

Stow-on-the-Wold and the Swells

Neighbourhood Development Plan

Volume 1. updated 24/01/2024

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Lindy Allfrey-Walker.

Walton House
Stow-on-the-Wold

While I'm pleased to see plans to build affordable homes in Stow-on-the-Wold the total number of new houses is excessive. A 30% increase in population would overwhelm local facilities- GP surgery, Post Office, Chemist, the one remaining bank, etc. It would also alter the aesthetics and tourist appeal of this ancient Town.

It's also not clear how many net new parking spaces will be created if parking is reduced in the Square? It's also not clear if the new houses would each have their own parking spaces? This would be essential if the already dire parking problems don't get worse. Many current residents don't have car parking at their house and have to hunt for street parking spots which certainly makes a transfer to EVs impossible.

Parking in the Square services the local businesses and a reduction in parking there will definitely adversely impact trade.

Yours faithfully,

Lindy Allfrey-Walker.

Mary Black
Foxlease
Broadwell
GL56 0TJ

Dear Sir/Madam

I write to request you take into account the grave concerns I share with many local residents regarding the proposed Bloor's housing development between Broadwell Hill and Tesco. I wish to object in the plan on grounds including those stated below.

The plan for the building of a minimum of 137 homes, with the possibility of 240, is on greenbelt agricultural land which is outside the area of permitted development for Stow. Additionally, and pertinently, Stow-on-the-Wold has not been designated as a key town for expansion in the Cotswolds (unlike Cirencester, Bourton and Moreton). The size of the development is excessive and, both practically and aesthetically, as it would be an hill-top development, overlooking land in an AONB, and would be detrimental to the area.

Importantly, the proposed vehicular entrance to the development from Broadwell Hill is, quite frankly, dangerous. The road is narrow, without road markings or pavements and is especially hazardous close to Broadwell village because of its restricted width and blind corners. It is also part of The Monarch's Way and popular with walkers. Residents of the planned estate would use Broadwell Hill and village to access the Oddington Road - also a very narrow country lane quite unsuited to heavy traffic - as a cut-through to the A316 and A44 southbound. This would dramatically increase the risk of accidents, not only involving vehicles but also to pedestrians. None of the lanes or minor roads leading into/from Broadwell are maintained well, the verges have suffered extensive erosion and both pedestrians and vehicles are put in danger.

Traffic using the Fosseyway A419 through Stow has increased hugely over recent years and there are frequently queues and delays. Not only would this situation be exacerbated by such a new, large, development but it would further add to the difficulties of accessing the A419 from Broadwell Hill. It can take over five minutes to turn onto the A419 - sometimes longer.

A potential environmental risk arises relating to the sewage and drainage from the site being gravity fed down Broadwell Hill to the Oddington Road pumping station. The increase in waste matter to be processed would be significant and could cause problems with back-up onto the surrounding land off the Evenlode Road and associated implications for the residents of Broadwell. There is no mention in the plans of an upgrade to the sewerage infrastructure. Additionally, the concreting over of such a large area at the top of the hill and its associated drainage and water run-off could potentially cause flooding affecting homes at the bottom of the hill in Broadwell. As an example, I refer to the flooding of homes caused by run-off in 2007.

Local infrastructure would be sorely tested to provide adequate services. Stow Surgery strains to meet the current demand from residents in Stow and the surrounding villages,

with long delays before being able to have a consultation. Without a provision for additional GPs and other medical services the surgery would be put under further increased pressure to provide an efficient and acceptable service to residents. The local Primary and Senior schools could also find themselves in an impossible situation if the new development attracted a sudden large influx of young families - which one has to believe would be the case with the building of a large number of family homes.

With reference to the suggested parking changes, any further limitation on parking in Stow town centre would surely have a detrimental effect on trade in the town. The demographics of the area illustrate that there is a large elderly population - indeed, the recent permitted developments of two large residential apartment complexes (albeit many not yet sold) and a care home for the elderly indicates that Stow councillors readily acknowledge that fact. Sadly, age is often accompanied by disabilities and physical limitations therefore the centre of Stow and its many excellent shops and services would become inaccessible to many who live in the nearby villages and have to drive to Stow. The independent shops of Stow would undoubtedly suffer and the town itself would be at risk of becoming a ghost town.

There is no proven need for a development of this size. The Neighbourhood Plan identified the need for 37 affordable homes for local residents between now and 2031. Bloors claim that to provide that number it would be necessary to build 170. Permission has, I understand, been recently granted to build 37 affordable homes on a site off the Oddington Road which suggests that Bloors figures may be driven not by local interest but purely by profit at any expense to others.

The scale of the proposed development would overwhelm the area and its infrastructure, adversely impacting the quality of life for existing residents and introducing unnecessary problems for the whole area.

I trust that the strong objections to this plan will be listened to and taken into account before any irrevocable decisions are made and the concerns of the residents of Broadwell (most affected but not included in the Stow and Swells Neighbourhood Plan) be taken into account.

Nigel Brindley
Clematis Cottage, Broadwell
GL56 0TY

Organisation and position (if applicable):

Date: 03 Jan 2024

Which part of the document does your representation relate to?

Paragraph number: 4.1

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

STC has NOT consulted with the local community as it has been selective about which neighbouring parishes to consult (i.e., The Swells, but not other adjacent parishes such as Broadwell, Maugersbury and Oddington or other parishes that will be directly impacted such as Evenlode and Adlestrop).

What improvements or modifications would you suggest?

Consultations should be held with all neighbouring parish councils and their residents included in any referendum held at the next stage.

Paragraph number: 5.6

Policy reference: SSNP1

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

STC seeks to amend the Development Boundary and to develop land outside this boundary. This conflicts with CDC's Local Plan. The main justification for doing so appears to build more affordable homes yet the plan pre-dates the approval of Planning Application No. 23/01513/FUL which will meet Stow's 2031 target on a single, more advanced site within the Development Boundary.

What improvements or modifications would you suggest?

Delete SSNP7.

Paragraph number: 5.10

Policy reference: SSNP3

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

The affordable homes target has already been satisfied by the approval of Planning Application No. 23/01513/FUL.

What improvements or modifications would you suggest?

Delete SSNP7 as not required.

Paragraph number: 5.26

Policy reference: SSNP7

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

This para falsely states that the walking distance to the town is less than 400m. This is incorrect as the shortest distance from the nearest point of the SSNP7 site to the Market Cross in the centre of town is over 500m. The distance from the centre of the SSNP7 site to the Market Cross is 980m. This also fails to recognise that the walk involves a 60ft descent (including a 35ft steep bank) followed by a 90 ft ascent that will deter many from walking and encourage them to use cars at the expenses of traffic and parking congestion in the town.

What improvements or modifications would you suggest?

Delete SSNP7 as an inappropriate site.

Paragraph number: 5.27

Policy reference: SSNP7

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

This para acknowledges that the SSNP7 site is exposed to the east and the wider AONB countryside and therefore can only be harmful to the AONB and the character of the countryside around Stow.

What improvements or modifications would you suggest?

Delete SSNP7 for its harmful impact on the AONB.

Paragraph number: 5.33

Policy reference: SSNP7

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

This para claims for the SSNP7 site significant improvements to biodiversity and local nature recovery but no evidence is offered to support the assertion that the conversion of agricultural land to housing can achieve this nor that it could be consistent with AONB conservation objectives.

What improvements or modifications would you suggest?

Delete SSNP7 for its harmful impact on biodiversity and AONB conservation.

Paragraph number: Basic Conditions Statement – para 3.4 (table)

Policy reference: SSNP7

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

The SSNP refers to the Flood Risk and Drainage Report prepared by BWB for the SSNP7 developer, Bloor Homes. This report is fundamentally flawed as it incorrectly states that the site is within the River Dickler catchment area (it is actually within the River Evenlode catchment area). No soakaway tests have been undertaken despite the ground condition being heavy clay soil over Limestone. Surface run-off is high during wet weather causing flooding to the Evenlode valley and in particular Broadwell (see attached photos of flooding in the village on 2nd January 2024). High water tables lead to various springs at high elevation around the SSNP7 site (these feed the historic wells just below the site). The proposed infiltration tests referred to in the report are irrelevant as any increased site drainage would simply feed into the high water tables feeding these springs and therefore increase flood risk below the site.

Also, no consideration has been given to the fact that the local sewer network is frequently overwhelmed with raw sewage being expelled into Chapel Lane and the grounds around the village hall in Broadwell on various occasions during heavy rain in the winter of 2023/23. The Thames Water sewage pumping station on Oddington Road, Broadwell, is already inadequate for current peak demand causing it to frequently discharge raw sewage into the Evenlode water course. Last year (2023) the Broadwell treatment plant discharged surplus untreated sewage into the River Evenlode watercourse for 528 hours (ref: [ECP December Newsletter \(earthwatch.org.uk\)](https://www.earthwatch.org.uk/newsletter/december-2023)).

STC states that the SSNP7 development “will be supported by the necessary infrastructure, facilities and a genuine choice of transport modes” without any supporting justification. The facts suggest quite the reverse. Stow is served by a very limited bus service and has no rail station. Local utility services are at full capacity and under strain with frequent broadband outages, power cuts, water supply will require updating for such a disproportionate increase in population and the serious drainage and sewage problems referred to above will be exacerbated. The lack of transport

infrastructure results in heavy car dependency currently leading to serious road congestion on the A429 off which this development will be located. This is before the 250 unit site at the Spitfire Development on the A429 at Moreton-in-Marsh is occupied and the SSNP7 site will result in further gridlock and unacceptable increased traffic pollution.

What improvements or modifications would you suggest?

Delete SSNP7 as its drainage and sewage impact, inadequate transport and road infrastructure, increased traffic pollution and lack of utilities capacity would render the site as unsustainable.

Please make sure any additional pages are clearly labelled.

Photos of flooding in Broadwell on 2nd January 2024 are attached below:









Caroline Brooks
1 Castle Barn Cottages,
Churchill,
Chipping Norton, Oxon OX7 6RB

As a local farmer, I have been able to see the beautiful view of Stow on the skyline for nearly 70 years, I cannot believe that you are planning to ruin this view with a development which is totally out of proportion, and will ruin the town itself and the surrounding area. Not only is it outside the Stow Development area, but it is within an AONB, which should be sacrosanct.

I hope that that you will listen to the pleas of both Stow and its neighbourhood, and withdraw the scheme.

Gavin Burtonwood
Millham Barn, Chapel St, Broadwell

GL56 0TW

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: SSN1

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Oppose

Please give details of your reasons for support or opposition or make comments:

I am a long-term resident of Broadwell and the Stow Town Plan has potential direct implications on me. Broadwell borders directly on to Stow and the Development Plan will, if it proceeds as proposed, have a disproportionate and negative impact on our village.

Whilst generating a plan may be admirable, it needs to be balanced against the damage that the development proposals would have on the environment. My primary concerns are around the recommended development of the site at the top of Broadwell Hill on an existing green field site outside of the existing town perimeter which is sited in the Area of Outstanding Natural Beauty.

My first objection is regarding the nature of the site. It sits on the ridge in a very prominent position and a development on this site will have a visible impact of the views of the ridge when viewed from the North West. This development will have a profound and permanent impact on the view and public amenity.

My second concern is about the justification for the sheer size of the development. Stow Town Council housing need assessment has identified a requirement for 37 affordable homes by 2031. Without focussing on the definition of "affordable housing" and the arguments for why these are required, having identified this as the requirement, proposing that the best way to deliver this is to obtain them through the construction of at least a further 100 plus market priced properties and 33 more low cost houses (for which no requirement has been identified) to incentivise the developer is not logical and brings with it a host of other problems. A development of this size is far greater than the town requires or can accommodate with its existing infrastructure. It will add an additional burden on existing GP provision within Stow, and social care provision. The market rate property is likely to appeal to and be affordable to an older population, increasing pressure on the social care and health provision.

Justifying the development on the grounds of needing low cost housing for young families to counter the ageing of Stow's current demographic is a fallacy. Whilst the affordable housing may be aimed at providing local young people who are starting families and supporting the school, social housing cannot be targeted in this manner and is provided to those most in need within the broader county. The housing is as likely to be allocated to individuals who

do not meet your target demographic with no links to Stow, who may have no children, who are vulnerable or who may have health conditions which inhibit them from working. What I am saying is that STC doesn't get to choose the demographic that comes into the area, and using the justification of a "need" for additional low cost housing to build 170 plus houses, the majority of which are not low cost housing is a massive miscalculation and wholly inappropriate for the environment, location and infrastructure.

I would also argue that if social and low cost housing is what Stow-on-the-Wold requires then there is an approved development which will meet this requirement on the Oddington Road site. Bayhill Property put in an amended planning proposal for exactly 37 affordable housing units (including 6 social rented, 16 affordable rented and 15 shared ownership affordable homes) which was granted in December 2023. As this exactly meets Stow's identified needs for 37 affordable housing units, I don't understand why the council are even considering a development of the proposed scale on Broadwell Hill. It is so far in excess of what is required that it is wholly unjustified.

Thirdly, I am objecting to the proposed plan on the grounds that the traffic implications of a build of this scale has not been considered or mitigated. With an additional 170-240 housing units on the Broadwell Hill site, one can expect an average of nearly a thousand car movements per day to and from the site. The route into Stow-on-the-Wold from the Fosse Way is already a quagmire of traffic for the busy parts of most days. By adding a thousand additional car movements to this does nothing to alleviate the existing traffic on the Fosse Way, and the neighbourhood plan makes no proposal for managing the increased traffic. A development on this site will have a significant adverse effect on traffic through Broadwell as traffic will avoid joining a traffic jam on the Fosse Way and turn towards Broadwell which will become a rat run for those looking to avoid the jams of Stow. Broadwell Hill has two blind corners on a steep single-track road and is unsuitable for significant increases in traffic. The lower half is also part of the historic footpath, the Monarch's Way. The increase in traffic would make walking this route more dangerous. I cannot support a development plan that identifies no mitigations to the proposed increase in traffic and which makes walking the national trail more dangerous.

My fourth concern is that a development on the Broadwell Hill site would have a flooding impact on Broadwell. Broadwell has had a number of significant floods in the past decades as it sits at the base of the ridge on which Stow-on-the-Wold sits. It currently has to deal with the existing run-off from the town, the fields around and Broadwell Hill Road. Broadwell has been subject to a long-term consultation with Gloucestershire County Council for a number of years to manage the flood risk and only last year villagers have been required to man storm drain clearance efforts (including through the night) during particularly wet periods to stop properties being flooded. A proposal to build on the site at the top of Broadwell Hill can only make the flood potential greater for Broadwell.

I attach a separate document to this email which shows photos of severe flooding that has occurred in Broadwell over the past decade. There will be large areas of hard surfacing from which the run off will be significant. In periods of heavy usage and rainfall, the sewage processing plant between Broadwell and Oddington fails to process the quantity of waste water that passes in its direction. All of the waste water from this proposed site will run to this processing site which is already over capacity. As such Thames Water is now regularly discharging sewage into the river Evenlode and has had to resort to using tankers to

transport sewage for treatment elsewhere. The sewage and waste water management system as stands fails to meet current requirement and cannot accommodate a further 170-240 houses. Without a substantial upgrade in these services this development would have a significant environmental impact on an area of outstanding natural beauty. The development plan fails to address this issue appropriately.

My fifth concern is that I can see no justification for developing the Broadwell Hill site on the basis that the town requires additional parking. As a regular user of the town's services, I have never had any issues with parking either in the square or the parking adjacent to Tesco. There is also parking available in the Mangersbury Rd car park which is under-utilised (primarily because there is a charge to use this car park). The proposal for an additional car park is a sweetener from the developer of the Broadwell Hill site, not a requirement of the town.

Additionally, the development includes a 'requirement' for a local community building. It is unclear why this is a requirement of any development plan for the town. There is already a sufficient number of community facilities within Stow none of which are at capacity usage. St Edward's Hall has periods of daytime and evening availability pretty much every day of the week. The Masonic Hall on Church Street is unused most days. There are also the following community centres/halls in Stow and the Swells: Stow Social Club, The Baptist Church Hall, Stow Community and Family Hub, Stow Rugby Club, Lower Swell Village Hall. None of these community hubs are anywhere near capacity. In fact most are very under-utilised. There is no requirement for a further 'community building' when existing ones are not being utilised.

On the basis of my comments above, I object to SSNP1 of the proposed neighbourhood development plan which I feel would have a detrimental impact on the environment, the AONB, congestion, and the neighbouring villages, and would overwhelm the infrastructure and facilities which support the existing community.

What improvements or modifications would you suggest?

Removal of the housing proposal as it far overreaches in what the community requires and what the environment can accommodate.















Kate Burtonwood
Millham Barn, Chapel St, Broadwell

GL56 0TW

Which part of the document does your representation relate to?

Paragraph number: N/A

Policy reference: SSNP7, and Appendices C, D & E

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

I have the following comment on the Stow and Swells Neighbourhood Plan, with reference to Policy 7 (SSNP7) and the relevant Appendices (C, D & E). I object to this Policy and believe it should be removed from the plan.

Overall it is clear that SSNP7 seeks to create a major development with a density, size and environmental impact which should not be allowed in the designated National Landscape or in the Stow area,. It is not in line with the National Planning Policy Framework and the Local Plan.

The SSNP fails to provide any indication of exceptional circumstances (required by Para 183 of NPPF) which would allow this development, indeed stating that Stow has already provided an above average amount of affordable housing in SSNP Paragraph 5.12. Large amounts of housing has been built in Stow over the period in which the SSNP has been prepared – none of which is referenced in the plan. More affordable housing is also set to be provided by a new development which has been granted planning (23/01513/FUL) and which meets any predicted housing need.

The development detailed in SSNP7 also contradicts the overall objectives of the SSNP listed in paragraph 5.2, which states that the key objectives of the Neighbourhood Plan are: • To ensure that the unique townscape and environment of the town and the surrounding parish is conserved and enhanced. • To ensure that the community has an adequate supply of affordable housing to meet its needs. • To secure and develop the town's economy. • To ensure that the community has appropriate infrastructure in terms of health services, community facilities, traffic and parking, public transport, and its green infrastructure. The development in SSNP7 is at odds with the unique townscape of Stow and its surroundings, with a density and type of housing which does not represent the style and layout of a market town. It seeks to create a "suburb" (and uses this term in the Design Code, despite the fact that a market town of this small size does not have suburbs) which could be independent from Stow with a community hub, businesses and retail and will therefore dramatically change and impact the town of Stow. The development does not include an increase in health facilities, which are already under strain in the area and has no provision for public transport, both of which would be essential if sustainability is an aim of the development.

In addition, the larger amount of Public Consultation described in paras 4.10 and 4.13 have statements regarding the community responses at research stage which put an emphasis on sport and leisure facilities, and the material facilities identified and laid out to be provided by the SSNP in the list after para 4.14 are affordable housing, leisure and sports complexes and a museum. SSNP7 delivers large amounts of market-value housing (100 units, with 70 more to follow on an additional plot and described within the SSNP), a car park and a mixed use facility which includes offices and retail facilities. This does not tally with providing what was asked for in the consultation process and therefore does not match with meeting the exceptional circumstance of being in the public interest. It is not in the public interest to build a large, market-value housing development.

Regarding SSNP7, Clause A, this lays out a plan for “170 homes...with approx. 70 affordable homes”. There is then a discrepancy in Appendix E, which notes the increase to 240 homes using land outside the site. The development overall is indicated as significantly larger than what is used for statistics in the plan, and with a larger proportion of market-value homes than is put forward in the SSNP. We are encouraged by the inclusion of the additional homes in the plan to view it as one development of 240 homes. The overall development would therefore only have 30% affordable homes, not the 40% touted in the SSNP.

Regarding these numbers of houses, the basis for the SSNP housing allocation is the Housing Needs Assessment (HNA) which indicates a need for 37, not 70, affordable homes by 2031. Alternative plans for 37 affordable homes exist and have recently been approved in Stow (23/01513/FUL). There is also no allocation for new housing supply in Stow in the Local Plan, to allow for the 170 proposed houses in Stow.

There is no logical justification given for almost doubling the number of affordable homes to be provided, as no demand is indicated, and the town already has an above average amount of affordable housing. The justification for the building of an additional 100-170 residential properties is economic requirement, however the planning application put forward for 37 affordable homes on a different site in Stow (23/01513/FUL) achieves this goal without requiring more than double the number of market value homes to be built. In building a larger proportion of private housing to affordable housing, the plan also goes nowhere in solving the issue of large amounts of housing in Stow being bought as retirement properties, which was also highlighted in consultations as an issue. This plan simply exacerbates the existing issues by providing a large new stock of market-value housing.

The further 70 market-value houses, sketched within the plan and referenced within it, are not within the Stow and Swells boundary - but within the small parish of Broadwell, a scattered rural settlement. It would be highly unsuitable to build in this way within this Parish, and would increase the housing and population in the Parish of Broadwell (population 342 in 2021 Census) by around 50%. No consultation took place with Broadwell regarding this plan (other than a meeting with the Parish Council to show them plans after the scheme was already drafted). It is at odds that the SSNP designates that Lower Swell, a larger settlement (pop 405), is unsuitable for development but pushes major development to a smaller settlement in the proximity, over which the SSNP has no validity and Stow Town Council has no authority. The SSNP simply presents a housing developer’s plan (Bloor Homes) for Stow and the wider area (Broadwell).

The development in SSNP7 also gives health and safety concerns. The access to the site is dangerous and insufficient. Putting the sole vehicle entrance into such a large major development onto a small country lane will have an environmental impact, with the traffic movements from 240 homes, a community hub and a 150-space car park. While the traffic comments in Appendix E state that this will be a rise in traffic movement of less than 10%, this seems to only take into account the movement on the A429, not the movement on this small country lane, which is currently minimal for local residential and farm traffic. The proposal goes against the recommendations drawn from public consultation, highlighted in the lists at para 4.14, where residents wished for traffic issues to be dealt with and a reduction in Heavy Goods traffic. By funnelling the traffic from additional houses and facilities onto an already overloaded section of the A429 at the North of the town, where traffic frequently backs up with up to 45 minute delays and long tailbacks, SSNP7 merely worsens traffic issues for Stow and the surrounding villages. It will also increase air pollution from cars sitting stationary at the junctions on the A429, with the worsened congestion. In the other direction, down Broadwell Lane towards Broadwell, the narrow and in parts single track country lane leads down a steep hill with blind bends, which also forms part of the Monarch's Way footpath, to a quiet residential village. The plan mentions measures being taken to avoid traffic travelling towards Broadwell, but gives no specifics as to how traffic could be managed and there has been no consultation with Broadwell about how this would impact or be mitigated. It is presented as an unknown quantity. Heavy traffic on this lane would be dangerous to pedestrians, cyclists and local traffic as it is not wide enough for cars to pass.

SSNP7 talks of giving pedestrian access from the development site to the supermarket and the town centre, but does not give any further transport options for those living there or using facilities. It is not possible that people will only need to go to these two destinations – as work, healthcare and wider retail are unlikely to be based in Stow given that it is a small market town with limited facilities. Again, this goes against key objectives to improve public transport for the town. In addition the pedestrian access to the site, out of the housing estate and onto Well Lane, leads pedestrians to a narrow walled lane, where they will be in direct conflict with traffic and there is no pavement and no space to pass safely. It is similarly dangerous and contrary to safe planning for pedestrian and cycle transit.

The SSNP at no point takes into account the Environmental Assessment, the needs for increased utilities and services or looks to increase or improve public transport. All these are necessary and part of the planning process and to make the development sustainable, which is key to the provision in the Neighbourhood Plan. In particular sewerage needs to be taken in to consideration, as a health and safety issue. The current sewerage capacity for the North of the town is already stretched and building a development of this size without significant change to utilities will lead to raw sewage overflows between Stow and the treatment works on Broadwell Road, specifically where the pipeline route turns a corner under Chapel St/Evenlode Rd in the village of Broadwell. This is extremely dangerous, both in endangering the health of people and safety of homes in this location, and in the potential for raw sewage flow into the River Evenlode and its tributary streams. Currently, Thames Water are discharging regularly into the River Evenlode near Broadwell due to a lack of capacity in the system (thameswater.co.uk/edm-map). Building a large estate of new

houses will create more sewerage and increase environmental pollution and this needs to be mitigated within the plan.

Broadwell also has a flood risk, and is currently the subject of CDC planning for flood defence work. The environmental impact of creating a major development site at the top of Broadwell Lane, where the main water flow comes at times of flooding, has not been assessed.

Clause A further lays out the building of a Community Hub. There are no justifications given for the building of a new community centre, other than anecdotal comments. There is no research presented in the plan as to what the centre would deliver and what need it would meet. It is notable that many community centres exist in Stow on the Wold (e.g. The Youth Club, The Social Club, St Edwards Hall, The Family and Community Hub) and a Village Hall in Lower Swell. These spaces are not referenced in the SSNP giving a false impression that no provision exists for the local community. The existing spaces are available for community use, and, far from being under pressure, they are under-utilised. No data on this provision has been examined in the forming of the SSNP. They also suffer in large part from under-funding and struggle to find community volunteers and staff. There is no plan presented for how the new Community Hall to be built under SSNP7 would be funded and run and it would put a further burden on the town to run and maintain it. Regarding the additional use, workspaces are also often available for hire within local businesses, business parks, and industrial and agricultural units. In my time as a resident in the local area, who is active in the community, I have never met anyone who has told me they cannot find a workspace, nor seen anyone seeking this provision and unable to find it on the numerous local social media groups. There is no evidence presented that this need exists in the community.

There is also a discrepancy in the description of the Hub in the Appendices, in which it is described as containing retail. This specifically goes against the idea that the development proposed in SSNP7 is designed to keep the current landscape of the town and boost the economy of the traditional town square. It instead seeks to create a separate commercial base away from the town centre, going against local wishes and changing the purpose of the proposed major development to one that is commercial rather than residential/community use.

SSNP7 Clause A and C also lay out the provision for a 150-space public car park. There is little data presented for the need for this car park – although improved parking is a clear objective and community request. There appears to have been no work carried out to review parking currently available in Stow, both in terms of the monitoring of timed parking zones, the use of current car public parks, which have poor layouts, or the use of existing business car parks (which are large, eg Tesco, Stow Vets, Cotswold Company) as part of community schemes. I myself have lived in the area for the past eight years and very rarely struggled to find a space for a brief trip to the centre of Stow. I have always found sufficient parking in town if not available in the square. The SSNP states that a problem exists with parking, but it is not proven. There are already 2 car parks outside the town square and within a 5 minute walk of the square. These are not referenced in the SSNP but parking is often available in these areas. In addition it is unclear in the plan what parking provision will

be given for the 240 homes within the full development (including the section of housing sketched within Broadwell Parish). With such density of housing in the space, and presumably only a maximum of one car-space per house, onstreet parking is unlikely to exist in the residential area, and those with second cars or visiting guests would need to use the car park for residential parking. This would therefore negate any spaces being available here for public parking. It is scandalous that options to adjust the existing, potentially sufficient parking are not considered first and that the SSNP would propose using greenfield land in the National Landscape to build a car park. This would be a terrible precedent to set and completely against the grain of planning frameworks.

I would further comment regarding the potential referendum which could occur if the SSNP goes forward. There is allowance for additional areas to be included in the referendum if deemed necessary by the District Council. I would strongly recommend that Broadwell should be included in the referendum. It is referenced many times in the SSNP, including sketches and paragraphs which denote the proposed housing development in the Parish. With the traffic entrance going out onto Broadwell Lane, which forms the boundary between Stow and Broadwell, the Parish is impacted environmentally and by traffic issues. It would also be impacted directly by light pollution due to the siting of the development on the Broadwell side of the ridgeline. The sewerage issues in particular impact Broadwell, as the main sewer route from Stow. There are also flooding issues which should be joined up. The plan impacts Broadwell dramatically and the residents of the Parish must be allowed to have a say in their own future.

What improvements or modifications would you suggest?

The removal of SSNP7 from the plan as it does not meet any assessed or evidenced needs for the town in its current form.

Further research regarding the possibilities for Truly Affordable Housing. A proper survey including District and County Council regarding parking requirements in Stow. These should be completed before any further submission by Stow TC.

The inclusion of Broadwell Parish in any referendum on the SSNP, should it continue to reference and have major impact on Broadwell.

The removal of the Swells from the Neighbourhood Plan. There is little evidence of research into the needs of the Swells, and no real suggestion of improvement to this Parish through the plan, other than suggesting that local residents propose parking schemes (which they could do without the assistance of the plan.) The Swells as a Parish is essentially absent from this Neighbourhood Plan and cannot claim that the providing of houses in a different area (Stow) meets it's Parish's requirements.

John Collard
13 Main Street
Adlestrop
Moreton GL56 0UN

Dear Sir or Madam at Neighbourhood Planning,

What worries me, having read through the Plan, is that there's not much detail about what parking will be available after the Square is closed. The only figure I came across was 200 spaces at the North Eastern development. But it looks as if that would be shared with the Hub Community.

The Square has about 130 spaces at present.

Regular shoppers from the North or East, like myself will perhaps still be happy to park at the Tesco parking, and new spaces that way. But are shoppers coming from the south going to be happy to switch to parking on the far side of the town and a quarter of a mile walk alongside a jammed up Fosseway?

To summarise, the very important issue of parking space for Stow in the future, should be much more clearly developed and presented.

V A Collins
Duck Puddle Cottage,
Evenlode Road,
Broadwell
GL56 0TS

Para 3.12 CE12 'Development Priorities.'

A smaller development would have less impact on the surrounding area notably Broadwell.

Para 4.15 'Large majority submitted by residents of Broadwell, most do not support the proposed vision but this runs contrary to the views expressed by Stow residents and businesses'.

Suggest this could be because of a failure to recognise how such a large development could impact upon the lives of existing Broadwell residents who are rightly concerned particularly regarding the location of the access off Broadwell Lane a very narrow main access road into Broadwell village used currently by motorists, pedestrians, cyclists and horse riders and which has an already dangerous blind bend at the bottom into the village. All the access roads into Broadwell are narrow and not adequate for increased vehicular (residents and service vehicles), pedestrian, cyclist activity on the scale which this development could create and how will traffic wishing to access the development be prevented from using the village routes especially given the congestion which occurs on the A429 Fosseway without giving rise to problems for village residents themselves?

A new public car parking area (150 spaces) on the development could lead to increased footfall for recreational purposes down into the village and off along its narrow routes creating additional hazards. Also, the creation of a 'business and leisure' facility in this area will likely add to this. Will this then become a major entry point into Stow itself directing traffic to a general car parking area? Presumably, yes?

Para 5.24 G 'The transport strategy shall seek to discourage traffic generated by the housing, public car park and community hub schemes from travelling East on Broadwell Lane towards Broadwell village'

How can this be achieved unless it is made one way which will then affect Broadwell residents access into their village where they live. Also, it would still allow access up the lane from Broadwell towards the new area ie by using the other routes into Broadwell.

'Shall implement any improvement works shown to be necessary to the A429 Fosseway/Broadwell junction prior to the occupation of the first dwelling'.

Note it says 'any' shown to be necessary. Presumably, without this there will be a period of up to five years of chaos at this junction and through the village whilst it is being developed and with no guarantees of how it would be managed following this.

Para 5.27 'Exposure on the East side to AONB so needs to justify 'major development' in the AONB.'

Not sure it does due to its scale and visual impact and other consequences such as water run off and potential for Broadwell to become flooded given the predicted rainfall due to

climate change. How would his be prevented?

Para 5.29 'The town is an internationally re-known historic tourism attraction of few equals in the UK but its success has created housing and parking problems that, if left unaddressed, have the potential to undermine that success in future years.'

Could it not also be that Stow could undermine its success by too much change and development and become more like Bourton on the Water? It could be argued that a theme park could enhance tourism etc.

Para 5.36

Some residents of Broadwell also would wish to retain the character and designation of the village in which they live and the peaceful situation and access to their homes and this development has the potential to seriously impact upon or disrupt that.

Para 5.63

'policy seeking to encourage the provision of new digital communications, infrastructure to support new business and homes'

No detail, is this to support the new housing development or wider afield?

Mr & Mrs Davin
Spring House
Upper Swell
GL54 1EW

I agree in a need for some affordable housing under the current scheme , however recent approval was granted for Bayhill on the Oddington Road . This is an 'Rural Exception Site' for 37 houses which satisfies the AECOM Housing Needs Survey , I fail to understand why we need the 250 proposed here ?

Stow on the wold is an historically important town sitting high in the Cotswolds surrounded by significant sites of archaeological significance and historical importance . The proposed site fundamentally changed this significant AONB and changed the landscape significant to Stow and immediate surrounding parishes

I can't understand why consent would be given to 250 new build properties proposed by Bloor when existing Cotswolds listed properties must go through extensive planning consent to extend update or review by current longstanding owners . Local grade 1 and grade 11 properties are under threat and residents are completely fed up with developers and commercial companies rail roading local areas for greed and profit.

The current plan significantly changes rural biodiversity and increases carbon footprint , despite proposed claims

The Fosseway is , on a good day , overloaded with cars and vehicles and the creation of this site only adds to existing challenges on this road

The impact of this proposal on the beautiful village of Broadwell completely changes the intrinsic landscaping of this Cotswold village . The light pollution , noise pollution , traffic light infrastructure, interference to village life, as well as fundamentally destroying the privacy and uniqueness for residents who have chosen to live in a quiet village in an area of AONB

The knock on impact also affects Longborough, Donnington , Condicote , Upper Swell , Lower Swell as drivers seek a rat run to avoid the inevitable traffic chaos on the Fosseway , further impacting local biodiversity, wildlife and increasing the carbon footprint in these surrounding villages

Existing sewage , water , electrical supplies and medical services are already under huge pressure if not breaking point . I fail to see how Bloor homes proposal can do anything other than add further to existing challenges

The scale of this , the location , the impact to a rural setting in an AONB is harmful , unacceptable and of huge negative impact .

We object wholeheartedly to this proposal

Antigone Dean
Wheatsheaf House, Broadwell, Moreton-in-Marsh
GL56 0TY

Organisation and position (if applicable):

Date: 4 January 2024

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: SSNP7

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

I'm a resident of Broadwell and have looked at your plans and would like to make the following objections:

Stow have identified the need for 37 affordable houses. I have no issue with the building of affordable houses, however there is absolutely no justification for building the 170 or 240 houses. Those who can afford to buy the private houses are very unlikely to have employment in Stow, where the main jobs are the lower income professions of caring, retail and tourism, so will be driving to employment elsewhere vastly increasing the already bad traffic situation. In addition there are over 100 empty properties for older residents as part of the two new developments built in Stow recently.

The Bayhill development on the Oddington Road has been recently given planning consent, which provides 37 affordable houses and that covers the current affordable housing requirement for Stow.

The houses are being built on top of a hill in an AONB and will be clearly visible across the Evenlode valley. The site has been rejected in the past as being obtrusive on the landscape and there are less prominent sites in Stow. The development does not fit with an area of outstanding natural beauty or a conservation area. The plan is outside the area of permitted development in Stow and would be building on greenbelt land which is currently agricultural land.

There is no provision in the plan for any highway recommendations. Stow is becoming much more congested with often lengthy waiting times on the Fosse Way. The volume of traffic through the A429 is growing as is the traffic through Broadwell, which will become a rat run for cars avoiding Stow and the inevitable traffic, cutting the corner off to travel between the Fosse Way and Chipping Norton, Kingham, Daylesford, Bledington area. The Broadwell Hill road between Broadwell and Stow is single track and unsuitable for heavy

traffic. It frequently has wide vehicle farm traffic on it and two blind corners. There is no provision for the traffic to pull out onto the Fosse Way, potentially causing long queues.

STC are keen for the development to go ahead as it will also include community benefits such as a new 150 space car park and a new community centre.

There are already two under used community centres in Stow and there is already a large car park in Maugersbury Park, Stow which is under used.

For people who live outside Stow, the plan to remove parking from Stow Square and make them walk in from the car parks, could potentially discourage them from driving into Stow at all.

There are no sewerage infrastructure upgrades mentioned in the plan. The sewage from the new housing estate would be gravity fed down Broadwell Hill to the pumping station on the Oddington Road. When this plant becomes over used, it will back up along the land by Evenlode Road in Broadwell and possibly have implications in our village for sewerage not getting away as it should do. There is also the issue of a large part of the hill being built on with concrete affecting water drainage and run off, potentially affecting Broadwell at the bottom of the hill with flooding and Broadwell already has a flooding issue.

Cirencester, Bourton and Moreton have already been designated as the key towns of expansion in the Cotswolds NOT Stow.

The number of residents who completed the survey in 2022 was 214 - around 11% of households. This plan is based on a narrow range of views from Stow residents. Hopefully more people will comment on the plan as the consultation has now been publicised.

There is no provision for additional GP services or district nursing in the Neighbourhood Plan putting the current already overloaded services under more pressure.

If it goes to a final referendum, the surrounding and not just Stow and Swell should be able to vote ,as it will impact them and also business owners in the area.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

Full name: MRS DOROTHY DENTON

Address: 12 HAWKESBURY PLACE

Postcode: GL54 1FF

Telephone:

Email:

Organisation and position (if applicable): Local resident

Date: 2-1-2024

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012?

Please delete as applicable: YES / NO

I oppose the plan that has been set out although affordable housing must be provided I think smaller sites nearer the town centre could be used i.e. around the old Telephone Exchange for example. The area chosen is in an A.O.N.B. and should never be built on. The area is good agricultural land & should remain so. Traffic chaos already occurs around the top of Breadwell Lane and therefore more will make things worse if building were to take place on the proposed site off that lane.

Part B

Which part of the document does your representation relate to?

see page 2

Paragraph number:

?

Policy reference:

?

Do you support, oppose, or wish to comment on this paragraph?

(Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

see page 2 for my reasons to oppose the plan.

What improvements or modifications would you suggest?

Use of smaller sites for affordable housing which is necessary

Please make sure any additional pages are clearly labelled

Andrew and Delyth Eastabrook
Rock Cottage,
Chapel Street
Stow

Representations on the Stow-on-the-Wold and Swells Neighbourhood Development Plan:
Regulation 16 Consultation

1. We have significant concerns about the Neighbourhood Plan and wish to register our strongest possible opposition with particular reference to Section SSNP7.
2. Our concerns are set out below and are to be read in conjunction with those other objections which we have had access to which go deeper into Planning Law.
3. Housing

Stow needs affordable housing, not market housing. The ascertained need of 37 units has now been met with the granting of Planning Permission for the Bayhill development adjacent to King George's Field on the Oddington Road. Within this scheme land is also allocated for further affordable housing provided by the Stow Community Land Trust.
4. Traffic

The Fosseway (A429) in particular and all the other approach roads to and through Stow are overloaded at present. Queues in the summer can be over 1 mile long and "log jams" regularly occur at the Evesham Road junction when drivers on the Fosseway coming from Moreton jump the traffic lights. A major housing development feeding onto the Fosseway on the Moreton side of Stow will only make it worse.
5. Stow Parking

It is acknowledged that parking is an issue. However, Tesco currently have an application before Cotswold District Council (CDC) which states that they do not need all their parking whilst seeking to expand their Supermarket. This "spare" parking should be allocated for Town use. Parking numbers can also be expanded by using the paddock between "Tall Trees"/"Belle View" and Stow Surgery. This could accommodate at least 60 cars in a sensitively designed and landscaped scheme.
6. Stow Square

The current parking layout is very poor. A scheme, which is attached, has been proposed and submitted to both Stow Town Council (STC) and CDC. This shows how

pedestrian space and green landscaped space can be expanded whilst at the same time parking can be increased by a small amount.

7. Community Use Buildings

Stow already has a substantial number of community use buildings. All are well used for a widely varying range of events but without any shortage of accommodation somewhere in the Town causing an event, of whatever type to be abandoned for lack of a venue. These are:-

7.1 St Edward's Church

The largest building in Stow which has been re-ordered by removing the pews at the west end of the nave. Stow Music Festival uses this venue along with major Town meetings and exhibitions.

7.2 St Edward's Hall

The upstairs hall can accommodate 100 people and is used for many events and classes solidly throughout the year.

7.3 Stow Primary School Hall

7.4 St Edward's Church Rooms

7.5 Baptist Church Rooms

7.6 Stow Social Club

7.7 Stow Youth Club

7.8 Stow Cricket Pavillion.

There is no need for a new community use building, especially of the size envisaged.

8. CDC Local Plan

This states the need for a Town Museum to widen the Town's appeal. The Trustees of St Edward's Hall have responsibility for some 9,000 items of local interest collected by a Victorian Vicar and some 450 books on the English Civil War. None of these can be displayed and all are currently in storage in the Corinium Museum and Gloucester Records Office. Both the Trustees and the Stow Civic Society have made representations to STC, CDC and Gloucester County Council (GCC) to use the abandoned Magistrates Court and the unused part of the Police Station. The building and site are owned by GCC and are let on a very long lease to the Justice Department and the Police. It should be noted that the last battle of the English Civil War was fought very near to Stow, indeed the prisoners were kept in the Church! This could be the inspiration for a major permanent Exhibition.

9. Environment

The traffic jams in and around the Town reduce air quality. No amount of landscaping around new executive houses will make up for the loss of open countryside. No Conditions on any Planning Permission can reduce or mitigate the light pollution at night. There is already an orange haze over Stow with only the Church Tower prominently lit at night on the western side. A major new development will emblazon the hill top at night.

The Neighbourhood Plan is fundamentally flawed and should be rejected. All the neighbouring Parishes are against it, including The Swells! It is a vehicle devised to make a distant developer a lot of money at the expense of trashing the Town, its environment and this area of the Cotswold AONB for all time.



Tilly Flaux
Oddington Top
Upper Oddington
GL56 0XN

I object to the Stow-on-the Wold Neighbourhood Plan on the grounds that it fails to meet the 'basic conditions' set out in the legislation.

The proposed housing development to the rear of Tesco's is major development in the Cotswolds National Landscape but fails to demonstrate the necessary exceptional circumstances and the development is not in the public interest.

The Local Plan is on track to deliver the 5 year land supply. The housing expected to be provided in Stow has been met and is expected to be exceeded by 59 homes. The NDP proposal for 170 additional homes would more than double the dwellings anticipated at Stow over the Local Plan period. There is no demonstrable need open market housing. The affordable housing need will be met by the recent planning approval for the site on Oddington Road.

The site's of the proposed new development is located within the AONB/National Landscape and is on productive Grade 3 agricultural land. It would be highly visible as it is very open to the north, south and east, with wide sweeping views across the Cotswolds landscape towards Oddington, Adlestrop, Cornwell, Chastleton and Kingham.

The NDP does not promote a sustainable pattern of development that aligns growth and infrastructure. It does nothing to improve the environment, reduce travel or mitigate climate change. The proposals would materially worsen traffic congestion on the main roads leading into, and through Stow, particularly in the peak periods, resulting in a harmful impact upon the vital tourist trade but also upon residents and businesses in the town and surrounding villages. Further harm will be caused to business by the reduction of available parking in the Town Square which will discourage locals from surrounding villages using the town for essential services.

The NDP should not proceed further without significant revisions to address the conflict with national policies and advice, be in general conformity with the Local Plan and contribute towards sustainable development.

Stow on the Wold and the Swells Neighbourhood Development Plan: Regulation 16 consultation.

Objections to this Development

Mrs Angela Goodchild, Bay Tree Cottage, Broadwell, GL56 0UF

This site is in no way consistent with the National Planning Policy or Cotswolds Local Plan 2011. Any land that falls outside Development Boundaries and Non Principal Settlements is referred to as countryside.

The site would be building on greenbelt land which is currently agricultural land and would be clearly visible across the Evenlode valley

The scale of the development is out of proportion with previous housing development in the area. Overall this site should not even be considered as it does not fit with an area of outstanding natural beauty (ANOB) or in a conservation area. New developments should not harm open spaces as this most certainly will.

Smaller sites would be more sympathetic to the local historic character of the town.

Cirencester, Bourton and Moreton have already been designated as key towns of expansion in the Cotswolds.

Moreton has a site on the Fosseway (A429) that is currently being developed by Spitfire homes with 150/2 new houses.

The other major problem is traffic on the A429 which is a major route running between the South West and the North of the district. Stow is already often completely congested with both local and through traffic, particularly in holiday times. It has steadily got worse over the last few years with new housing developments in Stow and Moreton. It can already take 20/30 minutes to get through Stow, with traffic queues as far back as the Donnington/Broadwell junction in the Summer. The combination of this proposed new housing development together with community building and 150 space car park etc. would only add to more congestion and will impact detrimentally to both Broadwell and Donnington which are small settlement villages.

As for sending tourists to this already congested area it would be madness, causing further traffic trying to get to the parking site could eventually deter them from coming to Stow. GCC highlights Stow as one of the 5 collision spots on the A429 now. Both current car parks are often not used to capacity due to their distance from the town and this new facility would be no nearer.

The proposal to restrict parking in the town square will be detrimental to the residents of outlying villages that use the current parking facility to get to the post office, chemist etc.

With a high population of older residents parking is needed near the shops.

This congestion already has a major impact on both Donnington and Broadwell villages that have become a rat run for cars avoiding Stow cutting the corner to travel to Evenlode, Chipping Norton, Kingham, Daylesford and Bledington. This development will in fact have a devastating effect on these villages increasing the traffic using the lanes to an unacceptable amount.

Consideration should be given to the cumulative impact of a new development which can subliminally erode the bucolic character of rural settlements and/or lead to produce a more urban form. This site has the potential to do so. Bloor homes states that Broadwell lane/A429

junction would need to be upgraded, signal controlled and the lane widened with provisions of pavements, this is not consistent with the rural character of this location.

Pedestrians in both villages have no footpaths and do not want them but unfortunately already find the increased traffic and the speed of the traffic has made it more hazardous to walk along the lanes. These lanes are wide enough for one car in places and are shared with tractors, walkers, cyclists (Broadwell is on the National cycle route) and horse riders. Tourists also walk along these lanes as they are part of The Monarch Way. Anything that would encourage more traffic, such as this development would be appalling.

Broadwell also has problems with sewage and drainage. The Oddington Road has insufficient for current sewage and the scale of the new housing development is likely to greatly increase this problem. Thames Water frequently discharges

sewage into the Evenlode water course during heavy periods of rain, drains in the village emitting raw sewage into Chapel Street and gardens.

Broadwell experienced severe flooding in 2007 affecting several properties and there have been episodes of streams breaking their banks and hill runoff flooding. This development site surface

P T O

run off would greatly increase the risk of flooding at the bottom of Broadway Hill. There are plans being progressed to build swales and field bunds to help prevent flooding but these are for current run off.

There has already been a strain on the local infrastructure due to development, for example GP services, dentists, and District nursing are already at capacity. There is a very restricted minor injuries unit in Moreton, and a part time Emergency service in Cheltenham which is already most unsatisfactory.

There is only a small primary school in Stow and pupils have to travel to Cotswold Academy which is currently full. It would need significant investment to meet any increased demand which this development will require.

The Cotswold is known for its areas of dark skies and this site would increase the risk of significant light pollution because of its elevated position and would impact a large area surrounding Stow.

As for the need for a community hub/work space I understand there are already several buildings in Stow which could be used or adapted for such use.

I understand Stow's need to provide 37 affordable homes but this proposed site is out of all proportion to that need. It would be better to provide smaller sites that are proportionate to the size of the town, more sympathetic to its location with ANOB and with a lesser impact on Broadwell, Donnington and other outlying villages.

I do not believe this development should be allowed, its size is out of proportion with the town and it will have a devastating impact on local infrastructure, particularly traffic on the A429. It could also be damaging to the historic character of Stow and risks harming the towns' tourist economy.

I have now received notification that planning permission has been passed for 37 affordable housing properties on more suitable land North of Oddington Road, Stow. Thus all the more reason to refuse unwanted development on this very precious Cotswold site with all the drawbacks it will bring to the area and surrounding villages.

Stow on the Wold and the Swells Neighbourhood Plan Regulation 16 consultations

Objections to this development

Mr Michael Goodchild, Bay Tree Cottage, Broadwell, GL56 0UF.

As this proposed development encroaches into Broadwell Parish boundaries it would be building on greenfield land within Conservative Area in an ANOB. With respect to any new development in a conservation area Section 72(1) of the Planning Act 1990 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. This developed site will contravene that.

I do not believe this development should be allowed, its size is out of proportion with the town and with Stows need to provide 37 affordable houses, it will have a devastating impact on local infrastructure, particularly traffic on the A429. Stow is already often completely congested with both local and through traffic, particularly in holiday times. It has steadily got worse over the last few years with new housing developments in Stow and Moreton. It can already take 20/30 minutes to get through Stow, with traffic queues as far back as the Donnington/Broadwell junction in the Summer. Highways have no plans to alleviate this already congested area which has a high record of traffic accidents. Broadwell is still a fairly rural community with working farms and this development would impact very heavily on the amount of traffic which would be diverting through the village to avoid traffic jams on the A429 and for frustrated new house residents trying to access the main road, turning left to go through the village. Broadwell is, like its neighbour, Donnington already suffering from rat run traffic to avoid Stow.

As for suggesting tourists would use a new parking area on this site when the other two car parks nearer the town are often unused suggests this is not the right site. It has also been suggested that parking in the town square would be made more restricted this would be very detrimental to local residents of nearby villages, often elderly, who use the facility to park near chemist and shops and could impact on local businesses.

There has been considerable housing provided in Moreton over the last few years and there is another development being built at present on the A429. All of which has or will increase the traffic congestion in this area. In the Summer it is frequently grid locked at Stow now. These developments have also had an impact on local services in the area, such as schools, GPs, dentists, hospitals etc. all of which are now at capacity.

There is also great concern about the development causing more problems with both sewerage and drainage in the village. Broad well was badly flooded in 2007 and has on occasion had similar problems since. Thames Water sewage plant is at capacity and this new development would most certainly overload the current sewage system as Thames Water already frequently discharges sewage into the Evenlode water course during heavy periods of rain, causing sewage flooding to houses and gardens in the village.

There is constant flooding at the bottom of Broadway Hill and this development site surface run off would greatly increase this flooding. There are plans being progressed to help prevent flooding but these are for the current run off.

GRCC has spent 100 years supporting and enabling rural communities to grow and thrive through community led planning, engagement and consultation.

Therefore I hope you will give serious thought to this application and its implications on Broadwell's ANOB Conservation Area.

Rosalind Margaret Gaskell

The Granary, Chapel Lane, Bledington, Chipping Norton, Gloucestershire, OX7 6XA

Organisation and position (if applicable): Bledington Parish Councillor; comments in a personal capacity.

Which part of the document does your representation relate to?

Paragraph number: Whole document

Policy reference: N/A?

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

- Stow on the Wold is the nearest town to Bledington, and any substantial developments in the town will potentially impact the residents of this village.
- SNDP's vision of Stow in the Wold as a thriving community with sufficient housing for all ages, some of which should be affordable, is commendable.
- However, although some plans for the site (eg community hall and car parking) are potentially useful, the overall scale of this development - 170 houses with likely another 70 in Broadwell Parish- appears to be out of proportion to the town's predicted needs.
- Indeed 37 affordable homes by Oddington Road were recently approved by the CDC in December 2023.
- It is estimated that 240 houses would be an approximately 30% increase in the population of Stow and its environs, which is a considerable amount.

- Such an increase would inevitably lead to substantially more traffic congestion - particularly on the Fosse Way - and pressure on accessing facilities such as GP surgeries, and also secondary schools such as the Cotswold School which currently appears to be maxed out on its site.

- Although the SNDP accepts that the AONB is important, this large scale development will clearly affect a number of other communities in the surrounding areas and will likely have a knock-on effect on tourism.
- The SNDP's own consultation with residents re their main issues flagged up Stow's unique townscape and environment as their number 1 concern, and that the AONB should be conserved and not spoilt by inappropriate development.
- The SNDP considers the effect on the AONB can be mitigated to some extent but it also flags up that the important setting to the east would particularly be affected.
- With major developments in an AONB, public benefit must outweigh harm; in this case, overall, that does not appear to be the case.

Rebecca Ducros, on behalf of Mrs Jean A. Glover

Elmsview,
Parsons Corner,
Stow on the Wold,
Near Cheltenham , Gloucestershire, GL54 1EE

Summary

I have read the plan and whilst social housing and affordable homes for young families would be welcome in Stow and the surrounding area to level up the community here, I do strongly question the scale of the proposed development and its location.

1. It is self-evident, that Stow is a historical town of considerable beauty and in a conservation area. Tourism is very important to the town and the opportunity to enjoy the beautiful walks and countryside must be preserved. Having said this, the numerous airbnb's in Stow do preclude people finding a property which is affordable in Stow.
2. That the traffic on the Fosseway is at best congested and often gridlocked, is well-known. Delays and access to the Fosseway from Tesco are often considerable. Hence the proposed enormous development would add to an already difficult situation and risks overwhelming it totally. Hence my comments on the location of the proposed development.
3. Parking is also a a major issue even given the two car parks at Maugersbury and beside Tesco. Parking in the square is a nightmare added to by the increasing number of SUV's. Furthermore it detracts from the beauty of the Square itself and the enjoyment of spending time there. I note the development cites 150 parking spaces but these vehicles would have to emerge on to the Fosseway and would add to the congestion in he Square.
4. Public Services and Amenities. Given that 240 homes are proposed increasing the population of Stow by 30%, it is highly questionable whether the existing structure would suffice. I understand however, that the school is undersubscribed. The Doctor's surgery already seems fully subscribed even before incorporating 30% extra patients.
5. Environment and Sustainability Concerns. I am not clear about the nature of the houses to be built. Will these be in Keeping with the Cotswold stone and comply with sustainability requirements. breathing clean air is a joy for people living in Stow. The sheer numbers of cars is already jeopardising this without adding to the pollution that the proposed development inevitably will.
6. An influx of youth and young families would be welcome, but there would need to be facilities tailored to suitably adapted youth and young children.

Conclusion

I believe the scale of the project and its location make it undesirable for Stow. I would however support a significantly scaled down version to add social housing and TRULY affordable homes particularly for young families (<100?). The location proposed would seem highly unsuitable given the existing problems. I am not clear of the economic benefits for

the community and whether these have been quantified. I welcome some form of development which takes into account these concerns which would serve to achieve a better balance between social, environmental and economic sustainability.

Sally Green
The Old Rectory, Upper Swell,
Cheltenham,
GL54 1EW

Dear CDC,

As a resident of over 20 years in Upper Swell I am writing to object to the proposal to build 240 houses on the edge of Stow-on-the-Wold. I am amazed that this site which CDC has already turned down as being unsuitable for allocation in the Local Plan is back under discussion. How often does the word No need to be said?

1. Those of us who live close to Stow know that all roads leading into the town are already overwhelmed with traffic. Drivers are constantly trying to avoid the Fosse traffic lights where the Evesham road, the Tewkesbury road and the Moreton road merge, by cutting through our tiny country lanes, thereby causing broken tarmac edges and general degradation. The rat run has become a daily trial.

2. The requirement for 37 affordable homes is one that has also already been addressed and received consent. One hopes that these would remain as such in perpetuity.

3. Car parking and a community hub are also mentioned. The Tesco car park and the Mangersbury road car park already provide additional parking to the Market Place. The ability to 'pop' up to Stow, park and buy the things we need and be gone, plays an important part in the lives of local people and those of the businesses with whom we are regular customers.

Within the town there are more than enough premises which could be used for social activities. St Edward's church, with its wonderful new layout, could fulfil this role as well as being a place of worship.

4. There are many more reasons against such a major housing development of this scale on the edge of this small, rural, ancient hilltop town with its historic buildings clustered around the market square, but I shall leave it for others to put them forward. What I would say is that tagging on a huge housing estate to this edge of Stow will destroy the connection it has to immediate farmland. The nature of the Cotswolds is already under threat of being urbanised and before long Stow could become another victim of an ancient market town enclosed by fast roads and gross overdevelopment. Once it has gone, it is gone forever. It is yours and our responsibility to look after our inheritance and protect it for future generations to enjoy.

5. Finally I would like to endorse the work of those who are more familiar with planning matters who live locally as well as Broadwell village, our near neighbour.

Anthony Gregory

Top Lodge Cottage, Well Lane, Stow on the Wold, Glos

Postcode: GL54 1BT

Organisation and position (if applicable):

Date:04/01/2024

Which part of the document does your representation relate to?

Paragraph number: Page 26 et seq

Policy reference: SSNP7 - Land North East of Stow

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

The creation of the Neighbourhood Plan has been an enormous task and all those involved are to be commended on a wide-ranging job very well done. No-one will agree with all of its conclusions and proposals, or the reasoning behind them, but the Plan embodies both good ideas and thorough research and the work involved has provided a very valuable basis for informed consideration of any future projects likely to affect Stow and its immediate neighbours.

I wish, however, to record my concern re the Plan's proposal for a very large development (240 houses in all) on a very visible hill-top site north-east of Stow. At present this site is agricultural land, is outside Stow's Development Boundary and lies in an Area of Outstanding Natural Beauty. Building on it, *on the scale proposed*, is sheer sacrilege and is surely prohibited by the National Planning Policy. Such development is also directly contrary to the guidance embodied in Cotswold District Council's Local Plan which states that Stow Town Council (STC) should seek to develop small and medium-sized sites no larger than 1 hectare. Furthermore, has not the alleged requirement for 'affordable' homes already been met by the recently approved development on the Oddington site?

With regard to *scale*, Stow's population, 1,905 at the last official census in 2021, has been at approximately this level throughout the past 40 years during which I have been a Stow resident. Assuming an average occupancy of 3 persons per household the proposed 240-house development would in the next 6 years to 2031 add approximately 720 people, an increase of some 38% - well over one third - to a community in which services and amenities of all kinds are presently stretched to the limits and beyond. Stow is not, and may never be, blessed with rewarding job opportunities. The new residents will need to find work elsewhere and this will greatly increase the already large number of people commuting in and out of Stow daily. Assuming an average of 1 ½ cars per household, 360 more cars would be in daily use in the already traffic-tortured roads in and around Stow – and chancing its dangerous internal 'rat-runs'. The scale of the proposal, within the overall context of this small rural community, is truly outrageous..

I note that at page 24 of the Plan, in para B.5.12 in the section on 'Housing Mix', the specially commissioned March 2022 Housing Needs Assessment conducted by consultants AECOM reports that: *"the town has an above average number of affordable homes in its current stock but this still falls short of meeting needs in a place like Stow"*. No further explanation is offered as to the nature or extent of the alleged shortfall, but the report has become an important 'driver' towards the large development now proposed. This is surely not the only solution: is STC in danger of going a bridge too far, and far too fast? Has sufficient consideration been given to solving the affordability issue by the creation of an appropriate amount of rented social housing – which would be far more affordable for those at lowish income levels than ownership in the likely high-cost mortgage environment of the next decade or more. If the only way that Stow can provide affordable housing is by bowing to the major developers' insistence that this can only be done within the framework of a grossly over-sized development of 'open market' housing, with all the adverse implications of this for this small community, then this is too high a price for this historic town to pay. I find the proposed 240-house development in breach of national, regional and local policies (as pointed out by many correspondents elsewhere here), of a completely unjustifiable scale, and not at all in the best interests of Stow. I would plead that no development of anything remotely of the size proposed should be considered until a major review of the adequacy of Stow's public services has been carried out and the surrounding road infrastructure has been expanded beyond its Roman fundamentals.

Lastly, re the proposed new car park on the north-east site, in light of Stow's relentless flow of visitors a further car park would of course be helpful - but should not be built if this can only occur as part of a deal whereby STC agrees to allow the building of an unnecessarily large housing estate outside the development boundary and prominently visible in the precious AONB. Any such car park will never be of first choice for Stow locals on a quick shopping visit; human nature being what it is these will always seek parking first in the Square, which just about works on most days for locals who know how and when to make the best of it. In light of the massive increase in Stow's population inherent in the 240-house plan STC's proposal to *reduce* the parking available in Stow Square (justified by the existence of the new north east car park?) appears counter-intuitive at best and would be very detrimental to the many Square-based businesses.

What improvements or modifications would you suggest?

Urgent review of the need for a development on this scale.

Mr.& Mrs R Hawthorne
Kin Gardens
Chapel Street
Stow-on-the Wold
GL54 1DA

COMMENTS ON THE STOW ON THE WOLD AND THE SWELLS
NEIGHBOURHOOD PLAN

Below is summary of my concerns

1. The size and location of the proposed development contains 100 market houses that Stow does not need and are not allocated in the CDC Local Plan
2. The developer is unlikely to comply with the provisions of Policies SSNP 3 and 4.
3. CDC has already discounted this site (S61) in their Strategic Housing Land Assessment as being unsuitable for allocation in the Local Plan. The 'masterplan' would NOT overcome the unique qualities of this site. It is a site that has one of the highest strategic landscape qualities in the AONB and would be a major development, with the associated large urban appearance (viewed from far and wide), traffic congestion and light pollution. It would have devastating consequences on these qualities and the hilltop setting of Stow.

I agree there is a need for affordable housing for purchase or rent to support the future economic development of Stow and the surrounding area. Such an affordable housing scheme submitted by Bayhill on the Oddington Road has just received planning consent. This is an 'Rural Exception Site' and only includes 37 affordable houses which satisfies the AECOM Housing Needs Survey.

Policy SSNP7 states that the land is in the control of Bloor Homes.

Bloor appears to have had a leading role in writing up the NP amendments and therefore has vested interests in preparing the wording. An example is the deletion of clauses C & D concerning the carparking and community hub that were requested by Swell Parish Council. This was added to ensure that the carparking and hub could not be abandoned once the houses were built and occupied. Alternative wording has been added but this is weaker and allows the developer to circumvent the original requirement.

'.....the following sentence has been deleted: "It shall be constructed and made available for operation prior to the first occupation of the housing scheme'

The NP states that this was the preferred site in 'community' surveys carried out in 2022 but only a small number responded as a percentage of Stow's population and

Stow Town Council itself acknowledged that this was a “low response rate” & “cannot regard the result as strong guidance” For such a large, damaging and controversial development this is poor evidence of support by the Stow community.

The NP acknowledges that the proposals would constitute a major development but then attempts to justify the unjustifiable by stating.....

‘The TC does not dispute that the proposal is ‘major development’ and that such a change will be harmful and permanent as a matter of principle. Nor does it dispute the fact that the land exhibits the special qualities of the AONB (as set out in the CAONB Management Plan), lying on an east facing slope of the town within its wider setting that is visible in part in long views from the east.....

For the proposal to form an allocation policy of the NP it must meet the ‘basic conditions’ in both having regard to national policy and being in general conformity with strategic development plan policy (notably Policy EN5 ‘AONB’ of the adopted Cotswold District Local Plan 2011-2031). It is therefore necessary to demonstrate that all three of the tests of NPPF §177 (to which Policy EN5 defers) are met,.

Test A: The Need for the Development. The scheme would secure both market and affordable housing for which there is a need in Stow to shift its demographic profile, economic base and self-sustainability. It would boost the supply of local housing in way that has not happened in 40 years and contribute to District-wide housing supply. Crucially it will deliver almost 100 affordable homes.....’

This statement is incorrect as only 37 affordable and social homes are required in Stow over the Neighbourhood Plan period (2021-2031) as set out in the AECOM Housing Needs Survey (March 2022) which is one of the NP base documents. No further market housing is required. Such 37 affordable houses recently received planning consent as a Rural Exception Site on the Oddington Road and so the justification for the 100 market houses is no longer valid.

Test B: The Absence of Alternatives. The whole of the NP area lies within the AONB. The benefit of the NP plan-led approach is that it allows for communities to envision their future, gather local evidence and come to a planning judgement on reasonable alternatives. Since the 1970s, any housing (other than for older people), economic (other than for tourism) and social (again, other than for older people) needs of Stow have been met by other towns in the northern part of the District, or in neighbouring Districts. For the vision to be realised, of necessity these needs must be met in Stow and therefore in the AONB.’

There are alternatives to the proposed community hub. Such as the large empty Magistrates Court in the Police Station that has been unused for decades, the Cricket Pavilion, the Youth Centre, Church & Baptist Rooms, School Hall, St Edwards Hall or a new building on King Georges Field?

Test C: Moderating Detrimental Effects. The concept masterplanning work has shown that the site is large enough to accommodate a landscape strategy that can successfully moderate the majority of the harmful environmental effects. The

arrangement of uses and design strategy will enable new landscape to permeate the scheme and to bolster the existing tree belts and hedgerows around its eastern, southern and northern boundaries. The scheme has additional environmental benefits in the form of green infrastructure and biodiversity enhancements. It would also deliver recreational benefits through new footpath links and the creation of publicly accessible areas on land that is currently private.'

CDC have already discounted this site for development. It is a site that has one of the highest strategic landscape qualities in the AONB. A major development, with the associated large urban appearance (viewed from far and wide), traffic congestion and light pollution, would have devastating consequences on these qualities and the hilltop setting of Stow.

Regarding the 'biodiversity' claims, this is a classic example of 'Greenwashing'. For the best biodiversity outcome and lowest carbon footprint the site should be left as open agricultural land preferably with wildflower margins.

The CDC SHLAA Assessment for this site reads as follows.....

'The site is on the same side of Stow as the refused planning permission for up to 146 dwellings on the Land east of Griffin Close site, which subsequently had an appeal dismissed. With S61, however, not only would the development also be considered to be 'major development within the AONB' but the scale of development would be considerably larger and more harmful to the AONB than the Land east of Griffin Close site. The site is on higher ground than the Griffin Close site and is more visible within the surrounding landscape. Stow is a hilltop town and development in this location would not be in keeping with the settlement pattern. The scale of development on a slope would erode the character of the town, as well the rural setting in which the town sits. It would adversely affect the intrinsic value of the AONB and the proposal is assessed to have "High" landscape impact. The development of S61 would also harm the rural setting of a Scheduled Monument, it would harm the setting of the Conservation Area, and it would harm the settings of a Grade I listed building and a Grade II listed building. Other considerations, such as the loss of productive agricultural land, whether the access via Broadwell Road is suitable for the scale of development and potential archaeological issues would also need to be explored further but may also be further constraints to the development of this site. Recommendation S61 is unsuitable for allocation in the Local Plan'

In Appendix E further attempts are made to justify the proposals including the AONB 'checklist'. The proposals DO NOT justify or outweigh the development implications.

Policy SSNP7 contradicts the CDC adopted Local Plan in many respects.

Typical examples are :-

1.5 *'.....Neighbourhood Plans must meet some 'basic conditions'. In essence the conditions are:.....'.Is the Plan consistent with local planning policy?'*

The NP proposals do not.

3.5. *'The Neighbourhood Plan must be in general conformity with the strategic policies of the [CDC] development plan.'*

The NP proposals are in conflict with Policies S13, EN1, EN4, EN5 and EN10-12 in the CDC adopted Local Plan.

3.6. *'Policy S13 [in the CDC Local Plan] is specific to the town and encourages improvements to community and tourism facilities but contains no development proposals'*

-
This speaks for itself

5.2 *'The key objectives of the Neighbourhood Plan are.....to ensure that the unique townscape and environment of the town and the surrounding parish is conserved and enhanced.'*

The proposals clearly do not.

Other Policies in the NP relate to Policy SSNP7.

Policy SSNP3: Housing Mix [in the NP] states a 40% requirement for 'affordable' housing and a specific rental/ownership percentage and dwelling type for new developments of 6 or more dwellings. These requirements are unlikely to be enforceable or protected from Appeals from experience of previous similar developments.

Policy SSNP4: Principle Residence proposes restrictions to ensure occupancy only as a principle dwelling to avoid them becoming holiday lets or second homes. This is notoriously difficult to implement and the NP acknowledges this by saying that *'this presents enforcement challenges to the District Council....'*

Part D of the Policy refers to the car park scheme and later states that the carpark is 10 minutes away from the town centre. However, many visitors are already reluctant to park in the Tesco or Mangersbury road carpark allocated for visitors.

Part H of the Policy states that *'the transport strategy shall seek to discourage traffic generated by the housing, public carpark and community hub schemes from using the Broadwell Lane other than to access the site from the A429 Fosse Way....'* This will not be enforceable. Most of the traffic generated will come from the A429 junction and this will probably need yet another set of traffic lights to cope with the potential 600 plus vehicles per day generated from both directions. In any event, it is not possible that practical restrictions could be imposed to prevent traffic using the Broadwell Lane from the development except by making it a one-way street which residents of Broadwell village would not find acceptable. This would become a 'rat run' for vehicles trying to avoid the congested A429 junction, guided by their satnavs.

Given the recent consent for 37 affordable houses in Stow there will be no public benefit from such a development of market housing. Nothing will compensate for the long term damage to the character and setting of Stow and the surrounding countryside with more traffic congestion and pressures on the already overloaded sewage, electric and water infrastructure. Most benefits will accrue to the developers, property speculators and the wealthy who can afford to buy the expensive upmarket houses.

A final issue is that the site falls partly within the Broadwell Parish. The 'masterplan' shows the full development of 240 houses including the area in the Parish of Broadwell. It is understood that many residents of Broadwell are not supportive of the development as they will be equally affected by the degraded landscape, light pollution and traffic congestion.

The Swells will also be affected by the increased traffic congestion and degrading of the AONB which was established for the national benefit and well-being of residents and visitors to the Cotswolds.

Robert Marcus Hearle
6 Old Quinmoor Farm, Broadwell, Glos,
GL56 0TB
Organisation and position (if applicable):

Date: 2/1/2024

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: SSNP7: Land North East of Stow

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

I wish to register my opposition to Policy SSNP7 and the proposed development on the land North East of Stow for the following reasons:

The scale of the housing development does match the identified need. Whilst the desire to deliver more affordable housing is supported, the scale of the proposed development of 240 does not appear to be in-line with identified needs for the area. The type of housing is identified in the plan, but the amount of required housing does not appear to be determined. The plan also does not consider the significant developments that have taken place in Moreton-in-Marsh with 250 new homes on the Spitfire Development and 67 new houses on the Evenlode Road. These developments are only approximately 4 miles from the proposed Land North East of Stow. These developments are already placing considerable strain on local infrastructure and transport.

The proposed policy does not address the traffic issues in the area. Stow is poorly served by public transport with no train station and only a limited bus service. Given that most homes will be purchased by people working outside the area this will only worsen the traffic problems in Stow.

The Fosse Way through Stow is already a traffic blackspot with vehicles consistently backed up beyond the Broadwell turning and traffic delays of 15-30 minutes through Stow common place. As a result, the traffic leaving the proposed new homes, community hub and car park will turn right through Broadwell and then onto Evenlode if travelling North and out to Oddington if travelling towards Kingham Station, Chipping Norton, Oxford and the M40. This will result in a substantial increase in traffic on roads which are not suitable. The road into Broadwell is narrow and includes two blind bends. It is also regularly used by walkers who have to walk on the road and is on a recognised cycling route which provides the only safe route between Stow and Moreton

Whilst the plan recognises this as an issue the only provision is to discourage drivers from turning right. This will not be effective given the current traffic problems.

Adverse impact on the AONB. The hilltop location means the new houses will be clearly visible across the Evenlode valley as its in an elevated position. This does not fit with an area of outstanding natural beauty (AONB) or in a conservation area.

The plan does not seem to be supported by residents in the area. Many of the above issues appear to have been raised during the consultation process but have not been addressed in the development of the plan. The plan recognises that the majority of comments on the pre-submission document do not support the northeast site development. These concerns have not been adequately considered with no material changes being made following the consultation.

What improvements or modifications would you suggest?

Substantially reducing the size of the development and/or considering alternative sites.

The plan needs to address the traffic issues in Stow and on the Fosse way. If the Northeast site were to continue to be considered alternative access routes need to be considered, perhaps through the existing traffic lights by Tesco.

Sophie Sara Hearle
6 Old Quinmoor Farm, Broadwell, Glos,
GL56 0TB

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: SSNP7: Land North East of Stow

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

I wish to register my opposition to Policy SSNP7 and the proposed development on the land North East of Stow for the following reasons:

The scale of the housing development does match the identified need. Whilst the desire to deliver more affordable housing is supported, the scale of the proposed development of 240 does not appear to be in-line with identified needs for the area. The type of housing is identified in the plan, but the amount of required housing does not appear to be determined. Additionally, there are a **large** number of unsold houses (approximately **100**) remaining in recent developments in the town – surely the fact that so many remain unsold would indicate the proposed ‘need’ for new houses is vastly over exaggerated.. The plan also does not consider the significant developments that have taken place in Moreton-in-Marsh with 250 new homes on the Spitfire Development and 67 new houses on the Evenlode Road. These developments are only approximately 4 miles from the proposed Land North East of Stow. These developments are already placing considerable strain on local infrastructure and transport.

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Whilst the plan recognises this as an issue the only provision is to discourage drivers from turning right. This will not be affective given the current traffic problems.

The proposed policy does not address insufficient medical provision in the town.

The local doctor's surgeries and Moreton Hospital are already under extreme pressure – this proposal does not make any additional provision to address the issue of GP services or District Nurses needed to alleviate this potentially escalating problem.

Adverse impact on the AONB. The hilltop location means the new houses will be clearly visible across the Evenlode valley as its in an elevated position. This does not fit with an area of outstanding natural beauty (AONB) or in a conservation area.

The plan does not seem to be supported by residents in the area. Many of the above issues appear to have been raised during the consultation process but have not been addressed in the development of the plan. The plan recognises that the majority of comments on the pre-submission document do not support the northeast site development. These concerns have not been adequately considered with no material changes being made following the consultation.

What improvements or modifications would you suggest?

Substantially reducing the size of the development and/or considering alternative sites.

The plan needs to address the traffic issues in Stow and on the Fosse way. If the Northeast site were to continue to be considered alternative access routes need to be considered, perhaps through the existing traffic lights by Tesco.

David & Rosalind Hedges
Granary Barn,
Chapel Street,
Broadwell, GL56 0TW

As residents of Broadwell, Our principal objection is the potentially devastating effect that the proposed development will have on this village, and we would comment as follows.

1. Traffic congestion Southbound on the A429 is already well documented and gaining access to the A429 from Broadwell Hill is often difficult.

Already, it is becoming obvious that an increasing number of vehicles are diverting through Broadwell in order to access the A436 to Chipping Norton.

This will only worsen massively should a potential 240 new dwellings be given access to the A429 from the top of Broadwell Hill.

The roads in and out of Broadwell are adequate for a small rural community but far from adequate for the potential increased traffic flow.

2. Broadwell is already threatened by excess surface water during prolonged wet weather and the proposed development will only exacerbate this at scale. Both surface water runoff and sewage disposal represent considerable issues for Broadwell, downhill from the proposed development.

3. The escarpment in an A.O.N.B stands to be disfigured by a development of the proposed size.

4. Notwithstanding all of the above, the essence of the S,& S, N.P. is, in many ways, to be commended but the location of the proposed development is absolutely not.

Any accusations of "Nimbyism" against Broadwell residents are ill judged as the quality of life in the village would be massively diminished for ever.

5. In the event of the proposal being ratified by the Inspectorate, any referendum on the result should include Broadwell residents, not least because part of the proposed development site lies within Broadwell Parish.

Lady Penelope Holmes

Fox House
EVENLODE
GL560NN

I am a resident of the village of Evenlode which is nearby to Stowe and the location of the proposed new housing. I have several worries about the Development Plan.

I object to the size of this plan for new housing due to its size which I think is out of proportion to its need.

I am particularly worried about its location being near to the Fosse Way where there is already a permanent build up of traffic into and past the town of Stowe. The addition of new housing will only make this worse.

In order to avoid this traffic jam cars will surely turn off towards the neighbouring village roads - eg Broadwell and Evenlode - and these roads are narrow country lanes not built for large volumes of traffic most of which are in a hurry...

The windy lanes are much used by horse riders and cyclists, the volume of which already poses a danger to both drivers and riders. The addition of more cars will bring more danger.

The village roads are not built to carry large volumes of traffic and with no pavements and a policy of no lighting in the evenings already pose a problem to villagers with more traffic already appearing (mostly from those avoiding the already bad jams on the Fosse Way) .

The area around Stowe and the town itself are a wonderful draw to tourists and visitors of all kinds. Parking is already a problem in town so this will also increase with more housing arriving.

There will also be a struggle with extra pressure on infrastructure generally - particularly sewage etc with which the area already struggles.

All in all I think this plan has not been thought through sufficiently and I would very much like all the above to be reconsidered seriously.

be taken into account at the Neighbourhood Plan examination.
Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

Full name: Margrit Hudson
Address: Moray House, chapel st, Broadwell, Moreton-in-Marsh
GL56 0TW
Postcode: GL56 0TW
Telephone:
Email:
Organisation and position (if applicable): N/A
Date:

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012?

Please delete as applicable: YES / NO

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: SSNP 14(104), SSNA6, SSNP 7

Do you support, oppose, or wish to comment on this paragraph?

(Please tick)

Support Support with modifications Oppose Have
comment AS ATTACHED

Please give details of your reasons for support or opposition or
make comments:

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

Cotswold District Council Page 1 of

2 www.cotswold.gov.uk

Margrit Hudson, Moray House, Broadwell, Moreton in Marsh, Glos. GL560TW

I Object to the site at East of Fosse Way, Stow on the Wold

SSNP14 (104)	<p>Talks about requiring that transport issues are considered to promote walking and cycling.</p> <p><i>I hope the transport issues will be looked at for Broadwell.</i></p> <p><i>It is already difficult to get out onto the A429, and I think Broadwell will become an even busier 'rat run' for those on the proposed new estate as well as others who already do so. We have part of The Monarch Way through Broadwell and villagers walking around the village lanes. Some lanes are only one car width without a footpath or grass verge to step onto, due to the steepness of the verges. It is already difficult when cars travel too fast.</i></p>
SSNP6	<p>The Policy proposals to consider health and wellbeing and the future impact of climate change.</p> <p><i>Once again they need to consider Broadwell as we are already told that due to climate change we can expect hotter summers and more torrential rain. We have had cases in Broadwell when due to torrential rain the water pours off of the hill flooding homes, and the roads both sides of the village green had become impassable.</i></p> <p><i>With 170 houses and 150 car parking spaces this will add to the water pouring down the hill into Broadwell.</i></p>
SSNP7	<p>States that the land is well located.</p> <p><i>For Stow but not for Broadwell as we are at the bottom of the hill. See above SSNP6</i></p>

Flooding in Broadwell, as a result of water pouring down the Stow hill, during torrential rain



Margit Hudson, Moray House, Broadwell Q156 OTU

Margrit Hudson, Moray House, Broadwell, GL05
9L56 OTW

flooding in Broadwell, as a result of water pouring down the Stow hill, during torrential rain



Christopher Johnston
4 Portland Terrace
Evenlode GL56 0NW

Please accept this email as a formal objection to elements of the prepared Stow on the Wold and Swells Neighbourhood Plan. The section I am primarily opposed to relates to the proposed residential development on Land to the North East of Stow.

I consider that such development would be wholly inappropriate for the following reasons:-

The number of houses proposed far exceeds the amount that has been identified as being required in the locality for the foreseeable future.

There is an alternative site within Stow, for which planning consent has recently been granted, which would meet the requirement for local 'affordable' housing in the coming years.

The development would create considerable additional traffic in a locality which already has significant problems of congestion, particularly during peak summer months. It would necessitate the creation of a new junction onto the Fosse Way which would further impede the flow of traffic through Stow.

The increased congestion on the main roads would inevitably mean that there would be extra traffic on minor country roads passing through local villages such as Broadwell and Evenlode as drivers seek to find alternative routes. Many of these roads are narrow with only occasional passing places and are frequently used by horse riders, cyclists, walkers and slow farm vehicles.

The site is elevated and the development would inevitably result in considerable light pollution to much of the surrounding area and this would be especially noticeable from within the Evenlode valley.

The sewerage system within the area is already under considerable strain and is often overloaded resulting in frequent discharges of untreated sewage into the river Evenlode to considerable detriment of the water quality. There is no spare capacity to process the additional effluent which would be generated by the proposed development.

As it would occupy an elevated position the development would be a visually intrusive blight and have an adverse impact on an AONB.

The local services such as the primary school and GP surgery are already or very nearly full and do not have the ability to meet the additional demand which would undoubtedly be generated should the development be allowed to proceed.

For these reasons I consider the proposed development to be wholly inappropriate and would urge most strongly that it be rejected.

22nd December, 2023

HOUSING DEVELOPMENT – STOW-ON-THE-WOLD

Would like answers to the following:

1. FROM BROADWELL LANE TO FOSSEWAY – WITH OVER 200 HOUSES BEING BUILT – HOW IS TRAFFIC GOING TO EXIT AND ENTER THE FOSSEWAY. IT IS BAD ENOUGH NOW DRIVING ON THE FOSSEWAY AND TO EXIT AND ENTER ON THIS ROAD WOULD BE A NIGHTMARE WITH ALL THE EXTRA TRAFFIC.
2. WHERE ARE ALL THE JOBS IN THE AREA – PRESUMABLY NOT IN STOW SO CARS WOULD BE NEEDED - MORE TRAFFIC ON THE FOSSEWAY.
3. WE HAVE DIFFICULTY GETTING AN APPOINTMENT AT THE DOCTOR'S SURGERY NOW – WILL THERE BE PROVISION FOR ANOTHER SURGERY? OR WILL WE BE WAITING EVEN LONGER FOR AN APPOINTMENT.
4. WILL THERE BE PROVISION FOR FACILITIES REGARDING CHILDREN IN THIS NEW DEVELOPMENT I.E.VILLAGE HALL, PLAY AREA ETC.
5. A NEW STORE? OTHERWISE OWNERS IN THIS NEW DEVELOPMENT WILL HAVE TO USE CARS TO THE CURRENT TESCO WHICH IS NOT VERY LARGE. MORE CONGESTION.
6. CANNOT SOME ARRANGEMENT BE MADE WITH BRIO AND THEIR NEARLY 100 EMPTY PROPERTIES? THEN WE WOULD NOT NEED OVER 200 HOUSES IN BEAUTIFUL COUNTRYSIDE WHICH WOULD SWALLOW UP THE VILLAGE OF BROADWELL.

FROM: MRS.LOUISE LANGDON
15 HAWKESBURY PLACE
FOSSEWAY
STOW-ON-THE-WOLD, GL54 1FF

John Anthony Leonard
Wheatsheaf House, Broadwell, Glos

Postcode: GL56 0TY

Organisation and position (if applicable):

Date: 04.01.2024

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: Policy SSNP7

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Support Support with modifications **Oppose** Have comment

Please give details of your reasons for support or opposition or make comments:

Broadwell Parish Council (BPC) submitted a detailed response to the Stow & The Swells Neighbourhood Plan (SSNP) in March 2023 and again as part of the Regulation 16 consultation. As Chair of Broadwell PC, I fully endorse these documents.

I also, in a personal capacity, endorse the report commissioned by local residents and prepared by Chadwick Town Planning, which has been submitted in response to this consultation.

During the time I have lived in the area (27 years), I have come increasingly to value how special a place it is, for residents and visitors, how vulnerable it is to irreversible damage and how close to overloading many of our services are. I am for change, but passionately believe that the imperative is for change to occur sympathetically, in accordance with regulation and guidance and with sound justification. None of these conditions are met by this plan. The nature of the area, with small communities distributed across an extraordinary and protected natural landscape, compounds the risk of local decisions being made without consultation with, or consideration for, the needs and utility of the people affected by them.

In objecting to this plan, principally on the basis of Policy SSNP7, I would, above all, like to express my concern at the lack of awareness there appears to be, given how intrusive the proposals are, from service providers (eg the doctors' surgery), shopkeepers (many of whom do not live in Stow) and residents of Stow and the surrounding area (as evidenced by response to door-knocking of residents). For this reason, should this Plan proceed any further, I strongly request that the constituency that votes on the plan includes the wider area that is affected by it – at the very least, all the satellite villages and occupants of the surrounding countryside. The outcomes are sufficiently existential for this approach to be justified. I'd also note that the level of appropriate consultation in the preparation of this plan has been very poor and that if the one satellite community that is nominally included in the Plan – The Swells - is also concerned about SSNP7, it would enormously undermine the claim that the plan is in any way fit for purpose or supported locally.

Taking the many technical and precedent-based arguments against Policy SSNP7 - in the documents referred to above and elsewhere - as read, I would simply like to say that this development presents an existential threat to the AONB and those who live here:

The position of the proposed development would clearly, demonstrably and permanently compromise the landscape and historic vistas from the North and East of Stow.

There are serious problems with the proposals around parking and the potential shift in the centre of gravity of the commercial centre – and life of – an historic town, particularly given the topography, its distance from the town centre and the proposed expansion of the Tesco site. Access to Stow and its environs will be threatened by a road system that is already overloaded – the regular back-up of traffic on the Fosse Way by the proposed site access and the increasing use of country lanes and village roads as rat runs are well documented and easily experienced. Both these factors will make Stow less able to serve the surrounding countryside, rather than more.

The impact on services and safety is a real concern. For example, Broadwell lies directly in the watershed below the site and already is vulnerable to flooding. This is easily shown by the fact that a scheme to mitigate the existing problem by CDC/GCC, led by Laurence King, has been approved, with allocated funds, and is subject to legal agreement with the relevant landowners. Water levels were a threat as recently as two days ago, with vehicles unable to pass, or stranded in, the village. Numerous photos are available to demonstrate this. The run-off from an additional 240 houses, ancillary buildings and car parking will dangerously exacerbate a critical existing problem. Furthermore, foul water run-off is closely associated with this issue and there are many examples of sewer effluent emerging into the environment in Broadwell and the wider Evenlode Valley, due to lack of capacity in these services. This is all, again, without an increase in the Stow population by approximately a third, concentrated directly above an existing problem.

Thank you for the opportunity to comment and I'd be very happy to be consulted further. The recklessness of this plan, its lack of justification, care for the AONB and the wider community or appreciation of housing need - eg. the existing housing pain or recent approval of a development on Oddington Road for 37 affordable housing units (CDC planning ref 23/01513/FUL) - and business needs or services provision all demonstrate that cannot this Plan cannot be allowed to proceed further.

What improvements or modifications would you suggest?

Remove SSNP7 and properly consult the community

Andy and Ruth Lucas
1 Manor Farm Cottages
Upper Swell
GL54 1EW

**COMMENTS ON THE STOW ON THE WOLD AND SWELLS
NEIGHBOURHOOD DEVELOPMENT PLAN
Regulation 16 Consultation**

Summary

- 1. The proposed development outlined in Policy SSNP7 comprises over 100 market houses that Stow does not need and which are not allocated in the CDC Local Plan*
- 2. The developer is unlikely to comply with the provisions of Policies SSNP 3 and 4.*
- 3. CDC has already discounted site (S61) in their Strategic Housing Land Assessment as being unsuitable for allocation in the Local Plan. The 'masterplan' would NOT overcome the unique qualities of this site. It is a site that has one of the highest strategic landscape qualities in the AONB and would be a major development, with the associated large urban appearance (viewed from far and wide), traffic congestion and light pollution. It would have devastating consequences on these qualities and the hilltop setting of Stow.*

We agree there is a need for affordable housing for purchase or rent to support the future economic development of Stow and the surrounding area. Such an affordable housing scheme submitted by Bayhill on the Oddington Road has just received planning consent. This is an 'Rural Exception Site' and includes 37 affordable houses which satisfies the AECOM Housing Needs Survey.

The NP states that this was the preferred site in 'community' surveys carried out in 2022 but only a small number responded as a percentage of Stow's population and Stow Town Council itself acknowledged that this was a "low response rate" & "cannot regard the result as strong guidance" For such a large, damaging and controversial development this is poor evidence of support by the Stow community.

The NP acknowledges that the proposals would constitute a major development but then attempts to justify the unjustifiable by stating.....

'The TC does not dispute that the proposal is 'major development' and that such a change will be harmful and permanent as a matter of principle. Nor does it dispute the fact that the land exhibits the special qualities of the AONB (as set out in the CAONB Management Plan), lying on an east facing slope of the town within its wider setting that is visible in part in long views from the east.....

For the proposal to form an allocation policy of the NP it must meet the 'basic conditions' in both having regard to national policy and being in general conformity with strategic development plan policy (notably Policy EN5 'AONB' of the adopted Cotswold District Local Plan 2011-2031). It is therefore necessary to demonstrate that all three of the tests of NPPF §177 (to which Policy EN5 defers) are met,.

Test A: The Need for the Development. The scheme would secure both market and affordable housing for which there is a need in Stow to shift its demographic profile, economic base and self-sustainability. It would boost the supply of local housing in way that has not happened in

40 years and contribute to District-wide housing supply. Crucially it will deliver almost 100 affordable homes.....'

This statement is incorrect as only 37 affordable and social homes are required in Stow over the Neighbourhood Plan period (2021-2031) as set out in the AECOM Housing Needs Survey (March 2022) which is one of the NP base documents. No further market housing is required. Such 37 affordable houses recently received planning consent as a Rural Exception Site on the Oddington Road and so the justification for the 100 market houses is no longer valid.

'Test B: The Absence of Alternatives. The whole of the NP area lies within the AONB. The benefit of the NP plan-led approach is that it allows for communities to envision their future, gather local evidence and come to a planning judgement on reasonable alternatives. Since the 1970s, any housing (other than for older people), economic (other than for tourism) and social (again, other than for older people) needs of Stow have been met by other towns in the northern part of the District, or in neighbouring Districts. For the vision to be realised, of necessity these needs must be met in Stow and therefore in the AONB.'

There are alternatives to the proposed community hub. Such as the large empty Magistrates Court in the Police Station that has been unused for decades, the Cricket Pavilion, the Youth Centre, Church & Baptist Rooms, School Hall, St Edwards Hall or a new building on King Georges Field?

'Test C: Moderating Detrimental Effects. The concept masterplanning work has shown that the site is large enough to accommodate a landscape strategy that can successfully moderate the majority of the harmful environmental effects. The arrangement of uses and design strategy will enable new landscape to permeate the scheme and to bolster the existing tree belts and hedgerows around its eastern, southern and northern boundaries. The scheme has additional environmental benefits in the form of green infrastructure and biodiversity enhancements. It would also deliver recreational benefits through new footpath links and the creation of publicly accessible areas on land that is currently private.'

This is a site that has one of the highest strategic landscape qualities in the AONB. A major development, with the associated large urban appearance, traffic congestion and light pollution, would have devastating consequences on these qualities and the hilltop setting of Stow.

Regarding the 'biodiversity' claims, this is a classic example of 'Greenwashing'. For the best biodiversity outcome and lowest carbon footprint the site should be left as open agricultural land preferably with wildflower margins.

In Appendix E attempts are made to justify the proposals including the AONB 'checklist'. The proposals DO NOT justify or outweigh the development implications.

Policy SSNP7 contradicts the CDC adopted Local Plan in many respects.

Typical examples are :-

1.5 '.....Neighbourhood Plans must meet some 'basic conditions'. In essence the conditions are:.....'.Is the Plan consistent with local planning policy?'

The NP proposals do not.

3.5. *'The Neighbourhood Plan must be in general conformity with the strategic policies of the [CDC] development plan.'*

The NP proposals are in conflict with Policies S13, EN1, EN4, EN5 and EN10-12 in the CDC adopted Local Plan.

3.6. *'Policy S13 [in the CDC Local Plan] is specific to the town and encourages improvements to community and tourism facilities but contains no development proposals'*

This speaks for itself

5.2 *'The key objectives of the Neighbourhood Plan are.....to ensure that the unique townscape and environment of the town and the surrounding parish is conserved and enhanced.'*

The proposals clearly do not.

Other Policies in the NP relate to Policy SSNP7.

Policy SSNP3: Housing Mix [in the NP] states a 40% requirement for 'affordable' housing and a specific rental/ownership percentage and dwelling type for new developments of 6 or more dwellings. These requirements are unlikely to be enforceable or protected from Appeals from experience of previous similar developments.

Policy SSNP4: Principle Residence proposes restrictions to ensure occupancy only as a principle dwelling to avoid them becoming holiday lets or second homes. This is notoriously difficult to implement and the NP acknowledges this by saying that *'this presents enforcement challenges to the District Council....'*

Part D of the Policy refers to the car park scheme and later states that the carpark is 10 minutes away from the town centre. However, many visitors are already reluctant to park in the Tesco or Mangersbury road carpark allocated for visitors.

Part H of the Policy states that *'the transport strategy shall seek to discourage traffic generated by the housing, public carpark and community hub schemes from using the Broadwell Lane other than to access the site from the A429 Fosse Way....'* This will not be enforceable. Most of the traffic generated will come from the A429 junction and this will probably need yet another set of traffic lights to cope with the potential 600 plus vehicles per day generated from both directions. In any event, it is not possible that practical restrictions could be imposed to prevent traffic using the Broadwell Lane from the development except by making it a one-way street which residents of Broadwell village would not find acceptable. This would become a 'rat run' for vehicles trying to avoid the congested A429 junction, guided by their satnavs.

Given the recent consent for 37 affordable houses in Stow there will be no public benefit from such a development of market housing. Nothing will compensate for the long term damage to the character and setting of Stow and the surrounding countryside with more traffic congestion and pressures on the already overloaded sewage, electric and water infrastructure. Most benefits will accrue to the developers, property speculators and the wealthy who can afford to buy the expensive upmarket houses.

A final issue is that the site falls partly within the Broadwell Parish. The 'masterplan' shows the full development of 240 houses including the area in the Parish of Broadwell. It is understood that many residents of Broadwell are not supportive of the development as they will be equally affected by the degraded landscape, light pollution and traffic congestion.

The Swells will also be affected by the increased traffic congestion and degrading of the AONB which was established for the national benefit and well-being of residents and visitors to the Cotswolds.

We support the proposed Neighbourhood Plan in general but with the exception Policy SSNP7 which we strongly advise should be removed from the Plan with no development whatsoever allowed on Site S61.

Mrs Ruth Lucas
1 Manor Farm Cottages
Upper Swell
Cheltenham GL54 1EW

I am a resident of Upper Swell and I am writing to express my deep concern about aspects of the Stow on the Wold and Swells Neighbourhood Plan.

Comments on the Stow on the Wold and Swells Neighbourhood Plan

1. The **size** of the proposed development in Policy SSNP7 (240 new houses) seems vastly out of proportion to the housing needs of the area. A CDC Housing Needs Survey identified a need for 37 additional (affordable) homes over the next 10 years. This need will be met by the recently approved Housing Development on the Oddington Road in Stow.

The size, 240 extra houses, also has serious implications for the local infrastructure.

- **Traffic congestion:** The A429, A424, B4077 and B4068 have all experienced increased levels of traffic over recent years and back roads between villages are used as 'shortcuts' causing further congestion and degradation of road surfaces and verges. The traffic lights at Tesco and at the A429 junction with the A424 are, at present, regularly gridlocked. Adding at least 240 extra cars (and potentially double this number if householders have 2 or more cars) will only serve to increase congestion.
- A separate, but related, issue is a serious **lack of public transport** in the area which contributes to increased traffic congestion.
- Stow and the Swells are small, rural communities with **very few opportunities for employment**. The jobs available are mainly in the elderly care and hospitality sector and these jobs do not pay well enough for employees to purchase most 'market' homes. It is more likely that these employee's needs would be met by a stock of good quality, affordable rented accommodation. A further influx of retirees or second-home owners will increase the demand for service workers but also prevent those service workers from finding affordable accommodation.

2. The **location** of the proposed development (240 new houses) on a prominent hilltop site is also vastly out of proportion to the size of the town.

- **Biodiversity:** Another agricultural field with the potential to be managed solely for wildlife would be lost.
- **Light Pollution:** The lights from an extra 240 houses, plus street lighting, plus car lights will be seen from miles around and affect wildlife adversely.

It is worth noting that, in the last few years, several housing developments have been built locally where there is an age restriction on purchasing a home. I believe that these homes are not fully occupied and could perhaps provide additional extra housing if the restriction was lifted? It would seem more sensible to use these existing properties rather than build new ones.

I hope you will consider our worries and concerns about this unnecessary and unwanted development.

- Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

Full name: HENRIETTA MACCURREACH
Address: RAPTERS, BOULTON HILL, BOULTON-ON-THE-WATER -
Postcode: GL54 2LF
Telephone:
Email:

Organisation and position (if applicable):

Date: 4th January 2024

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012?

Please delete as applicable: YES / NO

Stow-on-the-Wold

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: **SSNP7**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

Stow-on-the-Wald is an ancient and historic town in an
AONB = A small Market Town for locals and tourists to
enjoy.

Blooms Homes has no interest in Stow - They are only interested
in making money. They look expensive homes that would
appeal to second home/Air BnB and not to locals - Not affordable
(like the new houses in Camp Gardens) over 1 million per house.

There are already plenty of empty spaces for a Community Hall
near the Centre of Stow.

If parking is taken away from Stow Square it will ruin the
local economy - A but side is for cities not small towns -
people using Stow from the surrounding villages would go
elsewhere.

A 'Country Park' in a rural area on a steep & slippery field in
an AONB does not make sense. There are good footpaths
for those who want to use them.

Extra traffic would be a nightmare as Stow is already
a complete 'bottleneck' - The light pollution from homes
& streetlights would be totally unacceptable as would be
seen for miles around. This is an AONB and should be kept
as such.

James & Sally Mackie & Patrick Mackie

James & Sally Mackie - The Stables, Evenlode, GL56 0NY.

Patrick Mackie - The Hay Barn, Evenlode, GL56 0NY.

Dear Cotswold Gov

I am writing on behalf of James Mackie, Sally Mackie & Patrick Mackie – residents of Evenlode.

Evenlode will be affected in the same way as Broadwell. There have been so many thoughtful, articulate and well presented arguments against this proposal that we will not simply repeat the views of others. However we thoroughly endorse all comments put forward particularly those from Broadwell and Evenlode PCs and the Planning Consultants instructed by Broadwell Residents. We very strongly object to the proposal.

Sally Mason
Midsummer Cottage
Donnington
Gloucestershire
GL56 0XZ

Re: Stow-on-the-Wold and the Swells Neighbourhood Development Plan

I write in connection with the Stow-on-the-Wold and Swells Neighbourhood Development Plan which I strongly object to.

My main objections relate to:

1. the proposed allocation of approximately 170 homes on land North East of Stow plus a provision for an additional 70 homes (totalling 240 homes) on land in Broadwell Lane.
2. a community hub.
3. 150-space public car park.

My objections are as follows:

1. **Scale of Development** - the scale and extent of the development far exceeds the needs of the local community. There is no need for further residential development in Stow. All housing requirements set by the NPPF have already been met and any affordable housing need will be met by the 37 new homes at Oddington Road.
2. **AONB** - Stow-on-the-Wold is set within attractive countryside which is part of the AONB. This development would have a harmful and damaging impact upon the Cotswold National Landscape, eroding the character of the town, as well as the rural setting in which the town sits. The proposed additional 70 dwellings on Broadwell Lane would also have a significant adverse effect on the character and appearance of the AONB and the setting of Stow and as a result would not conserve the landscape or scenic beauty of the AONB.
3. **Traffic Congestion** - there is already considerable traffic congestion leading into and through Stow, along the A429 Fosse Way and the A424 Evesham Road, causing long tail-backs from the traffic lights. Donnington Village and Broadwell are increasingly used as rat-runs by people trying to avoid the long delays. This is an immense problem for the local communities, with vehicles speeding through the villages and causing danger to pedestrians. The addition of 170 dwellings would result in approximately 270 more vehicles at the residential development – and that doesn't include additional traffic associated with the community building and 150-space car park. The additional dwellings would materially worsen traffic congestion on the main roads and increase speeding traffic through Donnington and Broadwell, leading to even more of a detrimental impact upon residents and businesses – as well as tourists. It is already at breaking point.

In Summary

The Plan and allocation do not promote a sustainable pattern of development that aligns growth and infrastructure and improves the environment.

In short, the allocation does not qualify as a location for sustainable development, and I object to it in the strongest terms.

M. McGhie

Sunnyside, Upper Swell, GL54 1EW

FOREWARD

My response to STOW Town Council's (STC) final version of the Stow & Swells Neighbourhood Plan is a revised version of my previous response to the STC February Draft NP, so most of my comments will remain the same, However, I wish to highlight my principal concern relating to the following Policy (SSNP7), and expanded upon on Page??????.....

Policy SSNP7: Land North East of Stow (SEE ALSO additional comments on page 3) -

Along with many others, I have grave concerns over the inclusion of STC's extensive promotion of the Bloor Homes *major development* plans for approx. 200 open market houses on Site 61 and believe the flavour of a 'done deal' planning application warrants the exclusion of SSNP7 on the grounds of 'prematurity', bearing in mind STC's decisive opening statement - "A. The Neighbourhood Plan ALLOCATES 4.5 Ha of land to the north east of the town....".

Such a robust proclamation strongly suggests that STC had already decided to give the 'green light' to this controversial development, by facilitating its progress during the early 2023 'in camera' vote to bring S.61 land into the NP, before undertaking the duly required consultations with neighbouring Parish Councils and local communities. Such a major housing development is not in the "public interest" - see NPPF (15) Para.183

It is also patently obvious that the decision to incorporate the adjoining 'Community Hub' into Policy SSNP7 was made to 'aid and abet' Bloor Homes' chances of obtaining 'Exception Site' status, thus maximising a potential for Bloor to build additional open market houses, expand further afield, and for STC to extend Stow's Development Boundary between now and 2031! PLUS, I see no substantive plans to implement the necessary infrastructure to support such a major and all-encompassing development.

However, I wholeheartedly approve of the 'Community Hub' concept but firmly believe it should be treated in isolation, and placed on an alternative and more appropriate site, such as the strip of vacant land adjoining the Oddington Road Bayhill development, or created as part as part of STC's stated plans to upgrade community facilities on the Queen Elizabeth II Field, and/or tie in with STC's King George's Playing Fields "pavilion" proposal.

In conclusion, I have noted all the contents in Appendix E, including its Introduction, plus (2) Main Planning Issues /(3) Planning Policy Context/Strategic Planning Policy/Cotswolds AONB Management Plan. However, for expediency, I list the relevant *National* Planning Acts and NPPF in more detail to avoid any potential discrepancies in STC's interpretation of these:-

a) CRoW Act (The Countryside and Rights of Way Act)

251. Part IV of the Act....."places a duty on 'relevant authorities' when exercising or performing any functions in relation to, or so as to affect, land in an AONB, to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. It also consolidates the provisions on AONBs previously contained in the National Parks and Access to the Countryside Act 1949 ("the 1949 Act") - NB *i.e. Cotswolds AONB

Section 85 - General duty of public bodies, etc.

(1) In exercising or performing any functions in relation to, or so as to affect, **land in an area of outstanding natural beauty**, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the **area of outstanding natural beauty**.

M. McGhie - Response to STC Final Version - NP

2.

TOWN & COUNTRY PLANNING ACT - Environmental Impact Assessment. The aim

of **Environmental Impact Assessments** is also to ensure that the **public are given early and effective opportunities to participate in the decision making procedures.**

Sensitive areas

The more environmentally sensitive the location, the more likely it is that the effects on the environment will be significant and will require an Environmental Impact Assessment. **Certain designated sites are defined in [regulation 2\(1\)](#) as sensitive areas** and the thresholds and criteria in the second column of the table in [Schedule 2](#) are not applied. **All developments in, or partly in, such areas should be screened.** These are:

- Sites of Special Scientific Interest and European sites;
- National Parks, the Broads and **Areas of Outstanding Natural Beauty**; and
- World Heritage Sites and scheduled monuments.

Listed Buildings & Conservation Areas ACT 1990 Section 72(1)

General duty as respects conservation areas in exercise of planning functions.

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection

(2) **special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.**

THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) Revised December 2023**1) NPPF (15) > CONSERVING and ENHANCING THE NATURAL ENVIRONMENT**

182. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads ⁶³. **The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.**

183. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development ⁶⁴ **other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. (NB - A Community Hub is in the 'public interest' - the major development plans for Bloor's open market housing is not).**

NPPF (5) - Rural housing

82. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for *community-led development for housing. 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. (*** e.g. Stow CLT**)

Rural Exception Sites (NPPF 4.4) - The National Planning Policy **Framework** defines Rural Exception Sites (RES) as small sites used for **affordable housing in perpetuity** where sites would not normally be used for housing. Such sites have been used by many CLH organisations (**particularly community land trusts**) to provide homes for local people.

UK "SUSTAINABLE DEVELOPMENT" RULINGS (NOTE: Government bowed to pressure and tightened up the NPPF's definition of "Sustainable Development" as follows - "Resolution 24/187 of the United Nations General Assembly defined sustainable development as **meeting the needs of the present without compromising the ability of future generations to meet their own needs**).

Sustainability Appraisals (SAs) are enshrined in UK Planning Law, within which are set three roles for the planning system:-

- c) **an environmental objective—to contribute to protecting and enhancing our natural, built and historic environment;** including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including

moving to a low carbon economy.

M. McGhie - January 4, 2024

Cont/....

McGhie - Response to STC Final Version - NP

3.

RESPONSE TO FINAL STC NEIGHBOURHOOD PLAN

Policy SSNP1: The Stow on the Wold Development Boundary - SEE *NB

The Neighbourhood Plan defines the Stow on the Wold Development Boundary, as shown on the Policies Map. Within the Development Boundary applications for development will be permissible in principle. ***NB:- There is no mention here of the Development Boundary *Proposals as shown in in Policy 3 or indeed any clarification. One can therefore assume STC have plans afoot to extend Stow's Development Boundary??**

Policy SSNP2: Development in The Swells and the Countryside - AGREE as it stands.

A. The Neighbourhood Plan defines Lower Swell as a small village with very limited local services that is suited only to small scale residential development and where its existing community facilities and local green spaces will be protected and its off-street parking capacity improved.

B. The Neighbourhood Plan identifies Upper Swell as a hamlet with no local services that is not suited to small scale residential or any other form of urban development.

C. In the Rural Area beyond the settlements of Lower Swell and Upper Swell proposals to improve the agricultural economy, equestrian facilities and to deliver nature recovery will be supported. Proposals for any isolated homes in the Rural Area argued on the basis that they are of exceptional quality alone will not be supported.

Policy SSNP3: Housing Mix - AGREE with the basic idea - but, disagree with the overly proscriptive percentages shown in *B. These percentages should be flexible to accommodate the purpose and needs of particular developments.

A. Within the Stow on the Wold Development Boundary **proposals* for residential development schemes of 6 or more dwellings are required to deliver as part of the scheme at least 30% of the affordable dwellings (rounded as necessary) as First Homes to be made available at a minimum 50% discount. The mix of other affordable home tenures should have regard to the evidence in an up to date housing need assessment and should also be delivered within the scheme. Proposals that seek to maximise opportunities for new open market and affordable homes to be made available to persons with either a local connection to the Neighbourhood Area and its immediate surroundings or persons that are defined as key workers will be especially supported.

***B. Within the Stow on the Wold Development Boundary proposals for residential development schemes of 6 or more dwellings will be required to deliver the following mix of dwelling types**

- 7% 2 bed
- 33% 3 bed
- 34% 4 bed
- 16% 5 bed

Policy SSNP4: Principal Residence - AGREE in principle...

Proposals for new open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence. Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.

HOWEVER, I cannot see any enforceable measures to restrict outside owners circumnavigating this Policy in order to use their properties for Holiday lets and Air B&Bs. These dominate Stow's housing market now, to the detriment of the local community's housing needs.

IN ADDITION - RESTRICTIONS to minimise the scale and size of any future 'open market' housing developments must be implemented, bearing in mind the plethora of current and forthcoming 'open market' housing developments in and around Stow, plus surrounding settlements is now, and will be, unsustainable for the reasons stated in my opening 'Forward'.

Policy SSNP5: Specialist Accommodation for Older People in Stow - *SEE NB....

Proposals for specialist accommodation for older people falling within classes C2 or C3 of the Use Class Order, including sheltered and extra-care housing, care homes and other appropriate models of accommodation for the elderly and those with particular needs, will not be permitted unless:

***NB:- Agree with this policy in principle. However, we now have more than enough "specialist accommodation for older people" in Stow, notwithstanding the failure of existing 'care homes' to provide adequate accommodation for their care staff, hence their current problems in finding nursing staff. STC should also make a clear distinction between 'care homes' and 'retirement homes'. Care Homes should *not* be selling or providing private "Lock up and Go" apartments for wealthy incoming retirees.**

Policy SSNP6: Health and Well Being - AGREE

Proposals for housing development of any type should demonstrate how they will support the community's physical and mental health and social networks. Proposals will be supported that:(Rest as per final NP).

Policy SSNP7: Land North East of Stow (SEE ALSO APPENDIX E) - OBJECTION:-

OPENING NOTE - The magnitude of this site must be determined by the primary Planning legislation for National Parks and AONBs i.e. - the CRoW ACT 2000 (Section 85) which governs National Planning Policies NPPF/Guidelines you mention. STC will also know that CDC have already rejected the inclusion of site S.61 for open market housing as stated in SHELLA. (See Forward).

SHELLA contained a number of planning reasons which mirrored the ones contained in the Planning Inspectorate's dismissal of the Bovis appeal against CDC's 'refusal' to permit a proposal to build 146 houses on land east of Griffin Close site. SHELLA concluded with the Recommendation that S.61 was "unsuitable for allocation in the Local Plan" for the following reasons:-

- S.61 is "considered to be a 'major development' within the AONB, and would be considerably larger and more harmful to the AONB than the Land east of Griffin Close site".
- S.61 is "on higher ground than the Griffin Close site and is more visible within the surrounding landscape".
- "Stow is a hilltop town and development in this location would not be in keeping with the settlement pattern".
- "The scale of development on a slope would erode the character of the town, as well as the rural setting in which the town sits".
- S.61 "would adversely affect the intrinsic value of the AONB and the proposal is assessed to have "High" landscape impact".
- "The development of S61 would also harm the rural setting of a Scheduled Monument".
- S.61 would also "harm the setting of the Conservation Area, and it would harm

the settings of a Grade I listed building and a Grade II listed buildings".

M. McGhie - January 4, 2024

Cont/....

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5.

SHELLA also points out the environmental harm resulting from the loss of "productive agricultural land", plus the negative impact on its historic geology, and the scale of the required Highway Access on to the major A429 Fosseyway highway.

However, I note SHELAA fails to mention the environmental damage to the surrounding countryside, agriculture and Broadwell Village itself, due to the most likely threat of excess water flooding down from such an extensively concreted hilltop development, together with sewage leaks oozing out of Stow's already over loaded and inadequate sewage system.

Policy SSNP7: Land North East of Stow Continued..... (Excludes B/D/E/F) - OBJECTION

A. The Neighbourhood Plan allocates 10 Ha of land to the north east of the town, as shown on the policies Map, for a low or zero carbon mixed use development scheme comprising:

- A community hub building for a mix of local community facility uses (falling within either Classes E(d) or F2(b) only) and managed workspace uses (falling within Class E(g)(i) only); **Although I thoroughly I approve of this proposed concept, I wholeheartedly disapprove of the reason for its inclusion in this development, as previously stated in the Forward.**
- **A public car park scheme of approx. 150 spaces; and**
- **An enabling housing scheme of approx. 170 homes comprising approx. 100 open market homes (of which at least 5 plots should be provided as serviced plots for self-build or custom build homes) and approx. 70 affordable homes. Who will oversee the affordable housing and will it be a) truly affordable and b) 'in perpetuity'. I see no guarantee it will be either. (*See NPPF 4.4 - Rural Exception Sites). How will it be funded - e.g. through a Section 106, Infrastructure Levy, or other means?)**

C. The public car park scheme shall be located within the site in a way that minimises the walking distance to the town centre and that fits well with the layout of the adjoining housing and community hub schemes. It shall comprise a single car park laid out and landscaped in such a way as to minimise its urban appearance in the wider landscape. It shall be lighted using discreet columns that combine motion-sensitive lighting and CCTV to achieve a safe space that does not emit unnecessary light pollution. It shall comprise a permeable surface only. It shall be designed in such a way that every space can accommodate an electric charging point, with a minimum of 10% of the spaces having installed points at the outset. **It appears the close attentions to sensitive design details are geared towards the provision of luxury 'Executive Homes' sector. However, not all well paid executives can afford EVs. I suspect the car park will also provide a convenient excuse to denude Stow Town of its existing free parking spaces, and ease STC plans to pedestrianise the squares to the detriment of workers and local people!!!? PLUS, where will the very curly public and cycle paths be sited in reality, bearing in mind the width of the PROWS will need to be vastly increased? Has the Neighbouring landowner given his consent to such an invasive scheme??**

(Maybe plans are afoot to build a major development on this field too!!!???)

G. The transport strategy shall seek to discourage traffic generated by the housing, public car park and community hub schemes from travelling east on Broadwell Lane towards Broadwell village. It shall also implement any improvement works shown to be necessary to the A429 Fosse Way/ Broadwell Lane junction prior to the occupation of the first dwelling. **I see no convincing evidence that this strategy will not exacerbate the intolerable traffic congestion which bedevils Stow and**

surrounding settlements, and is already threatening to destroy Stow's future health and economic wellbeing.

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Cont/....

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6.

H. The green infrastructure strategy shall make provision for onsite biodiversity net gain of at least 20% (as measured by the most up to date BNG Metric) as part of its proposals to integrate with the wider network of green infrastructure. It shall avoid any loss of the existing mature tree and hedgerows within the site boundaries and shall seek to reinstate historic hedgerows as part of the landscape scheme. The landscape scheme shall also seek to replace existing non-native tree species on the site boundaries with native species. **Really? What about all the birds and bees who will have been evicted to make way for this monstrously large development and ensuing loss of vital habitats. (NB - See NPPF (15) + SA rulings Pg. 2)**

Policy SSNP8: Stow Town Centre & Market Square - DISAGREE with Point G.

G. Proposals that lead to a reduction in the overall space in the Market Square dedicated to vehicle parking will be supported, provided that space is repurposed for public realm improvements only and that the number of spaces lost will not undermine the commercial viability of the Market Square. **It is vital that local businesses have the final say on any STC proposals to change the configuration of the Square. The future of Stow's businesses must be safeguarded, along with the needs of all the local people who shop in Stow and support local traders. I also see no concrete proof that the proposed space for the "public realm" will not result in a major loss of the existing parking spaces and thus, the ultimate degradation of the town's future "commercial Viability"!**

Policy SSNP9: Playing Field Facilities - AGREE as it stands.

A. Proposals to upgrade, extend or replace the pavilion facilities at *Queen Elizabeth II Field, as shown on the Policies Map, will be supported provided that any extension of the building is no larger than 150% of existing floorspace and, if a replacement, it is located on or immediately adjoining the existing building footprint and its massing and height will not undermine the open character of the Local Green Space. **(NB. I thought there were existing plans to establish a community Hub *here??)**

B. Proposals to provide a new pavilion facility to serve the King George's Playing Fields, as shown on the Policies Map, will be supported provided the building adjoins the existing play facilities and its massing and height will not undermine the open character of the Local Green Space.

Policy SSNP10: Local Green Spaces - AGREE as it stands.

The Neighbourhood Plan designates the following Local Green Spaces, as shown on the Policies Map:

Policy STOW11: Stow and the Swells Design Code - AGREE as it stands.

Development proposals must accord with the Cotswold and Stow and the Swells Design Code.

Policy STOW12: Buildings of Local Importance - TOTALLY AGREE as it stands

The directly or indirect effect of a development proposal on the significance of a Building of Local Importance (listed in Appendix A) will be taken into account in determining the application by weighing the scale of any harm or loss against the significance of the heritage asset.

Policy SSNP13: Zero Carbon Buildings - DISAGREE

A. All development should be 'zero carbon ready' by design to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and

landscaping. **Some flexibility must be accorded to extenuating circumstances and overly burdensome cost implications, + genuine need should override virtue signalling.**

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Cont/...

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7.

B. Proposals for new and refurbished buildings should demonstrate that they have been tested to ensure the buildings will perform as predicted and a planning condition will be attached to a permission to require the provision of a Post Occupancy Evaluation Report to the Local Planning Authority within a specified period. Where the Report identifies poor energy performance and makes recommendations for reasonable corrective action, the applicant must demonstrate that those actions have been implemented before the condition will be discharged. **Some flexibility must be accorded to extenuating circumstances and overly burdensome cost implications, + genuine need should override virtue signalling.**

Policy SSNP14: Walking & Cycling in the Town and Parish - DISAGREE

Proposals that will improve the existing network of footpaths and cycleways through and out of Stow on the Wold will be supported. Proposals to create an off-road Stow to Bourton Cycle Path will be supported. **Some flexibility and careful thought must be accorded to extenuating circumstances, overly burdensome cost implications, + genuine need should override virtue signalling**

Policy SSNP 15: Vehicle Parking - AGREE to most except for (*).

A Proposals for residential developments must meet the standards for off-street parking provision set out in the Design Code.

B Proposals to create shared off-street vehicle parking in Lower Swell will be supported, provided:

- they are of a size and location that does not harm the special historic character and appearance of the Conservation Area;
- they do not cause significant harm to the amenities of local residents; and
- (*) they include provision for EV charging. - **DISAGREE > Some flexibility must be accorded to extenuating circumstances regarding space, and overly burdensome cost implications, + genuine need should override virtue signalling.**

Policy SSNP 16: Digital Infrastructure - AGREE to most so long as installations do not destroy customer's existing systems, and that telephone landlines remain intact.

Proposals to improve the digital infrastructure in the area by way of the installation of new transmitters, antennas and junction boxes will be supported unless they will cause substantial harm to designated heritage assets or to the **special landscape and scenic beauty of the Area of Outstanding Natural Beauty.**

APPENDIX B: BUILDINGS OF LOCAL INTEREST (POLICY STOW12) - AGREE, but See *NB....

The policy identifies a number of buildings of local interest. Set out below is a brief description of the local heritage interest of each building. Fosseway Farm Cottage, High Street - a range of dwelling and bard/ancillary buildings in the Cotswold vernacular occupying a prominent, large site at the northern entrance to the Market. ***NB:- You omitted to state that the whole of the Fosseway Farm site, including the Cottage is classed as a 'non-Designated Heritage Site', as opposed to merely a site of 'Local Interest'.**

APPENDIX C: SPECIFICATION FOR STOW ON THE WOLD BUSINESS & COMMUNITY BARN. VISION To expand and support the economy of Stow on the Wold and the Swells by facilitating and supporting entrepreneurship and creativity towards a more balanced mix of tourism, retail and commercial enterprise by providing progressive, sustainable, and sympathetic spaces for dynamic and aspiring

entrepreneurs and community use. **Question?** - Where is this barn to be sited - on the QEII Cricket Field? Why was Fosseway Farm NOT considered prior to its sale?! (See Forward).

M. McGhie - January 4, 2024

Cont. APPENDIX E.....

M. McGhie - Response to STC Final Version - NP

8.

APPENDIX E: STATEMENT ON MAJOR DEVELOPMENT IN THE COTSWOLD AREA OF OUTSTANDING NATURAL BEAUTY (POLICY STOW7) - OBJECTION:- This statement and the related Policy STOW7 should have been excluded from the NP Consultation, along with Appendix F, in its present form. (This assertion still stands as per the Draft NP Response)

END - M. McGhie - January 4, 2024

MM - APPENDIX A

DO YOU WANT A NEW HOUSING DEVELOPMENT OF 240 HOUSES ON YOUR DOORSTEP?

The draft neighbourhood plan proposes a large new development of 240 houses built by a Derbyshire based developer Bloor Homes, on the summit of Stow Hill behind Tesco.

Cotswold District Council have already discounted this site for housing from their Local Plan for multiple reasons:

- ⚠️ Not in keeping
- ⚠️ It's sheer scale & location on the slope would erode the character of the rural setting of the town
- ⚠️ Adversely affect the intrinsic & high impact value of the area of outstanding natural beauty
- ⚠️ Harm the rural setting of a Scheduled Monument
- ⚠️ Harm the setting of the Conservation Area
- ⚠️ Harm the settings of a Grade 1 and a Grade 2 listed building.

DID YOU KNOW?

Although up to 40% affordable houses and a 'community hub' are suggested, it is very unlikely this would happen due to loopholes in national legislation. Most of the houses would not be 'affordable' and could easily become more second homes or sold on under the Government 'Right to Buy' scheme.

The development could generate 600 extra vehicle movements a day and the Fosse Way is already well above capacity. A major new junction at the Broadwell Road is proposed, together with upgrading the road itself. Broadwell will become a rat run too.

Approximately 20% of all the housing stock in Stow is used for Second Homes, the projected Housing need is for some 40 new dwellings by 2031. We already have 40 derelict buildings, unoccupied flats and building plots that can be made available in Stow!

WERE YOU AWARE OF THE COMMUNITY CONSULTATION LAST YEAR?

Only a small number of us responded and our comments were conceded by The Town Council as a "low response rate" & "cannot regard the result as strong guidance."

HAVE YOUR SAY NOW!

Register your concerns online to Stow Town Council website:

www.stowonthehold-tc.gov.uk/neighbourhood-plan

Or attend in person at the Neighbourhood Plan Consultation drop-in sessions:

Tues 21st February St Edward's Hall, 2.00pm-8.00pm

Wed 22nd February Swell Village Hall, 11.30am-1.00pm

Sat 25th February Swell Village Hall, 2.00pm-5.00pm

Sat 4th March Stow Social Club, 10.30am-5.00pm

Please do not remove this poster, we will come back in March to remove it. Thank you.

If you would like one of these posters to print off, display or email to a friend, please email keepstowspecial@outlook.com

Anne McKechnie
Pursers Cottage. Broadwell,
Moreton in Marsh GL 56 0UA

I would comment as follows:-

Look at the definition of Town planning:-
planning and design of all the new buildings, roads, and parks in a place in order to make them attractive and convenient for the people who live there.

It seems to me that this plan falls woefully short of meeting that criterion. One of the current problems facing Stow is that of traffic. The plan does not seem to address this problem. Pedestrianisation of the centre will not make it more attractive and convenient for the people who live there. Stow is not a playground or park for tourists it's a living working environment. The traffic problem needs careful analysis to ensure facilities can be put in place to adequately manage the problem. There is no need for a new community hub there are sufficient facilities available some would undoubtedly benefit from a face lift and sensitive modernisation.

The most significant objection is the lack of employment in the area. Certainly insufficient to employ the occupiers of 240 new homes. As a consequence occupiers will need to travel thereby increasing the already dangerous pinch point that is created on Stow's main arterial road which abuts this site.

The infrastructure is already starting to buckle where is the consideration of improving this for the benefit of people who live there. The sewage system is already facing serious problems. No planning appears to be considered in fact quite the contrary. Allowing the building of another two hundred houses expecting the already inadequate main drain to carry it down through Broadwell to the existing, well past its sell by date, pumping station. This can hardly be said to improve facilities for people who live in Stow or for that matter Broadwell. The Doctors surgery is clinging on by its fingertips. This is not due to lack of facilities but its inability to find staff which is a nationwide problem.

Affordable housing would undoubtedly fill the requirement. The risible 37 being suggested apparently can only be built if 170 executive style houses can be built to compensate the builder for their loss of profit. There is no guarantee that these affordable houses will be built and every likelihood that the builder will apply to vary. It does seem that the actual number of people living and working in Stow is reducing whilst the number of second homes and air b& b is growing exponentially. Further more now that planning permission has been granted for affordable housing on the St. George's field site this will make the current application for affordable housing otiose. It is also essential that restrictive covenants preventing use of the properties for second homes and air b and b are strong enough for them not to be set aside on subsequent sales.

In short it seems to me that the proposed town plan centres on the "Gods of profit, tourism and politics " showing scant regard for the definition of a town plan.

Robert McKechnie
Pursers Cottage, Broadwell. GL56 0UA

Individual

I do wish to be notified of the decision

I oppose the adoption of the plan in relation to the development of the land to the North East page 26. I comment on Stow town centre traffic

General comment. The size of the proposed development with its own hub, physically separated from Stow town by Hawkesbury Place and Tesco, means that there is little prospect of integration of the occupants with the town.

Employment

The plan identifies that there is little local employment in the Cotswolds and adds that the working age group has fallen by 6% in a decade. That cannot be a surprise if there is little local employment.

Therefore, where are the occupiers of the proposed houses in the development going to find employment to which the answer must be by travelling to where the work is. For many these days, there is not just one breadwinner in a household, but two with cars providing necessary transport for each.

Needs.

The proposed development does not have an identified need in relation to general housing. The affordable housing numbers proposed are greater than the identified need, which would itself be satisfied by the other local development or a development of this site of half the size of that proposed.

Local infrastructure.

School

The plan fails to consider the local infrastructure. It would work well for those seeking a new build accommodation, allowing them to move to within the catchment area of Cotswold school..... as two purchasers of houses in Broadwell have recently conceded that that is the only reason for moving into the area.

Cotswold school may be able to absorb an influx of new pupils, but Stow school has not that ability..

Traffic

The inevitable increase in traffic disruption where eight roads converge is self evident with a development of this size. From the top of Broadwell Lane along the A429 to the far side of Stow frequently takes 20 minutes now without the additional influx.

Medical facilities

Stow surgery is not limited by the number of patients taken on, but is limited in the service

It can provide by the number of man hours in the day. A significant increase in the population will only exacerbate an already unacceptable position. Similar observations apply to district nursing and mental health facilities.

Drainage.

The proposed use of the main drain in Broadwell Lane is unacceptable. This may well be a planning issue, but it is already a real problem for those living on the hill where the main drain blocks from time to time.... The last on 15th January 2023, with consequent back up into property.

Aesthetics

Finally, the development on the outskirts of a hilltop town will be visible from several sides and diminish the efficacy of the AONB.

Stow town centre and motorists page 31.

Reference is made to the commercial viability of Stow. It is self evidently diminishing as judged by the number of local retailers who have closed down in the last 12 months. Some have been replaced by yet more charity shops and tea rooms. Thus the local services are diminished and replaced by Tourist services.

With the reduction of local retail services, there is an inevitable increase in the use of transport to go further afield to find those facilities which are not available in Stow town centre. That situation will be exacerbated by traffic from the north east development.

As to parking in Stow. If not there by 10 am on any day except Sunday there is only a chance of finding a car parking space. Later in the day standing in the square one can watch cars driving round the square several times to try and find a space. And with reducing small shopkeeper retail services it is the tourists who occupy parking spaces to the detriment of the local population.

Ann O'Sullivan
Spring House,
Upper Swell
GL54 1EW.

The historic town of Stow, and Swell parishes, are situated in a unique ANOB. Thousands of tourists visit this area every year, visiting historic sites, staying in local accommodation and enjoying the wonderful opportunities and beauty offered in the Cotswolds. The town is a hilltop town and can be seen from afar with the spire of St Edward's Church very visible.

The proposed develop, some 4.5 h, to accommodate 240, will undoubtedly do the same. Standing out on the hilltop, it too will be seen from far and wide, in conflict with nearby historic buildings and the site of a well known ancient battle field close by.

The site in question, lying to the north east of the town, has in recent years been rejected by Cotswold District Council Policy SSNP 3 and 4, (S61) in their Strategic Housing Land Assessment, as being unsuitable for allocation in its Local Plan. It is therefore, difficult to understand why it is now being included by STC in the NP.

Policy SSNP7, states that Bloor Homes is in control of this land, leaving more questions than answers, as to why this proposal is being so strongly proposed..

The proposal states the need for 240 houses, 4% of which to be affordable dwellings. However, with the recent approval of 37 affordable housing off the Oddington Road now satisfying the AECOM Housing Needs Survey, this surely negates this requirement.

Once outline permission is granted, as experience of other developments has shown, change to the mix, and to site layout, often go back to appeal - nothing is certain. This potentially could happen with such a development of this size.

It is stated in Policy SSNP4 that there will be proposed restrictions, dwellings will be intended as primary homes. Difficult to envisage how this will be monitored, for with such a beautifully located site as this one is, entrepreneurs and those wishing to acquire second homes, will be attracted to the location, making it extremely difficult for STC to control and enforce.

Is there justification for a new hub with so many alternative sites available in Stow. Sites such as the Cricket Pavilion, the Youth Centre, Church and Baptist Rooms, School Hall, St Edward's Hall and the large empty Magistrates Court in the Police Station could be modified for such social purposes.

Change of existing parking in the centre of Stow should surely be put to local traders for comment. It is a well known fact, that lack of convenient parking close to shops, can result in a drop of footfall and thus, trade. With the proposed new parking being a good 10- 15 minutes away and with an older population in the area, this has the potential to damage many businesses in the town centre and therefore needs to open

to wider debate, with possible rejection. What then, even more housing?

Proposals to limit traffic onto the Broadwell lane, with addition traffic control on the Fosseway (A429), will have a devastating impact on Broadway village and it's residents. As traffic seeks to avoid heavy congestion on the Fosseway, Broadwell will become a rat run. Should lights be installed, there will be three sets of lights with only 300-400 metres between each set. The Fosseway is already a highly congested road most months of the year - added vehicles entering and exiting the site can only add to the problem, in the event of the lane becoming ' one' way, Broadwell will inevitably bare the brunt of addition through flow of traffic, totally unacceptable through narrow country roads, and spoiling yet another pretty Cotswold village.

With the commencement of a new development of 250 house just 3 to 4miles down the road in Moreton, the Fosseway is in threat of becoming one long nose to tail route between the two towns, polluting and damaging the environment, and presenting potential environmental problems for the future.

The Swells are already affected by the current congestion of traffic as drivers seek alternative routes round Stow, through single track roads, bringing degradation and pollution to this outstanding ANOB in general.

The existing damage to the environment, together with future light, noise and traffic pollution, is surely unacceptable. No matter how much landscaping is promised, the best solution is to leave the site as it is, with natural hedging, greenery and pastureland.

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Stow does not need this large number of housing, therefore it is hoped that CDC reject the proposed NP and move to protect this unique ANOB.

Lady Jane Parker
Fir Farm, Upper Slaughter, GL54 2JR

I am writing to formally object to the Stow-on-the-Wold Neighbourhood Plan for the following reasons:

Policy SSNP7: Land North East of Stow

Policy SSNP7 allocates 10 hectares of land to the north east of the town for a mixed use scheme, including approximately 170 houses which would enable a community hub building to be built on the site. In addition, 150 car parking spaces are proposed.

I have serious concerns regarding the proposed allocation of land north east of Stow and how this allocation meets the 'basic conditions' as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). There are seven basic conditions which the appointed Examiner must be satisfied the Neighbourhood Plan meets.

Test (a) requires the Neighbourhood Plan to have regard to national policies and advice contained in guidance issued by the Secretary of State (i.e. the NPPF as updated in December 2023). Test (e) requires the Neighbourhood Plan to be in general conformity with the strategic policies contained in the development plan for the area (i.e. the adopted Cotswold Local Plan 2011 – 2031).

The proposal site (and the wider area of Stow) is located in the Cotswolds AONB. Paragraph 182 of the NPPF states that *“great weight should be given to conserving and enhancing landscape and scenic beauty in AONB’s which have the highest status of protection in relation to these issues”*. Paragraph 183 continues to state that *“when considering applications for development within AONBs, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

- a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”*.

Policy EN5 (Cotswolds Area of Outstanding Natural Beauty) of the Cotswold Local Plan states that *“major development will not be permitted within the AONB unless it satisfies the exceptions set out in national Policy and guidance”*.

Cotswold District Council is in the process of preparing a new Local Plan and in February and March 2023 they undertook a consultation on 'Guidance for major development in the Cotswolds AONB' to assist with assessing whether a proposal, particularly at site allocation stage would constitute major development.

Section 4 of the document seeks to set out what would constitute ‘exceptional circumstances’ as referred to in the NPPF. Paragraph 4.2 states that *“any development proposal for major development in the AONB should be accompanied by a statement that demonstrates the need for the development”*. The paragraph goes on to state that this should include both national and local considerations in the context of needs arising within the AONB, including for example needs arising within the settlement / parish where the proposed development is located as identified through a housing needs survey, a parking survey or a statement setting out exactly why a community facility is required. Paragraph 4.3 states that AONBs are unlikely to be suitable areas for accommodating unmet needs from adjacent, non-designated areas.

Paragraph 4.5 refers to the need for a sequential approach to site selection to be applied and states that *“no permission should / would ever be given for major development save to the extent that it met a need that could be (practicably) met outside the AONB or in some other way. This is supported by case law”*.

Paragraphs 4.6 – 4.8 refers to the need to identify and quantify any detrimental effects upon the environment, the landscape and recreational opportunities.

Paragraph 4.9 states that *“... When considering whether a proposed development is in the public interest, this should be ‘weighed’ against the fact that safeguarding the natural beauty of AONBs is in the national interest. In order to assist in this assessment, a checklist is provided at Appendix 4, listing the issues that will need to be considered by the decision maker in deciding if the exceptional circumstances and public interests are met”*.

The Survey and Evidence base for the Neighbourhood Plan does not contain any evidence regarding up to date housing need for Stow-on-the-Wold which is one of the three factors that paragraph 182 of the NPPF requires proposals for major development in the AONB to consider. A Housing Needs Survey for Stow dated February 2010 is submitted as part of the evidence base, however this is nearly 14 years old and pre dates both the NPPF and the adopted Cotswold Local Plan. Whilst not included within the online evidence base a Housing Needs Survey was prepared in March 2022 by AECOM Ltd to support the Neighbourhood Plan.

The survey concluded that there was identifiable need across the Parish of:

- 22 Households to rent
- 15 Households to own by assisted intermediate housing

This need has subsequently been met by planning permission ref: 23/01513/FUL which delivered 37 affordable homes (22 rented and 15 shared ownership) on land North of Oddington Road, Stow-on-the-Wold. The Council’s Housing Enabling Officer commented on the planning application stating that at that point in time there were 127 households looking for an affordable rented property in Stow-on-the-Wold, although only 13 of those had an applicable connection to Stow-on-the-Wold.

The draft Neighbourhood Plan does not contain any additional evidence of need to justify a proposal for 170 homes comprising approximately 70 affordable units. Whilst it is not

disputed that there will be housing need across the District the lack of evidence setting out this need and in particular how this need relates to the Neighbourhood Plan area is contrary to NPPF paragraph 183 and Cotswold Local Plan Policy EN5 which requires exceptional circumstances to be demonstrated for major development in the AONB, including evidence of need.

Draft Policy SSNP7 of the Neighbourhood Plan states that the proposed 170 dwellings would be “enabling” development for community hub and car parking. No evidence has however been submitted as part of the Survey and Evidence base to justify the number of dwellings proposed and how this relates to the delivery of the community hub. If the residential development is ‘enabling’ development the number of units should be directly related to the build and delivery cost of the community hub.

It is therefore also not clear how the proposal put forward at draft Policy SSNP7 of the draft Neighbourhood Plan relates to wider development proposals at land to the North East of Stow. The Illustrative Masterplan (8541-L-10) for the site (as available on the Neighbourhood Plan webpage under ‘Informal public consultation on potential development sites June 2022’) identifies the proposed allocation as part of a wider site for circa 240 dwellings with the additional land lying in Broadwell Parish, outside of the Stow-on-the-Wold Parish boundary and Neighbourhood Plan area.

There are no proposals for a Broadwell Neighbourhood Plan and proposals for an additional 70 houses would be contrary to the current adopted Local Plan lying outside a defined settlement boundary. Furthermore, a standalone application for the 70 houses would constitute major development in the AONB for which there are no exceptional circumstances as required by Local Plan Policy EN5. As set out above no evidence has been submitted to justify the numbers of house that the Neighbourhood Plan purports are required to enable the community hub. Whilst paragraph 5.26 of the draft Neighbourhood Plan states that there is no viability dependency of the proposed Neighbourhood Plan site on the land in Broadwell Parish it is not therefore clear what justification there will be for the additional residential development and how this relates to the Neighbourhood Plan.

With regards to the community hub itself, draft Policy SSNP7 refers to the building as being for local community use falling under Use Class E(d) or F2(d) together with managed work spaces. Appendix C of the draft Neighbourhood Plan provides a specification for the building. Notwithstanding the specification no evidence has been put forward to justify the need for the building and the proposed split of uses. There are already a number of community buildings in Stow, including St Edwards Hall, the Stow Youth Centre and Stow Community and Family Hub. Further facilities are provided in Bourton on the Water which is just 4 miles south of Stow, including Bourton Leisure Centre and facilities at the Cotswold Academy School.

Paragraph 5.30 of the draft Neighbourhood Plan states that the community is keen to reduce the town’s dependency on tourism for its commercial success, however it is difficult to understand how the community hub would achieve this with the focus of facilities providing workspaces for local residents, a new Town Council office and meeting / sports hall. Furthermore, proposals for offices (other than small scale rural offices) are required to

satisfy the sequential test which seeks to locate main town centre uses (including offices) within town centres rather than in edge of centre locations.

NPPF paragraph 183 (c) also requires any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated to be considered when demonstrating 'exceptional circumstances' for major development in the AONB. The suitability of the proposal site was considered by Cotswold District Council as part of the Council's Strategic Housing and Economic Land Availability Assessment (SHELLA) (2021). The site is referred to within the Assessment as 'Land east of Roman Road (ref: S61)' and the Council concluded that:

"The site is on the same side of Stow as the refused planning permission for up to 146 dwellings on the Land east of Griffin Close site, which subsequently had an appeal dismissed. With S61, however, not only would the development also be considered to be 'major development within the AONB' but the scale of development would be considerably larger and more harmful to the AONB than the Land east of Griffin Close site. The site is on higher ground than the Griffin Close site and is more visible within the surrounding landscape.

Stow is a hilltop town and development in this location would not be in keeping with the settlement pattern. The scale of development on a slope would erode the character of the town, as well the rural setting in which the town sits. It would adversely affect the intrinsic value of the AONB and the proposal is assessed to have "High" landscape impact.

The development of S61 would also harm the rural setting of a Scheduled Monument, it would harm the setting of the Conservation Area, and it would harm the settings of a Grade I listed building and a Grade II listed building.

Other considerations, such as the loss of productive agricultural land, whether the access via Broadwell Road is suitable for the scale of development and potential archaeological issues would also need to be explored further but may also be further constraints to the development of this site".

The Assessment continued to conclude that the site is unsuitable for allocation in the emerging Local Plan.

As set out above, the NPPF requires exceptional circumstances to be demonstrated for major development in the AONB and the Cotswold District Council consultation document entitled 'Guidance for major development in the Cotswolds AONB' made it clear that any proposal for major development should be accompanied by a Statement setting out the need for a development. In the absence of a Statement setting out the need for the proposed housing and community hub the draft Neighbourhood Plan is contrary to Local Plan Policy EN5 and NPPF paragraph 183.

Furthermore, whilst Stow-on-the-Wold is identified as a Principal Settlement in the Cotswold Local Plan, the Plan does not make provision for new housing outside of settlement boundaries. The proposal site cannot therefore be considered to be in general conformity with the strategic policies in the adopted Development Plan. The replacement

Cotswold Local Plan is in the early stages of preparation, however (as set out above) an up-to-date Site Assessment (through the 2021 SHELLA) has concluded that land north east of Stow is unsuitable for development.

In summary, the proposed allocation at Policy SSNP7 fails to comply with national policies and advice and is not in general conformity with strategic policies contained in the adopted Development Plan and as such fails to meet 'basic conditions (a) and (e).

The provision of 150 car park spaces as part of land at north east Stow within draft Policy SSNP7 overlaps with draft Policy SSNP8 (Stow Town Centre and Market Square) and therefore this element of the proposals is addressed below.

Policy SSNP8: Stow Town Centre and Market Square

Sub-Section G of draft Policy SSNP8 seeks to reduce the amount of car parking in the Market Square in Stow subject to the proviso that the space is repurposed for public realm improvements only and that the number of spaces lost will not undermine the commercial viability of the Market Square.

I have significant concerns about the loss of car parking in the centre of Stow. Existing car parking serves both local residents who will frequently pop into Stow for short convenience shopping trips as well as tourists who will visit for longer periods. Local residents and subsequently retailers rely on Town Centre car parking to facilitate short trips. The new car park proposed as part of the proposed north east Stow allocation would be a circa 15 minute walk in each direction from the Town Centre. Whilst many tourists may be happy with such a walk, particularly if they are visiting for the day, this is likely to discourage local residents from visiting the Town Centre as people seek the convenience of being able to park close to the shops. As set out above, paragraph 5.30 of the draft Neighbourhood Plan seeks to reduce the Town's dependency on tourism, however removing valuable car parking for local residents in the Town Centre conflicts with this aim and will simply discourage local residents from using independent retailers in the town centre.

Other Matters

The Department for Levelling Up, Housing and Communities' guidance entitled 'Neighbourhood Planning' (dated 25th September 2020) advises (at paragraph 059 reference ID: 41-059-20140306) that where the examiner is minded to recommend that the Neighbourhood Plan or Order should proceed to referendum, the examiner must recommend whether the referendum area should extend beyond the neighbourhood area. The paragraph continues to state that it may be appropriate to extend the referendum area beyond the neighbourhood area, for example where the scale or nature of the proposals in the draft Neighbourhood Plan or Order are such that they will have a substantial, direct and demonstrable impact beyond the neighbourhood area.

As set out above the Illustrative Masterplan submitted as part of the evidence base identifies that the site proposed on land to the north east of Stow (draft Policy SSNP7) forms part of a wider site that extends in Broadwell Parish. Without draft allocation SSNP7 coming forward it is difficult to see how the land within Broadwell Parish would come forward for development, however the allocation of the site would be a significant stepping stone

towards land in Broadwell Parish coming forward for development. Adoption of the Neighbourhood Plan is therefore considered to have a substantial, direct and demonstrable impact beyond the Neighbourhood Plan area and as such if the Examiner is unfortunately minded to recommend that the Neighbourhood plan proceeds to Referendum that it strongly requested that the referendum area is extended to include Broadwell Parish.

I trust that the above comments will be passed to the Independent Examiner and also taken into account by the LPA as part of their duty to consider whether to move to a referendum following receipt of the Independent Examiners Report. If you have any queries please do not hesitate to contact me.

Harold Porter and Frances Dodwell

Harold Porter, Chadwell Cottage, Broadwell, GL56 0UA

Frances Dodwell, Brakespear Cottage, GL56 0UA

My name is Harold Porter, Chadwell Cottage, Broadwell, GL56 0UA and my neighbour opposite, Mrs Frances Dodwell, Brakespear Cottage, GL56 0UA both wish to object to the proposed building of 240 houses at the top of Broadwell Hill.

We are both well into our 90's and have problems walking. We have both lived here for over 30 years and regularly cross the road to visit each other.

We believe this proposal will increase traffic and thus, make it more dangerous for us.

We also fear that the increased population would not have the necessary local community support, such as Doctors or schools.

I have been led to believe that there are already in occupied in Stow. Why build more?

Harold Porter and Frances Dodwell

Harry Taylor
Stoneleigh House,
High Street,
Longborough, GL56 0QE.

Having studied the neighbourhood plan, I can find no mention of traffic problems accessing Stow. Given the rural nature of the area I am surprisingly frequently delayed in accessing Stow (similar concern for Moreton). It is apparent to me that Stow suffers fundamentally by the number and phasing of traffic lights which do not seem to have any computerised/camera management. The situation has deteriorated markedly during the 22 years I have lived in the area and will ultimately result in a severe deterioration in trading for Stow business if it is not tackled.

Have mini roundabouts been considered - particularly at Tesco and the old Unicorn crossroads ? Delays can be extremely severe as things stand at present .

Joanna Thomas
2 Elm Tree Cottage
Elm Tree Drive
Upper Swell
GL54 1EW

Proposal by Bloor Homes to build up to 240 houses on a site behind TESCO within AONB

The planning proposal for this large modern development in a prime location alongside the historical market town of Stow-on-the-Wold should be refused. It will be an eyesore, is totally inappropriate in scale and will impact negatively on the neighbourhood. Apart from the obvious aesthetic issues there are important practical reasons to reject the project, as listed below.

1. The need for assisted housing around Stow, ie 37 affordable and social homes, seems to have been achieved and approved on a nearby 'Rural Exception Site' (Bayhill/Oddington Road Development) - therefore the Bloor Homes Planning Application for up to 240 extra, non-assisted houses seems unnecessary on green belt land and was, apparently, not included in the CDC Local Plan. I understand CDC have already, previously discounted and assessed as unsuitable, the site behind TESCO. What good reason is there for re-visiting this proposal? (Does Bloor Homes already own the site? They are described as 'in control' of it - what does this mean exactly?)

2. Local Infrastructure and Amenities

a. There is already an escalating problem around Stow-on-the-Wold with traffic overload and congestion. A development on this scale would seriously compound

/the

the problem and add to the pollution from vehicles held up in queues along the A429 and its junctions.

b. The area is already subject to frequent power cuts.

c. The sewage infrastructure would struggle to cope. There is another sizeable development already under construction at Moreton-in-Marsh (Spitfire?) r
reliant on the same infrastructure. And we are all well aware of the problems connected with river pollution and local flooding issues.

d. GP services and local schools will also be put under undue pressure.

3. Light Pollution

The light generated from such a large development will be visible for a long way around the surrounding countryside after dark in view of the proposed site's elevated and exposed position at the top of Stow Hill. It will affect wildlife in this agricultural environment and add an urban and unwelcome addition to the night sky in this AONB.

4. I support the view already expressed by others, that there are alternative housing options available around Stow itself, with existing unused premises. Perhaps this could be explored further.

/5 ...

5. I think the very reasons that attract so many visitors to this lovely area, with its ancient history and picturesque architecture set in a stunning landscape, would be irrevocably changed for the worse if this development went ahead. It would be out-of-place as well as being unnecessary.

Ms Joanna Thomas
2 Elm Tree Cottage
Elm Tree Drive
Upper Swell
GL54 1EW

Georgina Thorley
Loxley House, Broadwell, Moreton-in-Marsh

GL56 0TL

Organisation and position (if applicable):

Date: 4 January 2024

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: Policy SSNP7

Do you support, oppose, or wish to comment on this paragraph? *(Please tick)*

Support Support with modifications Oppose Have comment

Please give details of your reasons for support or opposition or make comments:

Thank you for the opportunity to comment on Stow on the Wold and the Swells Neighbourhood Plan 2023-2031 (the “Neighbourhood Plan”). The Neighbourhood Plan includes a number of policies that I believe will benefit the Neighbourhood Plan Area, including Policies SSNP 2, 3, 4, 5, 6, 10, 11, 13, 14, 15, and 16. I support these policies.

In contrast, however, I believe that the proposed mixed use development scheme on land east of the town (Policy SSNP7) would – if permitted – cause significant and irreversible damage to Stow on the Wold, the surrounding villages (Broadwell in particular), and the AONB. The policy does not meet the basic conditions for a neighbourhood plan. In particular, it fails to meet the requirements of paragraph 183 of the National Planning Policy Framework (“NPPF”) and does not contribute to sustainable development. I also have some procedural concerns about the development of Neighbourhood Plan, and Policy SSNP7 in particular.

For these reasons – explained in more detail below – I believe that Cotswold District Council and the Independent Examiner should require Stow Town Council to remove Policy SSNP7 before the Neighbourhood Plan can be put to a referendum. If the Neighbourhood Plan is permitted to proceed to a referendum without amendment, I submit that the referendum voting area should be extended to include Broadwell in light of the huge impact Policy SSNP7 would have on the village.

1. POLICY SSNP7 DOES NOT MEET THE REQUIREMENTS OF PARAGRAPH 183 OF THE NATIONAL PLANNING POLICY FRAMEWORK

According to government guidance on neighbourhood planning, “Only a draft neighbourhood Plan [...] that meets each of a set of basic conditions can be put to a referendum and be made”.¹ Among these is the requirement that the neighbourhood plan must comply with, “national policies and advice contained in guidance issued by the Secretary of State”², including the NPPF.

Paragraph 183 of the NPPF requires that “[w]hen considering applications for development within [...] Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the

¹ See, <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>.

² *Ibid.*

public interest”.³ According to paragraph 183 NPPF, this will only be the case where the following three conditions are met:

1. There must be a **need** for the development.
2. There must be **no alternatives** to the development; and
3. The proposal must show that any detrimental effects on the environment, landscape, and recreational opportunities **will be moderated**.

Policy SSNP7, which includes plans for 170 new homes (plus a further 70 homes outside the Neighbourhood Plan area), a 150-space public car park, and a multi-functional building of community facilities and business workspace, does not satisfy any of these conditions.

1.1. There is no need for the proposed housing development

There is no need for 170-240 new houses in Stow on the Wold or the Swells. This is evidenced by the Stow on the Wold and the Swells Neighbourhood Plan Housing Need Assessment (the “HNA”), which identified a need for just “4 homes per annum (rounded) or 37 homes over the Neighbourhood Plan period (2021-2031)” in Stow on the Wold and the Swells.⁴ This need has now been met with the approval, on 13 December 2023, of a development of 37 new, affordable houses along the Oddington Road (Application No. 23/01513/FUL). In the absence of any additional evidence of housing need above and beyond that identified by the HNA, the Policy SSNP7 therefore fails to meet this first test.

1.2. There are alternatives to the proposed development

Even if Stow on the Wold’s identified need for thirty-seven houses had not already been met by the Oddington Road development approved on 13 December 2023, there would have been alternatives ways to meet this need. For example, it is understood that there remain over one hundred empty, unsold properties in Stow’s two most recent retirement developments more than two years after these were completed. These could have been (and indeed still could be) redesignated as properties for affordable or social rent or affordable ownership. Such a proposal does not seem so farfetched given Stow Town Council’s own Policy SSNP5, which acknowledges Stow’s current “oversupply” of age-restricted housing.⁵

1.3. Policy SSNP7 does not contain meaningful measures to moderate the detrimental effects to the environment and landscape

Policy SSNP7 would have severe negative effects on the local environment and landscape. These include the loss of habitat and carbon storage on the greenbelt development site, the creation of significant additional road traffic and congestion, an increased flood risk in Broadwell, greater risk of sewage discharges into local rivers, and irreversible damage to the natural beauty of the AONB. As the Neighbourhood Plan does not propose any concrete or meaningful plans to moderate these detrimental effects, it also fails to meet the third requirement of paragraph 183 of the NPPF.

³ **National Planning Policy Framework, Department for Levelling Up, Housing, and Communities, December 2023, paragraph 183, available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf.**

⁴ **Stow on the Wold and the Swells Neighbourhood Plan Housing Need Assessment, March 2022, p.9, available at: <https://stowonthewold-tc.gov.uk/wp-content/uploads/2023/02/AECOMS-Stow-on-the-Wold-and-the-Swells-Housing-Needs-Assessment-final-report-March-2022.pdf>.**

⁵ **Stow on the Wold and the Swells Neighbourhood Plan, p.25, available at: <https://www.cotswold.gov.uk/media/4bqfuqgr/stow-and-swells-ndp-final-for-submission.pdf>.**

Policy SSNP7 fails to provide any concrete measures to moderate increased traffic and congestion. Stow Town Council itself acknowledges (Neighbourhood Plan, p.67), traffic is increasingly “blighting” Stow on the Wold. The volume of traffic along the A429 is growing, with traffic regularly backed up as far as, or even beyond, the Broadwell/Donnington crossroad at busy times of the day and in the peak tourist seasons. The addition of 170-240 new homes, a 150 space car park, and a mixed use community development, with a single highways access on to the A429 at the top of Broadwell Lane will significantly increase this congestion. And yet the SSNP7 offers no concrete solution to moderate or manage this additional traffic. It states simply that the “transport strategy” will “implement any improvement works shown to be necessary to the A429 Fosse Way/Broadwell Lane junction prior to the occupation of the first dwelling”.

What “improvement works” are envisaged? I cannot think of any that can offset the impact of an estimated 500+ car movements per day entering and exiting the new development.

Are we to have a fourth set of traffic lights along the A429? If so, it is difficult to see how this would reduce congestion through the town.

Nor does the Neighbourhood Plan provide any concrete plans to moderate the negative impact of the inevitable increase in the volume of traffic down Broadwell Lane – a road with two blind corners that is simply unsuitable for heavy traffic. Once again, we are offered only a vague assertion that the “transport strategy” will “seek to discourage traffic generated by the housing, public car park and community hub schemes from using Broadwell Lane other than to access the site from the A429 Fosse Way”. What measures does Stow Town Council have in mind here? Speed humps? Chicanes? Not only are such measures out of keeping with the rural setting, but they are entirely inappropriate on a road that is routinely used by wide, agricultural vehicles.

Policy SSNP7 risks undermining GCC’s Flood Mitigation Scheme for Broadwell. CDC/GCC are currently working with local landowners and Broadwell Parish Council to design and implement a flood prevention scheme to mitigate the flood risk in Broadwell caused by surface water flowing down the hill from the direction of Stow on the Wold and the A429. The extent of the problem has been clearly visible following the heavy rain of the last week,⁶ with extensive flooding on both sides of Broadwell village green.



I understand that a scheme has now been agreed subject to legals. It seems ludicrous that, at the same time as CDC/GCC are spending significant sums of public money on reducing flood risk at the bottom of Broadwell Lane, Stow Town Council is proposing a development at the top of the same hill that is likely to increase the volume of run off and surface water flowing down the hill towards Broadwell.

Policy SSNP7 risks increasing the volume and frequency of sewage discharges into the river Evenlode. Sewage from the new housing estate would be gravity fed down Broadwell Lane to the

⁶ Photos taken 2 January 2023.

pumping station on the Oddington Road. The Thames Water Live Discharge Map⁷ shows that this plant already discharges regularly, with sewage feeding into the River Evenlode – the most recent discharge at the date of writing began at 14:15 on 30 December 2023 and is ongoing (126 hours and 12 minutes later) at the time of writing. Such discharges – which damage the river environment and pose significant threats to human health – are likely to become more frequent with the addition of 170+ houses to the existing sewage and water treatment system. And yet, the Neighbourhood Plan does not appear to propose any upgrade or extension of the existing system or outline any concrete plans to mitigate this risk.

Finally, the Proposal would have a significant negative impact on the AONB. The Strategic Environmental Assessment (SEA) for the Stow on the Wold & The Swells Neighbourhood Plan (February 2023) agrees. According to the SEA, Policy SSNP7 does not do enough to moderate the negative impact on the historic environment and recommends the proposed development be amended to “acknowledge[e] the identified heritage constraints as key design considerations, and by directing development to the northern extent of the site where heritage sensitivities are reduced”. Even with these amendments, however, the scale of the proposed development is completely disproportionate to the size of the existing town, significantly increasing its footprint and potentially increasing its population by up to 30%. The result would be a material change in the character and appearance of Stow that – by virtue of the site’s elevated position – would also cause significant and irreparable harm to the AONB/National Landscape. The development – and all of its associated light pollution – would be visible for miles to (at least) the north east and east of Stow, materially impacting the long views of the AONB from numerous villages on this side of the town, including (among others) Broadwell, Evenlode, Adlestrop, and Chastleton. CDC is acutely aware of the impact that such a major development would have on this exposed hilltop site:

- CDC’s 2021 assessment of Stow on the Wold’s potential development sites found this site has high landscape sensitivity, as it “has openness to views from the east and would also impact upon views from the north and south. Development of this sensitive parcel would erode the prevailing character and cause the encroachment of the built settlement into this valued rural landscape. The parcel’s value is demonstrated by its location within the AONB and its contribution to the setting of the Conservation Area that is present to the south-west and the approach to the settlement. This approach to the settlement from the east is recognised along a publicly accessible rural lane that also forms part of the promoted walking route known as The Monarch’s Way. St Edward’s Well is a listed structure present along this walking route to the south of the parcel and contributes to the tranquil experience enjoyed along this lane”.⁸
- A smaller development of 146 dwellings on land to the east of Griffin Close was previously dismissed on appeal on similar grounds. The Inspector in that case found that even the smaller, less elevated development proposed would have had “a significant adverse effect on the character and appearance of the AONB and the setting of Stow”⁹ as it “would not

⁷ <https://www.thameswater.co.uk/edm-map>, accessed on 3 January 2024.

⁸ “**Stow on the Wold Site Assessments: Strategic Housing and Economic Land Availability Assessment (2021)**”, Cotswold District Council, p.21, available at: <https://www.cotswold.gov.uk/media/iryb5d4j/2-2-04o-site-assessments-stow-on-the-wold.pdf>.

⁹ **Inspector’s Decision in Town and Country Planning Act 1990 – section 78 Appeal by Bovis Homes Limited at land at Oddington Road, Stow-on-the-Wold Application: REF I3/01856/OUT**, paragraph 17, available at: <https://www.cheltenham.gov.uk/downloads/file/9281/k19-appeal-decision-appf1610a132203411%E2%80%93land-at-oddington-road-stow-on-the-wold>.

conserve the landscape or scenic beauty of the AONB, contrary to the aims of the [NPPF]”.¹⁰

1.4. Policy SSNP7 must be deleted before the Neighbourhood Plan is put to a referendum.

For all the above reasons, Policy SSNP7 fails to meet the requirements of paragraph 183 of the NPPF. I therefore respectfully request that CDC should require Stow Town Council to delete this policy from the Neighbourhood Plan before the remainder of the plan can proceed to a referendum.

2. POLICY SSNP7 DOES NOT CONTRIBUTE TO SUSTAINABLE DEVELOPMENT

According to the NPPF, paragraph 11, for plan making, plans “should apply a presumption in favour of sustainable development”.¹¹ For plan making, this means that “all plans should promote a sustainable pattern of development that seeks to:

- Meet the development needs of their area;
- Align growth and infrastructure;
- Improve the environment; and
- Mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”.

Policy SSNP7 does not satisfy any of these criteria.

Policy SSNP7 does not meet the development needs of the area.¹² According to Stow Town Council, the housing development proposed in SSNP7 is needed to secure the “economic base, and self-sustainability”¹³ of Stow on the Wold. This argument is flawed. According to Stow Town Council, “traffic and parking” are already “blighting” Stow’s “national heritage significance.” Increasing traffic and congestion by adding an additional 240 houses, a 150 space car park, and a mixed-use community space sharing a single highways access at the top of Broadwell Hill is only going to exacerbate the problem. Even worse congestion risks people (including tourists) avoiding the town altogether, undermining rather than securing the town’s economic base.

Likewise, removing parking from Market Square (SSNP8) to the remote car park the other side of Tesco (SSNP7) risks undermining the viability of the town’s businesses and further reinforcing its reliance on tourism. The overwhelming majority of local people with whom I have discussed the Neighbourhood Plan over the past four weeks said that if they were unable to park in the centre of Stow they would not bother going into the centre at all. It is precisely the convenience of being able to park close to the shops that draws locals into the town.

Business owners are well aware of this – I have discussed the proposal in SSNP8 with a large number of business owners in Stow (as well as the head of the Stow Business Association) all of whom have expressed real concern that if people are no longer able to park in the town centre the businesses might as well “pack up and go home”.

The negative impact of SSNP8 will be further exacerbated by the imminent expansion of Tesco. If people are unable to park in the town centre, why would they continue to use the butcher, the hardware store, the mini Co-op, the beer shop, the toy shop when they can meet all of their needs at the expanded Tesco where they are able to park directly outside for free?

The addition of a further 170-240 homes to the north east of Stow on the Wold would not align growth with existing infrastructure in the town.¹⁴ The development proposed in Policy SSNP7 could

¹⁰ **Ibid.**

¹¹ **NPPF, paragraph 11.**

¹² **NPPF, paragraph 11.**

¹³ **Neighbourhood Plan, p.68.**

¹⁴ **NPPF, paragraph 11.**

add up to 30% to the existing population of Stow (on top of the new residents in the Oddington Road development). And yet Policy SSNP7 is silent as to whether there is sufficient capacity at Stow's primary school, GP surgery, dentist practices, etc. to meet the needs of these new residents. Given that the provision of accessible services is a key element of sustainable social development (NPPF, paragraph 8), it seems strange that Stow Town Council has not seen fit to demonstrate how Policy SSNP7 would achieve this. In fact, it does not appear that Stow Town Council has made *any* efforts to check whether the town's infrastructure could support the proposed population growth. When we contacted a senior member of Stow's GP surgery about the Neighbourhood Plan in mid-December 2023, we were told that the GP surgery was unaware of the proposed housing development.

The additional traffic and congestion will not "improve the environment".¹⁵ The addition of 170-240 new houses, a 150 space car park, and a mixed-use community space will inevitably generate substantial additional traffic in an already notoriously congested stretch of the A429. The additional congestion – along with the resulting emissions – will certainly not "improve the environment". Nor – given the absence of any meaningful public transport network in the town – will it help the town "move to a low carbon economy".¹⁶ Instead, it will further blight the town, reduce its national heritage significance, reduce local air quality, and contribute to climate change.

3. PROCEDURAL CONCERNS REGARDING THE DEVELOPMENT OF POLICY SSNP7

I would also like to register a number of concerns about the extent to which Stow Town Council has followed to the required procedure in the development of the Neighbourhood Plan.

First, I question whether Stow Town Council has met its statutory obligations with respect to publicity and consultation. I note Stow Town Council's Consultation Statement regarding its efforts to inform and consult the community. Yet, my own experience over the past 4 weeks of speaking to a large number of business owners and residents in Stow and surrounding villages suggests that only a tiny fraction of local people (<5%) were aware of the Neighbourhood Plan at all, let alone specific policies such as the housing development (SSNP7) or plans to move parking out of Market Square to a car park situated outside the town beyond Tesco. In fact, almost all of the business owners that we spoke to who were aware of the Neighbourhood Plan were shocked to discover that policy SSNP8 includes plans to remove parking from Market Square. We heard repeatedly that Stow Town Council had explicitly assured business owners that there were no such plans. Most shockingly, as noted above, Stow's GP surgery – a key service provider to the local community – was unaware of the proposed housing development and associated increase in population when we spoke to one of the practice's senior GPs in mid-December. While anecdotal, this experience does not paint a picture of a community that has been well informed or consulted throughout the development of the Neighbourhood Plan.

I am also intrigued by Stow Town Council's conclusion in its Consultation Statement that the Regulation 14 Consultation "has not led to new factors of technical substance coming to light that would warrant the deletion of that proposal from the submitted Plan".¹⁷ CDC itself submitted a long list of technical concerns regarding Policy SSNP7, including the need for more evidence to substantiate the claimed need for more housing in Stow and a more detailed analysis of alternatives

¹⁵ **Ibid.**

¹⁶ **NPPF, paragraphs 8, 11.**

¹⁷ **Consultation Statement, Stow Town Council, September 2023, p.5, available at: <https://www.cotswold.gov.uk/media/vm3fuqnx/stow-and-swells-ndp-consultation-statement.pdf>.**

ways to meet any housing need.¹⁸ Stow Town Council's own Neighbourhood Plan partner – Swells Parish Council – likewise challenged STC's conclusions about the need for additional housing in Stow.¹⁹ And, according to the Consultation Statement, "the CNLB and a significant number of representations from residents of Stow and nearby parishes object[ed] to the policy on the basis of its location on the high wold plateau in the Cotswolds AONB".²⁰ All of these are technical factors that go to the ability of the Neighbourhood Plan to meet the Basic Conditions. And yet Stow Town Council has made no material efforts to address any of these points, making only a few superficial changes to the document before submitting it to CDC. Swells Parish Council's concerns are simply dismissed as "unfortunate".²¹ CDC's and CLNB's arguments are noted but STC concludes that these bodies just need "greater convincing".²² The many objections received from outside of Stow are simply disregarded as their authors "reside in neighbouring villages and not in Stow".²³ If Stow Town Council was not prepared to take on board comments submitted through the consultation, the consultation was little more than a meaningless, box-ticking exercise. As such, it is difficult to see how it can fulfil Stow Town Council's statutory consultation obligations.

Lastly, I am concerned by the extent to which Bloor Homes Limited has shaped and driven the development of Policy SSNP7. In particular, I have seen emails proving that Bloor Homes – not Stow Town Council – has driven the drafting of both Policy SSNP7 and the supporting Appendix E. This is simply not appropriate. If, as Stow Town Council claims, the Neighbourhood Plan is truly "a plan by the community for the community",²⁴ why has Stow Town Council – the qualifying body for purpose of the development of the Neighbourhood Plan – allowed a private, commercial company (that stands to make millions of pounds of profit from the venture) to take the lead in shaping and developing this policy?

4. IF THE NEIGHBOURHOOD PLAN PROCEEDS TO A REFERENDUM INCLUDING SSNP7, THE REFERENDUM VOTING AREA SHOULD INCLUDE BROADWELL

Finally, if the Neighbourhood Plan is permitted to move forward to the referendum stage with Policy SSNP7 included, I respectfully request that CDC include the Parish of Broadwell in the referendum area. This would reflect the enormous impact the proposed development would have on the village. In particular:

- **Policy SSNP7 will significantly increase traffic through Broadwell.** Despite Stow Town Council's claims that its "transport strategy" will "*seek to discourage traffic generated by the housing, public car park and community hub schemes from using Broadwell Lane other than to access the site from the A429 Fosse Way*", it is inevitable that a significant volume of traffic from the 170-240 houses, 150 space car park, and multi-purpose community space will come down Broadwell Lane and through the village. Likewise, the increased congestion through Stow caused by the development will encourage even more people to use Broadwell as a rat-run to circumvent the traffic chaos of Stow.
- **The development will impact the views of the AONB from Broadwell.** Given its elevated position, the development – and the light pollution it will inevitably generate – will negatively

¹⁸ **Ibid., p.15.**

¹⁹ **Ibid., p.15.**

²⁰ **Ibid., p.15.**

²¹ **Ibid., p.16.**

²² **Ibid., p.16.**

²³ **Ibid., p.16.**

²⁴ **Stow on the Wold and the Swells Neighbourhood Plan, p.4, available at: <https://www.cotswold.gov.uk/media/4bqfuqgr/stow-and-swells-ndp-final-for-submission.pdf>.**

impact the long views of the AONB from Broadwell.

- **The development will increase Broadwell's flood risk.** As explained above, landowners in Broadwell are currently working with CDC/GCC to design flood defences to reduce the risk of flooding in Broadwell caused by surface water flowing down the hill from the direction of Stow on the Wold / the A429. Meanwhile, the development proposed in SSNP7 will substantially increase the risk of such flooding. As it will result in a large area of agricultural land being tarmacked, the development will almost inevitably increase the volume of surface water running down the hill towards Broadwell.
- **Broadwell Parish would be directly affected by increased discharges from Thames Water's Broadwell pumping station.** As explained above, Thames water routinely discharges sewage into the River Evenlode from the Broadwell pumping station. Adding effluent from 170-240 houses to this already overloaded system will only make the problem worse.
- **The strength of feeling in Broadwell is demonstrated by the response to the Regulation 14 Consultation.** Of the 305 responses submitted to Stow Town Council during that consultation, 67 (22%) came from residents of Broadwell.²⁵

5. CONCLUSION

In summary, for all the reasons set out above, I respectfully submit that:

- a) Policy SSNP7 fails to meet the basic conditions for a neighbourhood plan and should therefore be deleted before the Neighbourhood Plan proceeds to a referendum; and
- b) If the Neighbourhood Plan is permitted to proceed to a referendum including Policy SSNP7, the referendum voting area should include Broadwell given the significant impact the policy would have on the village and its residents.

²⁵ Consultation Statement, Stow Town Council, September 2023, available at: <https://www.cotswold.gov.uk/media/vm3fuqnx/stow-and-swells-ndp-consultation-statement.pdf>.

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I oppose this plan in the following reasons.

The development to the North East of Stow, section 7, is too large. Stow has a population of approx 2000 people. An additional 170 homes could increase that by an extra 500 at the least. Too big an increase that would alter the town to too greater a degree

Additionally, the extra traffic that would bring onto the Fosseway would affect us all detrimentally. The Fosseway is already overloaded. There are often queues of traffic and more traffic would also mean extra air pollution.