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1 KOP 2020/12



Neighbourhood Planning,
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Katrina Ormiston-Rees

By email: neighbourhood.planning@cotswold.gov.uk

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Dear Neighbourhood Planning team

Representations to the Kemble and Ewen Neighbourhood Plan Pre-examination consultation (Regulation 16 Consultation)

This letter responds to the Submission Draft of the Kemble and Ewen Neighbourhood Plan, for consultation running until 10 August 2020. Savills is instructed on behalf of Kemble Farms Limited (hereafter 'the Client') to respond in relation to this consultation.

Our Client owns land and farms in the parish, including two of the sites allocated in the Cotswold District Local Plan. It wishes to take the opportunity to again declare its full support to the Kemble and Ewen Neighbourhood Plan and its aspirations to shape the future of development in the parish, and to safeguard community facilities and the area's distinct character. Congratulations are offered to The Forum having reached this milestone stage.

Representations were also submitted to the Pre-Submission Regulation 14 Consultation. The two matters for consideration here remain as before.

The first concerns Draft Policy KE3 Protecting Local Green Space. This proposes the designation of area KE3/2 – Field between Clayfurlong Farm and site K1_B as a Local Green Space.

The designation would need to meet criteria of Paragraph 100 of the National Planning Policy Framework which states Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance; and c) local in character and is not an extensive tract of land.

In planning terms, there is no clear justification to assign Local Green Space protection to the field between Clayfurlong Farm and site K1_B beyond the protection already afforded to it as open countryside outside the development boundary, and within the Special Landscape Area designation under Policy 8 of the Cotswold District Local Plan. Criterion b) is not considered applicable without clear evidence to suggest it is demonstrably special or holds a particular local significance greater than any other land around the village. There is a lack of evidence to demonstrate this. The additional protection sought by the draft policy is difficult to justify in terms of satisfying the quite precise criteria. Furthermore, the land remains protected under policies of the Cotswold District Local Plan outlined above.

The second matter relates to Draft Policy KE7 – Kemble and Ewen Design Code. The supporting Design Code appears to prescribe 'good design' to within a very narrow remit; as reflecting the character of existing dwellings with limited scope or guidance for good innovative/modern design. It would also be useful to clarify the weight to be afforded to the Kemble and Ewen Design Code against the Cotswold Design Code, which allows for both traditional and contemporary design solutions.

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In conclusion, our Client fully supports the Kemble and Ewen Neighbourhood Plan, subject to the following matters:

- Local Green Space designation KE3/2 should be deleted as the land does not meet the test set out in the NPPF/PPG. The land will continue to be protected as open countryside beyond the settlement boundary and within the Special Landscape Area, as all the other land on the edge of the village will be.
- The Kemble and Ewen Design Code should better align with the Cotswold Design Code in relation to both traditional and contemporary design.
- The weight to be attached to the Kemble and Ewen Design Code compared to the Cotswold Design Code should be clarified.

I trust that the above provides a useful contribution to the process, however, should you have any points of clarification or require any further details please do not hesitate to contact me at the above address.

Yours sincerely

A handwritten signature in black ink, appearing to read "Katriona Ormiston-Rees".

Katriona Ormiston-Rees
Planner

Cc Robert Linnell