



Annex B:

**Representation to the Stow-on-the-Wold and the Swells
Neighbourhood Plan Regulation 16 consultation**

Please find below comments from **Cotswold District Council** (CDC) on the Stow-on-the-Wold and the Swells Neighbourhood Plan 2020-2031 (the Plan).

CDC acknowledges the work that has been put in by the authors of this Plan, and commends its structure and clarity.

The following comments, observations and suggested amendments have been written to try to identify either points which in officers' opinion may not meet the Basic Conditions against which the NDP will be assessed, or where the wording used may be open to interpretation during the development management process. While we have commented on the majority of policies, we hope these suggestions will enhance the policies and the plan.

Unfortunately, we have also raised some more fundamental concerns. We have raised a number of concerns on Policy SSNP7, which is clearly a central pillar of the Plan. While the comments below go into some detail, it is worth highlighting our principal concerns: that the Plan seeks to allocate a parcel of land which is but a part of a larger site - thus is not presented as developable in its own right; and, that the development will need to demonstrate exceptional circumstances, yet reasonable alternatives such as a combination of smaller sites or developing outside the Cotswolds National Landscape (formerly known as the Cotswolds Area of Outstanding Natural Beauty) have not been fully considered.

On 22nd November 2023, the Government rebranded all Areas of Outstanding Natural Beauty (AONBs) as 'National Landscapes' to boost understanding of their national significance. References to the Cotswolds AONB should therefore be updated to the Cotswolds National Landscape.

Para 3.8 To provide confirmation to the note that the Neighbourhood Plan should be examined against the adopted Local Plan, please note the Local Plan Partial Update will now be submitted for examination in public in 2025.

Para 3.10 The Gloucestershire Local Transport Plan is an important consideration in the preparation of development plans and neighbourhood plans and especially so given the plan's intention to allocate major development.

Para 3.11 Please note that the Cotswolds AONB Management Plan 2018-2023 has been superseded.

<https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/>

Para 4.16 The suggestion that no factors of technical substance came to light regarding the site allocation at Regulation 14 is inaccurate, given the interest in this issue from numerous parties, such as the Cotswolds National Landscape Board and the technical issues raised by CDC. Some of CDC's previously raised concerns are raised again in this representation, for consideration by the examiner.

p22, and p44, Policy SSNP1 The Stow on the Wold Development Boundary

The proposed Development Boundary is the extant boundary, plus the site allocation at SSNP7. Our comments on the proposed site follow below, in this representation. Should the site allocation be accepted, it follows that the development boundary should be amended. Conversely, should the site allocation be determined not to meet Basic Conditions, a development boundary policy less the site allocation would duplicate the adopted Local Plan policy.

Policy DS2 of the adopted Local Plan supports the principle of development inside Development Boundaries. CDC is concerned that the whole of the proposed site allocation being within the Development Boundary may lead to further development on land which is proposed to be retained for landscaping, greenspace, etc. It is recommended that, should the site be allocated for development, that the Development Boundary be scaled back to only include the part of the site containing housing, car parking and other buildings.

We note that the base map is a little dated and does not reflect the existing built environment of Stow - notably at the north end of the town, where there is a 'white triangle' between Character Area D and the proposed site allocation - this area, adjacent to the proposed site allocation, is built out and accommodates the Edwardstow Court Care home and Hawkesbury Place housing for over 70s.

p22 Policy SSNP2 Development in the Swells and the Countryside

The Local Plan's development strategy actively avoids listing non-principal settlements, as such matters are considered on a case by case basis. The description of Swell at Clause A identifies Lower Swell as a village 'suited to small-scale residential development' - which is not consistent with the strategic policies of the local plan (DS1 and DS3). Essentially this clause suggests that Lower Swell is de facto a suitable location for small-scale development, whereas the Local Plan approach, outside of principal settlements, requires a judgement at the time of a planning determination.

The second line of C seeks to disapply part of NPPF (2023) paragraph 80(e). NDPs have to have regard to the NPPF, but can differ, so this may be acceptable, but CDC is not convinced that the assertion in the following paragraph is sufficient justification, given the robustness of the paragraph 80 criteria, and the size and varied landscape of Swell Parish.

p21 Policy SSNP3 Housing Mix

Achieving a housing mix to meet local needs is an aspiration we share for all development in the district. However, we wonder whether this policy represents an appropriate strategy to deliver that for the following reasons.

1. The very specific percentage requirements will not always be mathematically achievable: a point now recognised in the policy. In order to achieve whole unit numbers, there will be a process of rounding, leading to negotiation, which this policy does not specifically enable, but which is in reality the existing approach.
2. The housing mix in tenure and size on any development will need to reflect the viability of the development, in terms of the site, infrastructure requirements and the state of the housing market at the time. These variables are not immutable during the plan period, so whatever may be appropriate now may not be the best fit in future years. A particular issue here would be the changing dynamic of need in Stow, particularly if a large development such as that proposed in policy SSNP7 is built out.

3. Local Plan Policy H1 already says that, "*Developers should have regard to local evidence, for example, the latest SHMA and parish needs surveys, and show how the proposed mix of market housing provision will help to address identified local needs in terms of the size, type and tenure of housing.*" Stow's housing needs survey can already be used to help determine the mix of houses in any planning application assessed against Policy H1.
4. The current NDP policy is not flexible to changing circumstances and the latest evidence.

Local evidence, such as the Housing Assessment carried out by AECOM, and indeed any successor documents, can already be used as a starting point for determining the housing mix. We would be supportive of the NDP reiterating the position that such evidence should direct the housing mix, and which presents the current summary information in the reasoned justification.

p22 Policy SSNP4 Principal Residence

Second Home ownership, and other non-principal housing uses is an issue within the neighbourhood area and the wider Cotswolds, which may affect housing availability and affordability for local people. Land use planning tools can be used to try to address this, but appear to be a rather blunt tool in practice. A policy such as this is limited to new dwellings, when the main appetite for second homes will be for existing 'character' dwellings. There will still be the stock of (character) homes available for people to buy as second homes in Stow and the Swells. Therefore, will this policy be effective in preventing second home / holiday home ownership in the Neighbourhood Area? If not, is it an appropriate and proportionate response to the issue?

There are also several national policy interventions underway that could go some way to resolving the issue in Stow without the proposed NDP policy. In January 2022 the [government introduced legislation](#) that will prevent owners of second homes from abusing a tax loophole by claiming their often-empty properties are holiday lets, thereby avoiding paying normal tax rates.

The Levelling-Up and Regeneration Act also introduces further restrictions:

- Councils will gain powers to impose higher rates of council tax on empty and second homes (double the standard council tax rate on any home left empty for longer than a year, rather than two years as is currently the case) and this is something that CDC is already pursuing.
- It requires the Secretary of State to introduce regulations to cover the registration of short-term rental properties
- The government also proposes to introduce a new "tourist accommodation registration scheme" in England, through the [Tourism Recovery Plan](#).

The government also recently announced that second-home owners may face an 'Airbnb ban', which would aim to protect tenants living in tourist hotspots. Furthermore, it proposes to introduce a new planning use class for short-term lets, which could result in a change of use permission being required for conversion from conventional housing.

CDC is also seeking to address the issue by enabling the provision of short-term holiday let accommodation in suitable locations to redirect the demand for this accommodation away from unsuitable locations and /or stressed locations.

The proposed policy approach has been supported in neighbourhood plans elsewhere in the country, subject to sufficient supporting evidence. However, the evidence justifying this policy in Stow and the Swells is sparse. There should be far greater consideration of this matter (and its effects) in the SEA, given the role the Sustainability Appraisal played in the St Ives policy being upheld in the face of legal challenge.

<https://stivesnplan.files.wordpress.com/2013/08/sustainability-appraisal-submission-version.pdf>, pp41-42, pp60-63).

The evidence quoted is taken from AECOM's Housing Needs Assessment, which we believe is the 2011 Census data on 'Household Spaces with no usual residents'. While often cited in this context, this is not necessarily limited to non-principal dwelling uses. CDC's Council Tax data, appended to this response at Annex A, may be useful, albeit it would be fair to acknowledge that not every second home owner will declare their property as such in their Council Tax return. Notably, it does not show a significant increase in Second Home ownership over recent years. While currently there is no formal threshold for when this approach might be acceptable, a similar level of second home ownership has not been deemed sufficiently high to justify the imposition of this type of restriction in another Neighbourhood Plan (Bridport), a judgement reached by the same examiner as St Ives.

Stow is a Principal Settlement, and thus our strategy sees it having a role to play in meeting the district's housing needs, which, as defined by the NPPF, does include non-principal residency housing uses.

That said, CDC recognises that Stow is heavily constrained, to the extent that we have not allocated a site in the town within the current Local Plan - thus in the context of the district having sufficient housing land supply, development in Stow, such as that proposed in SSNP7, may only be considered to meet exceptional circumstances if it delivers growth on top of district needs, in order to meet housing need arising from Stow. The principal residency policy could be considered to underpin this rationale, being a tool to enhance the benefit to the town. This could also present a basis to judge the policy to be in general conformity with the Local Plan.

We note that there are known difficulties with determining 'principal residency' and with enforcement action thereafter - this policy is likely to be most effective at the point of property sale. Moreover, there will be loopholes - e.g. someone can register the first home in their own name and the second home in the name of (e.g.) their partner. As a further observation, should the site proposed for allocation in SSNP7 proceed as described, with the developer also seeking to deliver housing outside the boundary within Broadwell parish, this restriction would not apply to the houses that are functionally part of Stow, but are not within the parish/neighbourhood plan boundary. We imagine this might influence how different sizes and tenures would be distributed around the site.

p22 Policy SSNP5 Specialist Accommodation for Older People in Stow

The policy uses the term 'local connection'. The RJ appears to define this through the phrase 'households relocating from within the Town or Parish or from a Parish that immediately adjoins the Neighbourhood Area'. We observe that such a definition would be more limited than the definition of 'local connection' used by the district council, and which would be too restrictive if such affordable dwellings are managed through Gloucestershire Homeseeker Plus, the Council's housing allocations approach.

While CDC recognises local concern on this issue, exacerbated by a perception of oversupply, we're concerned about trying to create a cap on a particular form of development for the entirety of the plan period - we cannot see the particular case for a cap of exactly 40, and would expect any quantum of development to be responsive to changing circumstances.

p23 Policy SSNP6: Health and Wellbeing

We endorse the ambitions of this policy - it provides a clear message about healthy place-shaping to complement the design guidance.

p24 Policy SSNP7: Land North East of Stow

CDC recognises the importance of affordable housing in maintaining the vibrancy of Stow, the wider NDP area and, indeed, the whole of Cotswold District. Accordingly, Stow is defined as a Principal Settlement. Policy DS2 of the adopted Local Plan supports the principle of new housing development within the Stow Development Boundary and Policy H3 enables affordable housing as Rural Exception Sites outside the Stow Development Boundary. However, the constraints in and around the town, most notably its hilltop location and the national policy requirement for the scale and extent of development in the National Landscape to be limited, have dictated a Local Plan strategy that directs strategic growth towards other settlements, particularly those that are not wholly located within the Cotswolds National Landscape. The NDP process presents a further opportunity, in addition to the Local Plan update, to address housing and other issues in the neighbourhood area. However, we are concerned that various challenges can be levelled at the current proposal.

- A. NPPF (2023) paragraph 11 specifies that “Plans... should apply a presumption in favour of sustainable development.” Part b of paragraph 11 is for strategic policies. However, it lays down the principles that are required of development plan policies, which are highly relevant to SSNP7 in terms of the circumstances when housing needs should and should not be delivered in full. “Policies should, as a minimum, provide for objectively assessed needs for housing and other uses **unless: i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area**⁷; or ii) **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**” (CDC added). Footnote 7 confirms that Areas of Outstanding Natural Beauty (now rebranded as National Landscapes) are a protected area of asset of particular importance, the same as a National Parks, Sites of Special Scientific Interest, irreplaceable habitats; designated heritage assets and areas at risk of flooding.
- B. NPPF (2023) paragraph 176 specifies that “Great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues” and that “The scale and extent of development within all these designated areas should be limited.”

CDC is concerned that, in accordance with NPPF paragraph 11:

- 1) protecting the Cotswolds National Landscape provides a strong reason for restricting the overall scale, type or distribution of development in the NDP area.
- 2) the adverse impacts of the SSNP7 site significantly and demonstrably outweigh the benefits.

CDC is also concerned that the balancing exercise has not been undertaken, which should give great weight to conserving and enhancing the landscape and scenic beauty of the Cotswolds National Landscape. In addition, CDC is concerned that the SSNP7 contradicts the NPPF requirement for the scale and extent of development within the Cotswolds National Landscape to be limited.”

- C. The SEA does not need to explore every possible option, but it does need to explore reasonable alternatives. In addition to NPPF (2023) para 176, para 177 specifies that “*When considering applications for development within AONBs, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.... Consideration of such applications should include [amongst other things] an assessment of the **cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way**” (CDC emphasis).*

CDC is not convinced by the current rationale in the SEA. While we are pleased to see some amendments following our Regulation 14 representation, we do not believe that sufficient consideration has been given to assessing the scope for developing outside the designated area or meeting the need(s) in some other way. In particular, consideration should be given to whether Stow’s affordable housing need can be / is already being accommodated outside the Cotswolds National Landscape. For example, nearby Moreton-in-Marsh already has a 250 dwelling planning permission under construction at Dunstall Farm, a 67 dwelling planning permission under construction at Evenlode Road and other affordable housing developments. In addition, there is further potentially deliverable land elsewhere in Moreton. People living in Stow qualify as having a ‘local connection’ and can apply for affordable housing in Moreton. Furthermore, there are regular public transport connections between Moreton and Stow with a reasonable journey time and cost.

Whilst this option does not deliver a community centre or a car park in Stow, it may be able to deliver Stow’s affordable housing need without developing a highly sensitive major development site in the Cotswolds National Landscape.

Consideration should also be given a hybrid option whereby some of the affordable housing need could be delivered on a site (or sites) within the neighbourhood area that do not involve major development in the Cotswolds National Landscape combined with the remaining affordable housing need being met outside the Cotswolds National Landscape. The [Remainder of land at Tall Trees site at Oddington Road](#) may be one such location where the hybrid approach could be applied. This would have the advantage of delivering some affordable housing in Stow, albeit not the entire affordable housing need, with the remainder of the need being accommodated outside the Cotswolds National Landscape. This may provide another avenue for “meeting the need in some other way” without developing a highly sensitive major development site in the Cotswolds National Landscape.

- D. Is there sufficient evidence of housing need - that has to be delivered in Stow, to evidence the exceptional circumstances and public interest tests for major development? The adopted Cotswold District Local Plan has been developed to meet the district’s housing needs, including those of the Neighbourhood Area - is the need explored and enumerated in the AECOM housing report simply the Stow portion of this need, which the adopted Local Plan strategy is already addressing through allocations elsewhere in the district (in particular, recent development/permissions in Moreton-in-Marsh)? The Need Assessment is not supported by primary evidence, such as household surveys, but instead relies on modelling, using similar datasets to the calculation of the district’s housing need.

- E. We are not aware of a limit on the scale of development that a NDP can allocate. However, the SSNP7 development proposal is very large scale. The 170 dwellings would be 17 times the NPPF (2023) annex definition of major development in terms of the number of units and the 10ha site is around 20 times the same major development definition in terms of site area. We are unaware of a NDP allocating anywhere near the proposed scale of development within a National Landscape or a National Park. Another useful proxy is the adopted Local Plan which has avoided allocating sites of this scale within the Cotswolds National Landscape - largely for the reasons set out point (D).
- F. We previously commented on the version of the site assessments currently published on the town council website, which identified parts of the site assessments that required updating. The currently published site assessments are therefore not wholly accurate - notably the assessment published for site 7 fails to mention the proximity of a nearby listed structure (Stow Well) and Scheduled Ancient Monument. However, CDC acknowledges these constraints are considered in the SEA.
- G. Assuming the argument for housing need can be upheld, the proposed development has a greater land take than a 'housing only' approach, through the inclusion of a community/business hub and a public car park. Is the argument for these aspects of the proposed development sufficiently robust so as not to undermine the proposal as a whole? Is the need for the community/business hub sufficient to justify major development in the Cotswolds National Landscape and does it outweigh the proposed level of harm? Is the need for the public car park sufficient to justify major development in the Cotswolds National Landscape and does it outweigh the proposed level of harm? It is important to consider these aspects of the development separately to understand whether the level of harm can be mitigated by a smaller-scale development.
- H. The specification for the community hub (appendix C) envisages 6 x 25 sq m offices/retail units available for rent for periods of under one year. Both retail and office facilities are defined by the NPPF (2023) as Main Town Centre Uses. Supporting evidence would therefore be needed to demonstrate how this policy accords with Local Plan Policy EC8 and EC9, taking consideration of the proposed locations, which we assume to be out of centre given that the location would be near the car park to the north of the site (note the NPPF (2023) annex definitions of edge of centre and out of centre). Would retail / office uses be viable in this location, which would be on the edge of the town? Would there be sufficient footfall to sustain retail in particular?
- I. The location of this community/business facility, on the periphery of the town, with adjacent parking, risks generating short car journeys within Stow. Residents would likely opt for a private vehicle trip to access the facility and tourists would be incentivised to drive and park rather than incorporating a visit to this facility within a visit to the town centre.
- J. Access from the car park and community centre to the rest of the town. Given the local aspiration for a parking facility is driven by a desire to decant parking from the historic centre, is the access from this site to the town short enough, and attractive enough to achieve that objective? The site is circa 750 metres from the centre (using the library as the destination, contrasting with just under 450m for both the Shoppers' Car Park by Tesco and the Mangersbury Road Car Park, and unless access is achieved through Tesco, or routed down to Well Lane (increasing distance and inclines), requires a walk alongside the Fosseway for most of the route. Could the allocation make a play on creating an attractive feature walk into the town centre? A wildlife walk, boards explaining the history of the town, the landscape, etc, or something like that? Anything to make the route more attractive would encourage people to walk.
- K. The development proposal which has been consulted upon as this plan has progressed is not limited to land within the neighbourhood area. While the NDP states

that the viability of the policy is not subject to the whole site being developed, we are concerned about whether only a portion of a larger site can be considered a deliverable allocation, if it is not expected to come forward as a scheme in its right. The land area available for development within the plan area is contingent upon a defensible landscape barrier at the edge of the site, outside of the NDP boundary - i.e. a development only within the neighbourhood area would need to accommodate landscaping, which is not factored into the quantum of development the plan seeks to enable. On this point, a variety of technical documents prepared on behalf of the scheme promoter have been published - on initial review, none of these explore the acceptability of a sub-scheme only within the neighbourhood area.

- L. In a similar vein, the shape of the allocation itself is an unusual 'L' shape, projecting into the countryside at the south eastern edge, and creating an unusual urban form that is determined by the administrative boundary rather than being 'landscape led'. The shape of the allocation would cause additional landscape harm and is rather at odds with the approach sought by the Cotswolds National Landscape Board, the Local Plan, and articulated in the SEA.
- M. As already discussed, the adopted Local Plan strategy seeks to limit the scale and extent of development within the Cotswolds National Landscape and places great weight on conserving and enhancing its landscape and scenic beauty. If there is an exceptional circumstance for a major development in the Cotswolds National Landscape, and the development is in the public interest, the council would support such an approach. However, even if the principle of allowing major development in the National Landscape can be justified, it does not automatically follow that a site allocation be made or that planning permission should be granted. To reiterate, the proposed development site is highly constrained. Furthermore, it would seem the full extent of the available land is needed (including the land within Broadwell parish) for it to have a chance of demonstrating the exceptional circumstances and public interest tests. If this is the case, assuming the site allocation could be justified, would it not be better to allocate the entirety of the site through an expanded neighbourhood plan area? This solution would have the benefit of making best use of available land and avoiding the landscape harm of the irregularly shaped site. As presented it is unlikely this site would secure the benefit of site allocation in the Local Plan because the justification is currently too weak to pass the tests of soundness - a higher threshold than the Basic Conditions test required of Neighbourhood Plans.
- N. The policy, the reasoned justification and the building specification at pp 56-57 set out in some detail the scale of the car parking and the community building. However, the text does not specify the ownership model for either. While policy should rightly be focused on the land use, the ownership model is material to a view on whether the community benefit of these facilities outweighs the harm. Will the Town Council own these assets, and accrue a financial return to manage them as set out in the policy, and to the benefit of the town, or will it be expected to pay rent on the space specified in the policy? Does the cost of these assets need to be recouped from the development and offset against other deliverables, or will the developer retain ownership?
- O. The policy specifies "for a low or zero carbon residential-led, mixed use development...". If the plan includes "low or", our concern is that it will not deliver zero carbon. We suggest having one or the other.
- P. The policy includes a 20% BNG requirement.. If the site allocation is carried through within the final NDP, it would be helpful for the NDP to specify where the BNG would be delivered - e.g. anywhere within the Neighbourhood Area, within the development site or elsewhere? To what extent does this affect development viability and the deliverability of the plan and policy?

- Q. Within part A of the policy, we would prefer wording such as “comprising 60% (approx. 100) open market homes and 40% (approx. 70) affordable homes”. Otherwise, there is ambiguity over the specific percentage that will be required. The use of bullet points in this clause is unhelpful, as it makes it difficult to cite a policy criterion in reports. Numbering is advised instead.
- R. In part E, please replace ‘Cotswold Design Code’ with ‘the design policies of the Local Plan’. This will ensure the policy is flexible to any future changes to the Local Plan.
- S. Paragraph 5.26 specifies distances to the town centre and the superstore. Given the size of the site, there will be homes located much further away than these distances. To overcome this issue, we suggest instead providing a range including the closest point and the furthest point from the town centre and the superstore.
- T. Paragraph 5.27 states that, *“In this regard, the allocation proposal is considered to comprise a ‘major development’ in the AONB, the justification for which must show that its public benefits outweigh the harm to the AONB (as per NPPF §177 and set out in Appendix E)”*. To accurately reflect the NPPF (2023), the paragraph should read *“the justification for which must show that there must be exceptional circumstances for development and it can be demonstrated that the development is in the public interest”*.
- U. Paragraph 5.31 - *“new research has been commissioned but it is not considered that it will conclude anything other than capacity being an even greater problem.”* We suggest deleting this as it predetermines the evidence.

p27 Policy STOW8: Stow Town Centre & Market Square

CDC welcomes the intent of this policy.

Policy STOW10: Local Green Spaces

As a general point, CDC supports the identification of Local Green Spaces in Neighbourhood Plans. The sites proposed here, based on their description and distribution around the Plan area, appear to have been proposed based on their individual attributes in line with the guidance in the NPPF.

In terms of the final clause, for consistency with the Local Plan and clarity, we would suggest ‘Development will only be permitted within a Local Green Space where there are very special circumstances, which outweigh the harm to the Local Green Space’. Logically, if development is permitted, it is not inappropriate, with the opposite also holding true, so the current phrasing perhaps underplays the strength of this policy in preserving important community assets,

p29 Policy STOW11: Stow and the Swells Design Code

The Design Code reads well, and reflects the different character areas of the Plan area. CDC are concerned that it is perhaps too prescriptive, particularly in so strongly advocating for very specific traditional forms, in the context of a recognised need to improve the environmental performance of local housing stock. The layout should assist with putting the Code into use. More specific comments are added as Annex B to this representation, below.

p30 Policy STOW12: Non-designated heritage assets

While the Local Plan already affords protection to non-designated local heritage assets, identifying these through neighbourhood plans provides useful granularity and certainty, and allows NDPs to celebrate local heritage, which we truly welcome.

p30 Policy STOW13: Zero Carbon Buildings

While we embrace the thinking behind this policy, we do not believe that it is reasonable that it applies to 'all development' (clause A) given the range of circumstances and scale of development that might require development consent.

Clause B will be very difficult to implement - how will any faults be rectified if the building is built? Moreover, this places an additional resourcing burden on the Local Authority, which is not resourced or funded to deliver these additional commitments.

Clause C appears to give some significant leeway on design to meet this criterion. As scripted it would apply in, and possibly be in conflict with, the Conservation area designations in the NDP area.

p33 Policy STOW14: Walking & Cycling in the Town and Parish

We endorse the ambitions reflected in this policy.

p33 Policy STOW15: Vehicle Parking

Transport emissions are a major component of our carbon footprint in Cotswold District and Gloucestershire, and something that both CDC and Gloucestershire County Council are committed to reducing. We therefore welcome the consideration given to electric car charging points - in locations such as Lower Swell, better parking facilities, enabling ULEVs to enable a shift away from private car ownership may be part of the solution.

p34 Policy STOW16: Digital Infrastructure

We welcome the redraft of this policy since Regulation 14. The intention is clear, and there is a recognition that harm to heritage assets needs to be subject to a planning judgement. We are concerned, however, that the NPPF already has commentary on the importance of digital infrastructure, and similarly, the consideration that must be given to heritage assets - we're not convinced that this approach has regard to the NPPF.

p35 Implementation

No specific comment, other to endorse the inclusion of this section.

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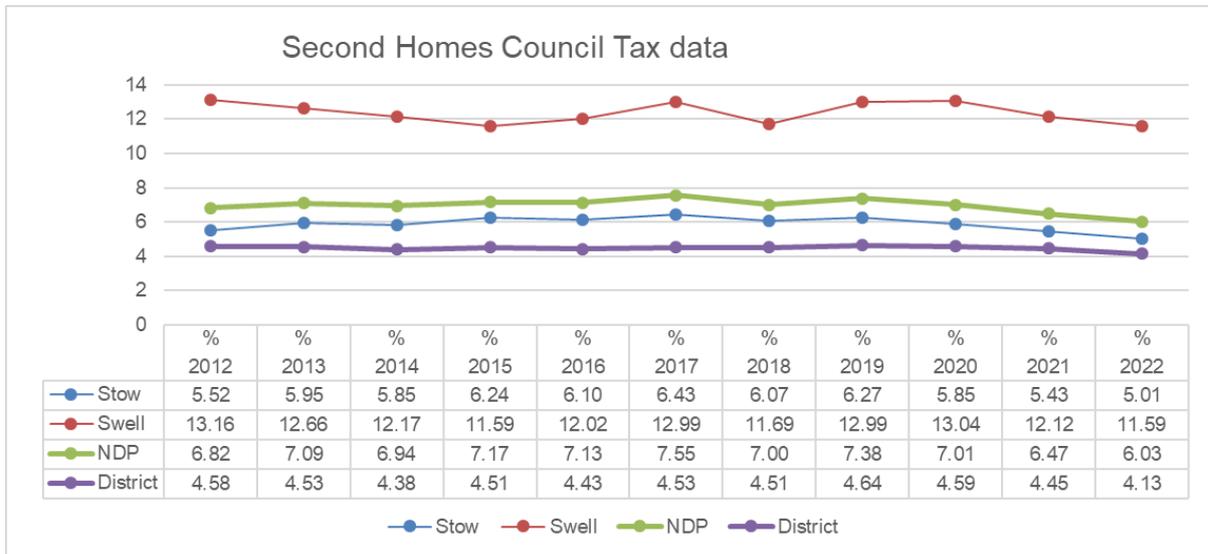
Trinity Road

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Annex A: Second Homes Council Tax Data



A Second Home for tax purposes is a dwelling with is substantially furnished (enough to live in) but not considered to be the liable parties main residence. For example, properties that are owned by someone which are left unfurnished and not lived in, wouldn't be reflected in these numbers. This data has been gathered from Tax Base records, which is reported each year to allow the following years Council Tax charges. This is information collated from the system, which holds Council Tax records so is an official count.

Annex B: Comments on the design code

We advise that the Cotswold Design Code will be updated and expanded as part of the emerging partial update of the adopted local plan (in line with the Council's 'green to the core' ambition, and the government's recent design code and guide guidance).

A number of the comments below will also apply to alter clauses that repeat the same type of wording but for other character areas.

The Stow Design Code is fairly architectural in focus and the references to Green Infrastructure (GI) are limited. There is no commentary on how the GI sections of the Cotswold Design Code should be considered in a Stow context. It also does not provide any guidance on how new sustainable technologies might best be installed in a way that retains the character of Stow, which is evidently a challenging operation particularly in the historic core of the town.

Para 2.1 (and various coding clauses)

We support the approach to divide the settlements into character areas, but the code also needs to be clear whether the design code also applies to developments in the more rural areas outside the character areas.

We have some concern that the preference for non-contemporary architecture in some character areas may be challenging when delivering net zero buildings.