



RIDGE

**RESPONSE TO THE COTSWOLD
DISTRICT LOCAL PLAN 2011 – 2031
PARTIAL UPDATE: TOWN AND
COUNTRY PLANNING (LOCAL
PLANNING) REGULATIONS 2012
REGULATION 18 “ISSUES AND
OPTIONS” CONSULTATION**

FOR BADMINTON ESTATE

March 2022

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CONSULTATION
FOR BADMINTON ESTATE**

March 2022

Prepared for

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Version Control

Project	5010271
Issue Date	March 2022
Originator	G.EB.
Checked	C.J/H.S
Version	1.3
Notes	

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1. INTRODUCTION

- 1.1 The following representation has been prepared by Ridge and Partners LLP on behalf of the Badminton Estate in response to the Cotswold District Local Plan 2011 – 2031 Partial Update Town and Country Planning (Local Planning) Regulations 2012 Regulation 18 “Issues and Options” consultation/participation, which is running between 4th February and 20th March 2022.
- 1.2 It is understood that at this stage the council are not necessarily undertaking a full-scale review, but a targeted update focussing on specific issues in line with requirements that local plans are periodically reviewed to keep them up to date and that other requirements such as housing requirements for example, must now be reviewed at least once every five years.
- 1.3 The consultation document comprises eighteen Topic Papers that put forward identified issues by the Council, and which propose options for how to tackle these through the Local Plan update.

Statement Structure

- 1.4 The purpose of this representation will be to comment upon the relevant topic papers which are proposed to achieve the appropriate level of growth within rural areas. This statement will then reflect on the proposed planning policy amendments and in doing so provide recommendations as to how sustainable and proportionate growth can be achieved.
- 1.5 However, in the first instance the following provides a narrative of the Badminton Estate’s role within the district and their future ambitions which coincide with the Council’s vision in achieving sustainable growth.

2. THE BADMINTON ESTATE

2.1 The Badminton Estate contains a well-established legacy, having been in the ownership of the Somerset Family since the early 1600s. Since that time, successive generations of the family have rebuilt and extended Badminton House and created the Grade I Listed House, garden and parkland we see today. Additionally, they have built many historic buildings and created today's landscape by planting numerous trees and woodlands, contributing to the character and appearance of the landscape.

2.2 Badminton House and its surrounding parkland, and much of the Estate are within the rural landscape of South Gloucestershire. However, the Estate also has land interest within the Cotswold District area. Consequently, the Estate offers a wide range of benefits to the local community including the provision of let residential property and rural employment opportunities through agricultural and forestry. Whilst continuing these services, the Estate is also keen to develop and diversify their offering to the community with the development of suitable new enterprises, which in turn will help maintain and retain their legacy as well as securing their future vitality and creating new employment opportunities which will assist with the revitalisation and diversification of the rural economy. In addition, the Estate seek to provide new residential units and community services through the offering of their land for future, sustainable development. Providing such uses within rural areas will support existing services and facilities and improve community uses, enhancing the sustainability credentials for rural villages and enabling the empowerment of their communities.

2.3 In support of this the Estate aim to deliver small-scale, sustainable residential development, whilst also seeking to achieve the following objectives:

- Maintain Badminton House, its surrounding gardens and parkland.
- Maintain all listed and non-listed buildings on the Estate, re-using any redundant buildings and securing viable new uses for them.
- To reduce the carbon footprint of the Estate and work towards a carbon neutral future, and work with other local businesses to offer carbon off-setting and biodiversification opportunities on the Estate.
- Continue the current programme of investment in improving and renovating residential property.
- Continue to offer a range of accommodation in let residential property to retain a balanced community.
- Continue to diversify the Estate's historical dependence on income from agriculture and forestry.

- To maintain and expand rural employment opportunities both on the Estate and in the wider community to enhance vitality within the local community.

3. RESPONSE TO TOPIC PAPER 2 - ACCESSIBILITY OF NEW HOUSING DEVELOPMENT

- 3.1 Topic Paper 2 outlines that the council seeks to provide greater definition and clarity to the adopted Local Plan objective to *“Locate most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.”* The aim is to develop a set of accessibility metrics, with reference to objective measures, that can be used to guide the location of new development – and potentially highlight the need for new services or better access to existing ones – to minimise dependency on private vehicles.
- 3.2 Whilst there are clear benefits to this approach for the purpose of allocating sites, for the purpose of assessing specific development proposals at Non-Principal Settlements it is considered that such an approach is overly restrictive, not in line with national planning policy guidance and would adversely impact on the vitality and viability of the district’s rural communities.

Proposed Accessibility Scoring System

- 3.3 The evidence paper supporting Topic Paper 2 proposes an accessibility scoring system to *“help to guide the decision on which sites are allocated in the Local Plan and ensure we meet local and national objectives to focus development in the most sustainable locations. The system would also provide clarity about how accessibility to services should be measured for Policy DS3, which will add certainty for both applicants and decision makers”*
- 3.4 A method based on identifying core services, primary services and secondary services and journey times to these is presented within the evidence paper. For core services, potential development sites that score red for any service are deemed to require improvement (in terms of access, service provision or other mitigating measures) before a site would be considered suitable for allocation for residential development in the Local Plan. This is in terms of its accessibility or whether the accessibility test would be passed for applications for housing development in Non-Principal Settlements.

Service	DfT journey time thresholds (mins)	Local Journey time bands (mins by walk/bus)
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	Lower	Upper	<15 mins	15-30 mins	>30mins
Employment	20	40			
Primary school¹⁶	15	30			
Secondary school	20	40			
GP	15	30			
Hospital	30	60			
Food store	15	30			

3.5 For the identified primary and secondary services, a scoring system where primary services score 2 for each service within 15 mins walk/bus time; and Score 1 for each service within 15-30 mins walk/bus time and Secondary services score 1 for each service within 30 mins walk/bus time is proposed. This is to apply to both strategic housing sites identified in the Local Plan and to planning applications for housing development in Non-Principal Settlements. In the latter case, applicants will be required to provide information on access to Core, Primary and Secondary Services as part of their planning application

3.6 It is contended that the proposed accessibility scoring system should not be applied to development proposals at Non-Principal Settlements and Policy DS3 should remain as currently adopted. This would not contradict the stated objective of locating most developments in locations where there is better access to jobs, services and facilities and public transport. As above, the proposed scoring system would have clear benefits when assessing significant developments and the location of allocations. Windfalls through Policy DS3 as currently worded however, account for a marginal percentage of the district's housing growth, and any further restrictions would have a significant impact on these rural communities, having regard to the district's predominantly rural location. Historically, restricting growth within rural areas, and particularly in the AONB, gives rise to deprivation and inequalities within these areas, enhancing their unsustainability.

3.7 It is recognised that in the council's latest annual monitoring reports, in the period 2018/19 only 4.3% of residential development was permitted under Policy DS3, within Non-Principal Settlements. This demonstrates that the current provisions of DS3 without the accessibility scoring system has allowed for proportional and sustainable development within rural areas, ensuring those locations are not overdeveloped and urbanised. It is considered where development has been permitted in

line with DS3, this has contributed to locating most development in sustainable rural locations. Paragraph 6.3.4 of the current Local Plan explains this in further detail:

“Some rural settlements, however, have greater sustainability credentials than others and may, for example, have ‘everyday’ facilities, such as a shop/ post office, a (non fee paying) school, and/or good public transport access to neighbouring service / employment centres. Availability of everyday facilities is important in reducing unnecessary traffic movements and engendering a sense of community, which helps to prevent ‘social isolation’. Accordingly, this policy applies to those rural settlements in the District that have reasonable access to everyday services, facilities and/or employment opportunities, either within the settlement itself, at a Principal Settlement, or at a neighbouring rural settlement. Some rural settlements are located near to the District boundary and have better public transport access to equivalent service centres in adjacent local authority areas (e.g. Cricklade, Burford and Winchcombe). Distance, quality of route, topography and pedestrian safety are important issues when considering the accessibility of services and facilities.”

3.8 Overall, it is considered that the proposed scoring system would further restrict an already limited percentage of residential development in Non-Principal Settlements which would have significant consequences on the vitality and viability of these areas, which as identified below is contrary to national policy guidance.

National Planning Policy

3.9 Topic Paper 2 quotes national policy and guidance to support an accessibility scoring system approach. It is considered that the majority of this guidance is aimed at significant developments and allocations. Paragraph 105 of the NPPF for example specifically refers to significant developments, and PPG guidance states that the outcome (of using such an approach) could include assessing where alternative allocations would improve sustainability.

3.10 However, in terms of rural housing, the NPPF is clear that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Paragraphs 78 and 79 of the NPPF are as follows:

“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.”

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

Where there are groups of smaller settlements, development in one village may support services in a village nearby.

3.11 Further, regard should also be had to the second part of Paragraph 105 of the NPPF:

“However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

3.12 In the context of the above, this representation considers that Policy DS3 as currently adopted provides scope to reduce the issues of isolation and rural deprivation that can occur through overtly restricting the opportunity for small-scale, sustainable growth in rural areas. Demonstrably, DS3 has allowed a sustainable percentage of growth away from main settlements to these rural communities where it could best address such inequalities. Continuing the wording of DS3 through the Local Plan review would also continue to comply with the National Planning Policy Framework (as above) to promote sustainable development in rural areas where it will enhance or maintain the vitality of rural communities, and to identify opportunities for villages to grow and thrive, especially where this will support local services in that village or another. Proposing the use of an accessibility criteria to be attached to Policy DS3 would not conform with such national planning policy requirements.

3.13 Within the Council’s potential policy response, it is stated that *“housing is sometimes needed in less accessible locations to sustain existing services and to enable people, particularly younger people, to live in an area where they have strong connections. So, there is a potential conflict in policy objectives that must be considered as part of the planning balance.”*

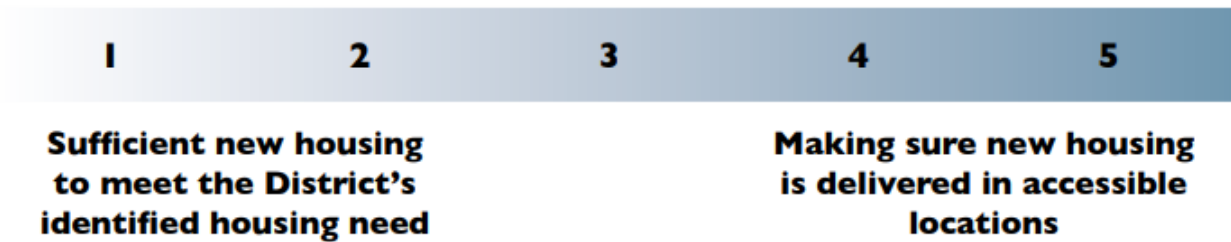
3.14 Given this, we contend that the idea of attaching an accessibility criteria to DS3 would restrict the objectives of securing sustainable growth in rural areas as contained in national planning guidance. It is our view that there is no evidence from the Council to justify this route, and indeed the use of the current wording contained in DS3 has positively contributed toward the sustainability of the district’s rural areas. Retaining the current wording of DS3 and instead attaching the accessibility criteria to potential allocations for development will still ensure the Council meet their aim *“to achieve local and national government targets to reduce carbon emissions and to deliver on our corporate promises to make our local plan “green to the core”, help residents and businesses maintain good health and wellbeing and support businesses to grow in a green, sustainable manner”* as set out in the consultation documentation

Consultation Response

3.15 In drawing all the above, the consultation portal asks in question 1: **Do you think it is appropriate that the Local Plan should prioritise development in areas that have good access to essential services without needing to drive?** Ultimately, we would agree with this statement, whilst suggesting the current local plan policies and provisions are currently delivering on this objective.

- 3.16 The accompanying evidence paper additionally sets out that the preferred approach is option 1 which is to introduce an accessibility scoring system, as opposed to the rejected option which is “do nothing”. This representation considers that whilst such an approach is reasonable for the purpose of allocating sites, for the purpose of assessing specific development proposals at Non-Principal Settlements it is overly restrictive, not in line with national planning policy guidance and would adversely impact on the vitality and viability of the district’s rural communities as demonstrated above. This representation considers that policy DS3 should continue in the local plan update as is currently adopted.
- 3.17 Similarly, at question 7 the consultation asks **If we apply these standards to new housing developments, it may mean that we are able to deliver less housing in Cotswold, or that housing development may be more concentrated in fewer locations with good access to facilities and services. Do you think this is appropriate or would another approach be preferable?**
- 3.18 This representation considers that the consideration of growth proposals beyond the areas that score well in the proposed accessibility matrix would bring new investment and strengthen patronage in rural areas that is essential to support rural services (and improve access), improve access to education and shops as well as other rural services and facilities.
- 3.19 This representation considers that the above aims of concentrating housing in fewer locations with good access to facilities and services needs to be balanced against the need to address existing issues of isolation and rural deprivation by redirecting sustainable growth away from main settlements to where it could best address such inequalities. Such an approach would also be in line with the National Planning Policy Framework requirement that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
- 3.20 In this context policy DS3 as currently adopted provides an effective mechanism of delivering benefits to rural communities that would be lost if a strict accessibility matrix was employed in rural areas.
- 3.21 It is recognised that in the council’s latest annual monitoring reports that in the period 2018/19 4.3% of residential development was permitted under policy DS3, within Non-Principal Settlements. This reflects a comparatively low level of overall growth, and therefore not contrary to the main aims of the emerging updated local plan but is currently delivering benefits to rural areas that cannot be achieved under such a strict accessibility matrix.
- 3.22 Therefore, we consider that in response to question 7, such an approach is not appropriate, and whilst growth should be facilitated in areas which have higher sustainability credentials in terms of accessibility, this should not be at the expense of, and be balanced against the need to, deliver development that meets local needs in rural areas.

3.23 This follows to question 8 which asks **what balance of priority would you give to providing sufficient new housing to meet the district’s identified housing need vs. making sure new housing is delivered in accessible locations?** Given the above response to question 7, ‘3’ on the below scale would be appropriate as whilst the majority of growth should be facilitated in areas that score highly on the proposed accessibility matrix, this should not be at the expense of, and be balanced against the need to deliver growth to deliver development that meets local needs in rural areas and that is sufficient to meet the districts identified housing need.



3.24 **Question 9 asks Do you agree that an accessibility test should form part of Local Plan Policy DS3?** It is set out extensively above that this representation considers that whilst there are clear benefits to this approach for the purpose of allocating sites, for the purpose of assessing specific development proposals at Non-Principal Settlements it is considered that such an approach is overly restrictive, not in line with national planning policy guidance, and would adversely impact on the vitality and viability of the district’s rural communities.

4. REPSONSE TO OTHER TOPIC PAPERS

Topic Paper 8 – Historic Environment

- 4.1 This representation agrees with the approach taken in regards to Topic Paper 8, the historic environment.
- 4.2 The accompanying Topic Paper sets out that the current Local Plan’s objective in this regard are to:
- a) *“Conserve and enhance the high quality, local distinctiveness and diversity of the natural and historic environment; and*
 - b) *Ensure that new development is of high quality and sustainable design, which reflects local character and distinctiveness, is appropriately sited, and provides attractive and inclusive environments.”*
- 4.3 The council identify that minor amendments are required in regards to policies EN12 and EN13 to accord with the revised NPPF. Additionally, due to the climate change and ecological emergencies declared by the council, the following issues are also proposed to be incorporated into a new policy:
- when changes are made to heritage assets, the potential impacts of climate change, e.g. increased storm events with higher rainfall, should be fully considered;
 - when retrofitting heritage assets to increase energy efficiency, including insulation and energy generation, the full implications of those changes should be considered, using a "whole-building" approach. The choice of energy efficiency measures should be guided to ensure that measures that both maximise energy efficiency and minimise any potential impacts on the significance of the heritage asset are prioritised;
 - the need for policies to be worded in such a way as to be flexible to incorporate emerging best practice.
- 4.4 This representation is supportive of the changes and additions proposed to be incorporated into the updated Local Plan as they accord with the Badminton Estate’s objectives to maintain all listed and non-listed buildings on the Estate, re-using any redundant buildings and securing viable new uses for them, as well as to reduce the carbon footprint of the Estate and work towards a carbon neutral future.
- 4.5 In response to question Q1a of the consultation document, we would agree with the measures the Council is proposing to ensure that their designated buildings are safeguarded as they mitigate and adapt to the effects of climate change for reasons set out above.

Topic 12 – Landscape

- 4.6 This representation broadly supports each option presented in the landscape Topic Paper, as each aims to protect and enhance the landscape.
- 4.7 The Topic Paper identifies that landscape policies can generally be seen in two ways, as protecting and enhancing the existing landscape and/or as helping to create new high-quality landscape. The council identify that the review of the Local Plan concluded that the landscape policies (EN4, EN5, EN6) did not require further update. However, the declaration of a Climate and Ecological Emergency by the Council and the Council’s Corporate Plan objective – making the Cotswold District Local Plan ‘Green to the Core’ – mean that Local Plan policies must all cumulatively assist in delivering this objective.
- 4.8 In response to this, three options are presented: option 1: retain policies as they are, ‘do nothing’, option 2: as option 1, but amend and add to the supporting text and option 3: a more climate-led landscape policy. It is recognised in the topic paper that the preferred option is Option 3, as *“if consistent with national policy, this is likely to be the most ‘value added’ approach but may take longer and need more evidence. In the short-term Option 2 may prove to be more realistic for this Update.”*
- 4.9 This representation broadly supports each proposed option as they reflect the Badminton Estate’s objectives contained in Section 2 of this representation, though greater support is attributed to options 2 and 3 as they go further to reduce the carbon footprint and work towards a carbon neutral future, and would assist with working with other local businesses to offer carbon off-setting and biodiversification opportunities.
- 4.10 However, despite the above support, this representation notes the potential to include or amend a policy to require development to; provide trees and protect soils, provide flood storage areas, and walking/cycle routes as appropriate to the scale of the development. This representation supports this inclusion as long as this remains proportionate to the scale of development proposed. As opportunities to include such features vary greatly depending on the site area, characteristics and the scale and type of development being proposed.
- 4.11 In direct response to question Q1a of the landscape Topic Paper, **do you agree with the preferred option?** Yes, this representation supports the preferred option, provided any requirements on developments are proportional to the scale of development proposed.

Topic 17 – Sustainable Transport and Air Quality

- 4.12 Topic Paper 17 concerns sustainable transport and air quality, it sets out that the council consider that access to key service, facilities and employment for those who live and work in or visit the Cotswold District, and low sustainable accessibility can be encouraged by effective planning.
- 4.13 The Topic Paper sets out that the current local plan has an objective to reduce car use by:
- a. *“Locating most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.”*
 - b. *“Supporting improvements in public transport, walking/cycling networks.”*
- 4.14 The Topic Paper adds that this could be extended by the addition of two further sub-objectives to reflect firstly the importance of on-site infrastructure and design (as well as connections to the wider network) in supporting walking and cycling, and secondly the growing emphasis on more flexible working practises, particularly in the wake of the COVID pandemic:
- c. *“Designing sites that prioritise access to and through by sustainable modes, and that facilitate the use of electric and shared vehicles.”*
 - d. *“Providing opportunities to work locally.”*
- 4.15 The following potential policy responses are then presented, with the preferred option being cited as to implement all the proposals:
- *“Option 1: Introduce minimum accessibility requirements for new development sites.”*
 - *Option 2: Introduce mode share targets for new development sites*
 - *Option 3: Develop a Sustainable Transport Strategy for Cotswold*
 - *Option 4: Adopt the Hierarchy of Road Users, LTN1/20 and the principles of “filtered permeability” and ensure they are used to guide the design of new developments and their links to the wider travel network. Provide for electric and shared vehicle use within the design of new developments.”*
- 4.16 In response to the relevant questions of the consultation document on this topic, this representation considers the following:
- 4.17 **Q1a Given transport’s high contribution to the UK’s total carbon emissions and other pollutants, how can we in Cotswold District seek to reduce our use of petrol- and diesel-powered vehicles?** As demonstrated above, this representation supports reducing carbon emissions through sustainable travel initiatives, including locating allocations and significant development proposals near to services principally.

4.18 Q1a considers policy options to reduce carbon emissions and refers to 'reducing the amount we travel' and 'reduce long distance journeys' both of which can still be achieved with rural development through allowing small-scale, proportional growth.

4.1 This is especially true given the implications of the pandemic, i.e. people are increasingly working from and more locally in flexible office solutions. COVID-19 has forced us into a different way of living and working and a YouGov poll in 2020 indicated that only 9% of Britons want life to return to "normal" after the outbreak is over, with many now enjoying lifestyle changes in the way they both live and work. Moreover, a recent YouGov poll in 2022 found 56% of participants polled in Great Britain "would prefer to work from home at least some of the time in future". This provides the basis for changes in the way we plan and design for our places in the future, and the impact of the pandemic which has emphasised the importance of flexible working space, with a focus for establishing a work-life balance.

4.19 It is noted that a counterpoint of question Q1a is that reducing car use in rural areas is too difficult - urban areas should achieve most of the change. We do not agree with this claim. It is acknowledged that the proposed strategies presented above will require urban areas to achieve most of the change, and going forward that the council's policy position should be in accordance with paragraph 105 of the NPPF which is clear that:

*"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. **However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.**" [own emphasis added].*

4.20 Having no regard to such national planning policy requirements would make the plan unsound, and therefore it is requested the Council consider how rural development can meet these climate change objectives, as demonstrated above.

4.21 **Q9 asks: Would you be interested in contributing to a plan to improve sustainable transport options in Cotswold, or help us assess walking, cycling and public transport provision in your area?** The Badminton Estate would be interested in contributing to a plan to improve sustainable transport options in the Cotswold as well as assisting the council to assess walking, cycling and public transport provision in their areas.

5. SUMMARY AND CONCLUSIONS

- 5.1 This representation has been prepared by Ridge and Partners LLP on behalf of the Badminton Estate in response to the Cotswold District Local Plan 2011 – 2031 Partial Update Town and Country Planning (Local Planning) Regulations 2012 Regulation 18 “Issues and Options” consultation/participation, which is running between 4th February and 20th March 2022.
- 5.2 It is understood that at this stage the council are not necessarily undertaking a full-scale review, but a targeted update focussing on specific issues in line with requirements that local plans are periodically reviewed to keep them up to date and that other requirements such as housing requirements for example, must now be reviewed at least once every five years.
- 5.3 The consultation document comprises eighteen Topic Papers that put forward the issues as the council currently sees them and proposes options for how to tackle them through the Local Plan update.
- 5.4 This representation sets out that the Estate offers a wide range of benefits to the local community including the provision of let residential property and rural employment opportunities through agricultural and forestry. Whilst continuing these services, the Estate is also keen to develop and diversify their offering to the community with the development of suitable new enterprises, which in turn will help maintain and retain their legacy as well as securing their future vitality and creating new employment opportunities which will assist with the revitalisation and diversification of the rural economy. In addition, the Estate seek to provide new residential units and community services through the offering of their land for future, sustainable development. Providing such uses within rural areas will support existing services and facilities and improve community uses, enhancing the sustainability credentials for rural villages and enabling the empowerment of their communities
- 5.5 In response to topic 2 – the accessibility of new housing development, it is considered that whilst there are clear benefits to an accessibility scoring system approach for the purpose of allocating sites, for the purpose of assessing specific development proposals at Non-Principal Settlements it is considered that such an approach is overly restrictive, not in line with national planning policy guidance and would adversely impact on the vitality and viability of the district’s rural communities. This representation considers that policy DS3 should continue in the Local Plan update as is currently adopted.
- 5.6 In response to the consultation question on this topic: Do you think it is appropriate that the Local Plan should prioritise development in areas that have good access to essential services without needing to drive? Ultimately, this representation agrees with this statement, whilst suggesting the current local plan policies and provisions are sufficient currently delivering on this objective.
- 5.7 In response to question 8 a balanced approach would be appropriate as whilst the majority of growth should be facilitated in areas that score highly on the proposed accessibility matrix, this should not be at the expense of, and be balanced against the need to deliver growth to deliver development

that meets local needs in rural areas and that is sufficient to meet the districts identified housing need.

- 5.8 In response to question 9 it is set out extensively above that this representation considers that whilst there are clear benefits to this approach for the purpose of allocating sites, for the purpose of assessing specific development proposals at Non-Principal Settlements it is considered that such an approach is overly restrictive, not in line with national planning policy guidance and would adversely impact on the vitality and viability of the district's rural communities.
- 5.9 In response to question Q1a of Topic Paper 8 – the historic environment which asks that, do you agree with the measures we're proposing to ensure that our designated buildings are safeguarded as we mitigate and adapt to the effects of climate change? This representation's response is yes, as they reflect the objectives of the Badminton Estate as set out above.
- 5.10 In direct response to question Q1a of the landscape topic paper, do you agree with the preferred option? Yes, this representation supports the preferred option, provided any requirements on developments are proportional to the scale of development proposed.
- 5.11 Regarding topic paper 17 on sustainable transport and air quality Q1a considers policy options to reduce carbon emissions and refers to 'reducing the amount we travel' and 'reduce long distance journeys', both of which can still be achieved with rural development through allowing small-scale, proportional growth.
- 5.12 Additionally, the Badminton Estate would be interested in contributing to a plan to improve sustainable transport options in the Cotswold as well as assisting the council to assess walking, cycling and public transport provision in their areas.

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