'As appropriate to their scale, nature and location, development proposals should respond positively to the Chipping Campden Design Guide and be

designed in accordance with Natural England’s Green Infrastructure Planning and Design Guide and the Building with Nature standards or equivalent.’

Policy 4 – Non-Designated Heritage Assets

- 7.36 Appendix 5 of the Plan provides details of the proposed non-designated heritage assets (NDHAs), and explains their local significance. It advises that some of the important features of buildings are already protected under existing legislation, national and local planning policy.
- 7.37 I saw the significance of the proposed NDHAs 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.
- 7.38 I note that The Campden Society proposes additional non-designated heritage assets. In its response to the clarification note, CCTC advised that:
- ‘(the) NDHA list was created following the process set out in Cotswold Local Plan Policy EN12 and associated guidance and local volunteers identified candidate assets. The Council has resolved not to make further additions during this NDP cycle because new nominations require investigation, consultation, and assessment, adding them now would require re-consultation on Policy 4, and it would jeopardise Plan delivery timescales. Further NDHA work can be taken forward after NDP adoption as part of a Local Heritage List project.’*
- 7.39 I am satisfied that the proposed NDHAs are appropriate for the neighbourhood area and reflect the approach taken in Table 6 of the Local Plan. The approach taken has regard to Section 16 of the NPPF. In this broad context, I recommend that the opening element of the policy is modified so that it is more explicit about its relationship with Policy EN12 of the Local Plan. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the policy with:

‘The Plan identifies the following features as non-designated heritage assets for the purpose of the application of Policy EN12 of the Local Plan:’

Policy 5 – Biodiversity Net Gain and Local Nature recovery

- 7.40 This is a wide-ranging policy. As its title suggests, it addresses both Biodiversity Net Gain (BNG) and Local Nature recovery.
- 7.41 The policy element on BNG is general in nature. The element on the Local Nature Recovery Strategy (LNRS) is more specific. It advises that land identified in Table 7, Figure 16 and Appendix 6 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021.
- 7.42 I note the approach taken in the supporting text and the wider ambitions of CCTC 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 (LNRS). Nevertheless, I sought commentary from CCTC about the extent to which is it appropriate and/or lawful for a neighbourhood plan to propose Local Nature Recovery Areas. In its response to the clarification note CCTC commented that:

'(it) recognises that the statutory Local Nature Recovery Strategy (LNRS) will be prepared by Gloucestershire County Council as the responsible authority. The intention is not to create statutory Local Nature Recovery Areas, but to

- identify areas within the parish that, based on locally-held habitat evidence (Appendix 2), have potential to contribute to nature recovery*
- ensure local ecological priorities are set out transparently*
- guide developers when identifying appropriate off-site BNG locations consistent with national policy's 'onsite first, local offsite second' structure.*

The areas shown are aspirational, non-statutory indicators, to be considered alongside, and ultimately superseded by, the Gloucestershire LNRS when published. The Plan wording could, if necessary, be modified to make this explicitly clear, such as renaming to Areas of Potential Local Nature Recovery (or similar).

- 7.43 In addition, I sought CCTC's advice about the what extent have the owners of the proposed Local Nature Recovery Areas been engaged in the Plan preparation process. In its response to the clarification note, CCTC commented that:

'engagement has taken place through the Regulation 4 consultation, during which all affected landowners were contacted and invited to comment, direct correspondence with several landowners who are supportive of biodiversity improvements....Where landowners have objected, this is explicitly acknowledged, and the policy does not apply designations or constraints to land. It purely identifies opportunities.'

- 7.44 Criteria a-e read as process issues rather than as land use policy matters. I sought advice from CCTC about 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. In its response to the clarification note CCTC commented that:

'the criteria in Policy 5 are intended to

- provide a clear, locally-specific decision-making sequence for developers seeking to meet statutory BNG requirements*
- ensure that BNG delivery aligns with both national requirements and local evidence*
- support the NPPF expectation that strategic ecology networks and local priorities be taken into account*
- prevent ad-hoc or poorly targeted off-site BNG contributions.*

While BNG requirements originate in national legislation, the criteria add the following locally distinctive value

- *referencing locally mapped priority habitats*
- *supporting parish-level delivery of BNG where possible*
- *preventing loss of opportunity for ecological connectivity through isolated or remote off-site solutions.*

The town council would be open to separating the first part of the policy, LNRA's (or Areas of Potential Local Nature Recovery), from the BNG part of the policy.'

7.45 I have considered these comments very carefully alongside the representation from CDC and SF Planning (on the LNRS issue). In general terms I am satisfied that the element of the policy on biodiversity net gain has regard to Section 15 of the NPPF. However, in this context I recommend the following modifications to this element of the policy to bring the clarity required by the NPPF and to allow CDC to implement it through the development management process:

- a rationalisation of the overlapping criteria;
- the removal of unnecessary supporting text from within the policy; and
- the relocation of the third part of the policy into the supporting text.

7.46 I also recommend modifications to the supporting text based on the comments from CDC and Gloucestershire County Council (GCC) (both in its initial representation and in its comments on the revised Basic Conditions Statement).

7.47 On the LNRS part of the policy I have noted CCTC's response to the clarification note on its intentions for the policy. It highlights that the responsibility for the preparation of a LNRS rests with GCC. In these circumstances I recommend that this part of the policy is deleted, and that the supporting text is consolidated. I also recommend that the extent of the proposed site 11 for local nature recovery is modified where it does not have the support of the landowner.

7.48 For clarity I am satisfied that the retained element of the policy (on biodiversity net gain) refers to the Gloucestershire LNRS. It is perfectly appropriate for a neighbourhood plan to signpost developers to a policy or strategy prepared by another organisation which affects the neighbourhood area

7.49 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

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

- **by ensuring any relevant overlap with Gloucestershire Local Nature Recovery Strategy regarding the proposal site, including its relationship with the Gloucestershire Local Nature Recovery map; and**

- ensuring that long-term biodiversity net gains will be delivered with enduring benefits, and with long-term management arrangements where necessary.

Wherever practicable, biodiversity net gain should be delivered on the development site. Where this is not practicable, a sequential approach to off-site delivery will be applied as follows:

- within the Chipping Campden Local Nature Recovery Areas; or
- if this is not practicable, elsewhere within Chipping Campden Parish; or
- if neither of the above is practicable, in locations that contribute to the Gloucestershire Local Nature Recovery Strategy.

Proposals should only deliver biodiversity net gain outside the three areas listed above where it can be clearly demonstrated that none of the listed options are practicable.’

Replace the third paragraph of text on page 77 with:

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

Replace the final paragraph of text on page 77 with:

‘The CCNDP acknowledges that the County Council is responsible for preparing the Local Nature Recovery Strategy (LNRS). Within this context Figure 16 identifies areas which could be optimum locations within the parish to deliver nature recovery and improvement, because either they are already important for biodiversity in their own right, provide ecological connectivity or have good potential to increase in biodiversity value or connectivity. These are based on data provided by the Gloucestershire Environmental Records Centre. It is acknowledged that the report (published in 2017) relies on data from that time and more recent data will be available, but it is considered to remain a realistic and credible representation of nature recovery and improvement potential in the area. Planning proposals should demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.’

Delete the part of the Local Nature Recovery Area (site 11) within Springhill Industrial Estate as shown on Figure 16 and in Appendix 6.

Policy 6 – Local Green Spaces

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

- 7.52 In terms of the information in Appendix 7 I sought CCTC's comments on the following matters:
- the sizes of LGSs 11/17/19/20/21/22;
 - the process that was followed to engage with the owners of proposed LGSs and how the details relate to the information contained in the Consultation Statement on this matter; and
 - whether any assessment was undertaken on 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).
- 7.53 Where appropriate CCTC's responses to these matters is incorporated in this report. This report also takes account of the very detailed responses from CCTC to the representations received on the proposed LGSs.
- 7.54 The hearing identified that CCTC had relied on Tool Kit information as part of its consideration of the extent to which the parcels of land concerned met the various criteria for LGS designation in paragraphs 106 and 107 of the NPPF. Following the hearing CCTC shared its work on the Tool Kit assessments with the hearing participants and CDC invited comments from the other participants. Where appropriate, the information received is incorporated in this report.

The proposed LGSs

- 7.55 I looked carefully at the proposed LGSs during the visit. I noted their various sizes, land uses, and locations. I am satisfied that most of the proposed LGSs meet the requirements of paragraphs 106 and 107 of the NPPF. In many cases, they contribute to the attractive environment of both Chipping Campden and Broad Campden. In their different ways proposed LGSs 14 (Ernest Wilson Garden), 15 (Wold's End Orchard), and 17 (Calf Meadow) are precisely the types of green space that the authors of the NPPF would have had in mind for such designations.
- 7.56 Detailed objections have been made about the proposed designation of LGSs 19 (The Hoo West), 20 (The Hoo East), 21 (The Cley) and 22 (The Craves). The four proposed LGSs were considered at the hearing on 14 April 2026. I address these proposed designations in turn in the next sections of this report and assess each of the four proposed LGSs against the relevant criteria in paragraphs 106 and 107 of the NPPF and the more general issues in Planning practice guidance.

LGS19 The Hoo West

- 7.57 Appendix 7 of the Plan advises that this proposed LGS is an essential part of the rural environment within which the Town is set, and which gives the Town its specific character. It also comments that the CDC Green Infrastructure August 2017 identifies that the setting of the town is important to the whole of its aesthetics uniquely in that the built environment remains generally hidden in the folds of the landscape. The Cotswold Way runs up Hoo Lane from the centre of the town, and public footpath runs up Hoo Lane to the east and north east of the site and overlooks the site. Other public footpaths cross the site. The site is mostly open pasture. The footpaths are used for walking, running, and dog walking.

7.58 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026.

7.59 The agent acting for the owner of the proposed LGS comments that:

'In regard to being demonstrably special or holding particular local significance, the land identified as LGS19 forms part of the open countryside that surrounds the market town of Chipping Campden; a network of agricultural fields. This wider surrounding landscape is already protected for its scenic beauty through designation as a Natural Landscape (the Cotswolds National Landscape) (formerly AONB). The settlement of Chipping Campden and surrounding countryside is washed over by this national designation. The importance of this land as local green space has been overstated in my opinion in an attempt to block areas considered under threat from future development. This restrictive (rather than positive) planning strategy is wholly inappropriate and contrary to local strategic policies for growth and national planning policy.'

7.60 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the town

7.61 I am also satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. It plays an important role in the setting of the town and is attractive countryside.

7.62 The proposed LGS is 15.3 hectares in size. Based on all the evidence and my own observations, I am not satisfied that it is local in character. Whilst Planning practice guidance does not identify any specific maximum size threshold for a LGS I have concluded that the proposed LGS is an extensive tract of land. This reinforces its location in the countryside surrounding the town.

7.63 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence I am not satisfied that this is the case. It is an integral part of the landscape which surrounds the town and enjoys the protection afforded by national policy for National Landscapes.

7.64 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation I am not satisfied that it is local in character. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS20 The Hoo East

7.65 Appendix 7 of the Plan advises that this proposed LGS is a key part of the natural setting of the Town, is extensively walked (a footpath runs through it) and is part of the wildlife corridor from The Cley westwards. It also comments that The Hoo provides the skyline views looking north-west from most of the town and is also highly visible from approaches to the town. It is a key part of the green landscape within which the town nestles and includes ridge and furrow features which illustrate the agricultural history

of the town. It is visible from National Footpaths such as the Cotswold Way and the Monarch's Way.

7.66 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026.

7.67 The Agent acting for the owner of the proposed LGSs comments that:

'At the Regulation 14 stage, our client submitted clear, evidence-based objections to these designations. These concerns were acknowledged by the Neighbourhood Plan Group's own consultant, who described the evidence as "compelling" and recommended the removal of the sites. It's also suggested that the Local Planning Authority objected to LGS20 on the basis that it constitutes an extensive tract of land, contrary to the NPPF.

Despite this, the sites have not been removed. Instead, the Neighbourhood Plan continues to rely on inaccurate landownership data, insufficient evidence, and unsubstantiated claims of community value. No meaningful effort has been made to address the issues raised—either with the landowner or the Local Planning Authority—nor has there been compliance with the procedural expectation of genuine stakeholder engagement.

In planning terms, both sites fail to meet the tests for Local Green Space designation set out in Paragraphs 105 107 of the NPPF. The designation appears to serve no clear purpose beyond restricting future development, contrary to the requirement that such designations support sustainable development and complement investment in homes, jobs, and services (Paragraph 106 of the NPPF).

Given these factors and the absence of any demonstrable local significance for these sites, their continued inclusion as Local Green Spaces is not justified and would result in an unsound approach to Local Green Space Policy that would not stand up to scrutiny over the course of the current development plan period.'

7.68 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the town. Its accessibility is reinforced by the well-used footpaths throughout its area.

7.69 I am also satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. It plays an important role in the setting of the town and is attractive countryside.

7.70 The proposed LGS is 17.8 hectares in size. Whilst Planning practice guidance does not identify any specific maximum size threshold for a LGS I have concluded that the proposed LGS is an extensive tract of land. This reinforces its location in the countryside surrounding the town.

7.71 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence I am not satisfied that this is the case. It is an integral part of the

landscape which surrounds the town and enjoys the protection afforded by national policy for National Landscapes.

- 7.72 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation I am not satisfied that it is local in character. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS 21 The Cley

- 7.73 Appendix 7 of the Plan advises that this proposed LGS is an area of natural pasture and wild woodland, the last in the area, which occupies an elevated position. It is a notable feature on the approach to the town, providing a backdrop. It is visible to the public from the Aston Road and from the well-used footpath along the northern boundary of the site, which connects the Aston Road to the Cotswold Way National Trail. It also advises that the land is home to an extremely wide variety of wildlife including hares, rabbits, moles, fieldmice, muntjac deer, roe deer, foxes, badgers and a wide variety of birds, some of them rare species.

- 7.74 I saw these details from the footpaths surrounding the site during the visit to the neighbourhood area on 6 February 2026.

- 7.75 An unaccompanied visit into the site was arranged for me during the hearing that took place on 14 April 2026.

- 7.76 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. It is immediately adjacent to the built form of the town.

- 7.77 Appendix 7 comments generally on the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance. CCTC submitted its toolkit analysis after the hearing. On this issue it comments as follows:

'The character of Chipping Campden is to a large extent defined by its history, evidenced for instance by historic buildings and sites such as Old Campden House and Gardens, and its rural setting which tells the story and provides a physical link with its agricultural past. Sites such as the Cley are essential elements of the rural setting. The Cley is the last surviving unspoilt woodland in the town; it is also the last piece in the jigsaw of the circular paths around the town, being a green strip adjoining the footpath leading down from the Hoo to Aston Road. DEFRA specifically categorises the site as Priority Habitat Inventory Deciduous Woodland with regard to biodiversity and habitats. In addition, it is in an area categorised as Environmentally Sensitive and is included in the Ground Water Vulnerability Map,'

- 7.78 Following the hearing, the agent acting for the owner of the site provided a package of information about the work it is undertaking on a Woodland Management Plan for the site and which is being pursued with the Forestry Commission as follows:

'The Woodland Management Plan identifies widespread woodland degradation, including significant Ash Dieback, unmanaged scrub growth, declining tree health, structural instability, and risks associated with trees adjoining residential property and third-party land. Importantly, substantial felling operations have been recommended across the majority of the woodland compartments as part of good and necessary woodland management.

The evidence base supporting LGS21 places substantial reliance upon:

- *the quality and amenity value of the woodland;*
- *the ecological significance of the site;*
- *the contribution of the tree stock to the setting of the town.*

However, the professional woodland management evidence now before the Examiner demonstrates that:

- *large parts of the woodland are in declining condition;*
- *substantial felling is considered necessary as part of responsible woodland management;*
- *significant proportions of the existing tree stock are affected by Ash Dieback or structural decline; and*
- *active intervention is required to secure the long-term future and resilience of the woodland.*

That evidence sits uneasily alongside the suggestion within the Neighbourhood Plan evidence base that the site comprises a uniformly high-quality woodland resource of exceptional local significance.

This does not diminish the value of the woodland generally; however, it does demonstrate that the condition, composition, and quality of the woodland is materially more complex and dynamic than suggested within the Local Green Space assessment.'

- 7.79 I noted carefully the location and condition of the trees on the site during the visit in April 2026. On the balance of the evidence, I am not satisfied that CCTC has made a compelling case that the proposed LGS is demonstrably special. The Tree Preservation Order on the site is of a general nature rather than specific to individual trees. Furthermore, there is clear evidence that management of the woodland is necessary to secure its longer-term future and well-being.
- 7.80 The proposed LGS is 2.17 hectares in size. Based on all the evidence I am satisfied that the proposed LGS is local in character and not an extensive parcel of land. Whilst it is slightly larger than most of the other proposed LGSs within the built-up part of the town its size and character are local. Moreover, its size is considerably smaller than proposed LGS 19 and 20 which I have concluded are large tracts of land.
- 7.81 I have also considered carefully the way in which the proposed designation would comply with the requirements of paragraph 106 of the NPPF. I am satisfied that its designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. In

the broader context of CDC's preparation of a new Local Plan I note that the site was considered as part of the Site Assessment process in 2021 (as site CC64) and was discounted as the whole of the site is covered by a Tree Preservation Order.

- 7.82 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. On the one hand, I noted that the proposed LGS has a different and more enclosed character to that of the adjacent proposed LGS 20 (The Hoo East). On the other hand, I saw from both visits that it formed part of the wider landscape beyond the built-up form of the town. On the balance of all the evidence I am not satisfied that the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape.
- 7.83 In all the circumstances I recommend the deletion of the proposed LGS. Whilst it meets several of the criteria for LGS designation, I am not satisfied that meets the demonstrably special element of paragraph 107 of the NPPF. Furthermore, I am not satisfied that its designation would bring additional local benefit to the location of the site in the Cotswold National Landscape.

LGS22 The Craves

- 7.84 Appendix 7 of the Plan advises that this proposed LGS is integral to the town's identity. It has been a valued green space for centuries, with three well used public footpaths and is a unique remnant of the separation of the Norman new town of Campden from the distinct and earlier settlement of Westington. It is a sloping field and from its high point walkers can see views over the town. The sloping site is also visible from within the town and provides a green backdrop to the historic buildings, which is a special feature not seen elsewhere. The town uses it for walking and dog walking – and paddling in the River Cam.
- 7.85 I saw these details first-hand during the visit to the neighbourhood area on 6 February 2026. I noted the importance of the footpaths within the site and the way in which they connected with the built-up parts of the town surrounding the proposed LGS.
- 7.86 The agent acting for the owner of the proposed LGS comments that:

'Contrary to the views expressed in the LGS assessment (Appendix 6, Reg 15 version CCNDP), draft designation LGS22 does not meet the criteria set out under Paragraph 107. As such, the designation of this land as LGS would be contrary to national planning policy.'

It is accepted that a footpath crosses the field (Footpath 15) and there are two headland footpaths that run partially along the northern (Footpath 14) and southern (Footpath 16) boundaries, but this is not reason enough for this land to be of particular importance or demonstrably special. The NPPG is clear that "Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation." (Paragraph: 018 Reference ID: 37-018-20140306: Revision date: 06 03 2014).

In addition, the NPPG states “There are no hard and fast rules about how big a Local Green Space can be because places are different, and a degree of judgment will inevitably be needed. The total area of the field known as the Craves amounts to 7 acres. When considered against the immediate local context this amounts to an area of considerable size, a large area or extensive tract of land which would fail to comply with the designation criteria set out in Paragraph 107 of the NPPF. Although this land lies within the form of the settlement and not adjacent to the settlement where a LGS designation might be likened to a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.’ [Paragraph: 015 Reference ID: 37 015-20140306; Revision date: 06 03 2014]. Equally, a blanket designation of the land known as the Craves would not be consistent with or appropriate as a ‘back door’ approach to protect this land from future development or as a strategic gap by any other name.’

- 7.87 I have carefully considered this proposed LGS. It is an unusual LGS to the extent that it is a parcel of agricultural land within the built-up part of the town. Nevertheless, national legislation is clear that LGSs can come forward in a variety of circumstances.
- 7.88 I am satisfied that this proposed LGS is in reasonably close proximity to the community it serves. Indeed, it is set within the built-up part of the town. Its accessibility is reinforced by the well-used footpaths throughout its area.
- 7.89 I am satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. As the Plan comments it has been a valued green space for centuries, with three well used public footpaths and is a unique remnant of the separation of the Norman new town of Campden from the distinct and earlier settlement of Westington. It also provides a green backdrop to the historic buildings, which is a special feature not seen elsewhere.
- 7.90 The proposed LGS is 3.21 hectares in size. Based on all the evidence, I am satisfied that the proposed LGS is local in character and not an extensive parcel of land. Whilst it is slightly larger than most of the other proposed LGSs within the built-up part of the town, its size and character are local. Moreover, its size is considerably smaller than LGS 19 and 20 which I have concluded are large tracts of land.
- 7.91 I have also considered carefully the way in which the proposed designation would comply with the requirements of paragraph 106 of the NPPF. I am satisfied that its designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. In the broader context of CDC’s preparation of a new Local Plan I note that the site was considered as part of the Site Assessment process in 2021 (as site CC58) and was discounted for the following reasons:

‘Unsuitable for housing or commercial development – this is a highly sensitive site within the Conservation Area and the AONB. The site also forms part of the setting of a large number of Grade II Listed Buildings and is a green lung within the town. Flood Zones 3b, 3a and 2 (SFRA Level 2) extend within the northern boundary. A Public Right of Way also runs through centre of site and along northern and southern boundaries. The access onto Blind Lane is also likely to be problematic.’

- 7.92 I am also satisfied that the proposed LGS is capable of enduring beyond the end of the Plan period and there is no evidence to suggest otherwise.
- 7.93 I have carefully considered the extent to which the proposed LGS will bring additional local benefit to the location of the site in the Cotswold National Landscape. Based on all the evidence, I am satisfied that this is the case. LGS designation would identify the special characteristics of the site, including the way in which it provides a setting for several heritage assets and includes well-used footpaths.
- 7.94 In conclusion I am satisfied that the proposed LGS meets the basic conditions.

The Policy Wording

- 7.95 The policy takes a simple format and merely lists the proposed LGSs. The information in the box in the supporting text draws attention to national policy on this matter in the NPPF. Whilst the implication of LGS designation may be clear to planning professionals, it is not set out in the policy. I recommend a modification to address this matter.
- 7.96 With this modification to the policy wording and the deletion of the three LGSs I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Delete proposed LGSs 19, 20 and 21 from the list in the policy.

Add as a separate element at the end of the policy ‘Development proposals within the designated local green spaces will only be supported in very special circumstances.’

Remove proposed LGSs 19, 20 and 21 from Figure 17

Community Aspirations

- 7.97 Section 4 of the Plan identifies the following community aspirations:
- Better town centre parking;
 - Railway Station;
 - Campden BRI, Campden Business Park, and start-up industries
 - Replacement Primary School;
 - Health Centre; and
 - Indoor Sports Facility.

- 7.98 These matters are properly addressed in a separate part of the Plan from the land use policies. This is best practice. In addition, I am satisfied that the community aspirations are appropriate to be included in the Plan and are locally-distinctive to the neighbourhood area.

Monitoring and Review

- 7.99 The Plan addresses the way in which it will be monitored and review in a positive fashion. This is best practice. It comments generally about the potential significance of

the adoption of the emerging Local Plan. In this context I recommend that the commentary is more specific about the way in which CCTC will respond at that time.

Replace the commentary on page 8 (under the Neighbourhood Plan period heading) with:

'The CCNDP supports policies in the Cotswold District Local Plan 2011 – 2031. The CCNDP period relates to that for the Local Plan and covers the period to 2031. Where Local Plan policies change some of the policies in this CCNDP may become out of date and a review of the NDP would be justified. In this context the Town Council will consider the need for a full or partial review of the Plan within six months of the adoption of a new Local Plan for the District.'

Other Matters - General

- 7.100 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. It will be appropriate for CDC and CCTC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies.

Other Matters – Specific

- 7.101 CDC has made detailed comments on the Plan. They have been very helpful as part of the wider examination process. Where they relate directly to specific policies, I have considered them in my assessment on a policy-by-policy basis. CDC has also made a series of more general comments on the wording used in the Plan. I recommend the following modifications to address these matters:
- Page 15 and beyond – replace 'Cotswold Area of Outstanding Natural Beauty with Cotswold National Landscape'
 - Include numbers in the headings to the various sections of the Plan to correspond with the numbering in the Contents page
- 7.102 Some representations to the Plan proposed additional policies or site allocations. Whilst I have considered their details carefully, my role is to examine the Plan as submitted rather than to propose additional policies or a revised Plan. It is on this basis that this report has not directly addressed these representations.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to extend the key centre boundary, to safeguard the character of the neighbourhood area and to designate Local Green Spaces.
- 8.2 Following the independent examination of the Plan, I have concluded that the submitted Chipping Campden Parish Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 Based on the findings in this report I recommend to Cotswold District Council that subject to the incorporation of the modifications set out in this report the Chipping Campden Parish Neighbourhood Development Plan should proceed to referendum.

Referendum Area

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 14 February 2014.
- 8.5 I am grateful to everyone who has contributed to the examination. The Town Council's responses to the clarification note were both helpful and timely and the hearing was conducted in an open way.

Andrew Ashcroft
Independent Examiner
25 June 2026

Appendix A

Chipping Campden Parish Neighbourhood Development

Detailed Hearing Note

Context

This note clarifies the next stages of the examination process and expands on the earlier note about the need for a hearing.

The examination of the submitted Plan is proceeding well. I have visited the neighbourhood area, read the submitted documents and the representations made to the Plan. I have also prepared a clarification note and read the responses to that note.

Hearing

I am satisfied that most of the Plan can be examined by way of written representations. However, in accordance with paragraph 9(3) of Schedule 4B to the Town and Country Planning Act 1990, I have concluded that to ensure an adequate examination of the Plan it is necessary to hold a hearing on the contents of Policies 1 and 6 of the submitted Plan.

Hearing Details

The hearing details are as follows:

Date: Tuesday 14 April 2026

Time: 10.30 am

Venue: Town Hall, High Street, Chipping Campden GL55 6HB

The issues and the participants

The Issues

The hearing will address two issues.

The first is the Plan's proposal in Policy 6 to designate the following local green spaces:

- The Hoo West (LGS19);
- The Hoo East (LGS20);
- The Cley (LGS21); and
- The Craves (LGS22).

The second is the Plan's proposal in Policy 1 to extend the Chipping Campden Key Centre boundary.

The Participants

Chipping Campden Town Council (CCTC) and Cotswold District Council (CDC) have a statutory role at the hearing.

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The private sector organisations listed below have been invited to attend the hearing:

- Morgan Elliot Planning (on proposed Local Green Spaces 20 and 21); and
- Brodie Planning Associates (on proposed Local Green Spaces 19 and 22).

The public and other interested parties will be able to attend the hearing. However, only the organisations invited to attend will be able to participate on the day.

There will be breaks throughout the day and with a slightly longer break at lunchtime. I anticipate that the hearing will finish around 4.30pm.

The hearing sessions

Session 1: The extent to which the Town Council has addressed the additional benefit of the relevant proposed local green space designations beyond the location of the sites concerned in the Cotswolds National Landscape.

This session will address the extent to which the proposed local green space (LGS) designations have regard to Planning practice guidance (ID: 37-011-20140306).

The participants for this session will be CCTC, CDC, Morgan Elliot Planning, and Brodie Planning Associates.

Session 2: Proposed LGS 20 The Hoo East

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Morgan Elliot Planning.

Session 3: Proposed LGS 21 The Cley

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);

- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Morgan Elliot Planning.

Session 4: Proposed LGS 19 The Hoo West

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Brodie Planning Associates.

Session 5: Proposed LGS The Craves

This session will address the following matters:

- the extent to which the proposed LGS is demonstrably special to a local community and holds a particular local significance (NPPF 107b);
- the extent to which the proposed LGS is local in character and is not an extensive tract of land (NPPF 107c);
- the extent to which the proposed designation has regard to Planning practice guidance ID: 37-017-20140306 (on public access), and ID: 37-018-20140306 (on public rights of way);
- the extent to which the proposed designation would be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services (NPPF106); and
- the extent to which the proposed designation is capable of enduring beyond the end of the Plan period (NPPF 106).

The participants for this session will be CCTC, CDC and Brodie Planning Associates.

Session 6: The proposed extension of the Chipping Campden Key Centre Boundary

This session will address the following matters:

- the extent to which the proposed extension of the key centre boundary is based on appropriate evidence; and
- if there is a case to extend the boundary, how should the policy be worded so that it relates to the general principles and approach set out in Policy EC8 of the adopted Cotswold District Local Plan.

The participants for this session will be CCTC and CDC.

Other Matters

The Arrangements for the Hearing

The hearing will address the matters above in turn. I will ask the various questions and lead any further discussion on the issues.

The details in the Plan and the representations made by the various parties are thorough and comprehensive. As such hearing statements are not required.

The Next Steps after the hearing

I will finalise my report on the Plan as soon as possible after the hearing. The parts of the report which are unaffected by the hearing will have been completed by 14 April.

The Examination Report

The hearing introduces an additional stage into the examination process. It does not affect the way in which the report will be produced and finalised. I will send a fact check report to the District Council and the Town Council (as set out in the note on examination arrangements). The main findings of the hearing will be incorporated within the report on a policy-by-policy basis. The final report will be published once the fact-checking process has concluded.

Andrew Ashcroft

Independent Examiner

Chipping Campden Parish NDP

13 March 2026 (Examiner's Note – this is the date of the hearing note, and not the date of the final report)