

COTSWOLD DISTRICT COUNCIL (CDC) LOCAL PLAN EXAMINATION

Matter 8 ID Chipping Campden Town Council (Cllr King and Clerk Mrs Harrigan).

Chipping Campden (CC) representatives have through the Hearing to date noted a range of comments from the Inspector and CDC and in this particularly important Session 8 dealing with the North Cotswolds we would like to bring these points together in a summary of our views particularly with regard to Allocated Sites and Infrastructure requirements.

1 BACKGROUND

CDC, earlier in the Hearing, correctly emphasised that The Cotswolds has important unique features. Chipping Campden in turn is a unique Cotswold market town described by historians and Cotswold District Council as the "Jewel of the Cotswolds".

We have no less than 256 listed buildings. The Town lies in the folds of surrounding rolling hills presenting particularly iconic views of the townscape. We are 100% within the AONB and much of the centre of the Town is in a Conservation Area. It is a major centre for the Arts and Crafts Movement and is reliant upon tourism and agriculture. It is hence perhaps not surprising that identification of housing sites that do not seriously conflict with the NPPF is at best difficult. Meanwhile we are clear that the protection of such unique areas is one of the objectives of the NPPF, which should surely be respected and not overruled. With this in mind we will now summarise all the substantive issues and our supporting evidence which demonstrates the conflict between the CDC Local Plan and the CC emerging Neighbourhood Development Plan (NDP) (notably supported by the vast majority of our residents).

2 HOUSING BUILD COMMITMENT

The current total housing commitment (built, plus committed plus windfall) for CC is 168 (at 50% yielding 84 Affordable). In the last 3 years 2 significant sites have been approved for development ie at Badgers Field for 16 houses (following two Appeals) and Berrington Mill for 26 houses, plus the highly controversial 40 dwellings on Aston Fields (CC_23C).

3 CDC LOCAL PLAN HOUSING PROPOSAL

For a large part of the Local Plan formation period the target proposed by CDC over 20 years has been 208 houses. Hence, against this figure we are at 168 houses some 16 years covered to date.

As explained in 1 above (ie largely driven by the scarcity, deliverability and availability problems) CDC has for some time focussed their attention on development of a single large site to the north of the Town designated Aston Fields and proposed development of 114 houses.

The Town Council has contributed over the period to discussion on option sites especially via the SHLAA and SHELAA process. Very recently, only in September 2017 we have established with some surprise that CDC has reissued an updated SHELAA in which the target for the Aston Fields site has now been reduced to 90 houses. We welcome this

change and especially the significant "comments" against the two site designations for Aston Fields. The thoroughness of the SHELAA report is illustrated by the fact that no less than 69 housing sites were considered. Of these 23 are complete or extant, whilst 44 are discounted or not deliverable. Aston Fields hence is the sole remaining target. Also most recently in answer to the Inspectors questions 124 and 125 re Issue 8.2 we were further surprised to find that (presumably reflecting the SHELAA) CDC replies 124.2 "*New evidence...Land at Aston Road (CC_23B and CC_23C)...The remaining site area can deliver 36 dwellings in 6-10 years*". (Plus 40 extant equals a new total of 76). Whilst this reduction trend from 114 to 90 to 76 surely supports our consistent position objecting to the site as not suitable, we need to stress that (see below) we believe the evidence for total removal of the Aston Road site proposal is very substantive.

4 RECENT ASTON FIELDS HISTORY

Chipping Campden Town Council (CCTC) is opposed to the development of housing on the Aston Fields site and we believe the substantial evidence supporting our case makes the CDC proposal unsound. The main facts in support of our case are given below together with a summary of the recent history.

a) In 2015 Ref 15/00419/OUT an application by Gloucestershire County council for **90 dwellings** on the site was unanimously refused by CDC's Planning Committee, with the support of Case Officer recommendation. To quote the main reasons (see SHELAA 2017)... "*Refusal reasons included the site's size, its position on greenfield land and the size of the scheme proportionate to the size of the existing settlement. That particular development was also said to be a significant encroachment into the AONB landscape and would have involved the replacement of an area of agricultural land that makes a positive contribution to the settling of the settlement with built development, which would have been detrimental to Chipping Campden's character and appearance.*"

In addition to the conflict with three NPPF criteria included above (ie "major site", visible impact in AONB and high quality agricultural land usage) it also had become clear that this site is an established nesting site for Skylarks, an endangered species. Hence there is conflict with four NPPF criteria.

b) In 2016 Ref 16/00937/OUT a further application was presented for **40 dwellings**. Despite very strong objections by the Town Council, residents and Ward Councillors the application was approved by a small majority of 8:6. The decision was seen as highly contentious by many of those in attendance and also as being unsound due to the effective suppression of the fact that this was a phased development application and hence "major" (as has indeed later been clearly substantiated). Residents in particular chose to take their objections for consideration to the Ombudsman, where it still resides.

5 CDC HOUSING EVIDENCE BASE CRITIQUE

In answer to the Inspectors questions 122, 123 and 124 Issue 8.2 CDC have provided responses which we have now had the opportunity to investigate in some depth. Our response in turn is as follows:

Re Question 122 we believe that the evidence we have provided in our NDP, this paper and elsewhere is robust. Furthermore, a verbal comment from CDC earlier in the Hearing would

suggest that they perceive the primary point at issue between the Local Plan and the NDP is our proposal for an "Organic Growth Policy". This is only one of several important points at issue and is specifically responded to below.

Re Questions 123 and 124 we note that CDC's answer makes reference to Evidence Papers EB002a and b (Nov 2014) and EB 007 (April 2016). Examination of these references reveals the following:

1. The site evaluation tables (between 2014 and 2016) remain unchanged for the three CC23sub areas, whilst in fact it is clear that significant new evidence has emerged (see also CDC answer 124.2) over this period. This for example includes "Community Engagement Feedback " resulting from public consultation on both the towns response to the Emerging Local Plan and Emerging Neighbourhood Development Plan. These later surveys are based on very much larger response numbers eg 315 compared to up to 50 in the CDC report EB200a. Even more important the later much larger samples yielded typically at least 95% in opposition to the Aston Field site development. This change we maintain moves the "Community Engagement Feedback" score for CC_23 B, C and E all to a RED coding.
2. Additional substantial evidence (as clearly supported in the CDC quote in Para 4 above) demonstrates increased conflict with four key NPPF criteria which should once again justify a RED grading in the table against "AONB (NPPF)".
3. We contest as unsound the differing gradings for several criteria in the table between the three sub areas CC_23 B, C and E when they are all in essence one location. By way of example we maintain that "Economy, Employment and Retail" and "Natural Environment" for this locality cannot as recorded range from RED to GREEN gradings. CC_23 B, C and E for consistency should all be RED graded.

The overall conclusion resulting from these areas of new evidence is that the analysis as currently recorded is unsound and should now conclude rejection of the site CC23 in total.

6 NEIGHBOURHOOD DEVELOPMENT PLAN (NDP)

Chipping Campden has an Emerging Neighbourhood Development Plan, which is currently with Npier for a "health check". The NDP has been through extensive consultation with residents (resulting in a 95% level of support) and discussed with many appropriate authorities, including CDC. The Aston Field housing proposal, extension to the Development Boundary, our organic growth policy and analysis of our local CC housing "need" are all points of conflict with the CDC Local Plan and our position on each is stated below.

The evidence supporting our position on Aston Road is as follows.

- a) Recent reductions to the total number of houses proposed (whether 114, 90 or 76 see para.4 above) does not negate this clearly being a "major" site even by CDC's own volition. Supporting this, a site elsewhere on the perimeter of town for 30 houses has been judged by CDC as "major".
- b) The three other NPPF criteria in conflict with the proposal are visible intrusion in the AONB, high grade agricultural land and the nesting site of an endangered species (Skylarks)

With regard to the **Development Boundary** extensions CDC have already responded to our criticism on three other Green Field Sites and reinstated the original boundary. We believe their continued insistence at placing the boundary around Aston Fields is unsound and

inappropriate as it would seem to provide a totally unjustified situation for approval of this highly controversial site, in the extreme by even allowing permission by delegated authority.

We have noted earlier in the Hearing, CDC specific comment on the **organic growth policy** proposed in our Emerging NDP. Our response is as follows.

1. History shows that organic growth has served us well in development over many decades in the town and resulted in the iconic tourist centre that has been and still is "The jewel of the Cotswolds".
2. Future growth in this manner we maintain allows for much better integration of new residents into the town and better prospects for infrastructure planning and funding. We simply vote against a new village being generated on a perimeter approach road totally destroying the town's unique character.
3. Even based on the total target build of 208 houses over the 20-year timescale on an organic growth basis this constitutes 10 houses per annum.
4. Our policy has precedent in the case of Thame TC Neighbourhood Plan v Oxford South District where the Inspector ruled in favour of Thame organic growth policy and against the Districts proposed single 600 house site.

In the case of housing (and especially Affordable Housing) "**need**" **evaluation** we have always argued that an evaluation "bottom up" in our area was important, even if in potential conflict with the "top down" approach based on the CDC macro-level modelling. Furthermore, there is significant debate on the methodology for generating apportionment across the District. In the absence of any local "need" data from CDC we instigated our own "need survey" in 2012 utilising Gloucestershire Rural Community Council. This data when compared with our current forward house build commitment demonstrates that we are already well in excess of the need valuation (indeed by a factor of 4x on Affordable Housing). This leads us to contest the soundness of the CDC essentially arbitrary allocation particularly in the light of the scarcity of suitable sites mentioned above (para 3). This conclusion is totally endorsed by the 7-mile zone housing evaluation discussed below (para 9) and has been supported by the judgement in the East Bergholt Parish Council Vs Babergh District Council decision.

7 CONSULTATION

The Town Council has been very proactive in terms of consultation with Residents and Local Groups, both for the Local Plan (LP) draft submissions and our Emerging Neighbourhood Development Plan (NDP) we have held well attended public meetings, provided exhibitions and arranged questionnaires. The NDP project team was also composed of representatives from the public as well as the TC. The result for both LP and NDP is that we have been given in excess of 95% support for the Town Councils recommendations. This result conflicts with the CDC Evidence Base for housing analysis where they use a much smaller sample (see para 5) and we conclude make an erroneous judgement on the evaluation of the appropriateness of Aston Field sites (see Para 5)

8 WHITE PAPER

We are particularly encouraged by emphasis in the recent White Paper (Planning for the right homes in the right places) on both Cross Boundary and Infrastructure Planning and encouragement for a more in-depth analysis of housing "need" evaluation and increased recognition of the importance of Neighbourhood Plans. These issues have been high profile in our Emerging NDP. Meanwhile we have endeavoured to establish the degree to which discussions have taken place between CDC and our neighbouring Districts of Wychavon and Stratford. The information gained to date has suggested that such discussion has been minimal and hence our own evaluation we would suggest is of some significance. Overall the White Paper proposals give support to our initiatives.

9 LOCAL HOUSING ANALYSIS AND INFRASTRUCTURE

Due to our unique geographic location at the intersection of Cotswold, Wychavon and Stratford Districts and also of three Counties and lacking any other source of cross boundary data on house build numbers we chose to initiate our own survey for inclusion in our NDP. We undertook a 7-mile radius house building analysis (Appendix 2 and 3 of NDP) which proved to be very significant on three counts. The map showing this analysis is attached as an Appendix to the report.

- a) It shows that in the very small area immediately around Chipping Campden of some 38 sq.miles we have currently an 8100 house target equalling the total for Cotswold District spread over 450 sq.miles (ie the proposed housing density in our rural area is no less than 12x the District average). This high density determined from our cross-Boundary analysis we maintain nullifies any attempt to argue "exceptionality" and further additions to our house build target.
- b) It brings a clear focus on the substantial anticipated problems of all the infrastructure planning and budgeting issues and in particular the dire situation that will otherwise ensue with traffic problems especially North to the Midlands (particularly through Stratford and crossing the River Avon). In the nearer term this will be amplified by construction traffic and in the longer-term commuter flows North/South.
- c) On a more positive note analysis shows that this large build programme offers an effective solution to our local Affordable Housing Needs both through high volumes of local houses and arguably even more important significantly lower Affordable Housing pricing structures compared to those in Chipping Campden itself.

CONCLUSIONS

In conclusion we believe the above evidence is robust and demonstrates why with regards to the conflict between the Emerging Local Plan and our Emerging Neighbourhood Development Plan

- 1 The allocation of Aston Fields as a proposed development site in the Local Plan is unsound.
- 2 The Development Boundary should not be extended around this site.
- 3 Our proposed organic growth policy is sound and practical.
- 4 Cross boundary infrastructure planning in the North Cotswolds, in particular for road transport, is totally inadequate

