

January 2015 Response to Winchcombe & Sudeley Draft Neighbourhood Plan (NP)

Consultation Process

We wish to make some general comments about the consultation process before addressing the contents of the Draft Neighbourhood Plan.

1. We would like to register very strong objections to the attempt to only permit a single format to register comments, this is not in accordance with the level of community engagement required by the Localism Act 2011 nor in accordance with DCLG Guidance that consultation should be continuous throughout the process & be over & above that required in legislation – comments should be considered regardless of the format in which they are submitted.
2. The JCS consultation accepted comments in any format (not just handwritten responses using a prescribed form) and the NP consultation should do the same for inclusiveness. The consultation must meet requirements regarding equality & Disability Discrimination. It would be unlawful not to accept consultation responses in other formats. Other consultation methods such as public meetings, focus groups etc... should also be considered.

We note what has been said about it being “easier” if comments are in a common format but the Town Council, when inaugurating the NP process, should have made adequate provision for the proper assessment of comments in all formats, it is for them to meet the needs of residents, not the other way round. A suggestion has been made that provision should be made for an online form to be completed which would be helpful to many but which also requires higher level IT skills; people may be able to send emails but not complete online forms and we believe provision should be made for people to submit their comments in any form they wish. We note from the slightly amended wording on the Blog that the acceptable response format has now been extended to allow email & attached document responses; however the vast majority of Winchcombe residents have not been made aware of this.

We are further of the opinion that requiring comments to be written in such small spaces is an attempt to stifle or limit representations which is also unacceptable.

3. We would also express concern about the lack of an option for a neutral response ie “neither agree nor disagree” rather than being expected to commit; respondents may feel there is not enough information to express such a definite opinion or they may wish to qualify their response in some way e.g. agree subject to.... However, in the absence of a qualified option, we understand we have to disagree totally unless we are in unqualified agreement. This, therefore, includes having to disagree with points where we feel there is a lack of clear information on which to base a decision or where we might be in partial but not total agreement.
4. There is also the issue of how comments will be counted – joint responses should be included as two responses rather than as one. It also leads to serious concerns that the analysis will simply be one of counting those for and against rather than giving proper weight to the issues raised &/comments made.

5. We are of the view that due to the problems outlined above, together with the fact that many residents still had not received copies of the Draft NP document some two weeks into the consultation period, this consultation process is flawed. This situation means some residents are being denied the full legally required six week period to respond; the date of 13th February should be extended.
6. We are also concerned that the consultation has taken place without an accompanying Statement of Community Involvement demonstrating how the plan has evolved due to public involvement and how the concerns raised by residents have been addressed. This will certainly be required for the next stage & best practice would surely be that it is on-going throughout the process.
7. We would express great disappointment that absolutely nothing which has been said since the Exhibition of January 2014 by residents has carried any weight with the SG/TC (Town Council). This despite the fact that all our comments have been tested against professional opinion, including from the RTPI and the DCLG, that quotes have been produced by us from the NPPF, Planning Policy Guidelines and Statements, Ministerial announcements, Hansard in support of our position, all this has been totally ignored in the insistence in adhering to the original Draft Plan (for that is, in reality what is has proved to be) as shown at the January 2014 Exhibition.
8. The consultation document is also difficult to follow due to the cross referencing to other documents and complete lack of referencing of any kind, either page, paragraph or numbered bullet points for Section 6, probably the most significant Section. The draft plan should be one comprehensive document for ease of reference & there should have been a summary leaflet version available to those who want one (see Roadmap Guide, www.locality.org).

Accordingly, we believe the Draft Neighbourhood Plan & process to be fundamentally flawed.

Landscape Assessment

We would wish to draw reference to some of the shortcomings regarding the Landscape Assessment, both in terms of process and the Report.

1. We feel the process to be flawed as the Landscape Assessor was aware (EA para 151) of the “ideas” (we would say proposals) promoted at the Exhibition of January 2014. Consequently, the assessor would have been aware of what the client (the TC/SG) wanted before he began work. We feel this could have compromised the “independence” of the Report, which residents had expected.
2. We also feel that the Report concentrates too much on what walkers & visitors would see with very little regard for the adverse affects on the visual amenity of existing properties – which are visual receptors. The impact on these numerous visual receptors needs to be considered more fully.
3. We also have issues with some of the “evidence” in the Report, for example Page 18, photograph 3 cannot be considered “an illustrative view from a private garden on Mercia Road” because there can be no such thing; the viewpoints assessed should be

clearly identified/labelled and photos taken from these – there should be no illustrative views, this is imprecise.

4. Mercia Road is T-shaped meaning that properties in the upright have very different views from those in the cross part of the T at the top. The road also rises quite steeply and the photograph chosen is at the lowest level near the junction with Orchard Road. Residents are angry and disappointed about this, particularly as they offered photographs & access to their properties which would illustrate the diversity of outlook, perspective & view of the topography from the different properties as well as the variety of this much-valued landscape.

Detailed comments on the Draft NP

In addition to the comments below, we would wish all comments/statements/questions delivered at TC meetings by us, or other residents with similar views or on behalf of WRAP (since September 2014) from Feb 2014 to Dec 2014 inclusive also to be taken into account as part of these comments on the Draft NP as materially there is no difference between the January 2014 Exhibition panels & current Draft.

Section 1.

1.1. This policy may well have merit but it is contradicted & undermined by later policies in other Sections (eg 3.5 & 6 where the proposals certainly do not “enhance or protect” the AONB to give but one example) so which Policies will hold sway – this or those in later sections? In view of this, have to *disagree*.

1.2 Generally tend to agree more than disagree as long as grazing land is also considered to be productive land, this is not clear from this policy; if it applies only to arable land, this would not be satisfactory, we suggest “grazing land” should be included for avoidance of doubt. In view of lack of clarity, have to *disagree*.

1.3 Again, generally *seems* reasonable but is undermined in later policies where flood risk made known to the Steering Group (SG) has been ignored; there is no mention of issues with springs on the hillsides. In view of lack of clarity, have to *disagree*.

1.4 This policy may have merit but is it unrealistic? We understand that, according to the urban design compendium, 1200m is normally considered the preferred maximum distance for walking; we agree that this is perfectly reasonable for the able bodied, indeed longer distances are perfectly acceptable but, in truth, will people walk even much shorter distances (eg 400m)? Although government advice is that travel choice should be provided, many people already drive very short distances. Due to lack of clarity have to *disagree*.

1.5 We totally *disagree* with some of the suggested sites; according we quote below from the NPPF beginning with Paragraph 77 followed by relevant extracts from Planning Practice Guidance:

The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;

- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

- **How does Local Green Space designation relate to development?**

- Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.

How big can a Local Green Space be?

There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, [paragraph 77 of the National Planning Policy Framework](#) is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.

We feel that the sites shown on the Draft NP Map represent a ring around Winchcombe and could be considered as a limit to development of sites other than those proposed in later Policies (& which we challenge most forcefully). This could be deemed to render the Draft NP flawed. While some of the sites may have merit, in other cases such as the field next to the Redrow development, (this is an arable field which limits if not prevents leisure use), the land has little intrinsic merit as landscape in spite of its designation as SLA which is not for that land’s own merit but for its position in relation to the AONB. This has already been significantly compromised by the Redrow development.

As the sites do not have a reference on the Map, it is difficult to give specific reference but we also feel that other parts of proposed Local Green Spaces, such as that of the field adjoining the river nearest to Rushley Lane, while having the merit of a public footpath & usage, does not have the seemingly required special landscape quality necessary, it is a field, similar to many others.

We would argue that there is a far greater argument for designating land West of Winchcombe (Parcels 1a & 1b) as Local Green Space. It is AONB land, it is highly valued

by local residents and walkers, it is used regularly (ie on a daily basis by dog walkers & others), it represents a distinctive landscape as being part of Langley Hill which is designated by the Cotswold Conservation Board as an Escarpment Outlier. There is a considerable & varied amount of wildlife, as grazing land there is probably more here than the arable field near the Redrow development; residents have recorded 50+ species of birds just in their adjoining gardens, there are two species of deer regularly seen, not to mention numerous pheasants, owls (three types), squirrels and other wildlife. At certain times of year, there is also a magnificent display of wild flowers. Also, as grazing land, it has the additional benefit of providing the opportunity for residents, walkers and visitors to observe cattle & sheep, something lacking in some of the currently proposed areas. There are also a number of local artists living in this area (including one who has exhibited at the Royal Academy) whose works include a considerable number of paintings of Langley Hill & its immediate area. Their inspiration should be preserved (not lost to development as is proposed in later policies).

We are concerned that the current proposals “box in” Winchcombe & would lead to future further encroachment into the AONB as all other possible locations would be covered by Local Green Space Designation. As the development requirements for Winchcombe are not yet known in the absence of the necessary guidance from Tewkesbury Borough Council (TBC), we feel it is dangerous to limit potential development sites by the use of Local Green Space Designation which is also contrary to the Government’s purpose for this Designation.

Section 2.

2.1 This would *seem* reasonable as long as the AONB status of this land is not forgotten or ignored and the historic & architectural value of any buildings is protected. Due to lack of clarity, have to *disagree*.

2.2 At present, very little of this development is visible to passing traffic and we would feel that this policy is reasonable as long as that continues to be the case; any extensions or new buildings which intrude visually should not be considered. Due to lack of clarity, have to *disagree*.

2.3 We would agree with this; point a) is, we believe, in accordance with normal planning guidelines & thus is not a new policy for the NP.

2.4 Agree.

2.5 Generally agree but guidance as to what would be considered “unreasonable” would be helpful; any disturbance to normal residential enjoyment of a property, including its outside space, would seem a reasonable definition, particularly in more tranquil or rural areas. If nothing is added, this would be left as a matter of planning judgement. Due to lack of clarity, have to *disagree*.

2.6 Generally agree (but due to lack of clarity have to *disagree*) that more tourist accommodation is needed, however would question whether hotel is the best option; these are often very expensive unless budget hotel which would not be suitable or economically viable for Winchcombe. Would not high quality Bed & Breakfast provision be the most suitable and useful? Also, tourist “attractions” would have to be of a suitable nature, not, for example, theme parks or such like.

2.7 Agree.

2.8 *Disagree.* This could have a negative impact on existing local shopkeepers who all have to pay business rates & rely on local trade for their whole income (and some of whom already sell local products). It would be most damaging for occasional traders without these overheads to come and take this trade. In a worst case scenario, a number of local shopkeepers could go out of business, the occasional traders might move on & residents would be left without local shopping facilities forcing them to go out of Winchcombe for basic needs.

2.9 Agree to a point but due to lack of clarity have to *disagree* – what is meant by “development”? What would not be desirable is for Sudeley Castle to develop into an events centre, such as Audley End House in Essex, where there are large-scale outdoor concerts and events which cause considerable disturbance and nuisance to people over a large area (up to five miles distant). One of the great assets of Winchcombe is its tranquillity.

2.10 *Disagree.* Has anyone asked Winchcombe Pottery’s owners for their views? They may be perfectly happy as they are. The land opposite forms an attractive rural screen (admittedly better before the trees were cut down) and should not be despoiled by a car park. A large part of the Pottery’s charm is its informal nature & small, artisan scale.

2.11 *Disagree.* How many “local people” have welcomed the idea of removing the railings? Glazing at ground floor level would, in our view, be out of keeping with the age & style of the building. We would see a need to obtain the view of a heritage specialist on this point. We would have thought that promoting the sale of “Made in Winchcombe & Sudeley” products must be best done through existing or future local shops thus helping improve their trading positions.

2.12 Surely any development at this site would further erode the gap between Winchcombe & Greet? If this policy means that the gap no longer matters, then this would support housing development on the field next to the Redrow site thus avoiding encroachment into the AONB? As it is obviously believed that people will walk from Winchcombe Station into the town centre as long as the pedestrian access is improved, that is another argument in favour of promoting the field next to the Redrow development for any future housing need as this would demonstrate it to be sustainable.

Section 3.

Firstly, we would challenge the statement in the introduction that “What’s more important for Winchcombe & Sudeley Neighbourhood Plan is not the precise number” – of course that is **the** overriding consideration. It would be totally unacceptable to damage the town & its surroundings further by building houses which we are not compelled to do. This is one reason why we have felt it very dangerous to be ahead of the TBC Local Plan as it may well be the case that the NP will make provision for more housing than TBC will require Winchcombe to take. We have raised this a number of times at TC meetings and been assured this would not be the case but now truth will out & the statement we quote demonstrates that the SG/TC is quite prepared to accommodate more houses than TBC would require. We believe that, if the people of Winchcombe were to be fully aware of this, they

would make known their very strong opposition to this stance; they have made it very clear their objections to the Bloor, Redrow & Mount View developments.

3.1 *Disagree*; while not objecting to the principle of incremental growth we object most strongly to development on the sites promoted in Section 6 as being totally unsuitable, unsustainable, in breach of the numerous policies in the NPPF & Planning Policy Guidelines. “Incremental growth” should not be used as a euphemism for urban sprawl or creeping development, particularly as here it relates to the irreplaceable AONB.

3.2 We would not totally disagree with infill development as long as the restrictions laid down in this policy are strictly met and that such development does not damage the rights of the occupiers of neighbouring properties to the enjoyment of said properties. There is a need to guard against town cramming & back land development etc. We would also seek clarification as to whether this would include development in back gardens which is generally thoroughly undesirable and almost inevitably leads to overlooking of adjacent properties with significant loss of amenity to those properties. Due to lack of clarity, have to *disagree*.

3.3 Qualified agreement although we feel it should include a restriction that nothing should be more than two-storey (ie ground & first floor), the existing flats off Abbots Leys Road are intrusively high, as are the 3 storey town houses in Wyndham Way which dominate the bungalows in Greenways. Due to lack of clarity, have to *disagree*.

3.4 Is the policy outlined in para 2 enforceable? Was not the Government considering changing the rules on this so as not to place too great a “burden” on developers? The current developments (all three) have provided/will provide many such units – has the updated need been assessed? Does para 3 refer to Rural Exception Sites as these can cause considerable problems without addressing assessed local need? Due to lack of clarity, have to *disagree*.

3.5 Where is TBC’s evidence? From speaking to local residents, it is our perception that what many people will want as they age is perhaps a bungalow (at least two bedrooms) with a small, perhaps courtyard garden & adequate off street parking, including for visitors (see 3.7 below where some of this is acknowledged). The idea of “serviced apartments” (or a Care Village?) is generally greeted with great hostility. If there is such demand, why are there always so many properties for sale in Blenheim Court which could meet this suggested “need”? It is also the case, based on personal & professional experience, that it is not always best for people to go into supported housing too early, it can lead to greater dependency & removes any sense of challenge, they frequently age faster and become less independent far sooner than would have been the case if they had been able to live in suitable “general needs” housing. Another negative aspect of serviced accommodation/care villages, we understand from experience elsewhere is that, in many cases, these apartments are occupied by part-time residents who live abroad and use them as a pied a terre in the UK. There is a considerable issue of affordability, many older residents of Winchcombe would find them too expensive as one has to consider not just the purchase price but the very high ongoing service charges. Has this been tested for deliverability & viability?

We *disagree* fundamentally with this policy & think there is no place for such a development in Winchcombe.

3.6 While this may sound very good, is it viable or is it merely an aspiration? It would be very wrong to create unrealistic expectations in residents hence have to *disagree*.

3.7 This would seem reasonable (although sometimes this provides a way for a young family to afford to buy a property & improve it to become a family home); however, is this enforceable, particularly in the light of the extended Permitted Development Rights? Again, it would be wrong to encourage unrealistic expectations for residents. Of course, another point of this is that extending into a roof area can also often cause overlooking & privacy loss issues for neighbouring occupiers. In view of lack of clarity, have to *disagree*.

3.8 *Disagree* totally; this provision is totally inadequate; it has to be remembered that residents will have visitors and those visitors will arrive by car in the vast majority of cases, where are they supposed to park? Many of us have friends and relatives who live in homes with inadequate parking provision, whether on or off street, leading to stress, tensions, unhappiness and damage to vehicles. It has to be remembered that this is, fundamentally, a rural area and people cannot rely on public transport for access to services or, indeed, employment; in a family home with five adult residents, it may well be absolutely essential for them to have five cars, to ignore this would be blinkered and unrealistic. These people will also have visitors. Anyone who has ever had experience of, say, a 1950s suburban estate, will be aware of the chaos which occurs when there is inadequate parking provision. We would also make the point, again based on personal, professional experience, that “parking areas” are **not** the answer, frequently becoming a magnet for crime and anti-social behaviour.

Section 4.

4.1 This is incredibly vague and, as such, have to *disagree*; under Draft Policy, what exactly is meant by “Development”? Housing development, leisure development? It could mean anything from a play area on a housing development to a leisure centre! This policy would represent a dangerously vague “blank cheque”.

4.2 As above, while this seems superficially reasonable, it is far too vague, the decision could only be made once specifics were known hence have to *disagree*.

4.3 This really is outrageous, an outdated and stereotypical view of virtually anyone over 55-60 which could also be considered offensive. The age range of “the retired” is very, very broad and to lump them all together & in need of a specified amusement is a sign of unacceptable prejudice. *Disagree*.

4.4 Would agree with this as long as it can be ensured that this does not lead to nuisance & anti-social behaviour damaging the lives of residents. It should also be remembered that the Medical Centre shuts at 6.30pm, any leisure facility would generate much use on summer evenings *after* that time so the point is not really relevant. In view of lack of clarity, have to *disagree*.

Please stop trying to segregate the generations! In a strong community the generations will interact to great social benefit. A general playing field area for family activities (all generations) would be good; after all, grandparents have been known to play football, cricket, rounders etc with their children & grandchildren!! The world has moved on from everyone of retirement age playing bowls, this NP should catch up with it.

4.5 Would broadly agreeing with supporting public rights of way, we totally *disagree* with cyclists being allowed to use footpaths; walkers & cyclists do not mix, protection of pedestrians of all ages from danger from cyclists must be paramount, young children need to be able to walk (from toddler age) without risk of harm, as do others, particularly the vulnerable and less agile. We have experience of how this mix does *not* work from places as diverse as Cambridge and rural Burgundy.

4.6 This is far too vague; while the principle may be laudable, the siting of such car parking is of considerable significance as it must also be ensured that it does not provide opportunities for anti-social behaviour (this is an increasing problem in the evenings in the Back Lane Car Park to a degree that it is deterring people from using it). Due to lack of clarity, have to *disagree*.

A general comment, in our opinion, nothing over two storeys (ie ground & first) should be allowed as it would be incompatible with existing properties (we are aware there is one development which includes 3 storey town houses but feel this is unacceptable & out of keeping with the town & area in general).

We do have one suggestion which concerns the need for a further meeting place/hall in Winchcombe. At present, the only options are Abbey Fields & the Methodist Church Hall which is often too small, indeed some organisations such as the History Group are having to restrict membership because of the limitations on numbers in this Hall. Another meeting place, ideally larger, would be beneficial to many organisations within the town, provide opportunities for social interactions and leisure activities.

Section 5.

5.1 While parts of this are obviously desirable, is it enforceable or yet another aspiration which cannot be delivered? Also, in Draft Policy 5.1 c), who determines “unduly”? For a property without other nearby surrounding properties, the situation will be very different from one surrounded by other houses. This is, yet again, very vague, far too vague to merit unqualified support; in the light of this, we have to *disagree*.

5.2 Yet again, too vague hence we have to *disagree*. It is difficult to imagine how “development” could enhance anything, unless it were a derelict industrial site. What kind of “development” is envisaged as, again, that would be the overriding factor as to whether it were considered acceptable or not.

5.3 Agree.

5.4 Is this anything new or it is merely a re-stating of existing general planning guidelines?

5.5. Agree, family homes should have family sized gardens with adequate playing/recreational area, very few built in the last 40-50 years do have reasonable outside space.

5.6 Broadly agree as long as the privacy of individual residents is not compromised by the design; for some, privacy may be more important than security so designs which limit heights for examples of front boundaries may not be desirable. Similarly, there are examples of developments where residents overlook each other’s property to an unacceptable degree due

to the angles of the properties. People live in their house every day, risk would be, at worst, occasional and the everyday experience may be more important to some.

5.7 Have no views other than to state than, in our view, wind turbines, whether singly or as farms, are totally unacceptable anywhere. A weak policy as does not stipulate this so have to *disagree*.

5.8 This is inadequate; development with allows possible problems from surface water run off, including from fields, is unacceptable. *Disagree*.

5.9 No opinion.

Section 6.

We would point out that the lack of paragraph numbers by which to cross reference is a major failing of this section in presentational terms and makes it difficult for residents and those reading the comments to relate text & comment. This layout should be reconsidered. For clarity with our responses, we have numbered the pages & paragraphs: Page one contains paragraphs 1, 2, 3, 4. On Page 2 we believe there is a space missing hence the line beginning “Their conclusions” begins paragraph 5, this page also contains paragraphs 6, 7, 8, 9 & 10 and Page 3 contains paragraphs 11, 12, 13 & 14. In relation to the conditions, we have numbered the bullet points, on Page 4, these are 1-16 inclusive and on Page 5 these are 1-10 inclusive.

Page 1

Firstly, we would challenge the statement in para 2 that anyone involved in the preparation of this Draft NP “took account of representations by local residents”. Since the proposed “Draft Plan” was first shown at the Exhibition in January 2014, we and others have consistently raised **planning** grounds as to why the suggested sites were unsuitable. Not only have our comments and evidence been disputed and, ultimately, ignored but we have also been variously insulted, abused, vilified and our integrity impugned by various members of the SG & TC. Even when we have given direct quotes from the NPPF, letters from the local MP, letters & emails from advisers at & to the DCLG, advice from other planning professionals, Ministerial statements & Hansard, the veracity of these has been derided and dismissed.

We are not alone in this situation and have subsequently come together with others expressing similar views & supporting the aim “To preserve intact the AONB around Winchcombe for the benefit & enjoyment of all, current & future generations & visitors to the area.” (Winchcombe Residents AONB Preservation Group – WRAP). We were encouraged to form such a group by the current Chair of the Town Council).

We note in the final section on this page (para 4) that absolutely no weight is given (as it wasn’t in the Landscape Assessment) to the negative impact of development on the amenity, visual & otherwise, of properties & residents near to 1a, 1b & 3 as shown on the associated maps. Indeed, development in these areas would affect far more existing residents (surely the life blood of Winchcombe) than developments in some of the other non-AONB areas, such as 7, the field adjoining the current Redrow development where the only people affected

would be a few of the *future* residents on the Redrow development (we will return to this site later).

Page 2

In para 5, we would also point out that Almsbury is *not* a “brownfield” site as determined by the Glossary of the NPPF on Page 55 for which the proper term is Previously Developed Land & excludes land which has been occupied by agricultural buildings (the term “brownfield” does not appear in the Glossary).

We would point out, again in relation to parcel 7 adjoining the Redrow development, that this is a large site, not AONB and could provide the type of incremental development favoured in earlier sections of this document for many years to come, probably even beyond the end of the current plan period (2031) thus avoiding the need for any encroachment into the AONB at any point in the foreseeable future.

Winchcombe has already been subject to what many might consider a degree of urban sprawl to the north ie with the Bloor & Redrow developments, and to develop parcel 7, indeed if any development were to be required by TBC, would avoid the damaging of other parts of Winchcombe. Indeed, the immediate past Town Council Chair stated, at a meeting with TBC officers in July, that he would see any further growth being “to the north”. Regardless of the claims about this being a Special Landscape Area, we would yet again point out that this is a local designation whereas AONB is a **national** designation (more on this point to follow).

We are also aware that the Chair of the SG has expressed a view that maybe the boundaries of the Cotswold AONB should be amended but we would point out that these boundaries are enshrined in Statute and only a new Act of Parliament could undo these. The Cotswold AONB was set up in 1966 (after most of the houses in Mercia Road & its immediate vicinity were built). It is not for an individual to attempt to undermine this Act regardless of their own personal views on the merits of particular parcels of land (& we know he does not look favourably upon this but that is his personal view and should carry no more weight than the views of any other resident in this context). We are aware that the Chair of the SG has variously described the area West of Winchcombe as a “desert” (STC Meeting 10.12.14) & also claimed that it is not valued or used by residents (email to local residents Feb/March 2014). These views are not objective, merely his personal opinion, and would be strongly challenged by many people, not only Winchcombe residents or those living near this area. The issue here is loss of amenity value if these sites were to be developed, not just to residents but to all users & visitors.

There has been much made of the “gap” between Winchcombe & Greet (now more a perception than a reality) but we believe Parcel 7 could still be developed incrementally and the use, for example, of tree belts could create the idea of separation; this approach has been used in other areas of the country where it has been deemed successful.

We would also urge the TC/SG to read again the relevant sections of the Inspector’s Report when allowing the Redrow Development on Appeal. Many in this town, including us, made very strong objections not just to the Redrow proposals but also to Mount View Phase 2. However, the situation is as it is, the SLA at the Redrow site has already been degraded by development and its purpose (the protection of views of the AONB) compromised. We can see no valid reason for wilfully damaging further parts of the AONB when this is so

unnecessary.

Various paragraphs on Pages 2 & 3 of Section 6 also ignore the significance of NPPF Para 14 footnote 9. This has previously been drawn to the attention of the TC & SG and was indeed further emphasised in a letter from a Planning Policy Adviser, Alan Scott at the DCLG, when replying to a resident on behalf of Laurence Robertson MP which yet again emphasised the importance placed by the Government on Para 14 footnote 9.

There are numerous paragraphs in the NPPF and further advice in the Planning Policy Guidance issued by the DCLG. In persisting with the intent as declared in the Exhibition of January 2014 of only promoting AONB sites for development, we believe that the Draft NP is in clear breach of (as opposed to conformity with) the NPPF. We believe the following paragraphs relate, some to the AONB, some more widely (this list is illustrative not exclusive): Paras 7 & 8 (there is no environmental gain in developing the AONB sites proposed), Para 14 (inc footnote 9 which was particularly emphasised in recent Government Guidelines), Para 17, bullet point 7, Para 109, bullet points 1 & 3, Paras 110, 111, 115, 116, 118 bullet point 5, Para 123 bullet points 1, 2, 4, Para 132, 152, 155 (engagement in Local Plans, for illustrative purposes) & Para 184.

We would also refer the SG/TC, as we have done previously, to the Slaugham Examiner's Report where the Draft NP was deemed to have failed to meet the requirements, for very similar reasons to those which we believe contribute to rendering this Draft NP flawed. We understand that this Report is still considered relevant in planning terms.

Page 3 (& see above)

In para 11, where is the evidence of the "clear need" for supported housing for older people? What we have heard most from others when discussing this is hostility. There is also, in relation to the Almsbury site, a great difference between sensitive use of the existing buildings with perhaps some minor additions and developing an adjacent green field with intensive housing.

We would strongly challenge and dispute the final sentence of para 12 beginning "If Parcel 3" – as we have clearly and, we believe, conclusively demonstrated, there *is* an alternative for development outside the AONB.

Page 4

We would strongly DISAGREE with the suggestions for Parcel 3 for reasons we have explained at length above and in other relevant sections of this document.

Page 5

We would strongly DISAGREE as follows:

this proposal breaches numerous parts of the NPPF;

it would be impossible to meet bullet point 1; development here could not "enhance & protect the Cotswolds AONB & views to & from the fields (1.1)"

bullet point 3 – this would also be impossible; this would be obvious if the whole area had been viewed fully & objectively;

the situation of nearby residents has been totally ignored throughout this whole process;

the amenity value of this land to them and to others has not been duly considered;
the severe negative effects on wildlife, habitats & flora & fauna have received no proper consideration;
the issue of the many springs on Langley Hill & the potential flooding impact has received no consideration or mention;
the inevitable increase in traffic (people will not walk from there) will have a dreadful affect, particularly on those residents living in cul-de-sacs who currently enjoy a tranquillity which would be lost with such development;
the damage that would result from an increase in traffic at the Orchard Road/Delavale Road/Barnmeadow Road junction has received no consideration, it is a dangerous junction, particularly with the bend into Delavale Road;
there is already a serious issue with on-street parking in Barnmeadow Road, the bus often struggles to get through, access for emergency vehicles is compromised at certain times and further development in this area will only exacerbate existing problems;
we are aware from discussion with the architects that, when Knottes Close was built, the development was designed in such a way as to minimise the interruption to views of nearby residents, preserving their views through the site to Cleeve Hill, the proposal for “terraced homes” would render this impossible and deprive people of further amenity value. If preserving these views was felt important in 2007, why not now??

We totally DISAGREE with all elements of Section 6.

General

As we have made clear from the time we became aware of this NP process in Winchcombe, we feel the whole matter has been mishandled, there has been a total failure of proper and meaningful public engagement leading now, by a flawed process, to a Draft NP which we believe to be fundamentally flawed and which fails to meet the required conditions, it is not fit for purpose.

Indeed, we believe that this aspect of the Draft NP (Section 6), if not the whole, was pre-determined by the time of the Exhibition of January 2014 and all questions, challenges, alternatives, from whatever source, have been swept aside with a total disregard for their validity. This, in turn and together with the denial of proper community engagement and the unnecessary secrecy surrounding the preparation of the NP by the SG/TC (which is in great contrast to NP preparation in other areas as we have previously demonstrated) has created a possibly unjustified feeling of distrust and suspicion in the community.

On the subject of the SEA/Environmental Report, we take significant issue with aspects of this, in particular Section 5 which is contradictory, conflicts with previous statements made by SG/TC, and contains numerous errors/inaccuracies.

We would draw attention to the TBC Strategic Housing Land Availability Assessment (SHLAA, now the Strategic Assessment of Land Availability) which is currently being updated; we have checked and been informed that the status of the site West of Winchcombe (Submitted site 201) remains as last year, in that it is considered Unsuitable, Available & Unachievable, the only alteration will be a slight adjustment to the density multiplier. We realise that this document does not determine or make recommendations as to whether particular sites should be allocated for housing development but we would remind the SG/TC

that the SHLAA is one of the documents that should be used as part of the evidence base feeding into the Draft NP.

We also believe that preparing a Draft NP at this time is very premature in that the other Plans with which the NP should be in general conformity (the JCS & TBC LP) are far from being finalised. The JCS, the plan giving overall strategic numbers for housing in the three areas, is with the Government-appointed Inspector and the TBC LP is at an earlier stage in that the numbers of houses required for Winchcombe as a Rural Service Centre have not yet been announced therefore the NP has been produced "in the dark" and with a very real risk that it may make provision for more housing than will be required, something which we are sure the community does not want. As a further consequence, this could lead to the NP having to be reviewed & modified at an early date if these prove to be significantly different from what has been anticipated (guessed?) by the SG/TC. If the Draft NP process was sensibly timed to follow closely the TBC LP timescale until there was certainty over numbers, then this risk would be avoided, unnecessary overdevelopment of Winchcombe could be avoided & "greenfield" sites around Winchcombe could possibly be saved.

We all want a Neighbourhood Plan, but the most important thing is that it should be the **right** Neighbourhood Plan and we do not believe that to be the case with the current Draft which we believe to be fundamentally flawed in many aspects. Protecting this wonderful town & our community from excessive and unnecessary development which will further damage its fabric should be the overriding concern of us all.