

## Joseph Walker

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**From:** NIBLETT, Robert <...>  
**Sent:** 30 June 2021 16:39  
**To:** Joseph Walker  
**Cc:** PEARMAN, Karen; BENTLY, Alan; KENT, Alastair; KENNISON, Gary; SHIBLI, Emma;  
Archaeology Planning Advice  
**Subject:** FW: South Cerney Neighbourhood Plan: Regulation 16 Consultation now open, until 2nd July

Hello Joseph

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

### Transport Planning Comments

From a transport perspective it may be useful to emphasise the proximity of South Cerney to the Cotswold Water Park and to Cirencester. Section 5 recognises the need to strengthen walking and cycling links and opportunities within the settlement, and there may be benefits from extending this to linkages to and between surrounding close destinations and trip generators. In addition, the Local Transport Plan has been adopted recently. The NDP could refer to it and/ or to the transport and connectivity issues that are raised in the South Cotswolds CPS area, see [LTP4](#)

### Public Rights of Way Comments

Para 5.16.4 isn't quite right. The Commons and Rights of Way Committee (CROWC) don't deal with planning approvals. And the inference of the second half of the paragraph is that the CROWC also deal with requests for 'new' paths to be recorded on the Definitive Map.

The CROWC actually determine applications (known as Definitive Map Modification Order [DMMO] applications) on the basis of whether evidence exists that a currently unrecorded right should be recorded on the Definitive Map - they do not consider applications to create new "it would be nice to have" routes. The paragraph should be amended as follows:

#### 5.16.4

~~Although South Cerney is quite well served with footpaths, this amenity can be made better and safer through a small number of enhancements. The Parish Council has new footpaths pending planning approval with GCC Commons and Rights of Way Committee. Not least to meet the identified tourist need, new ones are identified and two sections of new footpaths needed to improve pedestrian safety. (See Appendix J).~~

#### 5.16.4

Although South Cerney is quite well served with footpaths, this amenity can be made better and safer through a small number of enhancements. The Parish Council has Definitive Map Modification Order [DMMO] applications pending with Gloucestershire County Council as it considered that rights exist over the same and that they should be formally recorded on the Definitive Map of Public Rights of Way. In addition, and not least to meet the identified tourist need, new ones have also been identified and two sections of new footpaths needed to improve pedestrian safety. (See Appendix J).

### Historic Environment Comments

It is good to see many of our previous comments have been addressed, however the following comments need to be restated:-

The document should follow Historic England guidance on the Historic Environment and Neighbourhood Planning <https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/>.

We recommend that a more comprehensive section is incorporated on the Historic Environment in South Cerney Parish using data from the Historic Environment Record (HER) as a baseline which includes a summary of all the designated and non-designated heritage assets (including those with archaeological interest). This section should incorporate archaeological information from the HER including maps in the appendices. Please contact the HER team for more information [her@gloucestershire.gov.uk](mailto:her@gloucestershire.gov.uk)

Please include in section 2 that the Church of All Hallows has a Norman foundation.

## **Ecology (Biodiversity) Matters**

### SEA/HRA for the Plan

Looking at biodiversity (ecology/wildlife) matters alone we are content to agree with the analysis set out in the screening assessment report. The report concludes that the plan proposals will not have a significant environmental effect and that SEA or HRA is not required. However, please note because the extent of the Cotswold Water Park SSSI has recently been greatly expanded ideally pages 6 and 7 should be updated. We do not believe that the expanded SSSI affects the screening report conclusions.

Please also note that the screening report still refers to Key Wildlife Sites (e.g. KWSs on page 9). These have been renamed to Local Wildlife Sites (LWSs) for some time now. Much of the Cotswold Water Park LWS has been subsumed into the expanded Cotswold Water Park SSSI and so the map on page 10 should ideally be updated too as well as the supporting text referring to KWSs.

### The Plan Content

We are pleased to note the Neighbourhood Plan now mentions the recent review of the boundaries of the Cotswold Water Park SSSI and their re-notification by Natural England. Please note our comment above on the SEA/HRA screening assessment report about the Cotswold Water Park SSSI.

We are also glad to see that Key Wildlife Sites are now correctly called Local Wildlife Sites in the main plan document (e.g. para 5.10.2.3).

We had previously recommended/proposed that ecology/biodiversity policy SC10 could be improved with alternative wording. We notice that this policy has changed greatly and incorporates many of our recommended modifications.

## **Libraries Comments**

It is unclear from the supporting Consultation Statement whether GCC's previous comments have been considered. It appears that our suggested additions to the community facilities policy have not been included in the current draft of the NDP but we would appreciate confirmation that they have at least been considered and the reasons for them not being taken on board.

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

Thank you

Rob Niblett  
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