

The Campden Society: Response to the CDC Local Plan Update.

Deadline, 240407

240304 v4

General comments		
<p>The CDC via their portal are canvassing views using two digital surveys: Development Strategy, Vision and Objectives (2026 - 41) and Local Plan Update - Draft Policies. The questions are tabulated below.</p> <p>They need to be read in tandem with their documents : https://www.cotswold.gov.uk/media/ifgnnu13/14-1-1-executive-summary-consultation-instructions-and-questions-feb-2024-v2.pdf and detail at : https://your.cotswold.gov.uk/en-GB/projects/lp-policies</p>		
<p>The Local Plan Partial Update ran through a consultation stage in Feb/Mar 2022. The CS responded – see CDC PARTIAL UPDATE ENTIRE DOC V8 formatted for reference. There is a summary of the consultation’s findings here: https://meetings.cotswold.gov.uk/documents/s5609/ANNEX%20A%20-%20Consultation%20Summary%20Report%20-%20Consolidated%20Report.pdf which includes an useful executive summary at the of responses front.</p>		
Development Strategy, Vision and Objectives		
	Question	Comments /Initial
Q1:	Do you agree with the draft Vision? Yes / No / Don't Know	Yes, provided that more environmentally friendly transport is covered in infrastructure, yes. The Objectives are fine in this respect.
Q2:	Tell us more about why you agree or disagree with the draft Vision.	
Q3:	Do you agree with the draft Objectives? Yes / No / Don't Know	Yes, but TCS would also like to see included within the Objectives: ‘ensuring the protection of green open spaces’
Q4:	Tell us more about why you agree or disagree with the draft objectives	TCS supports the additional emphasis on access to affordable homes, and transitioning to a low carbon future. However, the issue isn't the objectives, it's the policies and their application.

Q5:	Do you agree with the proposed development strategy (scenario combination)? Yes / No / Don't Know	TCS mostly agrees with the proposed Development Strategy.
Q6:	Tell us more about why you agree or disagree.	TCS not convinced that scenario 1 isn't opening the door to developments creeping over green space and flood risk management land.
Q7:	Are there any other scenarios that should be considered? Yes / No / Don't Know	Don't know
Q8:	If you answered 'yes' to the above question, please tell us what other scenarios you think should be considered.	
Q9:	Do you agree with the proposed development strategy? Yes / No / Don't Know	Yes
Q10	Tell us more about why you agree or disagree with the proposed development strategy.	Development should be linked to infrastructure (in the widest sense), so the strategy seems logical. The rider in DS2 that development in Principal Settlements should be within the Development Boundary is important. The flood risk management objective should be made stronger. The strategy will have a greater focus on reducing carbon emissions and focussing growth at locations with good transport connectivity and access to services, facilities and employment.
Q11: Call for Sites	Do you know of any land that is available for development and/or designation? • Market homes • Affordable homes • Gypsy and traveller pitches • Other types of residential development • Employment development (e.g. office, industrial or storage and distribution uses) • Other commercial development (e.g. retail, other town centre uses, etc.) • Renewable energy infrastructure / facilities (see policy CC2) • A Local Green Space (should any land be designated as a Local Green Space?)	Yes. Designation for Local Green Spaces.

Q12:	If you answered yes please tell us where. Where you are able to please complete a 'call for sites' form	Local Green Spaces as set out in the draft Chipping Campden NDP
Q13: Moreton	<p>Moreton is being considered as a potential location to meet future housing and economic needs. We believe the following infrastructure is essential and would need to be provided alongside new growth. Please indicate what infrastructure is important to you. Tick all those that apply:</p> <ul style="list-style-type: none"> • Improved sustainable transport / active travel links between the development sites and the town centre (e.g. footpaths and cycle ways); • A new road that takes through traffic away from the town centre; • Delivery of the transport hub next to the railway station; • Improved public transport connections to other locations, including the reinstatement of train services between Moreton-in-Marsh and Stratford-upon-Avon; • Comprehensive provision of wastewater treatment infrastructure; • Ensuring additional development does not increase flooding of the River Evenlode • Additional new primary school (possibly two additional new primary schools); • A new secondary school (although this would require around 5,000 additional homes and a longer-term vision beyond 2041); • Leisure facility improvements; • Town centre improvements, particularly the central parking area and landscaping and potentially an alternative to the long-stay visitor provision; • A Business Hub to support start-ups; • Community centre provision; • Library improvements; • Green Infrastructure (additional and improved) and additional green spaces; 	<p>Moreton is out of the TCS remit but we would suggest that all of these are important, noting particularly the lack of secondary education provision in Moreton. If the planned development went ahead without a new secondary school until after 2041, this would have a significant impact on Chipping Campden School and the Cotswold School in Bourton.</p> <p>Further information is needed regarding the flood risk of further development, given that Moreton is effectively a flood plain.</p>
Q14:	Please tell us if there is any other infrastructure not listed in the previous question.	The ability to park at the station is important to surrounding towns, villages and settlements; noting that the existing public transport does not provide sufficient connectivity.
Q15:	If a new road were to be provided in Moreton-in-Marsh, what things would be important for you? Tick all those that apply: • It should	It should divert existing through traffic away from the town centre

	<p>divert existing through traffic away from the town centre • It does not need to divert existing through traffic away from the town centre • The road is not used by heavy goods vehicles (HGVs) (i.e. HGVs would continue to pass through the town centre) • The road is used by all types of vehicle, including HGVs • The route extends the whole way around the eastern side of the Moreton, connecting the Fosse Way (A429) to the north and south of the town via London Road (A44) • The route incorporates the north-eastern part of Moreton only, connecting the Fosse Way (A429) to London Road (A44) • The route incorporates the south-eastern part of Moreton only, connecting the Fosse Way (A429) to London Road (A44) • The route is located along the outside edge of future planned development / the town • The route is located internally within future planned development • The road has a low vehicle speed (e.g. 20mph or 30mph) • The road has a higher vehicle speed (e.g. 40mph or 50mph) • A segregated pedestrian / cycle lane is provided • The route is lined by trees</p>	<p>The road is used by all types of vehicle, including HGVs The route is located along the outside edge of future planned development The route extends the whole way around the eastern side of the Moreton, connecting the Fosse Way (A429) to the north and south of the town via London Road (A44). The route is located along the outside edge of future planned development / the town. • The road has a higher vehicle speed of 40mph • A segregated pedestrian / cycle lane is provided • The route is lined by trees.</p>
Q16:	Please tell us if there is another important 'road' consideration not listed in the previous question.	
Local Plan Updates		
	Sustainable Development	
	SD1 and SD2 not referred to. Sustainable Development and Climate Emergencies.	
LPU Q1:	Policy SD3, the Cotswold Design Code, lists a series of design principles, do you think anything is missing from that list? Yes / No / Don't Know	Yes
LPU Q2:	Tell us more about why you agree or disagree with the design principles.	

LPU Q3:	Do you agree that the Local Plan should promote health and well-being, not just for residential development, but for other uses as well such as commercial and employment proposals? Yes / No / Don't Know	Yes
LPU Q4:	Tell us more about why you agree or disagree.	
	Climate Mitigation and Adaptation	
LPU Q5:	Policy CC1 - Retrofitting and Decarbonisation Existing Buildings Although not referenced in policy CC1 the council is exploring options to include an additional requirement that would require consequential improvements to be made to dwellings that seek permission to extend. This would be above and beyond existing building regulations and would address a significant component of carbon emissions in the district. This would emulate the existing Welsh Building Regulations; for example, a small extension of (10m2) in a house with less than 200mm loft insulation triggers a requirement to install 250mm of loft insulation to the main house. Would you support such a policy requirement? Yes / No / Don't Know.	Yes, emphatically.
LPU Q6:	Please state your reasons why.	The climate emergency is the single most important issue facing the world and the built environment plays a large part in the decarbonisation of construction and inhabitation / use of buildings. This policy needs to be applied to Listed Buildings also, whilst maintaining the balance between conservation and
	Renewable Energy	
LPU Q7:	Policy CC2 - The draft policy sets out a strongly supportive policy framework for renewable energy, energy storage and distribution infrastructure, prominently referencing the importance of increasing renewable energy generation in the context of climate change and the council's climate emergency declaration. The policy will make mention of both positive and negative impacts arising from such proposals,	Strongly Support

	including environmental, social, and economic impacts, amenity impacts and the loss of agricultural land. Do you: Strongly support, support, neutral, object, or strongly object?	
LPU Q8:	The policy contains a target for the deployment of renewable electricity generation, reflecting the increase needed nationally to achieve net zero emissions by 2050, provided this reflects what can be achieved locally without giving rise to unacceptable landscape or other harm. Do you: Strongly support, support, neutral, object, or strongly object?	Strongly support
LPU Q9:	This part of the draft policy suggest renewable energy development of all types may be acceptable in principle within the Cotswolds National Landscape (formerly an Area of Outstanding Natural Beauty), but that the benefits of development must outweigh harm to the designated area or its setting. Do you: Strongly support, support, neutral, object, or strongly object?	Strongly support
LPU Q10:	The draft policy position is that fossil fuel energy plant which increases emissions will be refused unless it can be demonstrated that the objectives of the proposal could not feasibly be met by zero carbon alternatives such as battery storage. Do you: Strongly support, support, neutral, object, or strongly object?	Strongly support
LPU Q11:	Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments to Policy CC2a.	This is not really about single-building level measures (except CC2c), but larger site installations. It removes the presumptions (often characterised as nimby) against larger installations (eg windfarms). Although each proposal does have to meet a set of tests, the presumption that proposals will be supported if they do meet those tests is the correct way forward (ie reverse what appears to be the current position).
LPU Q12:	Based on the Renewable Energy Strategy (not yet complete), the draft policy centres on identification of broadly suitable areas where	Strongly support

	onshore wind turbines may be developed, adopting wording to facilitate flexible approaches, whilst ensuring that unacceptable amenity and other impacts are avoided. Do you: Strongly support, support, neutral, object, or strongly object?	
LPU Q13:	The draft policy is that community-owned wind projects may also be acceptable outside of these defined areas, or commercial wind schemes if sited within large new developments or existing industrial estates. Do you: Strongly support, support, neutral, object, or strongly object?	Strongly support
LPU Q14:	Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments.	Strongly support with the caveat that there should be a defined plan of landscape sensitivity
LPU Q15:	The draft policy is supportive for both rooftop solar photovoltaic (pv) and ground based solar farms, rather than a rooftop solar first approach, recognising that both are likely to be needed to achieve carbon emission targets, and are largely separate sectors Do you: Strongly support, support, neutral, object, or strongly object?	Strongly support
LPU Q16:	Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments.	Strongly support noting that the conditions specified are all re biodiversity and do not assess the impact on landscape (eg a large windfarm)? This should not necessarily prevent such a development but should be considered.
LPU Q17:	Express support being given to community led energy schemes which provide for a community benefit in terms of profit sharing or proportion of community ownership, including a more permissive policy framework for community owned onshore wind proposals. Do you: Strongly support, support, neutral, object, strongly object?	Strongly support noting that there should still be subject to assessments of landscape and biodiversity impact tests.
LPU Q18:	Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments.	
LPU Q19:	Overall, is there anything missing from our proposed renewable energy policies?	Application guidance

LPU Q20:	<p>In late December the government published a Written Ministerial statement that affects the policy CC3 – Net Zero Carbon New Buildings – which may affect the council’s ability to deliver the proposed policy. It is likely we will need to alter the policies but it would be useful to know whether you believe we should continue to find ways to deliver net zero homes where possible. Should the council:</p> <ul style="list-style-type: none"> • Defer to Building Regulations and government standards? • Continue to propose higher local requirements (where justified)? • Consider another approach? 	Continue to propose higher local requirements (where justified), as long as the affordable homes targets are enforced (to reduce the additional cost impact on first time buyers and lower paid local residents).
LPU Q21:	Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments.	CDC may reasonably want to aim higher than central government. There will be housing cost implications, but these can be mitigated (for those most in need) through enforcement of the affordable homes requirements elsewhere in the LP.
No prompted questions	CC5 Managing Flood Risk; CC6 Water Management CC7 Green Infrastructure CC8 Sustainable Transport	TCS will suggest that these are referenced in the NDP CC5/CC6 / CC7
	Delivering the Strategy	
LPU Q22:	What three services and facilities are most needed in your town or village (please name the town or village in your response)? (e.g. Doctors’ surgery, school, post office, public transport, shop, etc.). You can also add the infrastructure item to the map at this link.	<p>In relation to S16 Chipping Campden.</p> <p>TCS are concerned that most the of major infrastructure mentioned has been deleted in S16.</p> <p>There is no reference to the Aston Rd / school car park proposals that are in the pipeline.</p> <p>TCS are not sure that the land earmarked for the Burial Ground is suitable?</p> <p>TCS would like to keep open the possibility of the train station and bypass. The trains station should stay in as this is not about the train operator’s willingness to run services that will stop at CC but about the means to have additional and alternative transport services in the future.</p>

		<p>TCS are unsure what the “indoor-based tourist attraction”? is and would want to know the context before agreeing that this should stay in.</p> <p>The draft CC NDP has a long list of social and community infrastructure assets which should be viewed from a planning perspective as the baseline (that’s what the NDP Policy says anyway). In that context, the priorities for Chipping Campden are:</p> <ul style="list-style-type: none"> • public car park (walking distance from TC) • larger Surgery with good pedestrian and cycle links • public transport that links to station at Moreton, to Stratford, Bouton on the Water, Cheltenham • additional sheltered housing provision
. LPU Q23:	Is there a reason why any of the proposed site allocation deletions should be remain allocated in the Local Plan?	No
LPU Q24:	Tell us more about why you agree or disagree	WEO no longer available for CP. Business Park being dealt with separately.
(LPU Q25-24)	(Cirencester specific)	n/a
	Housing Needs	
LPU Q35:	We have made various updates to policies H1 to H7 and have introduced policies H8 to H11. Are there any reasons why these updates and new polices shouldn’t be included in the Local Plan?	<p>TCS Need to cross reference with NDP</p> <p>H1 Housing Mix and Tenure Agree but would suggest a more flexible/innovative approach including maisonettes and flats – lower floors could still be accessible.</p> <p>Agree but TCS propose that any affordable accommodation with two bedrooms should be appropriate to the location and comprise of houses, bungalows, flats/maisonettes and sheltered accommodation.</p>

		<p>H2 Affordable Housing Agree Agree</p> <p>H3 Rural Exceptions Agree Agree, but Policy 1(b) seems to be contradicted by para 8.3.3</p> <p>H4 Specialist for Older People Agree Agree</p> <p>H5 Rural Workers Agree Agree</p> <p>H6 Removal of Occupancy Conditions. Agree Agree</p> <p>H7 Travellers' Sites Don't know. Agree</p> <p>New Policies:</p> <p>H8 Replacement Dwellings Agree</p> <p>H9 – Extensions and Alterations Agree. noting point 3 the parking requirement for CC High St, what if dwellings do not have vehicular access? 4. does not address non-small dwellings in Principal Settlements renovated or new outbuilding must be integral to the main house</p> <p>H10 – Community Led Housing – Agree Agree</p> <p>H11 – Homelessness – Agree Agree</p>
LPU Q36:	Apart from increasing the housing requirement or allocating additional land for development, are there any other ways that the Local Plan	Include maisonettes and low level flats in housing policy H1 and rewording/ more nuance to H8.

	can deliver more affordable housing, particularly social rented housing?	Restrictions should be imposed on the amount of short term-let property.
LPU Q37:	To help meet a potential shortfall in Traveller sites up to 2041, should sites for Traveller communities be required as part of large developments for housing and / or employment? Yes / No / Don't Know	Don't know
LPU Q38:	Tell us more about why you agree or disagree. If you answered 'No', how else can Traveller needs be accommodated up to 2041 if not enough sites have been identified?	
	Economy	
LPU Q39:	Should the Local Plan include a policy requiring home working spaces within all new homes? Yes / No / Don't Know	Relates to EC1 – Employment Development Whilst this is a good idea, it is a single lifestyle issue and difficult to define.
LPU Q40:	Tell us more about why you agree or disagree.	TCS would like to see a focus on the concept of lifetime homes which provide dwellings that are flexible for all stages of life and circumstance and include 16 design criteria which can be applied to new homes at minimal cost. This could be adapted to include easy and minimal cost design criteria to allow easy working from home, such as separate reception rooms rather than open plan living. https://cae.org.uk/our-services/housing-services/lifetime-homes/
LPU Q41:	Should the Local Plan include a policy requiring co-working spaces within larger housing developments? Yes / No / Don't Know	The Local Plan should include a policy requiring co-working spaces in all towns.
LPU Q42:	Tell us more about why you agree or disagree.	This is a hybrid version of working at home whereby facilities are within reach and a structure is provided for those who are unable to work from home for whatever reason but cannot commute into their workplace.
LPU Q43:	Do you agree with the proposals at the Fire Service College set out at policy EC4? Yes / No / Don't Know	Not within TCS remit

LPU Q44:	Tell us more about why you agree or disagree.	
LPU Q45:	Do you agree with the proposals at the Royal Agricultural University set out at policy EC4? Yes / No / Don't Know	Not within TCS remit
LPU Q46:	Tell us more about why you agree or disagree.	
LPU Q47:	We have undertaken various updates to policies EC1 to EC11 and have introduced policy EC12. Do you agree these updates and new policies should be included in the Local Plan? Yes / No / Don't Know	<p>EC2 – Safeguarding Employment Sites Agree, but some points are v technical.</p> <p>EC3 – minor changes Agree, so long as there are restrictions on subsequent change of use (ie they aren't a trojan horse for residential).</p> <p>EC4 – Special Policy Areas inc. Campden BRI – Agree</p> <p>EC5 – Rural Diversification & EC6 – Rural Conversions – Strengthening of regulations to prevent domestic dwellings in rural locations. Agree.</p> <p>EC6 – Conversion of Rural Buildings Strengthening of regulations to prevent domestic dwellings in rural locations. Agree</p> <p>EC7 – New policy – Agricultural and Farm Buildings - Agree</p> <p>EC8 – Town Centres. Moving emphasis away from retail to a mix of retail, food and drink, services and residential. “ ... main town centre uses (together with appropriate residential development) will be permitted where they would it will complement and enhance the vitality and viability retailing offer of the Centre.” TCS think Chipping Campden town centre and retail offer is so small any more residential development will diminish the town. Further</p>

		<p>restriction on change of use on CC town centre would help to maintain a thriving town centre. CC has lost important eating and retail venues because of change of use over the last twenty years which has diminished the vitality of the town.</p> <p>There is a focus on resisting the loss of main town centre uses, which is important. TCS note that there should certainly be a “positive strategy” in the draft NDP, which should include a positive strategy for the future of each centre which aims to safeguard and encourage its resilience, viability and vitality.</p> <p>EC9 Retail and Leisure and EC10 Tourist Attractions - minor changes. Agree</p> <p>EC11 – Tourist Accommodation Disagree. The policy strongly supports self-catering developments/conversions, and glamping etc. to help the economy. TCS has concerns about the balance of visitor to residential mix – which has not been addressed. Development of self-catering accommodation or holiday lets of appropriate scale and design should be restricted to ensure adequate provision of affordable residential houses. TCS believe that any temporary residential dwellings should be licenced or registered as per the national proposals by central government and that there should be a restriction on the number of holiday lets AirBnB etc.</p> <p>EC12 – Equestrian Development. Detailed instruction on these type. TCS Agree.</p>
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LPU Q48:	Tell us more about why you agree or disagree.	EC11 does not address the difficulties too much property used for short term let can cause for local, particularly affordable home provision and for small local retail offerings. The presumption that building or converting TC property to short term let will be permitted could kill a TC like Chipping Campden.
	Built, Natural and Historic Environment	
LPU Q49:	Do you support the Sherborne Estate policy (Policy EN18)? Yes / No / Don't Know	Yes, although out of TCS remit.
LPU Q50:	Tell us more about why you agree or disagree.	
LPU Q51:	Do you agree with a policy that seeks to reinforce local management of green spaces? Management of Accessible Open Green Spaces is a new policy, which reinforces the custodial role that Town and Parish Councils can play in the local management of accessible open green spaces. Yes / No / Don't Know	Refers to policy EN17. Yes. Hopefully this will go some way to protect residents of new developments from poor management and non-compliance of planning conditions. However, post construction phase how enforceable is it? In Chipping Campden the Olympick Drive (Leasows) development demonstrates poor quality, expensive and inappropriate management.
LPU Q52:	Tell us more about why you agree or disagree.	
LPU Q53:	We have undertaken various updates to policies EN1 to EN (typo?EC)15 and have introduced policies EN16 to EN18. Do you agree these updates and new polices should be included in the Local Plan? Yes / No / Don't Know	This one question covers EN 1-18 : Built, Natural, and Historic Environment (presumably ex. EN17 and EN18) Agree to all. Notes below. EN 1-6 Minor amendments and updates. If changed in substance, the wording is stronger. Agree all EN7 Trees, Hedgerows, Orchards and Woodlands. Yes, this substantially updated and strengthened policy should be included. Now includes "Orchards", References: To reflect the importance of Orchards and the planting of community orchards in new development and the

		<p>losses of them in Gloucestershire. Source: Gloucestershire Tree Strategy.</p> <p>EN8 Biodiversity & Geodiversity – strengthened. Agreed. (EN9 Designated sites – na) (EN10 &EN11 Historic Environment – minor updates)</p> <p>EN12 Non-designated Heritage Assets Strengthened and links in with current NDP draft Agree.</p> <p>EN13 Conversion of Historic Buildings – Agree with added phrase “optimum use” Agree, although the practical application of “optimum use” is not clear.</p> <p>EN14 - ?? missing</p> <p>EN15 – Polluted Land minor updates</p> <p>EN16 – Dark Skies – New Policy Agree. Agree, although is there a definition of “sensitive areas”?</p> <p>EN17 Management of Accessible Green Space in Residential Developments Agree, in Chipping Campden this applies to Olympick Drive, and the proposed Aston Road development</p>
	Infrastructure	
LPU Q54:	Tell us more about why you agree or disagree.	
LPU Q55:	<p>The Council is updating its Infrastructure Delivery Plan. Of the following types of infrastructure, what do you consider to be the three most significant issues in your area?</p> <p>1. Highways; 2. Flooding; 3. Telecommunications; 4. Renewable Energy; 5. Cycling and Walking Infrastructure;</p>	<p>TCS considers all of these issues as significant but would prioritise the following:</p> <ol style="list-style-type: none"> 1. Flooding 2. Public Transport 3. EV charging points <p>Also note that expansion of CCS (and only CCS) is included in the Strategic Infrastructure Plan for the North</p>

	6. Public Transport; 7. Electric Vehicle Charging Points; 8. Green Infrastructure; 9. Recreation and Wellbeing; 10. Water and Wastewater Management; 11. Other.	Cotswolds, implying that it should take up the whole of the expansion of Moreton
LPU Q56:	If you selected 'other' please indicate the type of infrastructure	
Policies Map	Includes : Update to the Chipping Campden Key Centre boundary (Policy EC7) to incorporate some additional Main Town Centre Uses.	The proposal is to update Chipping Campden Key Centre boundary to incorporate Lloyds Bank and the whole of the Lygon Arms building. TCS: Chipping Campden Key Centre boundary should extend to the corner of Church Street; the Chipping Campden NDP, due to be published shortly for consultation, also proposes this and the LP needs to correlate with this.
LPU Q57:	Are any other changes required to the Policies Map? Yes / No / Don't Know	
LPU Q58:	If you selected 'Yes', please explain why.	