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**From:**  
**Sent:** 23 January 2020 11:06  
**To:** Neighbourhood Planning  
**Subject:** FW: Regulation 16 Consultation on the Somerford Keynes Neighbourhood Development Plan

Hello

Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following officer comments to make.

### **Ecology Comments**

The policies promote biodiversity conservation and the achievement of net gain which is welcomed. The most relevant policies in this respect are SKPOL4, SKPOL14 and SKPOL15. Overall there are no compelling ecological reasons to recommend any change to the wording of the NDP policies.

Please be mindful that the Cotswold Water Park Biodiversity Action Plan is currently under review (10.3.2.3, 11.2, 11.3.2.6 & 13). A replacement document (which may have another name and format) may be agreed by the end of 2020 or later. The Cotswold District Council Heritage Team will have more information about this.

### **Minerals and Waste Comments**

#### **Policy SKPOL4**

We raised comments on an earlier draft of the plan in July 2016 and are disappointed to see that not all of the comments have been taken on board. Please see highlighted section below in relation to our comments on former mineral extraction sites policy.

*Furthermore, it is advised that draft policy SKPOL9 – 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’.*

The policy now appears as SKPOL4 – Tourism and Use of Former Mineral Extraction Sites and we consider that without the addition of a new criterion (suggested wording *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’.*) the policy could result in a situation of potential conflict with Policy SP5 of the adopted Cotswold District Local Plan 2011-2031, the adopted 2003 Minerals Local Plan and the emerging Minerals Local Plan 2018-2032.

The emerging Minerals Local Plan places great emphasis upon seeking net gains for biodiversity, some mineral restorations schemes require time to mature and achieve the full aftercare benefits. If existing, permitted, restoration schemes are not fully considered as part of any future proposals then biodiversity losses could occur.

#### **Other comments**

In addition the paragraph below appears on page 27 of the document and given that settlement protection zones no longer form part of local policy either through the emerging Minerals Local Plan or the Cotswold District Local the inclusion of the paragraph without any qualifying explanation does not seem to serve any purpose and has the potential to cause confusion. It is recommended that this paragraph should be removed.

**Minerals Extraction and the After-Use of Extraction Sites:**

*In the 2012 Parish Plan, 84% of all responding households supported the continuation of settlement protection zones as a means of protecting the settlements from minerals extraction and post-extraction uses that damage the setting of the settlements.*

**Archaeology Comments**

No further comments.

If you would like to discuss any of the points raised above please do not hesitate to contact me.

Thank you

Planning Officer

Sent from my iPad

1. Ref appendix 2. The logic of the currently defined limits does not stand up to scrutiny and is linked to a flawed 'key vistas' approach to maintaining the principal asset of the village of open countryside views. This is a 'have your cake and eat it' policy if countryside views are truly to be maintained. I would challenge why there is a defined limit so close to the Thames due to flooding risk and an arbitrary limit adjacent to manor cottages.

2. Ref appendix 7. The 'key vistas' seems arbitrary and seem to protect views of a subset of the village listed properties only. I would challenge that the current key vistas approach does not meet the primary aim of the NDP to maintain the village principal asset of maintaining countryside views from its existing permanent dwellings.

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Regards,  
Mr R. Ireland  
The Old School House  
Neighbouridge  
Somford Keynes  
GL7 6DX