

Neighbourhood Planning  
Cotswold District Council,  
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Our Ref: JGG/001

2nd November 2020

Dear Sir/Madam,

**Re: Preston Neighbourhood Plan, Regulation 16 Consultation. Land adjacent to the A419, Preston, Cirencester.**

On behalf of the landowners, James Gegg, Roger Gegg, Robert Gegg and Emily Robertson, Impact Planning Services Ltd., is pleased to submit representations to the Preston Neighbourhood Plan, Regulation 16 Consultation, supporting proposals at Land adjacent to the A419, Preston, Cirencester.

This representation is made to support the development of the site at Preston for the accommodation of a low-density residential development specifically for the needs of active older person's over 55 years of age.

### Engagement with the Neighbourhood Plan Process

IPS submitted representations to the Neighbourhood Plan regulation 14 Consultation in April 2020. A copy of the submitted representations is attached to this submission. In summary, the site at Preston is being promoted for the development of active older person's accommodation. This is a low-density single storey development, with small groupings of units creating an attractive parkland setting for those who are those seeking to down-size between 55-80 years old at the same time express a desire to remain within their own social networks, within reach of their GP, and wish to reduce domestic running costs. Our submission included a description of the site and a rationale of the proposed concept of active elderly accommodation and support coming forward for this type of development within research papers and guidance

Following the submission of these representations IPS suggested that a meeting be held with members of the Parish and Neighbourhood Plan steering group. This was not able to be facilitated by the Parish until late September, after the publication of the regulation 16 submission version of the plan.

Whilst the concept of the proposals was broadly accepted and supported by the attendees of the meeting, the siting of the proposals within the Preston Parish boundary was not supported and has not been considered in the emerging plan. The demand for this type of accommodation needs to be

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clearly recognised across all districts and settlements and has been specifically considered to address the varied and wide range of needs for accommodating older persons, specifically within this rural context. Noise from the A419 was cited as a primary concern and the Applicant is considering appropriate assessment and if required mitigation in response to this concern as the proposals progress and the promotion of the site continues.

### **Demographic Change**

Our previous representations highlighted growing concern regarding the changing demographic of the population is leading to increased attention on addressing the concerns of the ageing population; longevity, public health and social welfare costs and critically, loneliness. Housing for older persons continues to be a key consideration for both policy makers, decision makers and developers. In addition to the research papers identified in our previous submission<sup>1</sup> further topic papers such as *'Too Little, Too Late? Housing for an ageing population' – June 2020*, *'Moving insights from the over 55s – What homes do they buy' – December 2017*, and *'Building for the Baby Boomers, Making housing market for an ageing population' – December 2018* are continuing to highlight this growing concern and key issues which are of key consideration to all those involved with the development process across all sectors. This issue is also being highlighted in recent articles of planning news, most recently within Planning Resource.

In all of this it is important to distinguish the very different aspirations of urban dwellers and those within the rural areas when it comes to retirement housing. Urban dwellers may be prepared to down-size to an apartment within a town or city, those in rural areas are less likely to and remain trapped in family housing which becomes increasingly costly and unsuitable as the residents age. Older persons are reluctant to down-size and will not move unless an attractive housing product is available locally. So presently many are under occupying family homes at a high cost, both personally and to society as family homes remain unavailable to families within the local housing market. This is revealed within the latest Census data for Cotswold District, which indicates that the levels of under occupancy of homes in the rural area is over 80% (source: census 2011 table QS412EW – Occupancy rating [bedrooms]).

Importantly national planning policy, as expressed at paragraph 62 of the National Planning Policy Framework (NPPF) and which is applicable to the preparation of Neighbourhood Plans, expects such plans to provide for the housing needs of different groups within the community. This includes older people who are defined with the Glossary to the NPPF at Annex 2 as:

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<sup>1</sup> Housing and Care for Older People – HAPP1 4 Rural Housing for an Ageing Population: Preserving Independence (April 2018) and Housing our ageing population: Positive Ideas: HAPP1 3 Making Retirement Living a Positive Choice (June 2016).

*Older people: People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and who's housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.*

We consider that this site at Preston is ideally located to promote housing for 'active older person's accommodation within an attractive parkland setting. As described above those seeking to down-size between 55-80 years old at the same time express a desire to remain within their own social networks, within reach of their GP, and wish to reduce domestic running costs.

We are promoting the development of low-density single storey housing, within small groupings of units. This low-density housing is impossible (as a consequence of land value expectation by land owners) around the immediate fringe of most cities, towns and larger villages where conventional volume house builders are operating and future conventional housing allocations are likely to be directed. This type of housing would support the immediate needs for the current demographic of Preston, within a landscaped and attractive setting. The proposals would also provide additional community facilities which would contribute to the sustainability of the village.

### **Emerging Preston Neighbourhood Plan**

The draft neighbourhood plan identifies the current demographic and aspirations of the village, but it does not translate this into proactive policy making. Whilst paragraph 30 notes that the community is dominated by the older population, with an average age of 54.8, the plan does not consider the requirements of this age group for the plan period until 2031. The plan does not consider how the plan area may provide for these residents as they age further, or how to plan for new development to attract newer members of the community, perhaps with families or first-time buyers.

The adopted Cotswold District Local Plan 2011 – 2031 does contain some policy mechanisms to allow some types of housing and other beyond the Principal Settlements. Specifically, policies DS3 and DS4 allow small scale development within the NDP area and the development of small and medium sites is recognised within the NPPF paragraph 68 as making an important contribution to meeting the housing and development requirements of the wider area. The emerging plan does not however, include any allocations or mechanisms to meet identified needs within the village or any longer-term potential development considerations for the population of the village and the wider Cotswold District within the parameters set within these policies. It is noted that policy DS3 specifically supports small scale development in non-principal settlements which '*demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally*'. Support for growth within the Preston Parish Area is vital to support the existing services which the plan seeks to protect and enhance. It is vital to support the sustainability of the village throughout the plan period until 2031.

The emerging plan fails to provide for, or provide guidance on any emerging growth, whether that be housing, employment, tourist or leisure uses, across the entire plan. The plan merely seeks to preserve and protect the 'status-quo' of the plan area. The lack of vision for future growth across the neighbourhood plan area, compromises the sustainability of the plan and lacks forward vision to meet the combined needs of the wider local authority area and its immediate residents. The neighbourhood plan does not positively plan for the future of the area throughout the Plan period.

I trust the above application material is sufficient to confirm this site and submission to the Preston Neighbourhood Plan Regulation 16 Consultation. I would be grateful if you would kindly confirm receipt of this submission at your earliest convenience. If you have any queries or require any further information please do not hesitate to contact me.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'R Bird'.

**Rachel Bird**

**Senior Planner BA (hons) MPLAN MRTPI**

