

09 December 2020

Martin Perks
Planning Department
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

Dear Mr Perks

20/03875/FUL & 20/03876/LBC Change of use, alterations and extension to create five dwellings, involving demolition of existing rear single-storey former clubroom Braithwaite House High Street Chipping Campden Gloucestershire

I am writing to you in my capacity as Chair and Trustee of The Campden Society. As you probably are aware this Amenity Society was set up to: 1) To secure the protection of the architectural and historic quality of Campden, its open spaces and its natural setting; 2) To promote high standards of planning, architecture and landscaping in Campden; and 3) To stimulate interest in and concern for the character and beauty of Campden. With this in mind, we should like to register the following objections.

1. Loss of General Amenity – Retail Space

Excerpt from the Design and Access Statement

“Policy EC8 ... this site lies outside the Main Town Centre boundary. Although the proposals include the loss of a small area of floor space currently in retail use (although this originally formed part of a residential building) it does not conflict with Policy EC8.”

The property in question is adjacent to the “main town centre” as specified in the Local Plan and we would argue that the actual town centre of Chipping Campden stretches along the whole of the High Street. The site is in an important row of four commercial properties: a Florist (Symes House), Braithwaite House, Lloyds Bank and The Lygon Arms. The loss of other commercial sites at this end of the street, including the shop at Saxton House and the Seymour House Hotel, has depleted Campden’s retail offering.

The ground floor front of Braithwaite House has not been a residential premises since 1902, apart from the relatively short period between when Ashbee’s Hall of Residence for Guild workers closed in 1908 and 1921 when it was taken over by the British Legion. Since that time, the front part of the house was used by the Legion as offices until the 1960s. Then the committee rented these offices, for example, to Yoxall, a local Architect in 1960 and Raymer, an Evesham Accountant in 1963. Towards the end of the 20th century, this front part was then

rented out as retail space, (various including: Campden Photographic Studio, Campden Fruit, Simpsons, Kitchen Drawer, Mark Annett Estate Agents, Little Layne and, most recently, Cherry Press).

This continuous usage means that the conversion of this retail space would have an adverse effect on the viability and health of Campden as a main town. It would also go against the general principle of Policy EC7 which “... supports proposals in their defined centres which maintain and enhance retail provision and the wider health of the centre.”

2. Loss of General Amenity – Social and Community Infrastructure

The loss of the large British Legion function room and bar at the rear of the proposed development in 2013 impacted greatly on the local community; in particular leaving an older generation of men and women with few places to go at a price they could afford – especially when most pubs in Campden are focussed on attracting the more expensive restaurant trade. The British Legion is not a ‘private members club’, it is a charity. Any guest could visit the British Legion, by simply being signed in as such. The loss of the games room (snooker tables, darts etc.) was also felt by the community. Latterly the remaining buildings became the Braithwaite Club. Its membership was some 300 people, of all age groups. It provided a licensed bar and music entertainment at the weekend, ranging from punk rock and blues to the more middle of the road.

In light of the site’s important place in the social history of Campden as a CR Ashbee’s Guild Hall of Residence, the British Legion and the Braithwaite Club, we would hope the developers would be supporting the town’s community infrastructure with providing good quality homes for local people.

3. Highway Access and Parking - Traffic Flow

Turning to the applicant’s accompanying Transport Assessment. It concludes that: *4.1 As demonstrated, there will be no intensification of use of the site; moreover, the proposals will benefit the local highway network by reducing the number of vehicle trips on the local highway network.*

We are most concerned with the lack of local knowledge in this Assessment. The British Legion Club catered primarily for a local membership who were in walking distance of the site. The busiest periods for the Legion were in the evening, when parking is rarely, if ever, an issue. The Transport Assessment uses standard TRIC data for Public Houses in an attempt to prove there will be a lessening of the traffic flow. This is not the case as most visitors to the Legion were on foot.

4. Highway Access and Parking - Parking Allocation

The idea that the area “provides ample opportunity for any requirement for on-street car parking” is based on the assumption that the members of the British Legion Club all drove to the site. They did not. We hold the opposing view and point out that this application will exacerbate the extreme parking problem in Campden High Street by introducing cars associated with four extra dwellings.

The Transport Assessment also ignores any findings from The Chipping Campden Parking Audit 2017 which was carried out by Gloucestershire County Council’s Thinktravel programme on behalf of Chipping Campden Business Forum. The survey contains the most recent and local data for the town. Included in the data is the weekday percentage of car parking space usage. The most central streets: High Street, Lower High Street, Leysbourne and Sheep Street are all shown to be near capacity for substantial portions of the day. This is based on real observed parking. The High Street, where Braithwaite House is situated, has 128 spaces. It had an occupancy rate of 92-99% between 10am - 4pm in July.

Recent Planning Application approvals have further increased demand for High Street parking and reduced capacity in the town, including this applicant’s housing development at the rear of the Bantam Tea Rooms resulting in a loss of 8 spaces (Planning Officer’s Report August 2020).

5. Design

The Design and Access Statement asserts that all five of the proposed units comply with national space standards. Whilst furniture layouts are not required to demonstrate compliance, neither the area in m2 for each room; dimensions for individual rooms; nor loaded plans, are shown in the application drawings. The following table sets out the possible occupancy of each proposed unit (assumptions have been made due to the individual room areas/dimensions not being available) and as such it is possible that the full occupancy of each dwelling would result in 16 extra vehicles, particularly if the units were to be let as holiday lets, Airbnb or shared rental accommodation on the private rental market.

Unit	m2	bedroom	assumed bed space	Required storage m2	
	Comments				
1	113	3	6	2.5	
1	See general note below re open plan kitchen living dining areas and open staircase. All storage shown on the drawings is associated with individual bedrooms, no general broom cupboard storage apparent.				
2	45	1	1	1.0	
2	See general note below re open plan kitchen living dining areas and open staircase. The storage shown on the drawings is associated with the bedroom, no general broom cupboard storage apparent.				

3	44	1	1	1.0	
3	See general note below re open plan kitchen living dining areas and open staircase. The storage shown on the drawings is associated with the bedroom, no general broom cupboard storage apparent. The partition between unit 3 and unit 4 is shown as an insubstantial structure which would not provide adequate acoustic separation between the units. Whilst this may be dealt with under Building Regulations, it does not inspire confidence in the design that this has not been considered at this stage.				
4	80	2	4	2.0	
4	The 80 m2 for this unit is just over the allocation for two storey dwellings for two bedroom 4 person units. However, there is an open plan area which appears to be big enough for, and is marked as, kitchen/dining/living with a further lounge upstairs. This would inevitably be sold on as a three bedroom unit once the restrictions of the national space standards do not apply. This unit appears to have no internal storage. See general note below re open plan kitchen living dining areas and open staircase. See unit 3 comment re partition.				
5	89	2	4	2.0	
5	Externally the volume of the upstairs space for this unit See general note below re open plan kitchen living dining areas and open staircase.				
General comments					
Layout of units	All the units are shown with open plan kitchen/dining/living areas. Whilst this may be acceptable for a short period, it is restrictive for a number of people living in one unit as it means that there is no public space away from the main area for separate activities or for guests to sleep on a sofa bed, for instance. Units 2 & 3 are shown with shower rooms only, which is acceptable for short term occupancy but not a generous proposition for full time residency.				
Staircases	Units 2, 3, and 5 are shown with the top portion of the staircase not being housed. This does not help acoustic separation within a unit especially in unit 5.				
Service routes and boiler housing	Whilst it is commendable that the proposed drawings show the soil stacks removed from the outside of the building, it is not clear where the foul drainage routes would be. No boiler housing are described on the drawings.				

Chipping Campden is in need of small scale accommodation for local people starting out on the property ladder, for instance, and this site, with its history of community use, could provide a small contribution to that need. However, the overall design of the units is ungenerous and poorly thought out and indicates an Airbnb mentality rather than good quality homes for local residents. The D&A statement asserts that the units are accessible by bicycle but no bike (or buggy) storage has been provided, either within the units or externally.



No mention is made in the D&A statement regarding the climate emergency that we face and it is not made clear how any aspect of reduction of energy use and thermal efficiency has been made.

We would recommend that the shop is retained for local amenity and that the remaining units are redesigned to provide a higher quality of design for homes for local people to include better layouts and storage, over fewer units. We would ask that if planning is awarded for this scheme or an amended scheme that covenants are imposed as planning conditions for sole ownership that prevent the on-sale for investment homes, holiday lets or Airbnb.

We trust you find these comments useful and please could you acknowledge the receipt of this letter.

Yours sincerely

Elizabeth Devas
Chair

cc. Chipping Campden Town Council