

20 January 2020

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Dear Sir/ Madam

Representations on the Somerford Keynes Neighbourhood Plan

On behalf of my client, County to County Property Group, please see below our representations in relation to the Somerford Keynes Neighbourhood Plan. As you will be aware, my client has a current application pending on Land to the South East of Ashland House, The Street, Somerford Keynes for the erection of 2no. open market dwellings and 3no. affordable dwellings (reference 19/04270/FUL).

Having reviewed the Draft Local Plan, we would like to make comments on the following policies:

Policy SKPOL1: Residential Development

It is agreed that within Somerford Keynes, any development should be small and proportionate in scale to the existing settlement. This is considered to be broadly in line with policy DS3. It is understood that Somerford Keynes is a linear settlement, however it should not preclude development which meets a local need from coming forward, when it is adjacent to existing development within the village.

As you will be aware, my client currently has an application for 5 dwellings on land to the east of Ashland House (ref: 19/04270). This is proposed to provide three shared ownership dwellings and two market dwellings.

Whilst much of the policy appears to be along the lines of policy DS3 in the Cotswold Local Plan, there are significant concerns with some elements of it.

Part (b) of policy SKPOL1 sets out that development will be supported if it *"is located within the defined limits of Somerford Keynes"* as shown on the map at appendix 2. This plan suggests that development should not extend beyond the limits identified on the roadway. However, it should not preclude small back land development where in line with policy DS3 of the Cotswold Local Plan it complements the form and character of the settlement.

Furthermore, in relation to (f) within the policy, which seeks to ensure that housing is limited to small dwellings (up to 3 bedrooms). Whilst it is acknowledged that this is allow for a wider mix of homes within the village, it does not take into account site specific circumstances.

For example, my client is proposing to build three shared ownership homes (2 and 3 bedrooms), which will help to meet a local need within the village as set out in the supporting letter prepared by Cirencester Housing. As is set out within the Paris Councils Housing Needs Survey, there are currently only 10 Affordable Rental properties in the village and no shared ownership. The NPPF is explicit at paragraph 61 that *"the size, type and tenure off housing*

needed for different groups in the community should be assessed and reflected in planning policies". This includes affordable housing. However, in order to fund this, the market dwellings proposed have more than three bedrooms.

Furthermore, the strict criteria on plot sizes, is not considered to be in line with the need to ensure that development is compatible with the surrounding character and settlement (d). Whilst it is reasonable for policy (when justified) to set a minimum standard (such as national space standards), it is not considered to be reasonable to set a maximum size. As a result, this part of the policy (f) should be reworded to encourage smaller dwellings in new developments, having regard to site specific circumstances and remove the overly restrictive plot and dwelling sizes.

Part (g) of the policy in relation to flood risk, is considered to be unnecessary as policy EN14 of the Cotswold Local Plan and the National Planning Policy Framework already covers flood risk and drainage.

Policy SKPOL2: First Option to Buy for Local People

There are concerns as to how this policy would be implemented. Whilst ensuring affordable housing meets a local need in the first instance, it is not considered the role of the planning legislation to prevent new people moving into a village or town. This policy is not consistent with the NPPF and therefore should be deleted.

Policy SKPOL7: Flooding and Drainage Infrastructure

Whilst it is acknowledged that there are concerns about flooding within the village. This is dealt with by policy EN14 of the Cotswold Local Plan and the National Planning Policy Framework together with the Planning Practice Guidance. As a result, this policy should be deleted as it is considered to be duplication of existing policy.

I trust these comments will be taken into account. If you require any further clarification on the points raised, please do not hesitate to contact me on the number at the head of this letter.

Yours faithfully

Emma Wilsdon
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For Ridge and Partners LLP