

**Northleach with Eastington**  
**Neighbourhood Plan 2018 - 2031**

Plan submitted to LPA for examination

September 2018

**Report to the Cotswold District Council on the**  
**Independent Examination of the draft**  
**Northleach with Eastington      Neighbourhood**  
**Plan 2018 - 2031**

January 2019

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## **Summary of main findings**

0.1 It is a requirement of the Localism Act that this report should contain a summary of its main findings. The reasons for each of the recommendations are given in the following sections of the report.

0.2 The principal findings in this report are that the draft plan, subject to the modifications recommended in this report, meets the basic conditions as set out in the Town and Country Planning 1990 Act (as amended), does not breach and is otherwise compatible with EU obligations and is compatible with Convention Rights.

0.3 It is recommended that the plan, as modified, be submitted to a referendum and that the referendum area need not be extended beyond that of the neighbourhood area. Seven recommendations are made for modifications to the plan policies and text. The main points in summary are:-

- Policy NE1 to be modified to make the car park at West End an indicative location, not an allocation, and to include a requirement for a site-specific flood risk assessment before any development takes place. The last part of Policy NE4 to be incorporated within revised policy NE1;
- Policy NE2 to be revised to remove references to cardinal points and to bring it more closely in line with national policy for development within AONBs;
- That the area shown on the Policies Map and Inset for the Local Green Space at East End (Policy NE6(i)) be amended to exclude the western section which was granted planning permission as a landscaping area as part of the Westwoods housing development off Bassett Road.

## **Section 1 - Introduction**

### Appointment

1.01 I have been appointed by the Cotswold District Council (CDC), acting as the Local Planning Authority (LPA), under the provisions of the Town and Country Planning Act 1990, as amended by the Localism Act 2011, to carry out an independent examination of the Northleach with Eastington Neighbourhood Plan 2018-2031 (NENP) as submitted to the LPA in September 2018. The CDC carried out publicity for the proposed plan allowing a 6 week consultation period which ended on 17<sup>th</sup> October 2018 giving details of how representations might be made, in accordance with Regulation 16 of the Neighbourhood Plans (General) Regulations 2012 ('the 2012 Regulations')<sup>1</sup>. I was sent the documentation required under Regulation 17 on 18<sup>th</sup> October 2018 including copies of all of the representations received under Regulation 16. The examination commenced formally on that day. I have taken that documentation and all of the representations into account in carrying out the examination, along with additional material submitted during the examination.

1.02 I am a Chartered Town Planner (Member of the Royal Town Planning Institute) with over 45 years post-qualification professional experience in local and central government and latterly as a sole practitioner specialising in development plan policy work. I am independent of the Northleach with Eastington Town Council ('the Town Council' – NETC) and of the Local Planning Authority. I have no land interests in any part of the plan area.

### My role as an examiner

1.03 The terms of reference for the independent examination of a Neighbourhood Development Plan are statutory. They are set out in the Localism Act 2011 and in the 2012 Regulations. As an examiner I must consider whether the plan meets what are called 'the basic conditions'<sup>2</sup>. In summary, these require me to consider:-

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<sup>1</sup> All subsequent reference to a Regulation followed by a number is a reference to the 2012 Regulations.

<sup>2</sup> These are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as introduced in Schedule 10 of the Localism Act 2011)

- whether, having regard to national policies<sup>3</sup> and to advice contained in guidance issued by the Secretary of State, it would be appropriate to make the plan;
  - whether the making of the plan would contribute to the achievement of sustainable development;
  - whether the making of the plan would be in general conformity with the strategic policies contained in the development plan for the area;
- and to ensure that:-
- the making of the plan would not breach, and would otherwise be compatible with EU obligations relating to Strategic Environmental and Habitats Assessment and that the plan would be compatible with Convention rights, within the meaning of the Human Rights Act 1998; and
  - that 'prescribed conditions' would be met and 'prescribed matters' would be complied with in plan preparation and submission.

1.04 Legislation requires that my report on the draft plan should contain one of the following recommendations:-

- a) that the draft plan is submitted to a referendum, or
- b) that modifications are made to the draft plan and the modified plan is submitted to a referendum, or
- c) that the proposal for the plan is refused.

I may make recommendations for modifications which I consider need to be made to secure that the plan meets the basic conditions or for compatibility with EU obligations and (Human Rights) Convention Rights. The only other modifications which I may recommend are those to correct errors.

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<sup>3</sup> In so far as these are set out in the National Planning Policy Framework (NPPF) this was revised in July 2018. However, as this neighbourhood plan was submitted for examination prior to January 2019, paragraph 214 and footnote 69 in the revised NPPF apply. All references in this report are, therefore, to the 'old' (2012) version of the NPPF.

## **Section 2 – Statutory compliance and procedural matters**

2.01 Upon application by the NETC on 13<sup>th</sup> November 2013, following a six-week consultation period, the Cotswold District Council formally designated the Parish of Northleach with Eastington as a Neighbourhood Area on 14<sup>th</sup> February 2014. The submitted plan relates solely to the designated area and has been submitted by the NETC as the 'qualifying body'.

2.02 The title of the plan is given on the front sheet as the Northleach with Eastington Neighbourhood Plan 2018-2031 with a sub-title 'Submission Plan'. It is dated July 2018. The statutory requirement<sup>4</sup>, that the plan 'must specify the period for which it is to have effect', has been met. The plan does not include provision about development which is 'excluded development'. A plan showing the area to which the Neighbourhood Plan relates has been submitted as required by Regulation 15(1)(a).

2.03 The legislation states that the 'general rule' is that the examination of the issues by the examiner should take the form of the consideration of written representations. However, an examiner must hold a hearing 'for the purpose of receiving oral representations about an issue' where he or she considers a hearing 'is necessary to ensure adequate examination of the issue or a person has a fair chance to put a case'<sup>5</sup>. Before deciding whether a hearing would be required, on 1<sup>st</sup> November 2018 I issued a list of written questions seeking clarification and further information by way of justification for the plan policies. I received responses to my questions, from both the NETC and the CDC, on 7<sup>th</sup> December 2018 after the conclusion of a further consultation period on the SEA and HRA<sup>6</sup> and confirmed by e-mail on 11<sup>th</sup> December that a hearing would not be required.

2.04 I visited Northleach on Tuesday 6<sup>th</sup> November 2018 in order to gain a full appreciation of the character of the town, its conservation area and setting within the Cotswold AONB. Starting at the Old Prison I walked past the proposed car park site at West End to Market Place in order to assess the distance involved and parking conditions in the town centre. I then looked at each of the proposed areas of Local Green Space ending at the primary school, this gave rise to two supplementary site specific questions which were sent to the Town Council on the following day.

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<sup>4</sup> These statutory requirements are to be found in Section 38B of the Town and Country Planning Act 1990 (as amended by the Localism Act 2011),

<sup>5</sup> Paragraph 9 of Schedule 4B to the 1990 Act (as in reference 1 above)

<sup>6</sup> See paragraphs 2.08 and 2.11 of this report

2.05 The NETC have submitted a Basic Conditions Statement in accordance with the Regulations<sup>7</sup>. It includes general assessments against the basic conditions including, as appropriate, tables detailing conformity of the plan policies with national policies and guidance (section 3) and section 4 referencing the Sustainability Appraisal. At the time the report was written (May 2018) the Cotswold District Local Plan 2011-2031 (CDLP) had not yet been adopted but, nevertheless, general conformity of the NENP with the strategic policies of the emerging plan were assessed. As the CDLP was adopted in August 2018 it is that plan which forms the development plan for the area for the purpose of assessment against the basic conditions. Section 6 in the report deals with EU obligations with a single sentence in paragraph 6.3 to state that the plan has 'had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.' No representations have been made concerning this aspect. Furthermore, from my own assessment I have no reason to disagree with the NETC statement as above. I conclude that the approach taken in the plan is fully compatible with, and does not breach, Convention Rights. Compatibility with Environmental Assessment and Habitats Directives and Regulations is considered below.

#### Compatibility with the Environmental Assessment Directive and Regulations

2.06 There is no statutory requirement for neighbourhood plans to be subject to Sustainability Appraisal (SA) although producing one does assist in demonstrating the manner in which account has been taken of the basic condition to contribute to the achievement of sustainable development. However, with regard to Strategic Environmental Assessment (SEA) the Regulations<sup>8</sup> provide an exemption for neighbourhood plans<sup>9</sup> unless it is determined that the plan is 'likely to have significant environmental effects'. That determination<sup>10</sup> (by the 'responsible authority') has to be given before the plan can be adopted. Should the determination be that the plan would be unlikely to have significant environmental effects reasons have to be given and consulted upon. Otherwise, an environmental assessment of the plan is required in the shape of an 'Environmental Report'<sup>11</sup>

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<sup>7</sup> Regulation 15(1)(d)

<sup>8</sup> The Environmental Assessment of Plans and Programmes Regulations 2004

<sup>9</sup> In so far as it 'determines the use of a small area at local level' (Regulation 5(6)(a))

<sup>10</sup> In accordance with Regulation 9(1).

<sup>11</sup> In accordance with Regulation 12.

2.07 In this case, the situation is a little complicated. Initial scoping was undertaken in December 2015 when consideration was being given to making housing site allocations. It was decided to proceed to produce a full Sustainability Appraisal, incorporating an SEA report, which was prepared in January 2018 and consulted upon in parallel with a draft consultative<sup>12</sup> version of the neighbourhood plan, even though the allocations were not made in the plan. It seems that the Qualifying Body (then the 'responsible authority') chose to skip the 'screening' stage and did not issue a formal determination. However, the draft SA/SEA is of the nature of an 'Environmental Report' in which it is indicated that the plan would not be likely to result in significant environmental effects. That consultation might, therefore, be regarded as being under Regulation 13 rather than Regulation 11. There is little difference in reality and I am satisfied that the slight procedural irregularity will not have prejudiced any party.

2.08 A final SA/SEA report was produced in June 2018 shortly before submission of the final draft neighbourhood plan to the CDC. Some significant changes were made to it compared to the draft version. Despite this it transpired that the final SA/SEA report was not available on the neighbourhood plan website and no further consultation had taken place on it. I raised concerns that despite the fact that Policy NE1 proposes the provision of a car park within flood zone 3, albeit with permeable surfacing, the Environment Agency had failed to respond to the earlier consultation on the draft. That, together with the changes made to the plan itself and the SA/SEA report, lead me to the view that I could not be satisfied on the basis of the information before me that the plan would not be likely to have significant environmental effects. In the circumstances, I considered it necessary and expedient to request the District Council (now the 'responsible authority') to undertake a further Regulation 13 consultation on the final Environmental Report.

2.09 Of the consultation bodies, Natural England confirmed that the plan would be unlikely to have any significant environmental effects and Historic England deferred to the LPA. The Environment Agency did not respond despite the fact that the proposed site for a car park (policy NE1) is within flood zone 3. Comments were also received from Gloucestershire County Council and an individual. Taking these responses into account, I am satisfied that the EU Obligation<sup>13</sup> for Environmental

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<sup>12</sup> In accordance with Regulation 14 of the Neighbourhood Plans (General) Regulations 2012

<sup>13</sup> European Directive 2001/42/EC

Assessment has been met although a modification to the wording of policy NE1 is required to ensure there is no enhanced flood risk (See paragraphs 4.13-17 below)

2.10 In paragraph 6.2 of the submitted Basic Conditions Statement, reference is made to the Habitats Regulations Assessment (HRA) prepared for the Cotswold District Local Plan. It is stated that, as no part of the neighbourhood plan area comes within 15 km. of any European designated site, 'the Neighbourhood Plan does not need to undertake an HRA.'

2.11 Regulatory procedures are now set out in the Conservation of Habitats and Species Regulations 2017. Regulation 106 deals specifically with neighbourhood plans and indicates<sup>14</sup> that a qualifying body must, when the plan is submitted<sup>15</sup>, send to the 'competent authority' (the LPA) such information as they may reasonably require to determine whether or not an assessment is required under Regulation 105. Such an assessment<sup>16</sup> is required only should the competent authority consider that the plan 'is likely to have a significant effect on a European site...'<sup>17</sup> As no formal determination had been made I sought clarification of the LPA's position<sup>18</sup>. The CDC then prepared a screening report<sup>19</sup> which confirmed that the nearest European site<sup>20</sup> is 16.2 km. from the boundary of the neighbourhood plan area and that the proposals in the plan, either singly or in combination with those in the local plan, would be unlikely to have any significant environmental effects on a European site. Upon consultation<sup>21</sup> Natural England concurred with that view. The CDC, as the 'competent authority', then made a formal determination<sup>22</sup> that an appropriate assessment would not be required.

2.12 I am satisfied from the information supplied in the CDC Screening Report that the submitted plan is compatible with EU environmental obligations and meets the basic condition prescribed by Regulation 32 and section 1 of Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 (as amended).

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<sup>14</sup> Regulation 106(1)

<sup>15</sup> See also regulation 17(c) of the Neighbourhood Planning (General) Regulations 2012 (as amended)

<sup>16</sup> Strictly an 'appropriate assessment'

<sup>17</sup> Regulation 105(1)(a)

<sup>18</sup> As the 'competent authority'.

<sup>19</sup> Dated 18<sup>th</sup> October 2018

<sup>20</sup> The North Meadow and Clattinger Farm SAC

<sup>21</sup> 1<sup>st</sup> November 2018

<sup>22</sup> Under Regulation 106(1) of the Conservation of Species and Habitats Regulations 2017

### **Section 3 - Preparation of the plan and the pre-submission consultation processes**

3.01 As required by legislation<sup>23</sup>, the NETC have submitted a Consultation Statement. It sets out in detail the chronology of plan preparation from the first public meeting in November 2013, before area designation was confirmed. The considerable efforts made to engage the community during the early stages is impressive. It includes drop-in sessions and an exercise at the primary school as well as the carrying out of a parish survey during 2014. Work in preparing the plan continued through 2016 when further drop-in sessions and meetings were held and a site analysis undertaken. A Design Statement was also produced in parallel with the plan. From this I can see that the public consultation processes were very thorough and have led to a high degree of consensus within the community about the contents of the plan.

3.02 A formal consultation<sup>24</sup> on the draft plan took place between 29<sup>th</sup> January and 12<sup>th</sup> March 2018. It was sent to statutory consultees, made available on the Town Council web site and emailed directly to 300 residents on the council's mailing list. In accordance with the requirements of Regulation 15, the Consultation Statement includes a list of those consulted (Appendix 2). Responses by the Parish Council to the representations submitted during the consultation indicating how they were addressed in preparing the plan for submission to the local planning authority for examination are summarised in section 7 and set out in more detail as Appendix 3 to the Statement. The statutory requirements for the preparation of the Consultation Statement have been met.

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<sup>23</sup> The Neighbourhood Planning (General) Regulations 2012, Regulations 15(1)(b) and 15(2)

<sup>24</sup> In accordance with Regulation 14

## Section 4 - The Plan: meeting the basic conditions

4.01 This section of my report sets out my conclusions on the extent to which the submitted plan meets those basic conditions which are set out in the first three bullet points in paragraph 1.03 above. As indicated in paragraph 2.05 above, the NENP was prepared taking full account of the emerging CDLP and, subject to a minor wording change in Policy NE6<sup>25</sup>, I am fully satisfied that the neighbourhood plan is in general conformity with the strategic policies in that plan.

4.02 In this report I focus primarily on the extent to which the draft neighbourhood plan meets the first two bulleted basic conditions listed in paragraph 1.03 above, that is in relation to national policies and guidance and sustainability consideration. If I conclude that the inclusion of a policy in the plan means that, as submitted, it does not meet one or more of the basic conditions, I recommend a modification to the plan policy in order to ensure that the plan, taken as a whole, does meet those conditions. Where such a recommendation is made this is identified by the use of **bold text** followed by the recommendation number.

4.03 As indicated in section 2 above I posed a number of questions about aspects of the plan which required clarification or further comment and justification by the Parish Council. Taking account of the responses received I take the view that there are three main issues which arise in my examination of the plan against the basic conditions. These are:-

1. Whether the proposal for the development of a public car park at West End (Policy NE1) would, when linked to the enhancements proposed to Market Place in Policy NE4, contribute to the achievement of sustainable development.
2. Whether Policy NE2, in facilitating the future expansion of the primary school, is sufficiently clear and unambiguous for it to provide a basis for decision-making by the Local Planning Authority and whether it pays sufficient regard to national policies and guidance relating to AONBs and conservation areas.
3. Whether the proposed areas of Local Green Space identified under Policy NE5 meet, in their entirety, the criteria for such areas set out in paragraph 77 of the NPPF (2012)<sup>26</sup>.

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<sup>25</sup> See paragraph 4.40 of this report and recommendation 7

<sup>26</sup> The 2012 version of the NPPF (also called the 'old' NPPF) was replaced by a revised version in July 2018. However, the revised NPPF provides in paragraph 214 for plans submitted before January 2019 to be examined in the context of the 2012 version. All paragraph numbers for the NPPF given in this report are for the 'old' version.

## THE MAIN PLANNING ISSUES

### Main planning issue 1 – West End car park and enhancements to Market Place

4.04 It is clear that early survey and consultation exercises identified the lack of car parking as a major issue of concern in Northleach. On the one hand there is a recognition of the economic benefit which would derive from the attraction of more tourists to the town but, on the other, there is concern about the environmental impact from any additional traffic and the additional parking difficulties which would ensue. When I visited the town in early November, well outside the peak holiday season, it was at around midday yet I observed that there were few free parking places either on Market Place or at The Green. The NETC have since submitted further evidence, including survey results and photographs to illustrate the problems being experienced. There is no doubt that featureless hard surfacing and the visual clutter of motor vehicles parked in these areas is a major detraction from the conservation area and is incompatible with the setting of listed buildings within the historic core of the town. I accept that the viability of the small retail centre will depend on the reasonable proximity of parking facilities for customers and that there is considerable pressure on available spaces which are also called upon to serve public houses, a church, museum and the Cotswold Hall. I consider that the evidence provided is robust and proportionate and adequately justifies the provision of additional parking spaces although it is right that there should be a 'comprehensive car parking strategy' as a pre-requisite to any development. Nevertheless, an issue arises as to whether the West End site is the most appropriate for a car park in view of the constraints which apply to it and whether its development should only take place if it is to facilitate the environmental enhancement of Market Place to include a restructuring of the parking spaces there.

4.05 In the commentary<sup>27</sup> on Policy NE1 in the Basic Conditions Statement it is stated that the policy gives effect to Policy S12 in the Local Plan, assists in supporting tourism and, in accordance with the criteria in Local Plan Policy INF5, supports the retail function of the centre. There is also recognition of the environmental sensitivity of the site which, it is stated, is 'preserved' by the criteria in the policy. As the site lies within the conservation area in a sensitive position on the western approach to the town, within the AONB (as is the whole town), within

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<sup>27</sup> Part 5, Table B

the setting of listed buildings and with a visually very important line of trees along the site frontage, I agree that the effectiveness of the policy criteria in managing any harm which might be caused by the development is critical. Consideration must also be given to potential flood risk as the result of the location of the lower part of the area within Flood Zone 3 as shown on the Environment Agency's maps for fluvial flooding.

4.06 The Cotswold District Council state in their response to my questions that the development of a car park on the West End site would be harmful to both the natural and historic environment which can only be mitigated by enhancements to Market Place. A not too different approach is taken in the analysis in sections 8 and 9 of the SA/SEA, paragraph 9.2 in particular. In assessing the degree to which the plan proposals contribute to the achievement of sustainable development and whether they pay sufficient regard to national policy relating to the preservation and enhancement of heritage assets, I will consider the nature of any harm which might arise should the West End site be developed as proposed, subject to the criteria in Policy NE1, and whether environmental enhancements to Market Place are a directly linked and essential element in the overall community benefit arising from the scheme.

4.07 The first consideration is the degree of physical change which might result from the plan proposal. At present the area within which the car park would be located is a green field forming a gap between a cluster of buildings east of the A429 and the Old Coalyard Industrial Estate on the western edge of the town, opposite the recent redevelopment for housing of The Chequers. The listed buildings within the business park are adjacent to more recently constructed units. Furthermore, the presence of vehicles within the industrial estate would mean that the development of a car park on adjacent land would be likely to result in less than substantial harm to the listed buildings.

4.08 Criteria in policy NE1 would prevent the construction of any buildings within the car park and limit the number of cars permitted as well as preventing coach parking. Those criteria, the operation of plan design policies and requirements for landscaping would soften the visual impact to a degree. Nevertheless, whatever surfacing treatment might be chosen, a car park could not, in my opinion, be other than significantly different in appearance from the present green field. When looking northwards from the footway on West End, beyond the fronting stone wall, the lower part of the site is seen to rise steadily to the open countryside beyond. In that respect the open nature of the area makes a positive contribution to

character of the westerly approach to the town and to the scenic beauty of the AONB. The presence of up to 30 cars on what is now a field, especially should there be lighting, could not reasonably be regarded as 'making a positive contribution to local character and distinctiveness'<sup>28</sup>, nor would it accord with CDLP Policy EN11c.

4.09 There is then the matter of safe egress for cars from the site. The intention appears to be to form a new access at the eastern end of the site in the general location of the existing field gate. Along the whole frontage to West End, set in the highway verge between the carriageway edge and the footway is a row of fine mature trees with branches which extend partly over the road and sweep low across the field to the north. They make a fundamentally important contribution to the appearance of the conservation area. When I visited the site I observed that, by the existing field gate, the most eastern of the trees severely obstructs visibility to the west towards the A429 traffic lights. The driver of a vehicle leaving the site would only be able to see an approaching vehicle when he or she was 1 metre from the carriageway edge. For almost all vehicles that would mean that the front would have to be some way into the carriageway before the driver would be aware of an on-coming vehicle.

4.10 I have been forwarded a copy of an email exchange<sup>29</sup> from March 2015 in which the NENP steering group chairman confirmed that a site meeting had taken place with a representative of Gloucestershire County Highways who had indicated that the likely need for improvement to the visibility splay would result in 'the likely loss of one tree'. Even though criterion v. in policy NE1 requires a 'full landscape and arboricultural protection and mitigation scheme' that could not, in itself, off-set the likely loss of a mature tree nor would it do so, for that matter, if the requirement was to 'minimise' tree loss although those words, included in addition, would provide a safeguard against any additional felling.

4.11 Taking these factors into account my conclusion is that the visual effect of the provision of a car park in the existing gap on the northerly frontage to West End, which is to be identified indicatively on the proposals map, would, however designed and landscaped, be likely to result in substantial harm to the Northleach Conservation Area. In those circumstances, should a planning application be made,

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<sup>28</sup> NPPF, paragraph 126

<sup>29</sup> Appended to written responses to my questions 7.12.18

national planning policy is that consent should be refused 'unless it can be demonstrated that the substantial harm ... is necessary to achieve substantial public benefits that outweigh that harm ...'<sup>30</sup> CDLP Policy EN10 is to similar effect.

4.12 Although I have indicated above that the case has been made, in principle, for the provision of additional car parking to serve the town I do not consider that would be sufficient, in itself, to outweigh the substantial harm to the conservation area which would arise if it was to be within the area identified at West End. As eluded to in paragraph 5.10 of the plan text, 'substantial public benefit' would only arise should the additional car parking be directly linked to the proposals in the second part of Policy NE4 for the restructuring of car parking on Market Place enabling environmental enhancements which would contribute to the sustainability of the town as a whole by improving the tourism and retail 'offer'. That link is clearly stated to be a requirement in Policy NE1 and, with some re-wording to avoid unnecessary duplication within the policy, I am satisfied that the policy meets the basic conditions in that regard. Furthermore, the last part of Policy NE4 details the measures which are regarded as necessary to deliver those substantial public benefits. Should it be the case that other delivery mechanisms are identified, as suggested in the last sentence of paragraph 5.20, the link would be broken and the development at West End would not be justified. I recommend that for clarity of purpose within the plan and to properly demonstrate that a positive contribution is to be made through the plan to the achievement of sustainable development, the last part of Policy NE4 should be integrated with Policy NE1 even though not all of the proposed measures are likely to require planning permission. Consequentially, and for correction, paragraphs 5.8 to 5.10 and 5.20 in the plan text will require re-wording.

*Flood risk.*

4.13 Immediately behind the frontage wall to West End there is what is best described as a 'green trough'. It was dry at the time of my visit and there is no information available as to how often it floods. However, as the Environment Agency flood risk map shows the 'trough' as within flood risk zone 3 for fluvial flooding I assume that it is an overflow channel which is likely to fill at times of

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<sup>30</sup> NPPF, paragraph 133 (paragraph 195 in the July 2018 version)

heavy rainfall. It is stated in Planning Practice Guidance<sup>31</sup> that the approach to planning for the management of flood risk set out in paragraph 100 of the NPPF applies to neighbourhood plans as it does to local plans. Furthermore, in preparing a neighbourhood plan, a qualifying body should have regard to national policy on flood risk and be consistent with the Local Planning Authority's application of the sequential test and, if necessary, the exception test<sup>32</sup>. Policy EN14 of the CDLP and closely follows national policy<sup>33</sup>. NPPF Paragraph 101 requires the sequential test to be applied before any plan allocation is made.

4.14 The SEA makes reference to a consideration of alternative sites at the East End but the NETC have confirmed that those sites are no longer available. It appears that other sites were also considered at earlier stages in the plan-making process but discounted for a variety of reasons. The most critical consideration appears to be that the car park should be within easy walking distance of Market Place if it is to help support the retail function of the centre, limit traffic flows through the town with most visitors approaching from the A429 and provide longer-term parking for those using town facilities. On that basis, I accept that there are no reasonably available areas with a lower risk of flooding and that the sequential test has been applied proportionately.

4.15 A question then arises as to whether the exception test should be applied as required in paragraph 102 of the NPPF. In paragraph 8.6 of the SEA it is stated that 'this use is not considered as inappropriate within a flood risk area and the policy requires the use of permeable surfacing'. However, the provision of a surfaced car park is not classed as 'minor development'<sup>34</sup> and it is not simply a change of use. There is reference in the PPG<sup>35</sup> to car parking areas and open space within mixed developments as being of 'lower vulnerability' but, unlike amenity open space or recreational areas, car parks are not listed as 'less vulnerable' in Table 2 under paragraph 066 of the PPG which categorises developments according to risk. Within flood risk zone 3a only less vulnerable or water-compatible development is shown in Table 3 in paragraph 067 as 'appropriate'.

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<sup>31</sup> Reference ID: 7-061-20140306

<sup>32</sup> Reference ID: 7-063-20140306

<sup>33</sup> NPPF paras. 100-104

<sup>34</sup> Reference ID: 7-046-20140306

<sup>35</sup> Reference ID: 7-053-20140306

4.16 As a car park would not be 'appropriate' in such a location, the first bullet point in paragraph 102 of the NPPF requires it to be demonstrated that the development would provide wider sustainability benefits to the community which outweigh the flood risk before a plan allocation could be made. Whereas, as indicated above, the wider sustainability benefits have been demonstrated the Strategic Flood Risk Assessment undertaken for the Local Plan does not provide sufficiently detailed information to indicate the precise level of any flood risk in the West End area and so the balancing exercise suggested in NPPF paragraph 102 cannot be undertaken. The NETC have also indicated that funds were not available to undertake a site-specific assessment.

4.17 The allocation of land in a development plan carries with it a positive assumption that planning permission will be granted provided that any criteria set out in the policy are met. The statutory force behind s38(6) of the Planning and Compulsory Purchase Act would apply. I take the view that a site-specific flood risk assessment would be essential before any permission might be granted. That would allow the exact nature of any risk to be judged, including a detailed consideration of the permeability properties of the particular surfacing materials to be used as a definite requirement, not merely 'if possible'. It must be clear whether there would be any greater risk of flooding downstream. Measures to ensure the safety of users might also be taken into account.<sup>36</sup> In all of the circumstances, in order that Policy NE1 may be fully reflective of the national guidance on flood risk, I recommend that the policy itself should set a requirement for a site-specific assessment. The policy should also be re-phrased to refer to an indicative location for the car park rather than to the allocation of land. This would be shown, as already agreed, by a star on the policies map, not a specific area of land and Plan D becomes superfluous. For similar reasons, it should not be stated in policy that the development 'will be permitted' provided the criteria are met.

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<sup>36</sup> Advice on this matter was contained in the now withdrawn Practice Guide to Planning Policy Statement 25 in paragraphs 6.13 and 6.14. This covers the possibility of cars being washed away in a flash flood.

**Recommendation 1.**

**Delete Policy NE1 and the last part of Policy NE4 and replace them with a new policy NE1 along the following lines:-**

**Policy NE1 Public Parking**

**An indicative location for the development of a public car park, with access to West End, is shown on the Policies Map. The parking area should be for a maximum of 30 cars with no provision for coaches and with no ancillary buildings.**

**The development will be brought forward only as part of a comprehensive parking strategy for the town which incorporates a restructuring of existing public parking spaces in Market Place to create a new public space. Other public realm enhancements may include relocation of the public toilet block and reconfiguration of the bus stop.**

**Prior to any development taking place a site-specific flood risk assessment will be required to demonstrate, amongst other things, that safe egress will be available in the event of flooding; that the car park will be safe for its lifetime and that the use of permeable/porous surfacing materials will ensure there is no additional flood risk elsewhere.**

**Any tree loss necessary to provide safe egress shall be kept to a minimum and a full landscape and arboricultural protection and mitigation scheme will be required, also providing details of any external lighting.**

**Make consequential amendments to the supporting text in paragraphs 5.8-5.10, moving forward paragraph 5.20. Delete Map D.**

Main planning issue 2 – Proposed primary school expansion (Policy NE2): Clarity and regard to national policy for AONBs and conservation areas

4.18 The PPG advises<sup>37</sup> that plan policies should be sufficiently clear and unambiguous for them to be applied consistently and with confidence in the determination of planning applications. Discussions between the NETC and CDC at earlier stages of plan-making have resulted in the inclusion of a criteria based policy rather than the allocation of a specific site for school expansion to the south of the existing school which had been assessed in 2015<sup>38</sup>. The CDC have acknowledged the strong community aspiration to facilitate future expansion of the school but wish to see greater flexibility in the policy wording. As it is, the policy continues to refer to 'the site' and includes cardinal points which would not allow for other possible options. The text in paragraph 5.13 also refers to a specific site. Clarity is required.

4.19 The policy relates only to land 'at or adjacent to' the existing educational facilities thus limiting its scope. However, I agree with the CDC that the inclusion of cardinal points is not necessary for the successful implementation of the policy and that it reduces flexibility. The area is acknowledged to be an environmentally sensitive one, with the agricultural land to the south of the school rising quite steeply, all within the Cotswolds AONB. The school is not within the Northleach Conservation Area although consideration has to be given to any possible effect on its setting. I recommend re-wording of the policy which continues to identify those factors without reference to cardinal points.

4.20 National policy as set out in paragraph 72 of the NPPF very strongly supports proposals for the development of schools. Nevertheless, this has to be balanced with the 'great weight' to be given to conserving landscape and scenic beauty within AONBs.<sup>39</sup> My concern in this respect is the requirement in criterion v. that any buildings should be designed to 'minimise' their visual impact on the open landscape to the south and east of the school. That is not a precise concept because the needs of the school may be such that, however carefully designed they might be, any such buildings might not 'conserve' the landscape and scenic beauty

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<sup>37</sup> Reference ID: 41-041-20140306

<sup>38</sup> rCOH Site Assessments Report dated 22<sup>nd</sup> December 2015

<sup>39</sup> NPPF paragraph 115

of the AONB. Therefore, having regard to national policy, I recommend that the policy should require that the landscape and scenic beauty of the AONB be conserved. Such wording would still allow a balancing exercise to be undertaken between accommodating educational requirements and landscape considerations, especially as the AONB 'washes over' the whole town thus providing a wider context for consideration of issues relating to 'setting'. On the other hand, the national policy relating to historic assets refers to degrees of 'harm'. It is not, therefore, inconsistent with that approach to refer to minimising any harm to the setting of the conservation area.

4.21 The CDC have also made representation about the reference in policy to a north-south footpath link. They point out that there might also be an opportunity to create an east-west link, although a public footpath already leads to the St. George V playing field. It seems to me that the priority is the provision of a pedestrian link between the existing buildings and any new ones. Subject to that amendment in wording the plan would meet the basic condition in terms of clarity.

#### **Recommendation 2.**

**Revise the wording of criteria v. and vi. of Policy NE2 as follows:-**

***v. the height, scale, massing, orientation and roof design of any education buildings ~~minimise their visual impact on~~ conserves the open landscape and scenic beauty of the school-AONB area to the east and south of the site and minimises any harm to of the setting to of the Northleach Conservation Area to the north of the site;***

***vi. the layout of buildings and spaces makes provision for ~~a north-south pedestrian access through the site to connecting~~ with the access with to the main school buildings; and***

(Strikethrough denotes deletions; underlining denotes additions)

**Amend the wording of paragraph 5.13 to reflect the fact that the policy is criterion based rather than site-specific.**

Main planning issue 3 – Whether the proposed areas of Local Green Space meet, in their entirety, the criteria for such areas set out in paragraph 77 of the NPPF

4.22 The national policy for the designation of areas of Local Green Space (LGS) in paragraph 77 of the NPPF, together with additional guidance in the PPG<sup>40</sup>, is clear and quite specific. It is not considered appropriate for most green areas or open spaces and there should be a particular justification for such designation, most especially in terms of the second bullet point under paragraph 77.

4.23 The justification for the identification of each of the three areas of Local Green Space is set out in the plan text, paragraphs 5.23-34, following Policy NE6 with detailed plans for each. Also, as explained in paragraph 5.15 they are seen as an integral part of the green infrastructure 'ring' provided for in Policy NE3(v). The approach is commended.

4.24 I visited each of the proposed Local Green Spaces in turn and walked through them. I am fully satisfied that the woodland strip off Farmington Road and the meadowland along the River Leach together with the King George V playing field are closely aligned with the community and are very well used recreational areas. I was less certain about the land at East End. Whereas there is a clear path and public right of way from East End, just to the east of the recent Westwoods development, down to the river and eastwards from there, it is much less obviously the case that the field between the southern boundary of the new development and the river is used for recreation and there is no public right of way to or through it.

4.25 The housing development off Bassett Road is at a higher level than the proposed LGS and overlooks it. However, there is a very distinct change in the character of the valley floor in what I have described as a 'dog leg' west of a stone wall which demarcates the westerly end of the open pasture fields north of the river. The land is enclosed and has, evidently, been landscaped in accordance with the planning permission for the development and includes a surface water balancing pond. There is no public access through it to Bassett Road. Currently there are lockable security gates leading to the new development from Bassett Road.

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<sup>40</sup> Ref. IDs 37-005 to 37-022 inc.

4.26 As the result of my observations I raised the issue by way of a supplementary question following my site visit. I have been informed that there is informal access across the river and along the southern bank to the Eastington Road. From there, the area of land in question may be viewed as part of the valley landscape, however it is enclosed and distinctly different in character from the open valley to the east. There is no continuity of open greenery on the northern side of the river between Bassett Road and Eastington Road owing to the presence of the Westwoods and Health Centre buildings with associated hard surfaced car parking areas. For this particular area of land to be included as LGS it should be demonstrably of special significance to the local community. The reasons given in paragraph 5.25 for the designation of the wider area as LGS may well apply to the land further east but not to this parcel which has undergone a considerable change in appearance through the landscaping work which has taken place relatively recently. Although it is stated in the PPG<sup>41</sup> that there need not necessarily be public access to land designated as Local Green Space I do not consider that any of the factors mentioned in the second bullet point of paragraph 77 in the NPPF as giving an area particular local significance apply here. For these reasons, I conclude that, for the plan to meet the basic conditions in terms of the regard to national policies and advice, the area of land in question has to be excluded from the area coloured green on the Policies Map (and on Plan I) as part of the Local Green Space off East End (Policy NE6(i)).

**Recommendation 3.**

**Modify Plan I and the Policies Map (page 33) and Inset (page 34) to exclude from the Local Green Space off East End (Policy NE6(i)) the area of land granted planning permission, as part of the Westwoods housing development, Bassett Road, as a landscaping area.**

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<sup>41</sup> Reference ID: 37-017-20140306

### Other matters

4.27 In this section I will discuss issues arising from the wording of policies and, in some instances, the supporting text. In terms of the basic conditions these relate primarily to the guidance in Planning Practice Guidance that policies should be expressed in a clear and unambiguous manner so as to be used with confidence and consistency by the decision-maker, that is in the determination of planning applications. That is usually the Local Planning Authority but may also be the Secretary of State (or an Inspector) on appeal.

4.28 I recognise that the plan has been drawn up, with extensive consultation, largely by, and for the benefit of, the Town Council as the 'Qualifying Body' and that it will be used by them when consulted upon by the Cotswold District Council on planning applications. I suspect that the use of terminology in policies that certain types of development will be 'supported' or, in some instances, 'resisted' is reference to that consultative function but it is not entirely clear what those terms might mean for the decision-maker. In that context, 'support' can only convey an expectation that planning permission will be granted and 'resist' that it will be refused. I understand from the NETC's response to my questions that this form of wording is used in other neighbourhood plans in the CDC area. Therefore, for consistency, I will not recommend changing these wording of policies unless I have other reasons for so doing.

4.29 I will now deal with the wording each of the remaining policies in turn, in so far as there are any outstanding issues. There are no such issues relating to either Policy NE1 or NE2.

### Policy NE3

4.30 The introductory section in this policy states that new development should be to the highest design standards 'in accordance with the relevant policies of the Cotswold Local Plan and the Cotswold Design Code'. As I pointed out in my written questions, Local Plan policies apply alongside those in the Neighbourhood Plan and so it is not necessary to cross-reference in this way. However, I accept that it may help the non-professional plan user for attention to be drawn to the Local Plan. I also accept the point that referring to the 'relevant policies' provides flexibility should the Local Plan policies change through review prior to any change in neighbourhood plan policy.

4.31 It would not be right, as a matter of principle, for a neighbourhood plan policy to seek to require compliance with policies set out in a document which does not, in itself, form part of the statutory development plan and has not, therefore, been subject to independent examination. This would cause uncertainty in decision-making, contrary to national practice guidance<sup>42</sup>. For example, design 'policies' set out in a Supplementary Planning Document are for guidance as a 'material consideration' to be weighed in the balance with statutory policy<sup>43</sup>. I queried the status of the Cotswold Design Code because it is contained within an appendix of the CDLP and was originally produced as Supplementary Guidance<sup>44</sup> with a reference in paragraph D3 to it being a 'material consideration'. In response, the CDC have assured me that the Design Guide is part of the statutory plan, in which case the reference to it in NP Policy NE3 will not cause any uncertainty for decision-takers.

4.32 The criteria set out under Policy NE3 very much fulfil one of the main functions of neighbourhood planning in identifying features of specific local importance to which a more generally based policy, including those in the Local Plan, will be applied. As it happens, these all relate to features within the town of Northleach whereas the policy is intended to apply to the whole parish which includes a second, albeit smaller, conservation area in Eastington village. That is not mentioned at all, a fact which the NETC have acknowledged to be an 'oversight'.

4.33 The reference in paragraph 5.15 of the plan text to Local Plan Policy EN2 is somewhat ambiguous because it is not NP Policy NE2 which 'applies' the Cotswold Design Code, it is LP Policy EN2 which does that. Policy NE2 complements LP Policy EN2 in so far as it refers, in criteria ii., to the Northleach Design Statement. Although the main focus of the Design Statement is the town of Northleach it is stated in that document that the principles are intended to apply to the whole parish. I recommend some adjustments to the supporting text to make the application of the policy clear.

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<sup>42</sup> See para. 4.27 above

<sup>43</sup> In accordance with s38(6) of the Planning and Compulsory Purchase Act 2004

<sup>44</sup> As stated in paragraph 10.2.10 of the CDLP

#### **Recommendation 4.**

**Amend paragraph 5.14 by deleting the last three words 'in the Parish' and adding a new sentence to read 'It applies across the whole parish, including the two conservation areas'.**

**In paragraph 5.15, delete the second sentence and replace it by the following text:-**

**As such, it complements policies EN11 (in respect of managing development within the conservation areas for Northleach and Eastington and in their settings) and policy EN2 (referring to the Cotswold Design Code) of the Local Plan in applying the general principles of the Northleach Design Statement.**

#### Policy NE4

4.34 My recommendation 1 is that the second part of policy NE4 should be integrated with a revised policy NE1. Therefore, I deal here only with the first part of policy NE4 which sets out development management criteria primarily for proposals involving the change of use of premises from 'main town centre uses', including retail (A1) to other uses. In that context, it is appropriate to draw attention, as in paragraph 5.19, to the widening scope of permitted development rights which, for town centre uses are set out under Part 3 of the GPDO. However, although it is correct to state that 'some' permitted development rights do not apply in conservation areas or, for that matter, within the AONB<sup>45</sup> and to listed buildings, the position is somewhat complex. For example, changes of use between the subdivisions of Use Classes A (1-5) are generally not so restricted<sup>46</sup>.

4.35 The last part of policy NE4, which seeks to restrict changes of use, does not properly have regard to Government policy as expressed through the freedoms accorded by the GPDO. The policy could not be implemented as currently worded unless an Article 4 direction was to be made. In particular, no mention is made of Use Class A2 which is treated in the same way as A1 in Class A. A change of use between A1 or A2 and A3 is permitted<sup>47</sup> except for listed buildings. Also, under Class G an A1 or A2 use might be changed to a mixed use with up to 2 flats above.

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<sup>45</sup> Both are "Article 2(3) land"

<sup>46</sup> An exception is Class C which does not apply to listed buildings

<sup>47</sup> Class C

4.36 As currently worded, the policy might be construed as seeking to 'resist' certain changes of use which, in practice, cannot be achieved. However, the intention behind the policy is spelt out under criterion (ii) which is that the 'other uses' are, actually 'use classes other than A1, A3 and A4' although, as stated above, use class A2 cannot be excluded. For clarity, and to avoid any suggestion of intended restrictions beyond national policy, I recommend a reference to 'change of use' rather than 'loss' and the replacement of the non-specific reference to 'other uses' by 'a use other than A1-4'.

4.37 I have drawn attention through my written questions to the reference in the policy to the 'defined Town Centre Boundary' when that boundary is not shown on the neighbourhood plan policies map on page 33 nor to the enlargement on the final page (before the appendices). The boundary is, in fact, only shown on Inset 11 of the Cotswold District Policies Map as reproduced on page 79 of the CDLP. The statement in paragraph 5.16 of the NENP that the boundary is defined in CDLP Policy EC8 is not strictly correct and should refer to the District Policies Map. That would then enable the plan user to see more easily exactly where the boundary lies. As the function of the district-wide 'adopted' Policies Map is to show the geographical extent to which all development plan policies apply it need not be reproduced within the neighbourhood plan for the basic conditions to be met. It would be a matter of completeness if so desired.

#### **Recommendation 5.**

**Amend the introductory section of the third paragraph in Policy NE4 by the substitution of the words 'change of use' for 'loss' at the beginning of the first line and deletion of the words 'another use' in the second line to be replaced by 'a use other than A1-4'**

**In paragraph 5.16 of the plan text, delete the words 'and its Town Centre Boundary,' in the second line and add a new sentence: 'The Town Centre Boundary for Northleach is shown on Inset 11 to the Cotswold District Adopted Policies Map as reproduced on page 79 of the current Local Plan.'**

### Policy NE5

4.38 The second part of this policy is expressed in terms that the 'enhancement' of the Old Prison site for tourism and employment uses 'will be supported'. However, the text in paragraph 5.22 states that the policy 'encourages further tourism and employment development' at the site. That is somewhat of a contradiction because the policy could be read as discouraging development which does not 'enhance' the site, or at least does not say it will be supported otherwise. It is also not made clear in the policy that it is dealing only with proposals for development, that is requiring planning permission, rather than other 'proposals' which might affect features of special architectural or historic interest and, therefore, require listed building consent. The Old Prison is listed Grade II\*. A minor re-wording only is required to avoid any apparent contradiction and, hence, any ambiguity in policy application.

### **Recommendation 6.**

**In the first line of the second paragraph in Policy NE5 delete the words 'to enhance' and replace them by 'for the development of'.**

### Policy NE6

4.39 In my question 19 I raised a minor issue about the wording of the last part of Policy NE6. The NENP responded that this is an application of (old) NPPF paragraph 78. What that says is that the policy for the management of development within areas of Local Green Space should be 'consistent with policy for Green Belts'. That in turn is as set out in paragraph 87 of the NPPF. However, to state that 'development' will be 'resisted' unless very special circumstances are demonstrated is not entirely consistent with national policy, not because of the choice of words but because the important word 'inappropriate' has been omitted. Not all 'development' would be 'inappropriate' within an LGS but if it is not inappropriate it is not necessary to demonstrate very special circumstances. The second bulleted example in paragraph 89 of the NPPF is a case in point and no-one would suggest that the provision of a park bench would be other than 'not inappropriate' even though it would be 'development'.

4.40 The CDC have indicated that they would prefer the same policy to be applied within LGSs across the District and that policy would be as stated in CDLP Policy EN3(2). However, the relevant basic condition is only that the neighbourhood plan should be in 'general conformity' with the strategic policies of the development plan. In so far as there is a strategic element within Policy EN3, with the insertion of the word 'inappropriate' in the second part of NP Policy NE6, it would be more closely in general conformity with the CDLP as well as having full regard for national policy. What forms of development considered to be 'inappropriate' would then be a matter for local judgment.

**Recommendation 7.**

**In the second part of Policy NE6 insert the word 'inappropriate' before 'development' in the first line.**

Thames Water representation

4.41 Thames Water seek the inclusion of an informative statement in the plan addressed to developers relating to the consideration of implications for water supply and waste water disposal. However, neighbourhood plans are not required to cover every issue. Furthermore, CDLP Policy INF8 provides an adequate basis for the Local Planning Authority to consider any particular concerns of relevance for planning decision-taking. The NENP satisfies the basic conditions in relation to this matter.

### The correction of errors

4.42 As indicated in paragraph 1.04 above, legislation permits me to recommend the correction of errors. In reading the plan I have noticed some errors of fact owing to the lapse of time since the plan text was drafted, as set in the following paragraphs.

4.43 Paragraph 3.3, last sentence. Although it may have been true at the time this was written this is now a factual error. As mentioned earlier in this report<sup>48</sup>, the revised NPPF was issued in July 2018, some months before my examination of the plan began in October. However, that is not of direct relevance because the plan was submitted during the transition period as specified in paragraph 214 of the revised NPPF. The reference to the March 2018 consultation on the draft revised NPPF is also superfluous and out-of-date. In the circumstances, I **recommend** the deletion of the whole of paragraph 3.3.

4.44 In a similar vein, the statement in paragraph 3.4 has been overtaken by events in that the Cotswold District Local Plan was adopted in August 2018. The paragraph requires correction to state the current position and I **recommend** accordingly.

4.45 Finally, although not an error as such and therefore not a matter upon which I make formal recommendation, the NETC may wish to ensure that the plan is as up-to-date as possible when finalised prior to the plan being 'made'. In that respect, much of the text in section 1 will require updating or may be omitted because it relates to the earlier stages of plan-making which will be of little relevance. The reference to this examination in paragraph 1.6 is a case in point.

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<sup>48</sup> See footnote 25 on page 9 of this report

## **Section 5 - Formal conclusion and overall recommendations including consideration of the referendum area**

### **Formal Conclusion**

5.01 I conclude that the draft plan, subject to the modifications recommended in this report, meets the basic conditions as set out in Schedule 4B to the Town and Country Act 1990 (as amended). Also, it does not breach and is otherwise compatible with EU obligations and is compatible with Convention Rights.

### **Overall Recommendation A.**

**I recommend that the draft Northleach with Eastington Neighbourhood Plan 2018 – 2031, as modified in accordance with the recommendations set out in this report, be submitted to a referendum.**

### **The referendum area**

5.02 As I have recommended that the draft plan as modified be submitted to a referendum I am also required under s10(5)(a) of Schedule 4B to the Town and Country Planning Act 1990 to recommend whether the area for the referendum should extend beyond the neighbourhood area.

5.03 There have been no representations seeking an extension of the referendum area. No cross-boundary issues have been identified. Consequently, I find there to be no justification for extending the referendum area beyond the designated neighbourhood area.

### **Overall Recommendation B.**

**The area for the referendum should not extend beyond the neighbourhood area to which the plan relates.**

Signed:

*John R Mattocks*

JOHN R MATTOCKS BSc DipTP MRTPI FRGS

18 January 2019

## **APPENDIX – ABBREVIATIONS USED IN THIS REPORT**

'the 1990 Act'	The Town and Country Planning Act 1990, as amended
'the 2012 Regulations'	The Neighbourhood Plans (General) Regulations 2012 (any reference to a Regulation number is to these Regulations)
AONB	Area of Outstanding Natural Beauty
CDC	Cotswold District Council
CDLP	The Cotswold District Local Plan (August 2018)
GPDO	The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended 2016)
EU	European Union
HRA	Habitats Regulations Assessment
LGS	Local Green Space
LPA	Local Planning Authority
NENP	The Northleach with Eastington Neighbourhood Plan 2018-2031 ('the plan')
NETC	Northleach with Eastington Town Council
NP	Neighbourhood Plan
NPPF	The National Planning Policy Framework (unless stated otherwise paragraph references are to the 'old' or 2012 version of this document)
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment