

Neighbourhood Development Plan – Public Consultation

Note for Campden Society Members

The purpose of this note is to help you respond to the consultation; it is not intended to steer the substance of your responses. The Campden Society will agree and submit a committee response to the consultation.

Background

What is the Neighbourhood Development Plan (NDP)?

The draft NDP contains Policies, Community Aspirations, and quite a lot of contextual and historical material. It is required to be consistent with the Cotswold District Council Local Plan. Currently this Local Plan is being updated so references in the draft to the Local Plan are to the existing (not updated) version.

What is the point of the NDP?

This NDP establishes a vision and set of general planning policies for the future development and use of land in our local area. When a planning application is being considered by the planning authority (CDC in our case), that authority must take into account the Policies and Community Aspirations contained in the NDP. That doesn't mean that what is in the NDP is law, but it does mean that the planning authority has to have good reasons for going against it. So, in other words, our NDP won't determine planning applications, but it will be persuasive. In practical terms, the Policies rank higher than the Aspirations. This is because although important, Aspirations address issues that are not within the sole remit of the Cotswold District Council.

The Consultation

The current consultation is part of a regulatory process and intended to ensure that the final NDP is a community document. The Policies and Community Aspirations should reflect the views of the community. It is therefore important that **your** views are gathered and considered, so please do spend some time addressing the document. If you agree with the draft proposals, respond and say so. Your voice is important during this process and it is useful for the Town Council to gauge support as well as alternative suggestions. This is your opportunity to help shape the NDP to ensure that it reflects the whole community's views and serves the town's needs going forward.

Working through the Document

If you can spend some time on this, we suggest that you focus firstly on the **Policies** – which are the most important part - then the **Aspirations**, the **Vision Statement**, and lastly the **contextual material**. We know that the Working Party are already correcting typographic and factual errors, but that shouldn't stop you from highlighting errors which should be passed on to the Town Council direct.



Protecting the architectural and historic quality of Chipping Campden, its open spaces and its natural setting.

A note about the Response Form.

A paper version of the form has been distributed in the Bulletin; and the digital version is on the Town Council website. The digital response boxes expand to fit in more lines than first shown – just keep typing! The question prompts are standardised and brief. Please do not be put off by this but use the space to add your views. Digital surveys of this type do not generally send you a confirmation of your responses, and so to record your answers, you may want to copy your words into a separate document before pressing “send”.

To help you think about the **Policies**, we have taken each statement in turn and added further references and explanations where relevant. We have posed some questions you might want to consider, but, of course, your response could be wide ranging.

Policy 1 - Chipping Campden Town Centre

Policy Statement

- The information in Appendix 3 in this plan should be the baseline for Local Plan EC8 and there will be a presumption that town centre uses (Class E, Sui Generis and all forms of visitor accommodation) will be retained.
- The Key Centre Boundary is extended as shown in Figure 13.
- Where planning control can be exerted, the change from residential and town centre uses to visitor accommodation will only be allowed where it can be demonstrated that there will be no harm to the vibrancy of the town centre.
- Proposals to provide extra parking at Chipping Campden School or elsewhere to alleviate congestion in the Town centre will be supported.

Explanatory Notes

These policy statements are all about supporting and protecting the economic centre of Chipping Campden and are necessarily delivered in a technical language to comply with Planning Law.

In the first point, Appendix 3 is a list of current uses for every property in the extended town centre. Class E means commercial uses and Sui generis means “not included in another use class”/“in its own class” for things such as xxx. For a fuller explanation of what “Local Plan EC8” means please see the references and link below.

The second point refers to increasing the definition of our town centre. The boundary currently cuts off at Woolstaplers Hall and the Malt House. The proposed extension is to Ivy House and the Corner House opposite the Chemist.

As a background note to the third point, current Government proposals indicate that in the future short term lets will need to be registered and they will have a different use class from Class C residential. In this way, such visitor accommodation will be able to be identified and administered.

The fourth point needs no further explanation.

External References

This is a link to the [Local Plan](#)

Policy EC8 (Under Chapter 9 – The Economy)

- The first three elements are about Town Centre Uses, defined in National Planning Policy Framework (NPPF) to include retail, leisure, entertainment, sport and recreation, offices, arts, culture and tourism, not being supported outside town centres, subject to some factors also set out in the Policy EC8.
- All proposals should be consistent with the strategy for the settlement (in our case Chipping Campden), help maintain and appropriate mix of uses in the Town Centre and contribute to the quality, attractiveness and character of the settlement including the Town Centre and the street frontage.
- Retail will be supported, and a loss of a Main Town Centre Use will only be permitted where evidence is provided that the property has been continually, actively and effectively marketed for at least 12 months and that the use is no longer of commercial interest.



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Some questions to consider

Is every property correctly identified in Appendix 3?

Do you agree that the Town Centre boundary should be extended as proposed?

The test for change of use from residential to short term let is “harm to vibrancy of town centre”. What does “vibrancy of the town centre” mean to you?

What conclusions do you draw from the results of the parking survey on Page 59?

Would you use different words in the text referring to the school Car Park being available to the town?

Policy 2 – Social and Community Infrastructure

Policy Statement

- The infrastructure identified in Table 6 and Appendix 4 should be used as the basis of Local Plan Policy INF2 and EC8
- The provision of suitable land for human burial will be supported.

Explanatory Notes

These policies are all about supporting and protecting the community infrastructure of Chipping Campden and are again delivered in a technical language to comply with Planning Law.

The first statement is an inventory of all the elements that make up our community infrastructure. Table 6 should be read alongside Appendix 4 which gives includes a photograph and an explanation for each item.

There is a separate statement for a new cemetery because having another burial ground is an important part of our Community Infrastructure and the Town Council are currently trying to find somewhere suitable.

External References

LP Policy EC8 is referenced above.

LP Policy INF2 (Under Chapter 11 – Infrastructure)

- Proposals for community facilities will be supported subject to a number of criteria around accessibility, viability, and need.
- Proposals which result in a loss of community infrastructure will be permitted if it is demonstrated that there is no local demand, or suitable replacement facilities are being provided.

Two questions to consider

Is Table 6 complete – and the Appendix 4 correct?

Policy 3 – Design of the built and natural environment

Policy Statement

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

Explanatory Notes

As the draft NDP's introduction explains the Town Council has brought in an outside consultant to produce this Design Guide which is a separate document. See link below. The Campden Society has already commented on certain aspects of the Guide and we expect this to be edited at the next stage of the consultation. As the document was produced by an outside source, it would be particularly helpful if you could read through and comment on anything that is missing or doesn't quite sit with your view of the town's built environment.

The "Building with Nature Standards Framework" was created by Gloucestershire Wildlife Trust and the University of the West of England (with the support from a wide partnership including Cotswold District Council). Its aim is to set principles for high quality green infrastructure and CDC's Local Plan policies on Green Infrastructure (INF7); Design (EN2); and the Cotswold Design Code are compatible with this Framework.

External References

Local Plan Policies:

Green Infrastructure INF7 (Under Chapter 11 – Infrastructure); Design EN2 (Under Chapter 10 – Built, Natural and Historic Environment)

Cotswold Design Code [is here](#). (Under Appendices)

You can read more about the "Building with Nature Standards Framework" here [BwN Standards Framework](#).

and to [the Campden Design Guide here](#).

Some questions to consider

Do you have any comments on the Objective as stated?

Do you have any comments or suggestions about the Design Guide?

How prescriptive do you think the Design Guide should be? Are there areas in relation to which strict compliance should be mandatory?

Do you have any comment re the potential Aston Road development and design matters.

Policy 4 – Non-designated heritage assets

Policy Statement

- The following features are designated as non-designated heritage assets: (i.e. a list of 31 non-designated heritage assets).

This policy is similar and in the same format as Policy 2. It is an inventory of features around Chipping Campden and Broad Campden the Town Council feels are important. It is designed to protect things that aren't "Listed" by Historic England or otherwise.

The statement is an inventory and should be read alongside Appendix 6 which includes a photograph and an explanation for each item.

External References

Local Plan Policy EN12 (Under Chapter 10 – Built, Natural and Historic Environment) manages development affecting non-designated heritage assets, and seeks where possible to enhance the character of an asset while avoiding its demolition or total loss, subject to a balanced assessment of its significance.

[Table 6](#) sets out the criteria for designation.

A question to consider

Are there any others you think should be added to the list?

Policy 5 – Environment and Biodiversity Net Gain

Policy Statement

- Land identified in Table 7, Figure 15, and Appendix 7 is designated as the Chipping Campden Local Nature Recovery Areas for inclusion in the Gloucestershire Local Nature recovery map under provisions of the Environment Act 2021.
- Proposals that are required to demonstrate biodiversity net gain must demonstrate that those requirements have been fully addressed (then follows a list of requirements).

Explanatory Notes

These two Policy Statements support the first two Environment and Biodiversity objectives in the draft NDP. The first statement lists key areas of “Local Area Nature Recovery.” These have been identified by Gloucestershire Wildlife Trust using various databases. Table 7 lists 13 areas around Chipping Campden; Figure 15 shows those areas on a map; and Appendix 7 shows greater detail of each area. These are suggested targets only. National guidance on Local Nature Recovery was issued very recently by DEFRA (on 23 March 2023) and the implications of the 2021 Environment Act have not yet fully been worked through. So this is the Town Council’s best guess at complying with the legislation by providing some target Local Nature Recovery Areas. A more complete Local Nature Recovery Strategy will be led by GCC working with GWT and the Gloucestershire Environmental Records Centre.

The second Policy Statement is consistent with CDC’s Local Plan Policy EN8 ensuring any development produces biodiversity net gain.

It is not immediately clear how these two Policy Statements address the third objective which is :To meet the challenge of climate change, flooding and light pollution.

External References

LP Policy EN8 (Under Chapter 10 – Built, Natural and Historic Environment) requires development to conserve and enhance biodiversity providing net gains where possible.

The Environment Act 2021 requires 10% biodiversity net gain from all development.

Some questions to consider

Are there other either broad or more specific objectives you would want add here?

Do you agree with the Local Nature Recovery Areas identified, and are there others that you could recommend?

Are there inputs to the Local Nature Recovery strategy that you think should be in this draft?

Should the NDP say more about climate change, flood risk management, light pollution and the role of the green spaces in this section?

Policy 6 – Local Green Spaces

Policy Statement

- Land identified in Figure 16, Appendix 7 and listed below (i.e. a list of 22 areas in the NDP) is designated as local green space.

Explanatory Notes

The Working Party, and others, have spent a considerable time working through these proposals. Figure 16 shows the listed Local Green Spaces on a map and Appendix 8 (not 7) provides more detail for each proposed Local Green Space. We are aware that some details need amending.

Certain spaces have been excluded because they are National Trust or Landmark Trust properties and/or National Monuments (eg Old Campden House).

External References

We draw your attention to the NPPF 101, 102 and 103 which are laid out in the draft NDP on page 79. Perhaps the key point is that LGS should be treated the same way as Green Belt land in the context of planning applications.

Some questions to consider

Are you happy with the list?

Are there other sites you think should be included, and if so, why?

Is there anything you wish to add to the explanations for proposal in App 8?

Section 8 which covers Land Use planning matters

One question that could be addressed in this section is whether there are any other **Policies** that you think should be included in the NDP, for instance, stronger support for development that addresses the need for housing for social rent and referencing the Lifetime Homes standard which would need to be consistent with the updating (still in process) of the Local Plan.

There may be other issues you think should be addressed in Policy form; if you have ideas please do reflect them in your response.

If you still have the time and interest, there are three more sections you could comment on:

1. The **Community Aspirations (Section 4)**, these set out in the draft NDP document come mainly from previous consultations. And it would be useful for the Working Party to know whether you agree with these Aspirations, and are there others that you would like to see included? Remember, Aspirations although important to the town, address issues that are not within the sole remit of the Cotswold District Council. We suggest this goes in Box 8 of the Response Form.
2. The initial **Vision Statement (Section 2)** is trying to distil what we want the town to be. Putting this into one all-encompassing sentence is tremendously difficult. If you can think more applicable wording, please add it to the form at Question 1.
3. The **contextual material (Section 3)** is presenting the historic and present-day state of both Chipping Campden and Broad Campden to provide a background to the Policies and Aspirations. Is there anything that you would like to see added/changed/deleted? We suggest this goes in Box 8 of the Response Form.

We hope you find this helpful.

Elizabeth Devas

Chair