



## **Somerford Keynes Neighbourhood Development Plan Regulation 16 Draft:**

### **Representation from Cotswold District Council**

Please find below comments from **Cotswold District Council** (CDC) on Somerford Keynes submission draft neighbourhood development plan (SKNDP).

We are grateful for the positive discussions that have taken place with the parish council in order to frame the policies within this neighbourhood plan, and the time taken to explore the issues we have previously raised. The draft plan introduces some policy approaches which are distinct to Somerford Keynes, and provides some useful additional detail in other areas which we welcome. We'd like to take this opportunity to commend the parish council for the effort they have put in to develop this document.

The comments which follow have been written to try to identify either points which in officers' views may not meet the Basic Conditions against which the NDP is assessed, or where the wording used may be open to interpretation. They may also upon occasion reflect the difference between the district role of this Council, and the local role of Somerford Keynes Council (SKPC).

We would like to advise that Cotswold District Council is expecting to review and update its Local Plan, with a corporate aim to adopt an updated Local Plan in 2023. This review is at an early stage, and we do not wish to pre-empt evidence or the options which will need to be consulted upon in due course, but our intention is to extend the Local Plan period until 2041, so we will be looking at how growth will be accommodated around the district up until that date. The re-publication of the NPPF in 2018 strengthened the role and recognition of neighbourhood plans, and at paragraphs 65 and 69 makes it clear they have a role in delivering housing numbers. That said, our expectation is that the focus of development will remain broadly consistent with our current strategy of directing development towards our principle settlements. Therefore we welcome Somerford Keynes' position of encouraging some small scale development, and do not have a current expectation that it should be allocating sites.

The review of CDC's Local Plan will be framed within the wider considerations of the climate emergency, and CDC has declared a climate emergency and an ambition to become a zero carbon district as soon as possible. Neighbourhood Plans, where possible, could contribute to this aim by proactively including zero carbon building and renewable energy generation ambitions within their NDPs. The Somerford Keynes Neighbourhood Plan is largely silent on this issue, but nor does it seek to implement restrictive policies that would stand in the way attempts to address this issue through improvements to the built environment.

**p18 SKPOL1**

We support the SKNDP's intent to allow some small scale development. This is a complex policy, which takes a different approach to the Local Plan.

As noted in our introductory comments, Somerford Keynes is not a principal settlement, and does not have a housing allocation within the Local Plan. Outside of these principal settlements, the District Council does not define settlement boundaries but instead development is managed through Policy DS3.

**Clause b).** This clause doesn't 'conform' with the Local Plan's policies DS 2-3, in that we don't define development boundaries outside of our principal settlements, and this policy enables development beyond infill. That said, the impact is clearly local to Somerford Keynes, and does not undermine our strategy at a district level. While it a departure from the Local Plan approach, it is tempered by a requirement that development is adjacent to existing development, which then swings back to conformity with DS3, and consistency with other policies in this plan such as SKPOL13. This may well be judged therefore to be in 'general conformity'.

**p22 SKPOL2**

As is clear from the evidence base presented in this NDP, local house prices are high, especially in comparison with local incomes. While a policy that seeks to address this is justifiable, this policy needs to be considered in the context of the NPPF and its expectation that housing should be supplied that meets the housing needs of different groups (para 61).

While by inference the policy is directed at open market development, there is no clear exemption from its requirements for housing built expressly to meet housing need that may not be offered for market sale – for example a rural exception site, permitted under policy H3 of the Local Plan, designed to provide affordable tenures for local people.

Moreover, we note that the definition of local people is rather limiting, and rather different from, for example, the description of local connection used by the district council in housing allocations. In terms of requiring continuous residence in the parish, younger people are less likely to qualify under this definition, nor is it open to people who have a strong economic reason to seek residence locally

As the process of sale and occupation is not part of the development management process, we're not sure how this would be implemented, or indeed enforced, nor indeed what proportionate enforcement might be. We wonder whether there is sufficient evidence presented to support this restriction.

We'd also observe that in many instances, small scale 'in-fill' development is 'self-build' – that is commissioned by the intended occupier, and so wouldn't be captured by this policy.

**p22 SKPOL3 - Holiday Homes**

Both the facts and consultation responses support the Plan's position of seeking to limit the number of holiday homes. This policy would only apply if a planning application came in explicitly for a 'holiday home'. Such a tenure is not promoted as such in LP policy anymore, so there is no incentive for a property to be presented at application as a holiday home. There is nothing preventing a house being built elsewhere in accordance with other policies, and then being used as a holiday home, circumventing the intention of this policy. On that basis we doubt that the circumstances that would 'engage' this policy will come forward.

**p27 SKPOL 4**

We have no comment on this policy.

**p30 SKPOL 5**

We have no comment on this policy

**p34 SKPOL 6**

We note that the establishment of new access routes is unlikely to be a matter for NDP policy, but we welcome the aspirations underpinning the first clause of this policy. The second clause responds strongly to community opinion.

**p36 SKPOL 7**

We have no objection to this policy.

**p39 SKPOL 8**

We have no objection to this policy.

**p41 para 4.** This section feels rather removed from the relevant policy and rather suggests that signage and light pollution may fit better under 'Conservation and Environment' than under community facilities. While this may not be an issue in relation to the Basic Conditions, it could improve the structure and thus usability of the Plan.

**p41 SKPOL9**

We welcome this policy.

**p43 SKPOL10**

We welcome this policy, and support its proposals

**p46 SKPOL11**

We believe that the existing Local Plan should and does enable development of the types mentioned in this policy, but have no objection to a policy clearly articulating community aspiration.

**p45 SKPOL12**

While we do not object to the wording or intent, we question whether this adds anything extra to the existing approach (pp 224-226 in the Local Plan covers design of signage)– generally we'd prefer NDPs avoid parallel policy making which may lead to some confusion, going against the principles laid out in paragraph 16 (f) of the NPPF.

**p49 SKPOL 13**

We believe this policy is an evidenced and proportionate response to the local heritage assets and communities views expressed through the NDP process.

**p52 SKPOL 14**

This policy adds a distinct local dimension to the referenced Local Plan policy, which we welcome.

**p53 SKPOL 15**

We welcome this policy.

**p53 SKPOL16**

We welcome this policy, which supports established Local Plan policy, and introduces valuable parish level information.

**Factual:**

Section 7 of the Character Assessment (appendix 3) refers to Shorncote Reedbeds as a Local Nature Reserve – it is managed as a nature reserve but it is not formally designated under the relevant legislation as an LNR. The biodiversity mapping only shows the Cokes Pit LNR.