

## **Somerford Keynes Neighbourhood Development Plan**

### **CONSULTATION STATEMENT (Draft)**

#### **INTRODUCTION**

1. This Statement has been prepared to meet the legal obligations of the Neighbourhood Planning Regulations 2012, in which Section 15(2) Part 5 requires that a Consultation Statement should:-
  - (a) contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - (b) explain how they were consulted;
  - (c) summarise the main issues and concerns raised by the persons consulted;
  - (d) describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
2. The relevant planning authority is Cotswold District Council (CDC), with whose officers there has been ongoing consultation during the development of the Plan.
3. The Plan has been prepared by Somerford Keynes Parish Council, a qualifying body under Section 38A(12) of the Planning and Compensation Act 2004) for an area coterminous with the boundaries of the civil Parish of Somerford Keynes. There are no other neighbourhood development plans in place within this area.
4. The Parish Council wishes to acknowledge the contributions of all those individuals and organisations involved in the development of the Plan. In particular, it acknowledges the active participation of the local community in the process, both in the contribution of ideas and improvements to proposals presented to them.

#### **CONSULTATION AIMS**

5. Whilst acknowledging the statutory requirements on consultation, the Parish Council recognised from the outset that the Plan should reflect the wishes and aspirations of the community to influence the future

development of their physical environment. To that end, the process of consultation was intended to:-

- Involve as many of the community as possible at the key stages, so that the Plan genuinely and evidentially reflected the widest possible range of views
- Engage with the different populations within the Plan area
- Employ a range of communication media to maximise the opportunities for people to be aware of and engage with developments.
- Ensure that actions following comments and proposals were reported to the community, explaining reasons for decisions taken.

## THE INITIAL CONSULTATION PROCESS

6. The starting point for the decision to establish a Neighbourhood Plan for the parish of Somerford Keynes was the publication of the Parish Plan 2012-22 for Somerford Keynes and Shorncote. The Parish Plan was based upon an extensive consultation process with the local community that produced a series of action points to take forward in the coming years.
7. We approached Gloucestershire Rural Community Council (GRCC) for advice on exploring establishment of a neighbourhood plan. With funding from GRCC, we commissioned two reports on the Parish Plan to determine its suitability as a start point for a neighbourhood plan:-
  - Erimax - The next Steps to a Neighbourhood Plan  
[http://www.somerfordkeynes.org.uk/index\\_htm\\_files/Erimax%20report%20-%20moving%20from%20a%20PP%20to%20an%20NDP.pdf](http://www.somerfordkeynes.org.uk/index_htm_files/Erimax%20report%20-%20moving%20from%20a%20PP%20to%20an%20NDP.pdf)
  - Localism Network Report - Issues from PP to Consider in NDP  
[http://www.somerfordkeynes.org.uk/index\\_htm\\_files/Localism%20Network%20Report%20-%20issues%20from%20PP%20to%20consider%20in%20NDP.pdf](http://www.somerfordkeynes.org.uk/index_htm_files/Localism%20Network%20Report%20-%20issues%20from%20PP%20to%20consider%20in%20NDP.pdf)
8. In light of the recommendations in those Reports, the Parish Council decided that it would be appropriate to take forward the concept of a neighbourhood plan for discussion in the local community

## **DESIGNATION**

9. The Annual Meeting of Somerford Keynes Parish Council in April 2014 included a major presentation to explain the principles and purposes of a neighbourhood plan and to enable the community to decide if it wished to proceed with such a plan.
10. Based upon the views expressed at that meeting SKPC decided to proceed. A formal application was made by to CDC on 9 May 2014 to designate an area defined by the Parish boundaries as the neighbourhood area subject to this Plan in accordance with the Neighbourhood Planning Regulations 2012. The Parish boundary was modified and extended as part of a boundary review on 7 February 2014 for implementation with effect from 1 April 2015. The application was made to include this minor extension.
11. CDC published the application to produce a Neighbourhood Plan for a period of 6 weeks from 16 May to 26 June 2014. No representations or comments were received during this period and CDC designated the Parish of Somerford Keynes as a neighbourhood area on 9 July 2014.

## **CONTINUING PUBLIC CONSULTATION**

12. Consultation continued throughout the development of the Plan, but the following were major reference points:-
  - July 2014 - Public consultation on the proposed Vision, Aims, Objectives and Major Policy Areas of the emerging Plan
  - November 2014 - consultation with a structured focus group from the community on the translation of Objectives into specific policies
  - January 2015 - Community presentation and consultation on specific policies in each of the then six major areas.
  - June-July 2016 - first pre-submission consultation on Plan. The Report on this consultation is attached as Appendix 1
  - March-April 2019 - second pre-submission consultation on Plan. The Report on this consultation is attached as Appendix 2
13. It may be seen from the following chronology that the period between the two pre-submission consultations provided opportunities to review the Plan in light of substantial comments received following the first

consultation and to allow time for the CDC Local Plan to navigate the final stages to completion.

14. A number of changes were made during this time for one or more of the following reasons:-

- 1) On review it became clear that some Policies were so closely linked that greater clarity and coherence was achieved by bringing them together in a single Policy, e.g. SKPOL1 now covers all aspects of residential development.
- 2) The adoption of the CDC Local Plan in August 2018 enabled us to achieve greater consistency and avoid repetitive overlap in the SKNDP. Thus, some Policies were modified to add a local dimension to Policies in the local Plan.
- 3) It became apparent that a small number of SKNDP Policies added nothing to the Local Plan and were removed.

15. Whilst this resulted in a number of changes and a reduction in the number of separate Policies, the Vision and Aims remain consistent and the Plan continues to reflect the wishes and aspirations of the local community.

## **CONCLUSION**

16. The table attached summarises the major elements in the consultation process from inception to final submission. It reflects the extensive efforts made to ensure that the community was kept abreast of developments and had ample opportunity to comment and suggest amendments. Whilst not every suggestion was appropriate or consistent with the Vision and Aims, we are confident that the resulting Plan embraces a vision of the future supported by the community.

**A CHRONOLOGICAL SUMMARY OF KEY DATES/ACTIVITIES IN THE CONSULTATION PROCESS.**

<b>Date</b>	<b>Stage in process</b>	<b>Detail (who and what)</b>	<b>Publicity</b>
7 April 2014	PC decision	PC agreed Plan area and that there would be a presentation to the forthcoming Annual Parish Meeting	<ul style="list-style-type: none"> <li>- PC Minutes</li> <li>- Notice of Annual Parish Meeting</li> </ul>
April 2014	Annual Parish Meeting	Introductory presentation to the community on the purpose of NDPs and their potential importance for local people.	<ul style="list-style-type: none"> <li>- The Annual Meeting is held at about the same time every year and is publicised in the PC Parish Newsletter, on the village website and by circulation to the PC email list</li> </ul>
12 May 2014	PC meeting	Confirmation of submission to CDC of application for designation of Plan area	<ul style="list-style-type: none"> <li>- PC Minutes</li> </ul>
July 2014	Initial Public Consultation	Introduce NDP concept to community and secure views on the vision, aims and structure of the SKNDP via display in Village Hall, with NDP team members in attendance on three occasions - 17, 19 and 24 July 2014. 62 people attended.	<ul style="list-style-type: none"> <li>- NDP News 1 delivered to every household in Parish and posters placed in prominent locations throughout Parish. Invitation to attend sent to the PC mailing list and placed in Wilts &amp; Gloucs Standard Community News.</li> <li>- Results of this consultation published in NDP News 2.</li> </ul>

1 September 2014	Report to Parish Council 1	Full report on first public consultation	- Parish Council meeting
September - October 2014	Housing Needs Survey	Survey conducted by GRCC on behalf of PC. Questionnaires distributed to every household in Parish with an explanatory letter. Completed questionnaires were collected by up to two visits, with the option for respondents to return them either to the Parish Clerk or direct to GRCC via Freepost. 109 (52%) completed questionnaires returned from permanent home owners, none from holiday home owners.	<ul style="list-style-type: none"> <li>- Questionnaires delivered to every household, together with explanatory letter.</li> <li>- Survey publicised in NDP News 2</li> <li>- Full report to special meeting of PC on 20 October 2014 and formally adopted at its meeting on 5 January 2015.</li> <li>- Results published in NDP News 3</li> </ul>
20 October 2014	PC Special Meeting	Presentation for PC on emerging draft policies that serve the vision, aims and objectives of the Plan and reflect the views of the community ascertained in July 2014 consultations. GRCC also presented the Housing Needs Survey Report.	- Reported to PC in Progress Report 4 (December 2014)
24 November 2014	Focus Group Discussion	A group representing a cross-section of the community - by gender, age, employment status and location - was asked to consider and comment on key aspects of the proposed	- Reported to PC in Progress Report 4 (December 2014)

		Plan. A mixture of views emerged that informed the further development of the Plan.	
8 December 2014	PC Special Meeting	Update for PC on current draft policies to enable a direct input and guidance on further development	- PC Progress Report 5 (January 2015) summarised the meeting.
19 January 2015	Public NDP Consultation	Community presentation and consultation on specific policies in each of the then six major areas. Attended by 40 people.	- NDP News 3 publicising this meeting delivered to all households in Parish - Date publicised to all on PC mailing list -
2 March 2015	Report to Parish Council 6	Full report on presentation 19 January 2015	- Parish Council meeting
6 July 2015	Report to Parish Council 7	Report on consultations with various external agencies, including CDC and GRCC, on Latest Draft Plan	- Parish Council meeting
7 September 2015	Report to Parish Council 8	Progress reported on preparation of further draft, including introduction of Community Action Proposals and particular issues about tourism and future holiday home development	- Parish Council meeting

2 November 2015	Report to Parish Council 9	Report on meeting of NDP Team covering business contacts/meetings, parish Character Assessment, land use, identification of Local Green Spaces, Community Action Proposals and preparation of various maps.	- Parish Council meeting
April 2016	NDP NEWS 4	Details of forthcoming meeting with local businesses and early notice of first pre-submission consultation	- Delivered to all households in Parish
28 April 2016	Annual Parish Meeting	Update on progress and changes to the Plan, including the introduction of a policy on local green spaces, continuing work on boundary definitions and the inclusion of Community Action Proposals for important issues outwith the scope of a planning document. Early notification of forthcoming pre-submission consultation	- The Annual Meeting is held at about the same time every year and is publicised in the PC Parish Newsletter, on the village website and by circulation to the PC email list
23 May 2016	Local Business Consultation	Presentation to local businesses on draft NDP. The report on this event is included in Report to Parish Council 10.	- NDP News 4 - delivered to all households in Parish - All businesses based in Parish invited by email.

5 June 2016	SEA Screening Report	Confirmation from CDC that SEA not required	-
6 June 2016	Report to Parish Council 10	Report on NDP Team Meeting and business consultation evening.	- Parish Council meeting
June 2016	NDP NEWS 5	Explanation and details of first pre-submission consultation	- Delivered to all households in Parish
4 July 2016	Report to Parish Council 11	Report on further Plan modifications, confirmation that SEA not required, and details of pre-submission consultation, which would end on 29 July, including statutory consultees and local employers.	- Parish Council meeting
10 June 2016 - 29 July 2016	First pre-submission consultation	Main document and appendices available on Somerford Keynes website throughout the consultation period. Hard copies available upon request from the Parish Council Clerk. Three consultation events held at Village Hall (10 <sup>th</sup> , 12 <sup>th</sup> and 18 <sup>th</sup> June 2016), at which main NDP document and appendices visually presented on display boards and consultees invited to provide comment on feedback sheet.	<ul style="list-style-type: none"> <li>- NDP News 4 - delivered to all households in Parish</li> <li>- Reminder published in June's Parish Church magazine</li> <li>- All statutory consultees emailed at beginning of consultation period.</li> <li>- All businesses based in Parish emailed at beginning of consultation period.</li> <li>- Neighbouring Parish Councils and District and County Councillors emailed at beginning of consultation period.</li> </ul>

		More detail from the pre-submission consultation provided in the accompanying document.	
31 October 2016	First post pre-submission consultation (2016) meeting with CDC	<p>The purpose of this meeting was to discuss CDC's formal response to the pre-submission consultation (2016).</p> <p>The main areas discussed were as follows:</p> <ul style="list-style-type: none"> <li>- Being in general conformity with CDC's emerging Local Plan, evolving SK's policies to reflect the details being made available from CDC</li> <li>- Development boundaries. CDC's use of them in Principal Settlements only and the challenges presented by the large boundary in the Plan</li> <li>- Using criteria as a base for policies and avoid numerical limits (for example in number of houses, distances)</li> </ul> <p>Each policy was reviewed and the actions agreed are summarised in the meeting notes.</p>	<p>Present at meeting:</p> <ul style="list-style-type: none"> <li>- Ron Munroe (SKPC)</li> <li>- Sarah Powell (SKPC)</li> <li>- Tony Berry, CDC Councillor</li> <li>- Joseph Walker (CDC Neighbourhood Planning)</li> <li>- James Brain (CDC, Forward Planning)</li> <li>- Sophia Price (CDC, Heritage and Biodiversity)</li> </ul>
3 March / 3 April 2017	PC meetings	Reports on responses to pre-submission consultation	Minutes available on PC notice board and village website

2017	Technical Work on Plan	<p>Revision of policies following meeting with CDC ensuring that policies:</p> <ul style="list-style-type: none"> <li>- continue to reflect vision, aims and objectives of Plan</li> <li>- are criteria based</li> <li>- are in conformity with CDC's emerging Local Plan 2011-2031.</li> </ul> <p>(Note - CDC submitted its Local Plan for examination to a Planning Inspector in July 2017. The public hearings took place in October and November 2017 and the Plan was adopted in August 2018).</p>	
3 January 2018	Second post pre-submission consultation (2016) meeting with CDC	<p>Items discussed were:</p> <ul style="list-style-type: none"> <li>- Conformity of limits of development with CDC's Local Plan</li> <li>- Policy wording for conformity with CDC's emerging Local Plan, including referencing</li> <li>- Removing NDP Policies where there was unnecessary duplication of Policies in CDC's emerging Local Plan</li> </ul>	<p>Present at meeting:</p> <ul style="list-style-type: none"> <li>- Ron Munroe (SKPC)</li> <li>- Sarah Powell (SKPC)</li> <li>- James Brain (CDC, Forward Planning)</li> <li>- Sophia Price (CDC, Heritage and Biodiversity)</li> </ul>
8 January 2018	PC meeting	Report on CDC meeting and actions required to meet concerns	Minutes available on PC notice board and village website

9 April 2018	PC meeting	Latest draft agreed by PC and posted on village website	Minutes available on PC notice board and village website
April 2018	NDP NEWS 6	Update to the community on the reasons for the delay in reporting and actions taken since the last report	- Delivered to all households in the Parish
10 October 2018	PC meeting	Report that CDC advised a further pre-submission consultation take place in view of the passage of time since the initial one.	Minutes available on PC notice board and village website
November 2018	HRA Screening Report received	Confirmation from CDC that HRA Screening not required	
5 November 2018	PC meeting	Response from CDC to draft provided basis for further discussion and possible amendment following meeting with CDC	Minutes available on PC notice board and village website
3 January 2019	Preparation for second pre-submission consultation meeting with CDC	<p>Items discussed were:</p> <ul style="list-style-type: none"> <li>- Conformity of limits of development with CDC's Local Plan</li> <li>- Presentation of environmental data</li> <li>- Use of Housing Needs Survey data in NDP</li> </ul>	<p>Present at meeting:</p> <ul style="list-style-type: none"> <li>- Ron Munroe (SKPC)</li> <li>- Sarah Powell (SKPC)</li> <li>- Tony Berry, CDC Councillor</li> <li>- Joseph Walker (CDC Neighbourhood Planning)</li> <li>- Joanne Corbett (CDC Planning)</li> <li>- Sophia Price (CDC, Heritage and Biodiversity)</li> </ul>

7 January 2019	PC meeting	Report on successful CDC meeting and plan for new pre-submission consultation agreed	- Minutes available on PC notice board and village website
February 2019	NDP NEWS 7	Reporting on the further meetings with CDC and providing details of the forthcoming second pre-submission consultation	- Delivered to all households in the Parish
1 March 2019 - 12 April 2019	Second pre-submission consultation	Main document and appendices available on Somerford Keynes website throughout the consultation period. Hard copies available upon request from the Parish Council Clerk. Three consultation events held at Village Hall (28 <sup>th</sup> , 29 <sup>th</sup> and 30 <sup>th</sup> March 2019), at which main NDP document and appendices visually presented on display boards and consultees invited to provide comment on feedback sheet. More detail from the pre-submission consultation provided in the accompanying document.	- NDP News 7 - delivered to all households in Parish - Reminder published in community section of Wiltshire and Gloucestershire Standard (28 <sup>th</sup> March 2019) - All statutory consultees emailed at beginning of consultation period. - All businesses based in Parish emailed at beginning of consultation period. - Neighbouring Parish Councils and District and County Councillors emailed at beginning of consultation period.
1 July 2019	Report to Parish Council 12	Progress on supporting documentation, lack of clarity on LME boundaries and review of further information from CDC.	- Parish Council meeting

In addition to reports to the parish council listed above, a verbal report was made at every meeting. Details may be found in the Parish Council Minutes available on the Somerford Keynes website ([somerfordkeynes.org.uk](http://somerfordkeynes.org.uk)), as well as in the formal record.

## APPENDIX 1

### RESPONSES TO CONSULTATION ON PRE-SUBMISSION DRAFT (SUMMER 2016)

Response from the community were as follows:-

People who attended Village Hall Consultations - 47  
Overall support the Draft - 23 (21 by questionnaire, 2 by email)  
Responses with overall support for Draft with comment - 14 (11 by questionnaire, 3 by email)  
Comment from statutory consultees - 6 by email

Thus, of those in the community who gave an overall view, all supported the Draft.

Statutory consultees were Cotswold District Council, Gloucestershire County Council, Wiltshire Council, Swindon Borough Council, Gloucestershire Police, Gloucestershire Highways, Natural England, Historic England, Environment Agency, LEP, Local Nature Partnership, AONB, Cotswold Water Park Trust, Thames Water, Ashton Keynes Parish Council, Kemble Parish Council, Minety Parish Council, Oaksey Parish Council, Poole Keynes Parish Meeting, Siddington Parish Council, South Cerney Parish Council, Councillor Shaun Parsons, Councillor Tony Berry and Councillor Juliet Layton.

Below are comments ordered by the Policies in the Draft. There were some comments referring to the text and Appendices, which have been noted in the Appendices to this report.

Additionally, the CDC response was extensive and is included at the end of the community feedback. Responses to the CDC comments are made in this document, where appropriate. However, a number of the CDC comments were addressed in subsequent meetings, a summary of which can be found in the dates/activities table above.

#### **SKPOL1 - Characteristics of Settlements**

A number of key public vistas have been identified in Appendix 2 and shown on the Proposals Map (Key Vistas) as those that define the characteristics of settlements. Any proposal for development should protect and preserve these key vistas to ensure the continuity of the defining characteristics of the settlements.

#### **COMMENTS:**

Consideration of an additional vista (from Minety Lane) should be put into the Policy. Currently there is no vista that includes the River Thames, which is a key landscape feature of the village (resident).

Suggested Minety Lane vista, whilst an important landscape feature, does not define settlement characteristics so is not included.

Key Vista 2 is contrary to use of land adjacent to Church Lane as possible devt site in 2012 Parish Questionnaire (resident).

As part of the Housing Needs Survey a number of suggestions were made for possible sites for future development. Church Lane was suggested along with many other possible sites. The village also recognises the importance of the key vista along Church Lane, an integral part of which is the uninterrupted traditional Cotswold stone wall. It is for this reason that Church Lane has been excluded from development. However, this does not preclude development behind this wall providing that all the criteria in SKPOL1 are met and the key vista along Church Lane is maintained.

CDC (App 4)

Vistas have been selected and endorsed by community through two consultations as views that most encapsulate key characteristics that define settlement. It is acknowledged that the Neigh Bridge vista does not satisfy the criteria of defining the settlement characteristics so it has been removed from the vistas.

### **SKPOL2 – Location of Development of Permanent Housing**

Proposals for new permanent housing development will be supported if it is small in scale, is located within the settlement perimeter of Somerford Keynes as defined on the Proposals Map (Settlement Perimeter), Appendix 3, is immediately adjacent to existing development and is compatible with the surrounding character and setting.

### **COMMENTS:**

This policy refers to Appendix 3 the Somerford Keynes settlement perimeter. There is no key on the Appendix 3 map, we presume the blue dashed line is the one defining the settlement perimeter.

CDC (App 4)

Comments addressed in subsequent meetings.

### **SKPOL3 – Design of housing**

Proposals for new development of housing will be supported if the development:

- maintains the general principle of the 'ribbon' design of the villages, ensuring the existing open countryside views are not impacted

- complies with the Plan's Design Code at Appendix 4 in respect of the Cotswold Style, setting, harmony, street scene, proportion and materials
- provides for the safety of traffic and pedestrians in the (immediate) vicinity of the development
- does not increase the risk of flooding to any properties in the same settlement
- does not impact on any significant biodiversity or heritage interest

**COMMENTS:**

Design Code. Construction materials should include "reconstituted cotswold stone" as well as "cut stone" (resident).

Wording amended to state 'reconstituted stone' as suggested.

Bullet point 4 of Policy SKPOL3 (Design of Housing) is amended to read 'is not located in Flood Zone 2 or 3 and does not increase the risk of flooding to existing properties in the same settlement' (Environment Agency).

EA's statement accepted with reference to flood zone 2.

**CDC (APP 4)**

The word "ribbon" amended to "linear" and the word "negatively" added prior to impact in BP5. Other points addressed in subsequent meetings.

**SKPOL4 - Size of Housing**

New housing will be limited to small (two or three bedroom) houses, where the plot sizes comply with the following:

Two-bed house - plot size no greater than 250m<sup>2</sup>

Three-bed house - plot size no greater than 300m<sup>2</sup>

Applications for larger homes will have to demonstrate an exceptional specific housing need that cannot be met by 2 or 3 bedroom accommodation.

**COMMENTS:**

We support the proposals for small scale housing as this will help the vibrancy of the village (resident).

Comment noted.

We do not agree that NDP policy should impose restrictions on the size of new houses built in the village; or require developers to 'demonstrate an exceptional housing need that cannot be met by 2 or 3 bedroomed accommodation'. We consider that market forces in conjunction with the availability of suitable land for housing will provide sufficient response to meet local housing needs. (resident).

The Policy advocates the support for small houses to meet the housing objectives of the Plan. However, the wording of this policy will be reviewed.

**CDC (App 4)**

Comments addressed in subsequent meetings.

**SKPOL5 – first option to buy for local people**

All housing developments will be subject to conditions that, for the first three months from when the property is first marketed, the properties will be offered for purchase (at the market rate) to people who meet one of the following criteria:

- A person who currently lives in the Parish and wishes to move to a smaller property
- A person who has lived in the Parish for a continuous period of 5 years or more and is in housing need
- A person who is moving to the Parish to care for a dependent relative, already resident within the Parish, or to be cared for by a Parish resident

After this period, the property can be offered on the open market at the same advertised rate.

**COMMENTS:**

**CDC (App 4)**

The word “new” inserted as second word of policy. Other comments addressed in subsequent meetings.

**SKPOL6 – Holiday homes**

No additional holiday homes will be permitted within the existing development boundary (identified in Appendix 5) of the Lower Mill Estate over and above those that currently have planning permission. Proposals for purpose built holiday homes will not be permitted outside of the Lower Mill estate development boundary.

**COMMENTS:**

The policy to restrict holiday home development is welcomed. I hope CDC can support this policy in their Local Plan (Ashton Keynes PC).

Holiday homes boundary is incorrect (LME).

Boundary to be verified with CDC.

CDC (App 4)

Comments addressed in subsequent meetings.

**SKPOL7 - Business Use**

The use, and conversion, of existing buildings for small scale businesses will be supported if they meet the following criteria:

- There would be minimal impact on the environment from noise, pollution and traffic
- Sufficient off-road parking is provided
- Signage is appropriate for its rural setting
- The tranquillity of the setting will not be adversely affected
- Compliance with appropriate elements of the design code (set out in Appendix 4)

COMMENTS:

CDC (App 4)

Comments addressed in subsequent meetings.

**SKPOL8 - Settlement Protection**

Within the settlement protection boundaries around Somerford Keynes and Shorncote shown on the Proposals Map (Settlement Protection), Appendix 6, there will be no construction, development or minerals extraction, except that permitted by the Gloucestershire County Council Draft Minerals Local Plan or successor document, and that conforming to the criteria established within other policies in this Plan.

COMMENTS:

The purpose of a settlement protection boundary is laudable. However, the justification seems to restrict minerals extraction mainly. Minerals plans and policies are I believe outside the scope of a NP (Ashton Keynes PC).

It has been accepted that this Policy is outside the scope of NDPs and has been removed.

CDC (App 4)

As above.

Inclusion of policies re mineral extraction are outside remit of NDP and may lead to failing basic conditions. Consider re-working/removing Pol8 to remove all refs to mineral-related devt (GCC).

As above.

## SKPOL9 – Use of Former Minerals Extraction Sites

Developments proposals for low-intensity, tourism, recreational and business activities on former gravel extraction sites will be supported if:

- the proposed site is not designated as a local green space, local nature reserve or SSSI
- the development is outside the settlement protection boundary of the permanent settlements and at least 250m from any permanent dwelling within that boundary
- it is appropriate for an open countryside setting and it doesn't result in visual harm to the environment and/or the permanent settlements
- there is good access to the site from main public highways and sufficient provision is made for on-site parking
- there is no significant creation of noise and traffic nuisance
- biodiversity is protected and, where possible, enhanced
- public accessibility to the site is enhanced and provision is made for additional public rights of way and/or cycleways, particularly where there is the opportunity to connect existing routes and/or settlements

### COMMENTS:

Proposals for new activities will be supported if there is good access from highways and sufficient on-site parking. This is currently not enforced - how can numbers be controlled? Can yellow lines be painted on Spine Road and adjacent to KCP? (resident)

Whilst the frustration is understood, enforcement is not within the scope of an NDP.

Additional bullet point, "it does not increase flood risk." (EA) Also for SKPOL10 and SKPOL12

Relevant policies to be amended to include statement about flood risk.

### CDC (App 4)

Comments addressed in subsequent meetings.

Use of Former Mineral Extraction Sites, would benefit from a slight revision so as to better reflect emerging policy contained within the Submission Draft Cotswold Local Plan (June 2016) - see policy SP5, and the emerging Draft Minerals Local Plan for Gloucestershire (due to undergo public consultation from September 2016 onwards). An additional criterion is suggested, worded as follows - '...it takes account of the implementation of measures put in place as part of the approved restoration and aftercare scheme(s) associated with former mineral extraction' (GCC).

Comment noted and reference made to the emerging Draft Minerals Local Plan for Gloucestershire.

Generally agree with the policy's intention. In the case of Wiltshire, no development of minerals sites can be considered until operations have ceased and the required restoration plan is completed (Ashton Keynes PC).

Comment noted.

### **SKPOL10 – Keynes Country Park**

Proposals for development within Keynes Country Park will be supported if:

- they assist the Park's leaseholders in attaining or retaining Natural England's Country Park accreditation
- they include traffic management schemes to ensure that there is negligible traffic impact on nearby residents
- they do not generate any significant increase in noise

#### **COMMENTS:**

Recreational activities in Keynes CP to include traffic management schemes. This should require elimination of current failure to manage traffic as well as provision for further traffic (resident).

Support for the inclusion of traffic management schemes to be a condition of planning permission noted.

Parking - double yellow lines. This encourages parking on the grass. Also, Neigh Bridge car park fees have resulted in parking in the main road on the verges! (resident)

Whilst the frustration is understood, traffic and parking issues are not within the scope of an NDP.

#### **CDC (App 4)**

### **SKPOL11 – Tourism**

Initiatives to encourage sustainable tourism within the area will be supported in principle provided that they are compatible with or appropriate to the countryside setting, are compliant with other development policies and that they do not:

- have an adverse visual impact on the built and natural environment
- create significant noise and traffic nuisance

#### **COMMENTS:**

Amend BP1 to read, "---on landscape or the built - -" (GCC)

The policy has been amended to reflect this comment.

### **SKPOL12 - Renewable Energy**

Proposals for the development of renewable energy facilities will be supported provided that it can be shown that the activity would not conflict with the Policies of the NDP and in particular:

- would not adversely affect the areas which are of nature conservation importance
- would not adversely affect the quality and character of the landscape or of designated vistas of importance (identified in Appendix 2)
- would not result in irreversible loss of the best and most versatile agricultural land
- would not adversely affect the amenities or safety of local residents or other users of the countryside
- could be satisfactorily accommodated on or close to the existing road network without the need for significant changes, which would affect the character of the surrounding area

### **COMMENTS:**

Concern that 5 key points in this policy may not prevent renewable energy development in the field being the houses in Mill Lane (west side). Do not believe that it would be appropriate to have such development so close to houses and as such perhaps adding an addition point to this policy should be considered (resident).

Comment noted. Policy wording to be reviewed.

Some of the fields immediately behind houses, are not protected from developments such as 'solar panel farms'. Consideration should be given to the formation of a 'buffer' zone between houses and such developments (resident).

Comment noted. Policy wording to be reviewed.

Possibility of siting a wind turbine and using it for a telecoms mast (resident).

Comment noted.

### **SKPOL13 - Flooding and drainage infrastructure**

New development, whether constructions or excavations, should reduce the causes or impact of flooding in the area. Development, other than minor extensions, will be supported only with clear evidence that the site is suitably located in the areas of lowest probability of flooding. Development that results in an increased flood risk, either to the development site or to other land, will not be permitted,

No development shall commence until full details of the proposed drainage

schemes for surface water (including details of their routing, design, and subsequent management and maintenance) have been submitted to and approved by the planning authority; and no building shall be occupied until the drainage schemes have been implemented in accordance with the approved details.

The flood defences, all ditches and culverts affected by development proposals, should be maintained to ensure effective water management and the reduction of flood risk.

**COMMENTS:**

The wording "suitably located in the areas of lowest probability of flooding" is not clear. These words may be interpreted to mean no development except in flood zone 1. This excludes large parts of the village. Therefore, we do not support that wording. If what is really meant is "development that results in an increased flood risk will not be permitted", but the encouragement to reduce causes or impacts of flooding "would be encouraged" then this is already stated in the policy (resident).

Comment noted. Policy wording to be reviewed.

**CDC (App 4). Also para 9.3.1.1 comment**

Comments addressed in subsequent meetings.

**Extend to include ref to foul water and flooding from pluvial sources (Thames Water). See also Appendix 3 - Thames Water**

Comments noted.

**SKPOL14 - Footpaths and Cycleways**

Non-motorised transport links should be maintained and extended to facilitate safe and appropriate pedestrian and cycle routes within the Parish and link to wider networks. Planning applications that encroach upon existing cycleways, pavements and footpaths must make explicit the provision for their restoration, maintenance and/or enhancement.

**COMMENTS:**

**CDC (App 4)**

Comments addressed in subsequent meetings.

**SKPOL15 - Road safety**

Future developments must take account of their impact on traffic movements to discourage/avoid traffic movements which will adversely affect highway safety within the settlements.

**COMMENTS:**

**CDC (App 4)**

Comments addressed in subsequent meetings.

**SKPOL16 – TELECOMMUNICATIONS (Mobile Telephone)**

Proposals will be supported for structures designed to improve the mobile phone services in the Parish, provided that they are sympathetic with the local environment and the key vistas defined in Appendix 2. Where possible, such developments should utilise existing structures in order to minimise visual impact.

**COMMENTS:**

**SKPOL17 – Protection of Valued Community Facilities**

The following community buildings will be protected and developed as key community facilities:

- **Village Hall** -The maintenance and further development of the Village Hall, in the interests of the community, will be supported.
- **Parish Church** -The Parish Church will be registered as an asset of community value to continue to meet the needs of the community; and its surroundings and vistas will be protected.
- **Village Pub – Baker's Arms** -The Baker's Arms will be registered as an asset of community value to continue to meet the needs of the community.

**COMMENTS:**

Open space between Pendle and Croft Cottage should be registered as an asset of community value, as recommended by the inspector following an earlier planning application that was rejected (resident).

Whilst we recognise that this is a visual open space, it has not been nor is it currently used by the community.

**CDC (App 4)**

Comments addressed in subsequent meetings.

**SKPOL18 – Local Green Spaces**

The following open spaces are identified on the Proposals Map and designated as local green spaces to protect them from development:

- Neigh Bridge Country Park

- Village Lake (Lake 99)

Within these areas development will not be permitted other than in very special circumstances where the development is of greater benefit to the community than the space being lost and alternative provision of open space of equal value is made.

**COMMENTS:**

**GCC Property Management should be informed re Neigh Bridge (GCC).**

Comment noted. However, GCC is aware of the wish to designate Neigh Bridge a Local Green Space.

**As raised at PC AGM the "Gravel Patch" (Parish Field) should be included as a Local Green Space (resident).**

It is acknowledged that the Parish Field is a community open space. However, it does not fulfil other criteria such as tranquility.

**CDC (App 4)**

Comments addressed in subsequent meetings.

**SKPOL19 - Support for New Community Facility**

**SKPOL19.1 - Retail Facility**

The establishment of a small-scale convenience retail facility in the Parish in keeping with the community and its needs will be supported. Thus, a village shop either as an independent business or in combination with an existing community asset will be supported.

**COMMENTS:**

**Current planning policy wouldn't prevent such developments (CDC)**

Comment noted.

**SKPOL19.2 - Sports or Recreational Facilities**

The establishment of an open-air community meeting place/play area with, if appropriate, outdoor sports facilities including tennis courts and pitches will be supported.

**COMMENTS:**

**We would like to actively encourage (rather than just support) the opening of a village shop and more open air spaces (resident).**

Comment noted.

## **SKPOL20 - Signs and Signage**

Strict controls, within the law, must be imposed on outdoor advertising, signage, etc. Where signs are permitted under "deemed consent" the planning authorities should monitor to ensure strict adherence to the relevant regulations. Where "express consent" is required, the planning authorities should ensure that signs and signage takes account of public safety and amenity as required in the NPPF (including its impact on the amenity of the heritage and rural environment of the parish).

### **COMMENTS:**

At 10.3.4.1 in the Plan it is noted that some local signs have attracted adverse comment, and requires that such visual manifestations should be in keeping with the character of the surroundings. The excessive size and commercial brashness of many signs on the Spine Road should certainly be resisted, but elsewhere in the Parish each proposal should be judged on its own merits, with encouragement given for innovative contemporary graphics. Similarly, small individual hand-made signs should be encouraged, even if they break the rules of conventional good taste (resident).

Comment noted.

### **CDC (App 4)**

Comments addressed in subsequent meetings.

## **SKPOL 21 - Trees**

All ancient woodland and trees of good arboricultural and amenity value will be protected from loss to development. A tree survey should accompany any development proposals affecting such trees to establish their quality and develop a management plan for their maintenance and to ensure the protection of their immediate environs, e.g. to avoid serious root damage.

### **COMMENTS:**

## **SKPOL 22 - Biodiversity**

The natural environment and biodiversity of the parish, where affected by development proposals or otherwise, will be protected or enhanced, wherever possible. To this end:

- Development on sites that have a biodiversity importance and/or are designated as country parks, local nature reserves or local green spaces (Appendix 8) will be of small scale, low intensity leisure-based amenities serving residents and visitors making use of those locations
- Any development likely to have adverse impact on species or habitats will only be permitted following completion of an independent ecological assessment to the relevant local authority for endorsement. This should demonstrate how any

adverse impact will be mitigated or compensated.

**COMMENTS:**

**CDC (App 4)**

Comments addressed in subsequent meetings.

**SKPOL 23 - Heritage**

The environment of the Somerford Keynes conservation area and individual listed buildings and monuments will be protected from unsympathetic or inappropriate development. This means that:

- construction materials should be of a quality and nature consistent with the context of the conservation area and individual listed buildings
- the use of buildings should not be intensified where this would impact on the character and setting of the heritage asset.
- development should protect and, if possible, enhance the appearance and environment of the conservation area and individual listed buildings.

**COMMENTS:**

**Endorsed by CDC**

Endorsed by GCC who refer to the large number of nationally important finds and past settlements here

Design Code (referenced in SKPOL3)

**COMMENTS:**

The Somerford Keynes conservation area (it would be helpful if this was identified on the plans) is regulated by its own design and planning criteria. It is not clear whether the proposed Design Code (Appendix 4) is intended to apply to all the settlements in the Parish, and it is difficult to see how it would work at the 4 Acres site and at LME. It is therefore assumed that the Design Code would only apply to new housing in Somerford Keynes, since Shorncote is excluded from future housing development.

The Plan says (7.3.2.6) that the Design Code is not unnecessarily prescriptive, but in Appendix 4 there is a general requirement for new development to match and maintain existing building styles. Whilst there is a case for some uniformity with historic precedent, a Design Code should also promote innovative design, in which a sympathetic use of contemporary construction methods and materials is

encouraged. The following requirements in Appendix 4 appear to be unnecessarily dogmatic:

- Construction materials to match Cotswold reconstructed stone.
- Windows to be painted cream or white.
- Buildings to be set back from the road with front gardens.

This is a very rigid requirement: much of the 1970's housing laid out in this manner have a frontage space which is mainly dominated by car parking, and, despite the use of trees and boundary walls, this can produce something of a sense of disengagement from the village street. There are several instances in Somerford Keynes (and Shorncote) where older buildings abut directly on to the pavement/verge, thereby producing a stronger definition of the streets and lanes, and adding variety to the character of the village. (Examples include the Dower Court stable block, the Bakers Arms, Garden Cottage, Croft Cottage, The Coach House, April Cottage outbuilding, Yew Tree Farm outbuildings, The Old Bakery, Macks Farm, and Old Manor Farm, The Old Parsonage, and Church Cottage in Shorncote.) The CDC Cotswold Design Code shows good examples of traditional building styles, which is especially useful for new buildings in conservation areas, but it does not address the more difficult task of fitting 21<sup>st</sup> century buildings into a semi-historic context without resorting to pastiche. It is most important that the Plan does not unintentionally encourage layouts more associated with open-plan suburban environments (resident).

Comments noted. Design Code addressed in subsequent meetings with CDC.

## APPENDICES

### 1. LME email 13/06/2016

NDP

Page 9 it should be noted that the graph you use from Land Registry to show mean house prices is not correct. Lower Mill Estate Limited (LME) sells serviced plots of land and this is the figure recorded by Land Registry. The purchaser of that plot of land then self builds their own property. It should be noted that the red line indicates LME plot values and not the finished house sale value

This also has an impact on your commentary below the graph.

Text amended to reflect the way land is sold on the LME.

Page 15 foot note 1 to avoid confusion, the actual planning wording should be used which is: "the holiday units to be erected as part of the development shall be occupied for holiday accommodation only and for the avoidance of doubt shall not be occupied as permanent unrestricted residential accommodation or as principal or primary places of residence"

There has been a recent change in the definition of holiday homes. The text has been updated to reflect this.

Page 15 foot note 2 likewise the wording is 'The holiday units to be erected as part of the development will not be occupied from the sixth January until the fifth February inclusive in each year'. However it should also be noted that this condition has been lifted on a number of holiday units in line with permissions elsewhere across the Cotswold Water Park and the similar developments elsewhere in the Country where it has been recognised that the economic contribution in the close period is substantial.

There has been a recent change in the definition of holiday homes. The text has been updated to reflect this.

Page 22 SKPOL6 Holiday Homes The existing Lower Mill development boundary shown at appendix 5 is not correct. I attach the Zone C plan upon which it should be based and have highlighted on your plan where the difference is.

Guidance has been sought from CDC regarding a suitable boundary definition.

7.3.3.1 the reason for the 250m restriction is actually - "There shall be no buildings within 250 meters of the Spine road. REASON: to protect the amenities of neighbouring residents."

Comment noted.

7.3.3.3 The reduction of homes being bought in permanent settlements was actually only one of the rationales behind Lower Mill development. Others were tourism, employment and conservation management.

Comment noted.

7.3.3.3 It should be noted that in 2009 proposals were made to open the Lower Mill Estate facilities to the public but the application was opposed by the SKPC and CDC .

8.3.3.1 as 7.3.3.1 above

Comment noted.

Page 32 Fibre Optic broadband is not available at Lower Mill Estate

Comment noted.

2.Historic England email 15/07/2016

3.Thames Water (extract) 28/07/2016

#### Omission of a 'Infrastructure and Utilities' Policy

It is also important that developers demonstrate that at their development location adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users.

Thames Water consider that there should be a section on 'Infrastructure and Utilities' in the Somerford Keynes and Shornecote Neighbourhood Plan. The section should make reference to the following:

*Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.*

*Developers will be required to demonstrate that there is adequate wastewater and water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing wastewater and water infrastructure.*

*We would therefore recommend that developers engage with Thames Water at the earliest opportunity to establish the following:*

- the developments demand for water supply and network infrastructure both on and off site and can it be met;*
- the developments demand for sewage treatment and sewerage network infrastructure both on and off site and can it be met; and*
- the surface water drainage requirements and flood risk of the area and down stream and can it be met.*

*Thames Water must also be consulted regarding proposals involving building over or close to a public sewer. If building over or close to a public sewer is agreed by Thames Water it will need to be regulated by an Agreement in order to protect*

*the public sewer and/or apparatus in question. It may be possible for public sewers or water mains to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.*

*Further information for Developers on sewerage and water infrastructure can be found on Thames Water's website at:*  
<http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm>



## Comments on Somerford Keynes' draft neighbourhood plan

Please find below comments from **Cotswold District Council** (CDC) on Somerford Keynes draft neighbourhood development plan (NDP). In general these comments have been written to try to identify either points which in officers' views may not meet the Basic Conditions against which the NDP is assessed, or where the wording used may be open to interpretation. They may also upon occasion reflect possible tension between the district role of this Council, and the local role of Somerford Keynes Council (SKPC). So long as SKPC records how it has taken these comments into account, it is open to SKPC to proceed to examination without making changes CDC has suggested.

That being said, it is disappointing that many of the points raised below were also made as informal comments on an earlier draft. Where the District as Local Planning Authority advises that a policy may not meet the Basic Conditions, or is going to be problematic to implement, it is important to reflect upon that. Should the plan not be amended, it is likely the same point will arise during the examination. While it is the role of the independent examiner to determine where the NDP meets, or does not meet the Basic Conditions, this judgement will be made taking into account the representations made.

As another general point, throughout the plan some of the text is worded as if it were policy i.e. "should", e.g. p.30 "In the former case, installations **should** meet the standards of the Microgeneration Certification Scheme, which is supported by the Dept of Energy and Climate ..." For the sake of clarity, imperative language is best reserved for the policies themselves.

While the text is numbered, a number of policies have bulleted lists. Please could these be reworked as numbers or letters, to allow clear referencing?

Finally, after our comments, we have also listed out spelling and typographical errors. The examiner who undertook the Lechlade independent examination listed out such errors at the close of his report, so we feel it helpful to identify such errors at this earlier stage.

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**p.14** 'and to protect such development from later modifications which could violate this objective'

We cannot see any reference in policy or other text to restricting permitted development rights - which this sub-objective seems to be looking for (please note that the restriction of permitted development rights requires an article 4 directive, which would need to be a separate process from the NDP).

### **Page 15-16, Paragraph entitled Housing Stock**

The comparison between Cotswold District and Somerford Keynes house prices doesn't really bear scrutiny. The comparison between the mean value of all housing stock in the district, including flats, apartments, terraces, semi-detached and detached dwellings, with the value of relatively few properties that changed hands in the village, primarily semi-detached, is heavily skewed. A more accurate comparison would be with the value of similar stock in the district. We would suggest a reading and reference to the Strategic Housing Market Assessment or SHMA would be helpful. The point that can accurately be made is not that comparable house prices are higher, but that the existing stock is generally towards the higher end of the local housing market.

### **SKPOL1 Characteristics of Settlements**

We have a few concerns over this policy, as written. There is no right to a view within planning law, so trying to protect views through policy is very challenging. The form of the policy does not work well - the first line is explanatory rather than imperative - explaining purpose rather than the policy requirement. It is also not very clear. The policy would be improved if the first line was omitted, and clear reference to where the vistas are identified was made in the second line.

There needs to be a clear explanation of how these "vistas" were arrived at - what was the process of analysis? There is reference to the importance of the vistas in defining Somerford Keynes and Shorncote in 7.3.1.1, yet the vistas in the appendix only relate to Somerford Keynes. The presentation of the key vistas on Appendix 2 makes it difficult to understand how this policy is intended to work in practice. The 'splays' shown on the appendix suggest that it is solely the impact on a vista from this limited area that is of concern, but the photographs would suggest that development in a wider zone could be detrimental to the setting of the buildings - we note that the church and stable block are both listed - so their setting already has a degree of protection. Hatching or alternative shaded or the diagram would provide more certainty. 'Protect and preserve' is a very strong policy presumption against development per se. Assuming there is justification for such protection, the area(s) concerned should be clearly defined as such on the Proposals Map.

One wonders why the settlement perimeter has been drawn to include large areas beyond the fields, including these vistas. This needlessly invites development pressures to areas where protection is being sought. While the protection of the vista of Neigh Bridge is in keeping with the intent to designate as a Local Green Space, it arguably makes the reference here superfluous. It is hard to see how this particular the loss or retention of this vista impacts on the settlements themselves, despite that being the aim of this policy. The biggest risk to the vista would appear to be tree or shrub growth, rather than development, which cannot be addressed directly through the NDP.

As noted in earlier informal comments, the selective editing in Para. 7.3.1.2 referencing only one bullet out of a section gives undue prominence to a single factor, which is misleading. Adding '...' or similar would make it clearer that this is one of the factors to be considered.

### **SKPOL2 Location of Development of Permanent Housing**

Compared with the Development Boundaries commonly used in planning to determine where development would be acceptable, the settlement boundary used for this policy is very wide. To the extent that the policy only seeks to enable development next to existing buildings, this does curtail this area to some degree. However, it is reliant upon the interpretation of a subjective term 'small in scale'. While the justification explains that this is intended to cover both the size of buildings and the scale of development, it remains open to interpretation. The judgement of scale will be for the decision maker based on the application at hand, relevant local plan policies and relevant material considerations.

We understand there is an intent to protect the 'ribbon development' pattern of the existing village, but this policy does not curtail development behind existing buildings. We'd suggest use of linear or similar, rather than 'ribbon' which is often used as a derogatory term in planning.

Given that the plan appears to favour linear development, which by definition means along the roads radiating from the village, there is very limited capacity for additional housing within the proposed settlement perimeter. Would it not be better to look at each of those stretches of road and decide where development would be most suitable (for example building along Church lane could be linear development but falls within one of the vistas)? A more specific approach might be more certain and more understandable. It would also enable residents to comment on a more obvious allocation.

There's no rationale provided for the Settlement perimeter - the justification explains why you are proposing a policy, but it doesn't explain how the boundary has been arrived at. At this stage therefore, it is hard to see how you could justify where the line has been drawn if it's challenged - particularly during these consultation phases. Please add a key to the appendix to make it absolutely clear which line is the settlement perimeter.

Compared with the way we draw development boundaries, the settlement perimeter has been drawn too widely to bear any relationship with the settlement pattern - this policy enables development in a wide area, then the plan seeks to curtail this through encouragement of linear development patterns - policy 3.

The policy wording is unclear. The phrase 'will be supported' is somewhat equivocal - better to say 'will be permitted provided... (criteria)'. What is meant by 'permanent'? We suspect it seeks to draw a distinction with holiday accommodation, but you are seeking to tackle this issue in Policy 6 - better to just refer to 'residential development'.

### **SKPOL3 Design of Housing**

The phrase 'will be supported' is not that clear - better to say 'will be permitted provided... (criteria)'.

This policy references the 'ribbon' design of the villages, and not increasing the risk of flooding to any properties in the same settlement. This would suggest that it applies beyond Somerford Keynes itself - to Lower Mill Estate and Shorncote, yet other policies seek to prevent any development outside of Somerford Keynes. Reference to Somerford Keynes itself, rather than 'villages' or 'settlement' would reinforce this point, rather than create a degree of poor read across from other policies.

The final bullet references only biodiversity or archaeological interest, by inference to the exclusion of other landscape or heritage considerations, yet we would imagine given the other policies in this plan that the impact on trees and conservation area would also be a concern. As referenced above, 'ribbon development' is often a pejorative term. We don't wish to see significant densification in rural settlements, and would look to protect the linear character but we wouldn't wish to see small developments stretching out in the countryside, which in our view would negatively affect the character more than a well-designed development. To an extent your proposed settlement perimeter ought to protect against this, but as noted above, we have significant concerns over the robustness of that policy.

## **SKPOL4 Size of Housing**

The NPPF requires Local Authorities to:

'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);

identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand'.

Seeking to limit market provision to the extent envisaged in this plan does not provide for the range of needs and circumstances that people experience, and therefore it is open to challenge.

"However, it is recognised that there may be exceptional specific housing needs for the development of larger homes that should not be prevented. Examples include multi-generational living and homes that require space for disability adaptations".

Planning decisions are rarely based on the personal circumstances of the applicant - in part because ownership may be for a short time, whereas the building is likely to be around for much longer. We could not ensure that someone who gets consent to build a house for these reasons does not just sell it on.

This policy is highly impractical where housing development may be infill - where plot size will be determined by a number of practical factors, which could result in the most sensible arrangement being a larger plot - such circumstances may be unique but would perhaps struggle to be considered exceptional.

Limiting the size of new houses ought to improve affordability, but the interplay with other policies would undermine this - most notably the following policy.

## **SKPOL5 First Option to Buy for Local People**

We feel that this policy is a missed opportunity to make provision for affordable housing for local people - by seeking to be so restrictive to the immediate locality, this policy could limit the opportunity for working age people to locate into the village.

"All housing developments..." What does 'all' mean? This policy fails to consider that some developments may include a proportion of affordable housing for rent, or could be rural exception sites, which would not be offered on the open market.

Is this only intended to apply for the period when the property is first marketed - i.e. when it is first offered for sale, and not at the point of subsequent sales? Or is this intended to mean the first three months from when a property is put on the market, but not thereafter, should there be the frequent marketing and remarketing of a property prior to eventually sale?

Such a restriction on ownership rights does not fit well in planning policy. A broadly similar restriction does exist for former council properties within AONB and national parks (section 157 of the Housing Act 1985), but local authorities use this power with extreme caution, given the difficulties of enforcement and legal concerns over the infringements of property rights. Moreover, these restrictions apply to affordable housing, to roll forward the benefit of subsidised housing.

As a restriction on the legal title, this would have an impact on mortgage borrowing - banks cannot easily get their money out of a property, and therefore some are unwilling to lend, reducing the borrowing market options open to buyers. This would disproportionately disadvantage younger buyers and young families, and favour cash buyers.

The bullets defining 'local' could be improved. It is highly improbable that the second bullet can be used in practice - someone in housing need is defined in regulation as someone who cannot meet their housing needs on the open market, therefore by definition is someone who would not be able to benefit from the window of opportunity this policy seeks to provide. On this basis there is no bullet enabling local people to return to the village, other than in a caring capacity. Likewise, there's no criterion enabling residency for people looking to move to the village for work, which we'd expect to see here - bearing in mind the importance of enabling development for economic growth.

You need to develop a way of defining "lives in the parish" or "parish resident" - what happens if they have a house in the parish and it is their only house in the UK but they live abroad most of the time? What about people with houses in LME? What about a student whose parents live in the village? This is currently open to interpretation - our interpretation as the Local Planning Authority. In all comparable processes, there are various exemptions to such rules. Such a restriction would potentially create an undue delay on people in financial hardship, or bereavement or divorce.

### **SKPOL6 Holiday Homes**

This is a similar policy in effect to the policies made within the Lynton and Lynmouth and St Ives neighbourhood Plans, which restricts new

development to principal residences. As of May 2016, Cornwall Council was being taken to judicial review on its decision to put St Ives NDP forward for referendum. A key point to the examiner's findings are that the restriction was justified in terms of necessity and proportionality. The examiner's findings in St Ives was that:

'After much deliberation and on balance I have concluded that due to the adverse impact on the local community/economy of the uncontrolled growth of second homes, the restriction of further second homes does in fact contribute to delivering sustainable development. In terms of "delivering a wide choice of quality homes", I consider that the restriction could in fact be considered as facilitating the delivery of the types of homes identified as being needed within the community.'

The evidence provided in this pre-submission draft is focussed on residents' disagreement with the idea of further holiday homes - which while relevant to the thinking behind the policy and possible support at referendum, probably does not go far enough to justify this restriction. What is meant by "currently have planning permission"? The outline consent has run out so any new units need a new planning permission even though the total figure for the Outline permission has not yet been reached. We'd also challenge the use of 'currently' as this is not a fixed point in time. Furthermore, as a neighbourhood plan has no retrospective effect, all permissions in place at the time the plan is made will be unaffected by new policy; all new applications would be subject to it, so the expression is redundant.

Beyond the question marks over whether a neighbourhood plan is able to limit title to this extent, the biggest issue is probably enforcement - once permission is granted, what prevents a house being used as a holiday home/second home?

What about if an existing property at LME was to be sub-divided?

What about an application for low key holiday huts? eco lodges etc?

What happens if they brought other enabling benefits?

### **SKPOL7 Business Use**

This policy is clearly intended to enable some 'organic' business growth - but it is silent on the prospect of new build accommodation for businesses. While a neighbourhood plan is not required to have a full spectrum of policies, it is worth noting that on the issue of new build business accommodation, the Local Plan will continue to hold sway.

### **SKPOL8 Settlement Protection**

This policy reads as though it is intended to prevent any development except that enabled by the Mineral Plan, and other policies in this

Neighbourhood Plan. That would not fit with the Basic Conditions - as these two plans do not enable farm diversification or agricultural workers dwellings, new build business accommodation etc. this would not be in general conformity with the Local Plan, nor have regard to the NPPF. This policy seeks to give significant planning weight to the Draft Minerals Local Plan, which has not yet been examined (although we note the reference to successor documents) - any reference to other plans needs to be to adopted plans. If the intention of this policy is to create a buffer between minerals extraction and the settlement itself, it appears strange that this boundary appears identical to the Settlement Boundary proposed at Policy SKPOL2.

### **SKPOL9 Use of Former Mineral Extraction Sites**

We are concerned around the reliability on boundaries in this plan, given the limited evidence supporting their designation. However we believe the former mineral extraction sites within the proposed boundary will be protected as either village property or Local green Space (Village Lake and Neigh Bridge). On that basis an enabling policy for former mineral extraction sites is likely to be limited to the area outside the boundary, whether the boundary can be relied upon or not.

We're concerned about the intent to prevent development within 250m of permanent dwellings. What could be the harm from the change of use to a nature reserve? Low key fishing etc? This is overly onerous, and we do not believe in keeping with the presumption in favour of sustainable development - and thereby fails the Basic Conditions test.

The final bullet point is again too onerous, and appears to pre-suppose the nature of future use, by expecting public access to the sites, where this may not currently be the case, and where it may be inappropriate for particular business use.

A low key intensity use might complement a LGS or SSSI and not cause any harm - it could even be the establishment of a new country park. What is the evidence for the settlement protection boundary or the 250m? The LME precedent is not really evidence.

### **SKPOL10 Keynes Country Park**

This policy appears a proportionate and constructive approach to this site Community Proposal 1: Keynes Country Park, and subsequent community proposals.

Previous neighbourhood plan examinations have taken different views on the addition of non-planning policy projects or aims. Some examiners have expected such actions to be removed to an appendix, others have allowed actions to be picked up in a separate chapter. Given the cross-

reference to this policy we understand why it has been placed here, and we welcome the explanation of such proposals at p13. However, we suspect an examination recommendation may be to split these points out to a new section.

### **SKPOL11 Tourism**

[No comment]

### **SKPOL12 Renewable Energy**

[No comment]

### **SKPOL13 Flooding and Drainage Infrastructure**

It is worth noting that we can only expect new development to mitigate its direct impact, not to solve any existing deficiencies.

Planning policy does not have the power to exert a maintenance obligation on the owners of flood defences, ditches and culverts that may be affected by new development - these will not necessarily be part of any new planning agreement. On that basis the final line of this policy does not fit within policy. This point notwithstanding, Cotswold District Council does work to ensure such infrastructure is maintained.

Paragraph 9.3.1.1 The final line of this paragraph states 'It is essential, therefore, to ensure that future development impacting on surface water flow in and through the Parish includes detailed plans for mitigating any potential flood risk.' It is beyond the neighbourhood plan to be able to ensure this, as once made, the plan will only have effect within the parish boundary.

### **SKPOL14 Footpaths and Cycleways**

The first line of this policy is aspirational, rather than clear policy that can be delivered through development.

### **SKPOL15 Road Safety**

While road safety is an understandable concern, we are unable to use it to refuse development application except where impacts are severe or worse. A test of 'adversely affect highway safety' would make the neighbourhood plan more restrictive, and therefore is unlikely to meet the Basic Conditions

### **SKPOL16 Telecommunications**

[No comment]

### **SKPOL17 Protection of Valued Community Facilities**

Designation of a building as an asset of community value is not a planning policy, so cannot be done through a neighbourhood plan. While the parish may have an intent to add buildings to the local list of assets, this is a decision that can only be taken by Cotswold District Council, following a proper nomination. Such a nomination could be made now, in advance of

the NDP, or could be added to the plan as a community proposal, and actioned at a later date. Without a nomination being received, we cannot pre-judge whether such a nomination would succeed. We'd also like to note that the disposal of a church building is governed by specific rules which prevent disposal without community involvement.

Designation of property as an asset of community value does not automatically confer a particular degree of protection of the asset in planning terms (although in the case of pubs, it does remove certain permitted development rights). A number of emerging Local and Neighbourhood Plans are making specific reference to community assets in policy, which might better address the thinking behind this policy than the current draft.

### **SKPOL18 Local Green Spaces**

We see the identification of Local Green Spaces within a neighbourhood plan as a local issue, so won't comment on the sites proposed. Regarding the note underneath explaining the exclusion of the carpark at Neigh Bridge, it is worth noting that Local Green Space designation would not automatically prevent development that could improve access and enjoyment of the country park (NPPF para 89). We're pleased to see you've considered the CDC toolkit to present the case for designating green spaces - longer term this should help create some consistency across the district. The map on p41 is possibly sufficient, but we recommend the inclusion of a larger scale map of each site as an appendix, as this is an area neighbourhood plans have fallen down on at examination in the past.

In the policy it states "Within these areas development will not be permitted other than in very special circumstances where the development is of greater benefit to the community than the space being lost and alternative provision of open space of equal value is made." The provision of other open space will not always be appropriate. A proposal requiring planning permission might be fully compatible with the use of the site for LGS and therefore to ask for alternative provision would not be reasonable.

Para 10.3.2.2. Reference is made here to "the Cotswold Water Park wildlife corridor", but this is not defined or mapped or mentioned elsewhere in the documents.

### **SKPOL19 Support for New Community Facility**

It seems unlikely that current planning policy is a barrier to the establishment of community facilities of the kind referenced in this policy.

## **SKPOL20 Signs and Signage**

This is not a land use policy - you're not proposing new policy, but commenting on enforcement and emphasising the NPPF by which we are already bound. If the concern is one of enforcement - i.e. that the appropriate rules are in place - but in local opinion not being enforced - an action around this more properly fits as a Community Proposal.

## **SKPOL21 Trees**

[no comment]

## **SKPOL22 Biodiversity**

The policy states that "Development on sites that have a biodiversity importance and/or are designated as country parks, local nature reserves or local green spaces (Appendix 8) will be small scale, low intensity leisure-based amenities serving residents and visitors making use of those locations". There is no definition of biodiversity importance (the map and list at appendix 8 do not clarify this; the development could enhance biodiversity even if it was not small scale. Why should the use only be amenity? In fact, at 11.3.1.4. it states "However, it is acknowledged that sympathetic development which enhances opportunities to enjoy and understand these areas should not be excluded." This is all rather contradictory and not implementable and not consistent with the NPPF.

The wording for the second section of the policy is also unusual - "Any development likely to have adverse impact on species or habitats will only be permitted following completion of an independent ecological assessment to the relevant local authority for endorsement. This should demonstrate how any adverse impact will be mitigated or compensated" What is this endorsement? And what is "independent"? - who is paying? Ultimately, this policy only repeats what is in national guidance, albeit in less clear wording.

## **SKPOL23 Heritage**

The NDP would be a good opportunity for the community to identify any non-designated heritage assets.

The point about Conservation Area boundaries etc is noted.

## **12 Plan Delivery & Monitoring**

Bullet 1, references an intention to remain 'in conformity' with the CDC Local Plan and national legislation'. The proper test is 'general conformity'

which allows for a degree of variance to reflect local specifics, and 'have regard to' national legislation, which again suggests a degree of latitude.

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#### **Appendix 4 - Character Assessment and Design Code**

We find the categories a little confusing around open space. In section 2a on Somerford Keynes it states that 'There is, however, no public green space within the village as outlined on the accompanying map'. However it then goes on in para 6 on tourism and recreation to describe Lake 99 as "a quiet recreational facility", in the ownership of the village. While we're not sure of the legal status, and it may not be formally POS but it presumably acts in that manner. The LNR and the country park should be included as part of recreation (even though they may have a biodiversity value as well). The sites that are included in the biodiversity section exclude some areas of biodiversity value that fall in another category and are slightly confusing, for example Freeth's Mere SSSI falls within Lower Mill Estate. If you were not familiar with the area this would be quite difficult to follow.

Section 7 states: There are two local nature reserves; Coke's Pit and the Shorncote Reedbeds, Freeth's Mere SSSI and the Swillbrook Lakes. Of these sites only Coke's Pit is designated as an LNR. Our understanding is that Freeth's Mere is primarily designated as an SSSI for its aquatic plants, not for birds.

Land use map - We found the colouring on the map quite confusing. It also does not highlight where sites may have two different functions e.g. recreation and biodiversity.

Design Code section:

It would be useful for this to reference the new design code which forms part of the emerging local plan and is much more detailed than the previous version.

This section seems to be very prescriptive, even down to only allowing two paint colours for windows. Changing the colour of windows is in most cases permitted development. Also limits development to 2 storeys, would some 2  $\frac{1}{2}$  stories not be appropriate in some circumstances? The design code is a bit of a missed opportunity to influence works that are permitted development or extensions to existing properties. It also gives little scope for innovative contemporary design - for example if that design approach was followed you would not necessarily want to have a chimney on the building.

#### **Appendix 8 - Important Biodiversity Sites**

The map appears to show colouring that is not listed in the key.  
The LNR does not appear to be delineated on the map.

### Spelling and typographical errors

Bottom of p5; 'coterminus' should read coterminous

Section 2.6, top of p7, fourth bullet point under 'The Evidence Base';  
'emerging local plan' should read 'emerging Local Plan'

Section 2.6, Final paragraph; Close quote marks around 'References and Supporting Documentation'

p.8 'The area is rich in ecological resource; within the parish, one lake (Freeth's Mere) has been designated as a Site of Special Scientific Interest (SSSI) and there are three local nature reserves (Coke's Pit, Shorncote Reedbeds and the Swillbrook Lakes).'

There is only one designated LNR which is Coke's Pit. In the design appendix you refer to 2 LNRs. Most of the lakes within the parish are designated as part of the CWP Key Wildlife Site complex.

'Adjacent to the parish boundary are Clattinger Farm Special Conservation Area (SCA)'

This should read SAC.

### **Appendix 4 - Character Assessment and Design Code p10.**

'Trees to be planted where appropriate to **extent** the familiar element of mature trees within the settlements'

Should read **extend**.

## APPENDIX 2

### COMMENTS FROM THE PRE-SUBMISSION CONSULTATION 2019 WITH RESPONSES

Response from the community were as follows:-

People who attended Village Hall Consultations - 40

Overall support for the Draft - 26 (23 by questionnaire, 3 by email)

Additional responses with comment - 8 (3 by questionnaire, 6 by email)

Comment from statutory consultees - 3 by email

Statutory consultees were Cotswold District Council, Gloucestershire County Council, Wiltshire Council, Swindon Borough Council, Gloucestershire Police, Gloucestershire Highways, Natural England, Historic England, Environment Agency, LEP, Local Nature Partnership, AONB, Cotswold Water Park Trust, Thames Water, Ashton Keynes Parish Council, Kemble Parish Council, Minety Parish Council, Oaksey Parish Council, Poole Keynes Parish Meeting, Siddington Parish Council, South Cerney Parish Council, GCC Councillor Shaun Parsons and CDC Councillor Tony Berry.

There were some comments referring to the text and appendices, which have been noted at the end of this report.

Comments from the local planning authority, CDC, have also been incorporated into this document.

#### **SKPOL1 - Residential Development**

New residential development in Somerford Keynes will be supported if it:

- is small and proportionate in scale;
- is located within the defined limits of Somerford Keynes (shown on the map in Appendix 2);
- is adjacent to existing development;
- is compatible with the surrounding character and settlement;
- maintains the existing linear pattern of Somerford Keynes, ensuring the existing open countryside views are not adversely impacted;
- comprises housing that is limited to small (two or three bedroom) houses with modest plot sizes consistent with the specification in paragraphs 7.3.1.7 and 7.3.1.8;
- does not increase the level of flood risk to the occupiers of the site, the local community or the wider environment AND
- contributes to and enhances the historic and natural environment by:

- being in accordance with the Cotswold Design Code
- reflecting the analysis in the Character Assessment (appendix 3) and
- taking account of the key local features listed in table 7.3.1.9.

#### COMMENTS:

I disagree with the policy of limiting new housing to small houses (resident).

Previous consultations have shown a majority view for smaller houses as detailed in para 7.3.1.6 and 7.3.1.7.

I disagree that there should be a size limit on new houses built in SK, I think that we should maintain the ratio of smaller to larger houses (resident).

Previous consultations have shown a majority view for smaller houses as detailed in para 7.3.1.6 and 7.3.1.7.

We are concerned about the designated area of the NDP being extended to the end of Water Lane as we have always been under the impression (due to previous planning applications) that Macs Farm would not be incorporated into the housing stock on the south side. We are also concerned about the amount of low lying water between our house and the farmhouse after heavy rain - we believe development on the land will cause localised flooding (resident, comment received after close of consultation period).

It was agreed at the initial stages in the development of the Plan that the Plan would not include designated sites. As a result, the limits shown on appendix 2 show only the extent to which development may be permitted subject to ALL the criteria in SKPOL1 including flood risk.

The NDP has to be in conformity with CDC Local Plan. Policy DS3 concerns Small-Scale Residential Development in Non-Principal Settlements, such as S.K. Development Boundaries have not been defined around rural settlements nor land specifically allocated for residential development.

The question does arise whether the Defined Limits to linear development in NDP Policy SKPOL.1 constitute a "Development Boundary". In this context a boundary is a line which marks the limits of an area; the black lines on Appendix 2 show the proposed limits of linear development and do not, in my view, conflict with Local Plan Policy DS3.

An NDP can allow for identifying sites that are appropriate for small affordable housing development. In the S.K. context I consider it would be preferable not to do so but to weigh individual planning applications on their merits against Local Plan and NDP policies (resident).

These comments reflect the intention of this policy and the response from CDC also acknowledges that SKPOL1 is in general conformity with CDC's Local Plan.

Bit of a bizarre policy on housing size/plot size - it wants to limit the plot size to minimise options to extend a two/three bed house.... As it is a maximum plot size, any developer is going to make the plots as small as the market wants (and maximise the number of units), which automatically assists with the NDP objectives of maximising the number of small houses on small plots.

I don't know why the plan has specified quite large plots, which it seems to think are small plots. Eg the draft policy thinks it's efficient use of land to have a two bed house with a 13m wide plot with a single garage on the side.

These plot sizes are way bigger than you need for a two bed house. You could fit a four bed house on no problem or 2 x 2bed houses. A good example would be to measure the width of a typical house on Water Lane, I bet that is within 12-15m. You build a small house with a single garage on the side on a 13m wide plot and immediately the buyer converts the garage and extends above it to make a bigger house.

And you try parking in a space 4m long in front of your house and see if you can fit a car in it. Does everyone have to drive a smart car? A standard parking space in a supermarket is 4.8m long and they are not big enough for modern cars which have got a lot larger (resident).

It has been recognised that the plot dimensions given in paras 7.3.1.7 and 7.3.1.8 were over prescriptive. As a result, these paras have been amended giving more flexibility to building design but continuing to recognise that larger plots may be required where there is no mains drainage.

I believe that the Somerford Keynes NDP Document is an excellent piece of work and a credit to those who drew it up. I do however have a problem with the SKPOL.1 clause (b) which concerns future development.

#### The problem

- Both the old and new District Local Plans had Somerford Keynes classified as one of the 160+ villages and hamlets that are not sustainable because of a lack of facilities: no school, shop, etc. and therefore have no defined Development Boundaries (LP. Policies DS 2-3). A requirement of an NDP is however to identify new areas for development.
- The housing needs survey identified a desire/need for some limited, smaller, lower cost housing,
- \*The limits currently shown in the NDP Policy SKPOL.1 (b) and Appendix 2 (stop lines) are however a "broad brush" approach which allows several potential areas for development that could extend to about 20 -30 units depending on size. It in effect creates a "Development Boundary" around the whole of Somerford Keynes contrary to the CDC Local Plan Policy DS3.

- In a note to SKPC on 7<sup>th</sup> Jan 2019 we were told that: "The CDC had reservations about our wish to adopt development limits in accordance with SKPOL1, since they were concerned that this may be in conflict with Local Plan DS3. After considerable discussion, particularly about the northern limit, it was accepted that CDC would not object to this element, but the Examiner MAY remove it if he/she believes that it is not in conformity with DS3."
- The PC has been earlier given a review from the CDC Planners in October 2018 which spelt out their reservations:  
*"Clause b). This clause doesn't 'conform' with the Local Plan's policies DS 2-3, in that we don't define development boundaries outside of our principal settlements, and this enables development beyond infill. That said, the impact is clearly local to Somerford Keynes, and does not undermine our strategy at a district level. This may well be judged therefore to be in 'general conformity'. Wherever a boundary is defined in policy, we'd suggest an evidence base is required to justify what is 'inside' and what 'outside' (e.g. the Local Plan determines the scale of development that needs to be accommodated, maps constraints and makes allocations, then draws boundaries around the proposed sites and existing building). We can't see exactly why these lines have been drawn exactly where they are, which invites a challenge - if development is acceptable up to the line, why not over?"*

#### A solution

- Remove the stop lines on all the roads radiating out from the village shown in Appendix 2 which, in fact, do define a "Development Boundary" contrary to CDC LP policy DS3.
- Include specific area(s) for development such as the main road out to the Ewen turn which would extend the linear development outwards from the northern edge of the village. This area would allow some limited development and conform with both the Local Plan, the requirements of the NDP and the housing needs survey.
- All the other areas included in the current Policy have problems due to flooding, access and drainage but this site to the Ewen turn is clear of any such problems and, in fact, some of the other sites have previously been turned down on appeal for those problems.
- It conforms with all the other requirements included in the NDP SKPOL.1 for limited, smaller, lower cost Housing (resident).

Paragraph one seems to be confusing the Neighbourhood Plan with the strategic Local Plan. Para 29 of the NPPF 2018 states that "*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic*

*policies". Given that SK is not designated as sustainable in the CDC Local Plan and is not required to contribute to the housing plans, there is no requirement on the NDP to "identify new areas for development", though it may do so, of course. From the outset, in 2014, the Parish Council agreed that support for future development will be entirely criteria based.*

The second paragraph confuses the need for affordable homes, identified by the HNS as one family, and the wish to adjust the housing stock to allow for some smaller property. This is reflected in the Policy, meeting the wish of residents to remain in the village whilst downsizing as well as supporting the development of smaller homes to encourage younger people to move into the village.

The remaining text conflicts with opinion of other respondents and with the response of CDC, which states:-

*"While this policy does not create a development boundary, it does try to define the limits of growth by creating defined limits along the main routes. This is a departure from the Local Plan approach, but this is then tempered by a requirement that development is adjacent to existing development, which then swings back to conformity with DS3.*

We recognise that the designation of specific locations for development is entirely consistent with an NDP. In our case, however, it was established at an early stage, in early 2014, through discussion with the community and the Parish Council, that this would not be appropriate. Instead, given the limited availability of suitable land, the normal planning process should apply, taking account of ALL the criteria in SKPOL1. This has been endorsed on numerous occasions over the years that the Plan has been in development.

*We very much welcome the Somerford Keynes Development Plan and appreciate all the hard work that has gone into it.*

*We particularly welcome the residential development policy SKPol1 with its emphasis on linear development, preserving existing outlooks, and small scale housing.*

*We wanted to draw to your attention to the fact that although Appendix 2 ( defined limits of linear development) shows that a limit is placed at the junction of Church Lane with the main village street, that limit is not verbally listed in paragraph 7.3.1.4*

'To maintain this settlement envelope, defined limits for development are the River Thames by Neigh Bridge, Spine Road West, Water Lane / Spratsgate Lane junction and Ewen Road fork, as shown in Appendix 2, '.

We feel this limit should be expressed verbally within this paragraph as well as visually in the diagram to ensure there is no ambiguity (resident).

This omission has been rectified in the justification included in paragraph 7.3.1.4.

The proposed defined limits of Somerford Keynes' linear development (appendix 2) do not include Church Lane, which as been suggested by a good number of the parish in previous consultations, for the location of 'small barn-style housing' primarily for current parish residents wishing to downsize but also for potential new buyers to move into the parish.

The proposed linear defined limits of Somerford Keynes are not straight-line and could be argued as more ribbon limits, which support the inclusion of Church Lane.

Small development there would not compromise the Key view (SKPOL13 & Appendix 7) aspect as it is outside of it and beyond hedging (resident).

As part of the Housing Needs Survey a number of suggestions were made for possible sites for future development. Church Lane was suggested along with many other possible sites. The village also recognises the importance of the key vista along Church Lane, an integral part of which is the uninterrupted traditional Cotswold stone wall. It is for this reason that Church Lane has been excluded from development. However, this does not preclude development behind this wall providing that all the criteria in SKPOL1 are met and the key vista along Church Lane is maintained.

Para 7.3.1.11 - It is suggested that to seek to restrict any new development at the village of Shorncote based on the lack of services or community facilities will be an error as, well controlled new development could lead to those very services developing (Hills Group).

The scale of development necessary to introduce and sustain new community facilities would be such as to change substantially the nature of the settlement, something that has not met with support from the community.

CDC:

**p18 SKPOL1**

*It would be useful if the bullet points were numbered or lettered, to enable easier reference – in our comments we have ascribed ‘letters,’ based on order.*

We support the NDP’s intent to allow some small scale development, but this is a complex policy, which takes a different approach to the Local Plan.

Outside of our principal settlements, the District Council does not define settlement boundaries but instead development is managed through Policy DS3.

While this policy does not create a development boundary, it does try to define the limits of growth by creating defined limits along the main routes. This is a departure from the Local Plan approach, but this is then tempered by a requirement that development is adjacent to existing development, which then swings back to conformity with DS3.

**Clause f)** seeks two or three bedroom properties only – Please note that affordable housing is delivered to meet need, which is often for 1 bedroom (a single person or couple with no dependents would only qualify in terms of housing need for a single bedroom).

LP Policy H1- Housing mix and tenure, states in clause 1) that; ‘All housing developments will be expected to provide a suitable mix and range of housing in terms of size, type and tenure to reflect local housing need and demand in both market and affordable housing sectors, subject to viability...’.

While we understand the intention of your clause, it may prove too restrictive – we would suggest a reference to Policy H1 instead.

Bullet points have been given a letter.

Clause f has been modified to include properties of up to, and including, three bedrooms and policy H1 has been referenced. We appreciate that the purpose of this clause has been recognised and we hope that it can be used to provide a suitable mix and range of housing in the Parish.

**Clause b).** This clause doesn't 'conform' with the Local Plan's policies DS 2-3, in that we don't define development boundaries outside of our principal settlements, and this policy enables development beyond infill. That said, the impact is clearly local to Somerford Keynes, and does not undermine our strategy at a district level. This may well be judged therefore to be in 'general conformity'.

Wherever a boundary is defined in policy, we'd suggest an evidence base is required to justify what is 'inside' and what 'outside' (e.g. the Local Plan determines the scale of development that needs to be accommodated, maps constraints and makes allocations, then draws boundaries around the proposed sites and existing building). We can't see exactly why these lines have been drawn exactly where they are, which invites a challenge – if development is acceptable up to the line, why not over? We would note the defined limit in the east may conflict with the Local Nature Reserve to the north of the road – we assume this is not considered developable – we'd advise an explanation of this within the Reasoned Justification. An alternative approach you could consider would be to explain in more detail Clause 'f' ('maintains the existing linear pattern...') in the reasoned justification to guide development to the indicative areas you find acceptable.

More explanation has been provided on the rationale for the positioning of the lines. Similarly, sites that are located on the line of possible development but not suitable have been stated (such as Cokes' Pit Nature Reserve).

### **SKPOL2 – First Option to Buy for Local People**

New housing developments will be subject to conditions that, for the first three months from when the property is first marketed, the properties will be offered for purchase (at the market rate) to people who meet one of the following criteria:

- a person who has lived in the Parish, as their permanent residence, for a continuous period of 5 years or more;
- a person who is moving to the Parish to care for a dependent relative, already resident within the Parish, or to be cared for by a Parish resident.

After this period, the property can be offered on the open market at the same advertised rate.

### **COMMENTS:**

**I disagree with the policy of restricting the first option to buy for local people because this is rather discriminative (resident).**

The purpose of SKPOL2 is to provide people with local associations to have a small advantage in the purchase of new properties. This kind of

provision occurs in other popular tourist areas. To that extent it IS discriminatory in a very limited way.

However, it should be noted that the Policy relates ONLY to new build properties when they first come onto the market and is limited to a three-month period, after which they would be available to all. It is hoped that this might facilitate young people returning to their home community but it represents a very small additional hurdle for any potential newcomers.

I disagree this discourages diversity and new families from living in the village (resident).

Please refer to the previous response.

Hills would question how this policy would be implemented as the issue is not a planning matter and therefore unlikely to be a defensible planning conditions. The Policy also does not address the housing needs of someone coming to work in the area (Hills Group).

Whilst acknowledging the planning issue, it should be noted that this Policy is limited to a three-month period on the first occasion that a new property comes to the market. Whilst this may be seen as discriminatory in favour of local people, it is extremely restricted and short lived.

CDC:

p22 SKPOL2

As you are aware, we have reservations about whether the First Option to Buy policy is acceptable. To our thinking, it doesn't have regard to the NPPF or Human Rights.

As the process of sale and occupation is not part of the development management process, we're not sure how this would be implemented, or indeed enforced, nor indeed what proportionate enforcement might be. We do not believe that there is sufficient evidence presented to support this restriction.

We'd also observe that in many instances, small scale 'in-fill' development is 'self-build' – that is commissioned by the intended occupier, and so wouldn't be captured by this policy.

We think the definition includes students but not people who move for work (as not defined as a parish resident).

We read this policy as limited to 'at first occupation'.

We accept this Policy is restricted to commercial new-build homes 'at first occupation'. It is intended for those that may wish to downsize and / or long-standing connections with the Parish and gives them an early opportunity to buy new-build houses. The justification now makes this clearer.

### SKPOL3 - Holiday Homes

Proposals for purpose built holiday homes will be permitted only within the Lower Mill Estate development boundary (identified in Appendix 4).

#### COMMENTS:

Appendix 4 of the NDP shows the Development Boundary extending to the Swill Brook boundary.

To quote from the NDP: "*The planning permission for the Lower Mill Estate (application CT.6441/J, 1998), through its masterplan, set out the location of the proposed dwellings so specifying a development boundary within the estate, with all building and permissions for buildings contained within the boundary. Correspondence relating to the application ensured that all development of holiday units is confined to Zone C (as defined in the CDC Supplementary Planning Guidance, 1998) areas as well as removing development from the Swill Brook corridor and maintaining the distinctiveness of Somerford Keynes village by having no buildings within 250m of the Spine Road. The total number of permitted holiday homes is 575. This policy preserves these planning restrictions.*" (My emphasis)

I do not see the justification for extending the LME to the Swill Brook boundary as shown in Appendix 4 (resident).

Advice has been sought on the boundary and the revised policy wording provides for a boundary for holiday home development only.

Hills object to this Policy as prejudices any planning applications that may be forthcoming in the future. The case is made that holiday homes at Lower Mill have contributed little in provision of additional amenities or facilities, but that may not be the case for other developments. Additional pollution traffic and noise is noted as having arisen as a result of the Lower Mill development, something that the planning process would now scrutinise carefully before consents are granted. It is hardly surprising that the existing residents, whether part of full time disagreed with more buildings in the Parish. The results would be similar for every location in England. The benefits to the local economy, beyond the local pub in terms of employment and monies spent haven't been given any consideration.

The alternative wording could be "*Proposals for holiday homes must be rigorously supported with both the environmental and economic case demonstrating benefit to the Parish*" (Hills Group).

Para 7.3.3.2 details the strong opposition within the community to the establishment of further holiday home developments, which are no longer part of the CDC housing development strategy in that CDC's Local Plan 2011-2031 no longer encourages or pursues the development of holiday homes.

I note that The Lower Mill Estate Development Boundary in appendix 4 has been revised from the previously agreed position that you accepted following our last communication on the matter on 13<sup>th</sup> June 2016.

Unfortunately, your revised plan is incorrect and as such cannot be included in the NDP in its current form.

I attach a letter and three attachments from our planning consultant Alder King which which sets out the facts and revisions required to correct your plan.

I also re-attach the plan I sent you in June 2016 as to the correct extent of Zone C in regard to Lower Mill Estate.

To be very clear, the Owners of Lower Mill Estate are not proposing holiday home development on the eastern side of their landholding within Zone C but they do wish to see that the Somerford Keynes Neighbourhood Development Plan, when adopted, reflects the true planning position of their landholding within the community (LME, Habitat First).

The revised proposed LME Development Boundary reflects maps from existing permitted development and the CDC's recently adopted Local Plan 2011-2031 which no longer incorporates zoning in the Water Park to provide guidance on appropriate uses of lakes. As a result, the zone C lakes were removed from the previous LME Development Boundary.

Following further discussions with CDC and LME, the policy wording has been revised to be very clear that the development boundary applies only to holiday home development and the remainder of the site should be in conformity with SKPOL4 and CDC's SP5 for future development.

CDC:

## **p22 SKPOL3 - Holiday Homes**

This policy could only apply if a planning application came in explicitly for a holiday/2<sup>nd</sup> home, yet such development is not promoted as such in LP policy anymore, so it is hard to envisage that such a proposal would come forward. There is nothing preventing a house being built elsewhere, and then being used as a holiday home. On that basis we doubt that the circumstances that would 'engage' this policy will come forward, making it superfluous.

The development of holiday homes is an emotive issue with residents in the Parish and, as a result, we believe it is important that the NDP includes a policy on Lower Mill Estate. We understand that this policy is restricted to purpose built holiday homes.

## **SKPOL4 - Tourism and Use of Former Mineral Extraction Sites**

Development proposals for small-scale, low-intensity, tourism, recreational and business activities on former gravel extraction sites will be supported if:

- the development does not have a detrimental effect on any residential dwellings;
- it is appropriate for an open countryside setting and it does not result in visual harm to the environment and/or the permanent settlements;
- there is good access to the site from main public highways and sufficient provision is made for on-site parking;
- there is no significant creation of noise and traffic nuisance;
- biodiversity is protected and enhanced AND
- public accessibility to the site is enhanced and provision is made for additional public rights of way and/or cycleways, particularly where there is the opportunity to connect existing routes and/or settlements.

## **COMMENTS:**

Hills Group supports this policy (Hills Group).

Your support is noted.

## **SKPOL5 - Keynes Country Park**

Proposals for development of recreational activities within Keynes Country Park will be supported if:

- they assist the Park's leaseholders in attaining or retaining Natural England's Country Park accreditation;

- they include traffic management schemes to ensure that there is negligible negative traffic impact on nearby residents and other road users;
- they do not generate any significant increase in noise.

**COMMENTS:**

None

**SKPOL6 - Footpaths and Cycleways**

Proposals for improvements to or for new cycleways, pavements and footpaths will be supported where they enhance or extend existing provision, particularly, where possible in the locations shown on plan 9.3.1.4 and / or to achieve better linkages to Ashton Keynes, Kemble (including the railway station) and Cirencester.

Planning applications that encroach upon existing cycleways, pavements and footpaths must make explicit the provision for their restoration, maintenance and/or enhancement.

**COMMENTS:**

FP1 - footpath from village hall to Coke's Pit - road here is already narrow and adding a footpath will make it narrower still on what is a blind bend. (resident).

The desire for a footpath in this location resulted from the Parish Plan consultation. The challenges of creating this footpath are well understood.

We also very much support policy SKPOL6 - the development of cycle and pathways to link locations in the area (resident).

This comment has been acknowledged.

Sensible policy especially in this time of more people being encouraged and wanting to spend time in the countryside. A couple of issues faced by landowners and footpath users that should be part of this policy are:

- the prospect of finding / walking in dog excrement along the paths as it has not been bagged by its dog walker. (In fact, it is probable that this enters the food chain via livestock grazing the land and eating the food produce from it).
- Owners allowing their dogs to run freely / roam around the fields / property because they are NOT on leads or under close control (interpreted as within 5m of the owner). Dog walkers would not want the above happening on their own property / garden (resident).

The sentiments of this comment are fully understood. However, the

behaviour of users of footpaths across private land is not a planning manner.

### **SKPOL7 - Flooding and Drainage Infrastructure**

Policy INF8 of the CDC Local Plan recognises the importance of measures to control and mitigate flood risk. Developments must be sensitive to the flood risk within the Parish, particularly including:

- the areas shown on the drains map (Appendix 5) adjacent to the Thames at Old Mill Farm and the southern part of Shorncote;
- the impact on inflow to the County Ditch as it approaches the eastern boundary of Somerford Keynes;
- the area around Mack's Farm at the eastern end of Water Lane, including both culverts and ditches;
- the field immediately to the north of Water Lane.

#### **COMMENTS:**

#### **CDC:**

#### **p36 SKPOL 7**

This refers to a specific policy within the Local Plan. This is acceptable, but perhaps the policy requirement should be to follow the Local Plan, with the reference in supporting text, so that the policy could survive a review of the Local Plan.

Accepted and amended.

### **SKPOL8 - Telecommunication Infrastructure**

Proposals will be supported for structures designed to improve the telecommunication (including broadband and mobile) services in the Parish, provided that they are sympathetic with the local environment. Where possible, such developments should utilise existing structures in order to minimise detrimental visual impact.

#### **COMMENTS:**

None

### **SKPOL9 - Protection of Valued Community Facilities**

Development proposals to maintain or expand community use of Key Community Facilities will be supported, as will the sympathetic development of new facilities. Change of use and/or development of Key Community Facilities that

would result in their loss or would be detrimental to the community will not be supported.

The Key Community Facilities are:

- the Village Hall;
- the Parish Church of All Saints;
- the village pub - the Baker's Arms.

#### COMMENTS:

Justification (10.3.1.3) - Shorncote does not host frequent regular services, but does host an annual service which is very well attended (more so than most at Somerford Keynes) - and this is an annual "fixture" much loved by our residents (resident).

Paragraph updated.

#### CDC:

##### p41 SKPOL9

While we support the intent of the policy, we would suggest its main impact is to identify community facilities. Have you considered a direct reference to INF 2 in the Local Plan – it would be useful if there is clarity whether the intent is to replace or rely upon this policy.

**p42** The final line references the registration of the public house as an asset of community value. The phrasing is not that clear – it references the community's wish to have it registered, but not that it actually has been registered. We would note however that this original listing will expire within this plan's lifetime. Therefore the simplest wording is probably a direct factual statement:

'Its significance may be gauged by ~~the wish locally to have it registered~~ **its registration in 2019** as an asset of community value'.

It is our intention to rely upon Policy INF2 so supporting text has been modified.

Also, the text has been modified to reflect that the Bakers' Arms has been registered as an asset of community value, which occurred after preparation of the consultation draft.

##### SKPOL10 - Local Green Spaces

The following open spaces identified on the Proposals Map, and shown on the map below, are designated as local green spaces:

- Neigh Bridge Country Park;

- Village Lake (Lake 99).

Development will only be permitted within a Local Green Space according to clause 2 in CDC's policy EN3.

**COMMENTS:**

**CDC:**

**p43 SKPOL10**

As noted at SKPOL7 above, there is reference within the policy to a specific policy within the current Local Plan. A reference to follow the Local Plan, rather than the specific policy could enable the policy to remain current should the Local Plan be updated – we'd suggest the specific current policy be referenced in the Reasoned Justification.

Noted and amended.

**SKPOL11 - Support for New Community Facility**

**SKPOL11.1 - Retail Facility**

The establishment of a small-scale convenience retail facility in the Parish in keeping with the community and its needs will be supported. Thus, a village shop either as an independent business or in combination with an existing community asset will be supported.

**SKPOL11.2 - Sports or Recreational Facilities**

The establishment of an open-air community meeting place/play area with, if appropriate, outdoor sports facilities including tennis courts and pitches will be supported.

**COMMENTS:**

**None**

**SKPOL12 - Outdoor Advertising and Signage**

Outdoor advertising and signs necessary to support sustainable economic activity will be supported provided that it is:

- small-scale, taking account of the rural environment;
- sympathetic in design to its locality;
- not a distraction to motorists AND

- cognisant of public safety and amenity

**COMMENTS:**

Justification (10.3.4.3) - while I fully agree with the noting of strict controls, I do not agree that planning authorities do in fact ensure strict adherence - surely the awful 'camping' sign at the entrance to the village should be removed (resident).

Enforcement matters are outside the scope of NDPs. This matter has been referred to the Parish Council.

**CDC:**

**p45 SKPOL12**

We don't think this adds anything extra to the existing regime— examiner's approach to duplicatory or 'aspirational' policy can vary a little, but generally we'd prefer NDPs avoid parallel policy making which may lead to some confusion as to what policy should be followed.

Whilst recognising the elements of repetition we do not believe that they are in conflict in any way with the Local Plan. Indeed, the legislative and regulatory position with regard to signs is acknowledged in the Justification for this Policy (paras 10.3.4.1 - 3). However, the community has been concerned increasingly with the relatively high density of signage appearing locally which it believes to be out of keeping with the true nature of the local environment. SKPOL12 responds to that concern whilst, of course, not wishing to unduly hinder the success of local businesses.

**SKPOL13 - Key Views**

In accordance with CDC's Local Plan Policy EN4 clause 2, the key views of the Somerford Keynes Parish include:

- the view from the public footpath (BSK13) looking towards Manor House, All Saints Church and Somerford Keynes House;
- the view along Church lane towards All Saints Church;
- the view of Dower Court and the main Street, heart of the conservation area;
- the view of All Saints Church, Shorncote, and the village from the lane.

These are shown on the Proposals map in Appendix 7.

**COMMENTS:**

**CDC:**

**p49 SKPOL 13**

As per the comments at SKPOL7 and SKPOL10 above.

Noted and amended.

**SKPOL14 - Trees, Hedgerows and Woodland**

Policy EN7 of CDC's Local Plan 2011-2031 is fully supported. The areas within the Parish that contain trees that meet the criteria in section 1 of policy EN7 include:

- trees lining and/or featuring on The Street together with the hedgerow at the junction with Water Lane;
- trees lining Church Lane;
- the trees across the parkland south of the Manor House;
- the Chestnuts, adjacent to the Shorncote road junction;
- Former Jefferies Nursery (Ref: "Through the Saxon Door" op. cit. p51);
- the Village Lake;
- All Saints, Shorncote, churchyard;
- two stands of black poplars that are locally distinctive in the Cotswold Water Park.

These special areas of trees are shown on the Proposals Map in Appendix 8, along with current tree preservation orders.

**COMMENTS:**

**None**

**SKPOL15 - Biodiversity Habitats**

Proposals for development, in accordance with the relevant environmental policies in the Cotswold District Local Plan 2011-2031, will be supported that:

- conserve and enhance the biodiversity of the area, and in particular:
  - any designated sites;
  - protected species;
  - priority species and habitats;
  - species and habitats that are locally characteristic (as set out in table 11.3.2.6);

- and/or enhance the connectivity between existing biodiversity sites and habitats;
- and/or increase the potential for the public to enjoy and better understand biodiversity.

**COMMENTS:**

None

SKPOL16 - Heritage

Policies EN10 - 12 in the CDC Local Plan 2011-31 highlights the importance of recognising the place of heritage sites in the future development of the area. Within this Parish, it is relevant to the following:

- all buildings and monuments listed by Historic England as *Grade 2* (Appendix 10(3));
- all buildings and areas identified as non-designated heritage assets listed below and shown on the maps in Appendix 10(3):
  - the group of cottages between the Village Hall and the modern house, *Grangewood*, at the east end of *Water Lane*;
  - three cottages at the north side of the approach to *Mill Lane*;
  - the buildings clustered around *Lower Mill*;
  - the buildings clustered around the "Green" in *Shorncote*;
- all buildings shown as non-designated heritage assets within the *Somerford Keynes Conservation Area*, shown on the map in Appendix 10(2) (or as identified in the adopted *SK CA appraisal 2018*);

This is not an exhaustive list and further NDHAs may be identified in the future that meet the clauses provided in the *Cotswold District Local Plan 2011-2031*.

## COMMENTS:

### CDC:

#### p53 SKPOL16

While we welcome the intent of the policy, the wording of the sub-clauses identifying the Non-Designated Heritage Assets seems a little duplicatory. The first and second clause would appear to overlap, with the exception of the properties referenced in brackets. The first clause references a list, yet this would appear to only include those properties identified in the subsequent bullets.

We are concerned that this policy is not well future-proofed. It refers to “all buildings and monuments listed by Historic England as Grade 2 (Appendix 10(3));” What happens if listings are up-graded to II\* or I (please note that heritage assets are usually referred to in roman numerals)?

Monuments are not graded. The phraseology used now is heritage assets, not sites. Other sites might be designated in the future and not currently shown on their map. Please note that the Conservation Area is itself a designated heritage asset. We would suggest a rewrite, as the wording does duplicate information presented in the Reasoned Justification at para 11.3.3.1.

The important thing to get into policy is the NDHAs. Our suggested policy was –

#### 'SKPOL16 - Heritage

The SK NDP identifies the following as non-designated heritage assets -

- All buildings shown as non-designated heritage assets within the Somerford Keynes Conservation Area, shown on the map at Appendix XX (*or as identified in the approved SK CA appraisal 2018*)
- Buildings and areas identified as such on map XX
  - o The group of cottages between the Village Hall and the modern house, Grangewood, at the east end of Water Lane
  - o Three cottages at the north side of the approach to Mill Lane
  - o The buildings clustered around Lower Mill
  - o The buildings clustered around the “green” in Shorncote

This is not an exhaustive list and further NDHAs may be identified in the future that meet the criteria provided in the Cotswold District Local Plan 2011-2031.'

We don't think that there is any need to include designated heritage assets in the policy, as the plan doesn't introduce a new policy requirement and these are already clearly identified elsewhere.

We'd also encourage a reference to EN13 which refers to heritage assets.

The policy wording has been amended to reflect these comments and a reference to EN13 has been included in the justification.

#### **Community Proposal 4: Road safety**

*The community has expressed a clear wish to ensure that steps are taken to modify vehicle speeds within and around the settlements. This is not a problem in Lower Mill estate where the roads are all internal, but is being noted in the main road network. It is proposed that the Parish Council endeavours to conduct a review of speed limits throughout the Parish and establish with the highway authorities a number of traffic restrictions, particularly:*

- *50mph speed limits on the main roads within the parish;*
- *adoption of traffic-calming measures at village boundaries, where possible and appropriate.*

#### **COMMENTS:**

*May I query community proposal 4, page 36 - 50mph - surely 30mph (resident).*

*Main roads in the Parish are the Spine Road and Spratsgate Lane. These currently have a speed limit of 60mph*

#### **Community Proposal 6: Broadband Provision**

*Where commercial offerings become available in the local area, the Parish Council will investigate initiatives contributing to the improvement and / or extension of broadband provision within the Parish.*

#### **COMMENTS:**

#### **CDC:**

**p38 Community Proposal 6** –regarding broadband – given the significant investment in broadband across Gloucestershire, we wonder whether, as worded, this proposal is valid? The text on p.32 indicates that fibre is available. That being said, we would presume that Somerford Keynes would wish to benefit from the 4G rollout, and any subsequent technologies. Perhaps there is scope to reword the proposal – replacing ‘broadband’ with ‘latest telecommunications technology’ or similar?

Even though the Parish has been a recipient of the broadband investment across Gloucestershire, many residents do not receive a reliable service. We accept the recommendation to wider the proposal to include all telecommunications technology.

## General

### COMMENTS:

Section 3 Paragraph 2 - delete "or squared kilometres" - a hectare is 1/100<sup>th</sup> of a square kilometre, hence area is just under 8 square kilometres, not 795 square kilometres (resident).

Updated.

Please seriously consider changing the typeface of the finally submitted document to a grown up one, not one used to talk to children learning to read. Trebuchet MS, as used by many magazines and your website, would be a good choice for example. Your work is not likely to be considered seriously by planning experts as it is currently presented (resident).

Comment has been noted. However, research suggests that Comic Sans is more readable and accessible to people with visual impairment than other standard typefaces.

### CDC:

Bottom of **p5**; 'coterminus' should read 'coterminous'

**p16 Top line** Somerford Keynes has not been identified as an unsustainable settlement – it has not been identified as principal settlement, which would be expected to provide additional housing.

The NDP document has been amended accordingly.

**p40 para 4.** This section feels rather removed from the relevant policy and rather suggests that signage and light pollution may fit better elsewhere than under community facilities.

Commentary about signage and light pollution has been placed in the Economy section as it is businesses that these issues mainly apply to.

## Photograph of the response from Shorncote residents

### RESPONSE TO THE SOMERFORD KEYNES NDP April 2019 from Shorncote Residents

There are a small number of adjustments which need to be included in the Draft Document. These have already been sent to the NDP Team via email, in response to questions from Cllr. Munroe, as follows: Appendix 3, Permanent Residential (b) should read "Shorncote is a small peaceful *village* ..." (not 'hamlet', which is usually defined as a settlement without a church). This error is repeated at "the hamlet consists of ...", and the number of dwellings should be given as 9 (not 8).

In our representation to the 2016 Draft Consultation we questioned the relevance and appropriateness of the description within Section 4 which states that Somerford Keynes - and presumably Shorncote, Four Acres etc. - has the Positive Attribute of a "highly educated population". This term is employed again in the current Draft Document and it is expanded at 8.2 (Educational Attainment and Skills of Residents).

COMMENTS: It is difficult to avoid the feeling that the term 'highly educated' is an exaggeration, and that it prefaces a somewhat 'them and us' attitude in the following Section 8.2. The percentages given in 8.2 define 14% of the Parish (approximately 67 people) as having "no qualifications", in contrast to members of the "very well educated" majority of 44% who have degrees or equivalent. The remaining 42% of the population are not categorised.

The Document therefore makes a clear distinction between those with high academic achievements, and the rest, who have none, and it is difficult to understand why this value-judgement is included within a Plan which otherwise successfully emphasises the general cohesion of the community within the context of a neighbourhood ethos.

Furthermore, in 8.2 it is stated that the majority of those in employment are drawn from the highly educated group and that these people work in "managerial, professional and associated professional occupations". By concentrating solely upon this section of the population, the NDP gives no indication of where the 14% of unqualified people work (nor of the uncategorised 42%), and no mention is made of opportunities which exist locally in, for example, retail, tourism, construction, and land maintenance, most of which can provide basic training.

CONCLUSIONS: We suggest that the terms "highly educated" and "very well educated" should not be used because they do not adequately express the diverse nature of the community. Secondly, we suggest that the NDP should credit the status of people who for various reasons happen to be unqualified, instead of focusing upon the background and achievements of those in managerial and professional occupations, because the aim of the NDP should be to provide a balanced description of the skills and contributions of the entire community. Therefore, we suggest that the Section 4 item under the heading of 'Positive Attributes' should be changed from "Highly Educated Population" to, say, 'Diversity of Skills', which could then provide the opportunity to include within this Section the valuable part played by local groups, societies, annual events, and individual initiatives.

Shorncote is a village - References to Shorncote in appendix 3 identify it as a village.

The initial reference to a "highly educated population" is in a list of principal strengths, or defining features, along with others, such as a strong sense of community. It is there as a statement of fact, substantiated in Section 8.2. It is not a value judgement or a pejorative statement. Indeed, the subsequent listing of employment areas demonstrates the important contributions to the local economy of people of all educational attainment levels, whilst acknowledging the higher than normal level of managerial and professional occupations.

The subsequent references to education levels are in Section 8 dealing with the Economy. The data are drawn from the Somerford Keynes Parish Profile which utilises the 2011 Census (the most recent one available) and other Government statistics. It states the fact that more than 50% of the economically active population of the Parish is in professional and managerial occupations which is above the levels across both Gloucestershire and England. This has implications for communications, employment patterns and, one of the local employment features, working from home. The reason for drawing attention to this feature is its impact on economic activity.

Therefore, it is important to note that the Plan is looking specifically at the impact on employment patterns of having a workforce with higher levels of educational attainment. It makes no judgement on relative contributions of other groups. Certainly, it is not a social commentary and reference is made elsewhere to the strength of the community as a whole.

Disappointingly the 'supporting evidence and documents' were not available (2.6 - Evidence Base) for this pre-submission consultation as we have several questions regarding the Biodiversity data used for the CDC maps of the Priority Habitats and the Notable Species in the parish (resident).

The full Evidence Base will be available at the next (CDC) consultation.  
The questions regarding the CDC maps have been forwarded to CDC.

Penultimate para on page 11

*Agriculture is still a major business within the parish, with leisure, recreation and tourism an obvious growth area, particularly on the periphery of the parish around the lakes.*

The importance of the mineral industry to the Parish could be acknowledged. It provides a significant number of employment opportunities and the long term legacy of the restored sites they create contributes to recreation, tourism and employment and their associated economic benefits (Hills Group).

The impact of the minerals industry on the local landscape is noted on page 9, acknowledging the long history of gravel extraction in the locality. It continues to be one of the larger employers in the area, and this is now acknowledged on page 11.

### *5 The Vision and Aims*

Hills support the stated aims and in particular the balance that is struck in noting the importance of local employment to the economy. It is suggested that for clarity the wording is amended to reflect that employment opportunities in the Parish will also be supported.

*To make the parish an attractive place to work, to support new, appropriate, employment options in the Parish and a sustainable place from which residents can go to work*

*Alternatively the wording from 11.3.3.3 could be used : providing ample opportunity for business and appropriate housing development to take place, it endeavours to maintain balance between these two, sometimes conflicting, aspirations, so supporting the continuation of a vibrant and sustainable community (Hills Group).*

The Vision and Aims have remained unaltered since the very earliest stages of the Plan and have been endorsed by the community on every occasion, including specific consultation with local businesses. Within the broad brush of the vision, it should include the development of all employment opportunities, a point made more fully in the Economy section of the Plan and reinforced as part of the business consultation.

### 8.1 Economy Objectives

*Hills support these objectives and in particular "To support and encourage existing businesses within the parish" and "To encourage the development of the necessary infrastructure to support business and home working" (Hills Group).*

Your support is noted.

### *Para 9.2 Since there are no employers of significant size in the Parish*

*The mineral extraction operations are significant employers in the Parish (Hills Group).*

Whilst the terminology may be a little loose, it is clear that there are no employers the size of, say Honda or St James Place, located in the parish. Your own Company headquarters is registered in Swindon. Of course, a business employing a quite small workforce could be "significant" locally if it was drawn exclusively from the local community. We have no evidence for that.

*Para 10.2 - Efforts to attract young people and families would be at risk if the few amenities available were to be further diminished. However, it must be acknowledged that the current range of community amenities is somewhat limited, and their development represents a key plank in the plan to attract new people to the Parish*

*This seems at odds with a policy restricting new housing to those who have lived in the Parish 5 years and to a Policy which seeks to limit the scale of housing to small homes only (Hills Group).*

SKPOL2 - see comments above.

The explanation of our approach to housing is given fully in Paras 7.3.1.1 - 7.3.1.9 of the Plan.