

**KEMBLE and EWEN NEIGHBOURHOOD DEVELOPMENT PLAN:**

**CONSULTATION STATEMENT**

**KEMBLE AND EWEN PARISH COUNCIL**  
**December 2019**

Contents:

Report on Consultation

p.1

Appx 1	Report of first workshops	p.14
Appx 2	Report of second workshop	p.18
Appx 3	Issues and Options Consultation	p.23
Appx 4	Consultation Flyer	p.29
Appx 5:	Representation Form	p.30
Appx 6:	KE3 Notification Letter	p.31
Appx 7:	KE9 Notification Letter	p.32
Appx 8:	List of Consultees	p.33
Appx 9:	Letter to Consultees	p.34
Appx 10:	Representation Summary and Parish Council Responses	p.35
Appx 10A:	Design Guide: CDC Representation Annotated with Parish Council Responses	p.46

**KEMBLE AND EWEN NEIGHBOURHOOD DEVELOPMENT PLAN:  
PRE-SUBMISSION (REGULATION 14) CONSULTATION.**

**REPORT ON CONSULTATION**

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INTRODUCTION

1. This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2) which defines a “consultation statement” as a document which –
  - (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - (b) explains how they were consulted;
  - (c) summarises the main issues and concerns raised by the persons consulted; and
  - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan
  
2. The evidence base for the Kemble and Ewen Neighbourhood Development Plan ("the NDP") is made up, in part, of the following documents:
  - (1) The Kemble and Kemble Station Conservation Areas Appraisal and Management Guidance prepared by Montagu Evans;
  - (2) The Kemble Landscape Appraisal prepared by Tyler Grange; and
  - (3) The Kemble Heritage Appraisal prepared by Archaeology & Planning Solutions.
  
3. The Conservation Area Appraisal and the Landscape Appraisal were both subject to a full consultation involving all of the households in the NDP area, followed up by two exhibitions held in the Village Hall with appropriate response forms provided.
  
4. The Objectives of the NDP were produced by the holding of a workshop facilitated by the Parish Council's consultants (Kirkwells). The draft objectives were then subject to the consultation described in full at paragraphs 3.3 to 3.10 of the pre-submission draft NDP.
  
5. An informal consultation draft plan was then produced which was subject to a full NDP area consultation with every house being leafleted and with exhibitions in the Village Hall

and an appropriate response form.

6. In respect of the earlier consultations reports of the consultation were produced and are available separately.

## PLAN DEVELOPMENT AND INFORMAL CONSULTATION

### KEMBLE AND KEMBLE STATION CONSERVATION AREA CONSULTATION

7. The preliminary work on preparing the NDP was started with the preparation of two evidence base reports one covering the Conservation Area and a second an appraisal of the local landscape.
8. Consultation of the draft Conservation Area Appraisal and Management Guidance included:
  - Uploading the document onto the Parish Council web site;
  - Leafletting all households;
  - Offering opportunities to respond in writing; and
  - Two consultation events at the Village Hall on 23<sup>rd</sup> May 2016 (40-50 attendees) and 26<sup>th</sup> May 2016 (40-45 attendees)
9. Overall 27 consultation response forms were completed, and 5 responses were received by email, including one form the Heritage and Design Manager at Cotswold District Council.
10. The responses revealed a high-level of concern about heritage issues and the erosion of the character and a strong desire for up to date and clear guidance on heritage issues affecting development.

### LANDSCAPE APPRAISAL CONSULTATION REPORT

11. In keeping with the consultation on the Conservation Area work the following were undertaken as part of the preparation of the Landscape Appraisal:
  - Three stakeholder events 27 September 2016 and 20<sup>th</sup> and 26<sup>th</sup> October 2016;
  - Uploading the document onto the Parish Council web site;
  - Leafletting all households;
  - Offering opportunities to respond in writing; and
  - Two consultation events at the Village Hall on 8<sup>th</sup> May 2017 (40-50 attendees) and 11<sup>th</sup> May 2017 (10-15 attendees)
  -

12. The consultation responses demonstrated considerable concern about the landscape around the villages; significant concern about the loss of valued landscape features and the need to ensure that the landscape is appropriately protected and in particular that the development is not allowed to creep out inappropriately; and a strong desire for up-to-date and clear guidance on the landscape issues which arise when any development of any kind is being considered.

#### WORKSHOPS

13. Two workshop sessions were held to discuss and identify key issues. These sessions also developed a vision for the neighbourhood plan and a series of objectives. These workshop sessions included a wide variety of people with an interest in the future of the parish (Appendix 1 and 2).

#### ISSUES AND OPTIONS CONSULTATION

14. In order to assess whether the Neighbourhood Plan Team had identified the correct key issues and set out shared objectives a “Key Issues and Objectives” consultation was undertaken between the 7<sup>th</sup> July 2018 and the 3<sup>rd</sup> August 2018.
15. The consultation was conducted by distributing to every household in the designated neighbourhood area a consultation response document in the form attached at Appendix 2. The responses were deposited either in the box provided at the Village Store or returned directly to the neighbourhood planning team.
16. A total of 121 responses were received representing therefor a good proportion of the households in the NP designated area. Of the response documents received some 51 came with additional comment (Appendix 3).
17. The results of this consultation were used to put together a draft plan for further consultation.

#### DRAFT PLAN CONSULTATION MARCH-MAY 2019

18. An informal consultation draft NDP was produced to seek the community’s views on the proposed policies and approach in the NDP.
19. The consultation ran from the 25<sup>th</sup> March 2019 to the 3<sup>rd</sup> May 2019. Every home in the designated area received a copy of a leaflet informing them of the process and how to get

involved. Copies of the informal draft plan were left in the village shop and at the Tavern public house together with consultation forms. The draft plan was uploaded to the Village website.

20. Two consultation events were held. The first at the Village Hall on the 15th April 2019 from 10.00am to 11.30am, to coincide with the Coffee Stop, and the second on the 25th April 2019 between 6.30pm and 9.00pm. Approximately 45 people attended the first event and 25 the second.
  
21. A total of 30 consultation flier replies/emails were received. A significant number of people commented that they had looked at the draft plan and agreed with the approach but did not then complete a consultation reply form. Some made oral comments. The responses are summarized in Table 1.

Table 1. Informal Consultation Responses

Rep No.	Q.1	Q.2	Q.3	Comments	Response
1.	✓	✓	Development should be sympathetic in design and location		Agreed. The policies seek to achieve this.
2.	✓	✓	✓	(i) Should promote the cycle/pedestrian path on old roadway to Cirencester (ii) An off road path to Ewen from Kemble is needed.	(i) The CD LP encourages this and the NDP is supportive. (ii) The NDP promotes better footpath access to countryside.
3.	✓	✓	Fairly easy to follow	We do not want the cycle way or railway to Cirencester	This is promoted in the CDLP.
4.	✓	Yes – a balance is needed. Small sites only and infill	✓	KE7 is a key policy and should be enforced.	Agreed.
5.	✓	✓	✓	32 dwellings allocated plus 50 at Top Farm = 82. A 20% increase on 2011. KE1 is key, the assets are the glue that holds community together. Growth should not outstrip capacity to accommodate it.	Agreed. Growth needs regulating and to be properly supported by infrastructure consistent with Kemble being a village. The NDP promotes this.
6.	✓	✓	✓	Concerned about the development boundary being a clear limit.	See Policy DS2 of CDLP; outside the boundary is countryside where development is resisted.
7.	✓	✓	✓	Support for commercial development at airfield in pace with infrastructure. Affordable	The NDP will include an airport policy supporting appropriate scale employment development within the

Rep No.	Q.1	Q.2	Q.3	Comments	Response
				housing(AH) very important especially in Ewen. Support transport initiatives.	airport boundary.* A.H. provision is regulated by CDLP. The CDLP supports transport initiatives.
8.	✓	✓	✓	Any development should be sensitive to local aesthetics and infrastructure	Agreed. Development needs to be of appropriate scale.
9.	✓	✓	✓	-	-
10.	✓	✓	✓	Development should be circumscribed	Agreed.
11.	✓	✓	✓	Enforcement of Policy KE7 is important.	Agreed.
12.	✓	See comment	✓	(i) The plan needs to encourage provision of new facilities e.g. swimming pond, tennis court, basketball/netball (ii) New homes should be eco-friendly (iii) Kemble Community Gardens(CG) needs to be a public/private partnership	(i) Agreed facilities of a scale appropriate to a village are needed and the plan addresses this. (ii) This is addressed in national and local policy guidance. (iii) This is not for the NDP. The CG a protected greenspace.
13.	See comments	See comments	See comments	Need a sense of equality and fairness in 2 halves of village. One half is the “haves” the other the “have nots”. Fairness needed in where development takes place shop is great but parking a problem. People only care about beautiful houses.	The NDP strives to be a plan for the <b>whole</b> community and seeks to improve environment for all. Policies will be reviewed to highlight this. *
14.					
15.	✓	✓	See comments	It’s just about ok to read.	The language will be reviewed. *
16.	See Comments	See comments	✓	Not clear whether development boundary is sacrosanct and if too	The development boundary is dealt in CDLP policy DS2. The level of



Rep No.	Q.1	Q.2	Q.3	Comments	Response
				much infill is bad where will development needs be met.	development has been determined by the LP. Infill control is necessary to preserve village character and preserve the character/appearance of the Conservation Areas.
17.	✓	See comment	✓	Areas for no development like the Dutch barn between Kemble and Ewen and field between Clayfurlong Drive expansion area and Clayfurlong Farm should be identified. Strong support for cycle/footpath on old railway to Cirencester.	The countryside policies supported by landscape appraisal seek to do this. The Dutch barn is in the K and E Special Landscape Area. NDP policy requires clear boundary for Clayfurlong Drive development. The field between it and Clayfurlong Farm will be added to policy KE3. *
18.	See comments	See Comments	See comments	<ul style="list-style-type: none"> <li>(i) The Thames Path and Wysis Way over lap – add to text.</li> <li>(ii) There are two listed buildings at Clayfurlong. It should be considered as a Conservation Area.</li> <li>(iii) We agree with Key issues and support objectives especially 3.</li> <li>(iv) Speed on the A429 near the entrance to K1B needs regulating to be safe.</li> <li>(v) The proposed foot/cycle path to Cirencester will need careful consideration in view of vegetation maturity, overlooking issues. The A429 crossing will need careful handling.</li> </ul>	<ul style="list-style-type: none"> <li>(i) Agreed *</li> <li>(ii) Noted. The Ca was considered by Montagu Evans but no recommendation made for expansion or a new CA in this location.</li> <li>(iii) Noted</li> <li>(iv) Noted. For GCC and K1B Application.</li> <li>(v) Noted. These matters will all be consulted on.</li> </ul>

Rep No.	Q.1	Q.2	Q.3	Comments	Response
				(vi) Support LGS. The field by K1B should be considered for LGS. (vii) Concern about expansion onto green fields.	(vi) Noted. Agreed, the plan will be amended. * (vii) The NDP protects landscape around the village and the development boundary is defined in the CD LP.
19.	See comments	See comments	See comments	(i) Support Kemble Park as open green area (ii) Oak trees, veteran trees should be noted and woodlands near village (iii) The C Gardens should be formally protected in an agreement (iv) Use old railway to Cirencester as footpath (v) Mention liaising with land owners to create wildlife/conservation areas/corridors.	(i) Noted (ii) The trees are noted as being of value but not subject to TPO. (iii) This is for CDC/the developers but they are noted as LG5 in the CDLP. (iv) See the CDLP where this is promoted. (v) The NDP promotes this in policy KE6.
20.	See comments	See comments	See comments	(i) More houses and cars mean loss of natural areas. (ii) Heritage should be preserved no more overhead cables and solar panels. (iii) Care for elderly, activities for well-being, restrict road usage, tourism, village employment, keep village hall, use church as community asset.	(i) The NDP and CDLP seeks to control and limit losses. (ii) The NDP seeks to preserve the heritage. There are Permitted Development rights outside the CA to install solar panels. (iii) The NDP vision is in part for Kemble being a caring community. It engages as far as possible with each of the issues.

Rep No.	Q.1	Q.2	Q.3	Comments	Response
21.	✓	✓	✓	Traffic speed is a problem and potential rat running.	The NDP can't deal with these issues directly but seeks to avoid creating such problems.
22.	✓	✓	✓	Development needs to be in keeping with a village.	Agreed
23.	✓	✓	✓	The village is in two halves – development favours one or other. The village hall should be enlarged at the rear to make more space.	Noted; the NDP seeks development in the right locations. It preserves the hall as an asset. Its enlargement is for the Village Hall Committee.
24.	✓	✓	✓	Do not over build in village in future.	Agreed. The NDP seeks to regulate development.
25.	See comments	See comments	See comments	(i) All new homes should have water butts (ii) Footpaths need maintaining	(i) This is not for the NDP but is important. (ii) Agreed, this is for the County Council.
26.	See comments	See comments	See comments	(i) Grammatical problems. (ii) App 2 is missing. (iii) Presentation problems diagrams and lack of illustrations (iv) What App 3 for?	(i) Agreed corrected. (ii) Agreed it related to the objectives consultation (iii) The final version will be fully illustrated the draft is intended to address the policies. (iv) App3 is not necessary and relates to the designation of green spaces.
27.	See comments	See comments	See comments	Please can the PC make sure the footpath to Ewen is maintained.	This is in part for the County Council but the completion of the footpath is a current Parish Council project and it is intended that maintenance should be more regular in the future.
28.	See comments	See comments	See comments	(i) Consider using “ <i>must</i> ” not “ <i>should</i> ” in text.	(i) This will be reviewed. *

Rep No.	Q.1	Q.2	Q.3	Comments	Response
				<ul style="list-style-type: none"> <li>(ii) Green space protection should relate to wildlife not just people.</li> <li>(iii) Draft policy KE11/h-we should enhance woodlands, tree belts and hedges in strategic areas.</li> <li>(iv) The playing field is an essential amenity not just green space.</li> <li>(v) KE4/6 needs to be tightened up so that wildlife value is included.</li> <li>(vi) The objectives lack focus in the policies proposed.</li> <li>(vii) The relationship with farm practices needs exploring.</li> </ul>	<ul style="list-style-type: none"> <li>(ii) Agreed. The plan promotes biodiversity as appropriate: see KE6</li> <li>(iii) Agreed. As far as possible the NDP does this.</li> <li>(iv) Agreed. The CD LP protects it as LGS7. It will be added to KE1. *</li> <li>(v) Agreed. The policy will be amended. *</li> <li>(vi) The length of the policies doesn't relate to their strength.</li> <li>(vii) This is beyond the plans remit. It protects farmland as appropriate and for example promotes wildlife.</li> </ul>
29.	See comments	See comments	See comments	All Kemble and Ewen need is a gas connection.	Noted.
30.	See comments	See comments	See comments	<ul style="list-style-type: none"> <li>(i) We agree with Rep No.18</li> <li>(ii) K1B should enhance the village and needs a safe access</li> <li>(iii) Opposed to rail development on old line to Cirencester. The line is an important wildlife and landscape feature.</li> </ul>	<ul style="list-style-type: none"> <li>(i) Noted – see response above,.</li> <li>(ii) Agreed</li> <li>(iii) Noted. The CDLP support this- but not at any cost.</li> </ul>

## THE PRE-SUBMISSION DRAFT PLAN

22. The Pre-Submission Draft Plan was produced having regard to the responses on the informal draft plan.
23. The consultation on the Pre-Submission draft was undertaken by delivering to every property in the NDP area a leaflet in the form attached at Appendix 4. The draft NDP was uploaded to the Kemble Village ([www.kemble.co.uk](http://www.kemble.co.uk)) website and a response form provided in the form available at Appendix 5.
24. Each of the owners of land proposed as local green space or as a non-designated heritage asset was separately notified by post with a letter in the form attached at Appendices 6 and 7 respectively.
25. A list of others consulted is attached at Appendix 8. At appendix 9 is the letter sent to all the consultees.
26. The consultation ran between the 23rd September 2019 and the 4<sup>th</sup> November 2019.

## RESPONSES TO THE CONSULTATION

27. A total of 14 consultees responded to the consultation with some 35 representations.
28. The representations received and the Parish Council's response to them is set out in the Schedule at Appendix 10. The draft plan will be revised in accordance with the Parish Council's responses set out in the Schedule at Appendix 10 prior to submission to Cotswold District Council.
29. The CDC comments on the Design Guide are set out at Appendix 10A annotated with the Parish Council's responses.

## ACKNOWLEDGEMENTS

30. The Parish Council is grateful to all of those who took the trouble to respond to the Draft NDP. The Council is particularly grateful to the CDC Planning Team, led by Joseph Walker, for the full and careful representations they made.

November 2019

**KEMBLE AND EWEN NEIGHBOURHOOD PLANNING GROUP : REPORT OF THE FIRST  
NEIGHBOURHOOD PLAN CONSULTATION MEETING HELD ON 12<sup>TH</sup> JUNE 2018 AT KEMBLE  
HOUSE, KEMBLE.**

Introduction

1. The consultation event was organised so as to allow the formulation of draft objectives for the NP. The objectives emerging from this meeting would be subject to wider consultation in order to establish the extent to which they had public support and were suitable as a basis for the formulation of policies in the NP.
2. The people invited to attend had been selected by the Chairman of the Kemble and Ewen Parish Council as representing a cross-section of residents in the village so as to give the fullest possible consideration as to what the objectives should be.
3. Those who attended were:

Linda Tate – Village Hall  
Andrew Tate – Village Hall  
Ron Collard – Local resident Top Farm  
Michael Whitney – NPG Member and resident  
Vernon Sewell – Local resident  
Carol Dougill – Headteacher Kemble/Siddington Schools & PC  
Lester Napper – Local resident/historian  
Alistair Wilkinson – Local resident  
Tony Ferris – Ewen/Church  
Steve Marsh – PC & Local resident  
Tony Berry – District Council Member for Kemble area.  
Peter Skinner – Local resident  
Roger Pettit – Chair of PC  
James Edwards -  
George Hillier – Local resident Top Farm  
Martin Kingston – NPG member and resident  
Plus 2 husband and wife surveyor, Cirencester??

## Kirkwells Presentation

4. Michael Wellock, a Director of Kirkwells the Planning Consultant retained by the Parish Council to assist with the NP process, gave a presentation which provided:
  - An introduction to the Neighbourhood Plan process
  - Identification of the benefits of the Neighbourhood Plan
  - An explanation of the plan making process and the timescales
5. The presentation was interspersed with questions from those attending.
6. Following the presentation the group was divided into two and each group given a different task by MW. The first group was given the task of identifying the points of the NP area which were “good” elements whilst the second group was tasked to identify the “bad” or “negative” elements of the area. The groups worked on that task for 20-25 minutes following which the groups were brought together. There was then a feedback session led by MW which allowed him to group the negative and positive elements and to extract from them some outline objectives which could be identified for the NP.
7. Among the good elements were the following:
  - The facilities including the Church, pub, doctor’s surgery, the shop, and the school
  - The railway station
  - The village hall facility
  - The community garden
  - The green spaces available
  - The rural density of the villages
  - The demographics, being mixed and not mono-cultural

- The overall scale of the villages
- The Thames path and River Thames
- The fast broadband
- The essentially agricultural base of the village and the area around it.

8. The negative elements were identified including the following:

- Commuter parking and the lack of use of the new car park
- The size and quality of the village hall facility
- The bus service
- The playing field facility and the absence of facilities associated with it
- The busy main road through the centre of the village
- Commuter traffic
- The absence of a pedestrian crossing giving easy access to the station
- Absence of cycle tracks and footpaths through the area
- Litter
- The closure of the nursery's play group because of absence of space in the school
- Criminal activity
- The overflying from Cotswold Airport
- The absence of wildlife areas
- The poor quality of some of the design of the development in the village and individual houses

9. MW having grouped the negatives and positives and identified some outline objectives which he undertook to work up further into five or six objectives which could then be presented as part of a



wider village/NP area consultation. This would allow the preparation then of draft policies for the NP.

### Overview

10. The meeting was well attended and the contributions were both informed and lively with a positive sense of engagement with the NP process and the desire to see it taken forward. Those who attended were, despite the identification of some negative elements, overall very positive about the benefits of living in Kemble/Ewen and the opportunities it presented. There was a clear identification of the need to permit some new development in order to ensure that new housing was available for people wishing to move in the village whilst at the same time a desire to ensure that the development was of an appropriate quality, scale and design so as to ensure that the village retained its village character and its currently identifiable sense of community. Some of the matters raised were clearly not directly related to land use planning so that the NP's role in relation to them would perhaps be more in the way of identifying supporting actions that would allow issues to be addressed. All of those involved indicated their willingness to engage positively with the process as it went on.
11. The consultation ended at 9.00pm with thanks extended to MW for his presentation and the organising of the evening.

**KEMBLE AND EWEN NEIGHBOURHOOD PLANNING GROUP : REPORT OF SECOND  
NEIGHBOURHOOD WORKSHOP MEETING HELD ON 17<sup>TH</sup> OCTOBER 2018 AT KEMBLE HOUSE,  
KEMBLE**

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INTRODUCTION

1. This second workshop event was organised so as to allow consideration of the first working draft of the Kemble and Ewen Neighbourhood Development Plan (“KENP”). It followed on from a NP area wide consultation on the draft objectives for the NP the results of which have been separately reported.
2. Those who attended the workshop were:
  - Mike Patch – Local Resident and Farm Manager
  - Pat Ayres – Local Resident and WI and other organisations
  - George Hillier – Top Farm resident
  - Carol Dougal – Local Resident and School Headmistress
  - John Tarrant – Local Resident
  - Ron Collard – Top Farm resident
  - Steve Marsh – Local Resident and Village Website
  - Eric Silk – Local Resident and Parish Councillor
  - Vernon Sewell – Local Resident
  - Tony Berry – Local Resident and CDC Councillor
  - Alistair Wilkinson – Local Resident
  - Andrew Tait – Local Resident
  - Peter Skinner – Local Resident
  - Nick Fox – Local Resident and Village Hall Committee
  - Tony Ferris – Ewen Resident and Church Warden
  - Tony Mant – Surveyor and Local Resident
  - Maggie Mant – Local Resident
  - Roger Pettit – Local Resident and Chairman of PC
  - Michael Whitney – Local Resident and NP Working Group
  - Michael Wellock – Kirkwells Chartered Surveyors retained by PC
  - Martin Kingston – NP Working Group

## THE WORKSHOP

3. MK gave a summary of the story so far in terms of the evidence base that had been generated, the earlier workshop and the outputs from it, the objectives consultation and the outcome from it and what the next steps would be.
  
4. Michael Wellock then introduced the working draft of the NP and took the group through the document section by section with contributions and questions being taken as the evening progressed. Whilst a wide range of issues were aired the following main matters emerged from that exercise:
  - (1) It would be necessary to update the maps being used in the NP to ensure that the OS base was up to date for which purpose the PC would require a “public service mapping agreement”. **Action item:** RP agreed to check whether they had such an agreement. (RP has subsequently checked that the PC does have such an agreement, the licence number will be supplied to MW and the maps updated as necessary by him).
  
  - (2) Section 2 of the plan would require a pen picture of the NP area which should be no more than 2 to 3 pages of A4 enabling readers to get an understanding of the history of the NP area and how it had developed over the years: **Action Item overview to be prepared by MK/RP.**
  
  - (3) Section 3 of the plan which addresses the objectives would need a “vision statement” at the end explaining in no more than 3 or 4 sentences what the NP area would look like by 2031

which was the end date: **Action Item MK to prepare in consultation with RP a vision statement.** (A draft has been sent to RP for comment).

- (4) Either at the end of section 4 or the beginning of section 5 it would be helpful if the NP said what the limits of what it could do were so that, for example, in relation to highways issues it should be made clear that it was not for the NP to attempt to regulate such matters; there were other means by which these things could be achieved. It was noted that this was necessary in order to ensure that consultees on the objectives did not feel that they had been ignored.
- (5) In relation to the NP policies and draft Policy KE1, other facilities needed to be added and workshop attendees undertook to let MK know if others should be added. Those noted at the meeting included the Kemble Doctors Surgery, the Railway Station and the Burial Ground. It was thought helpful to delete the second paragraph of the Policy with its reference to the CDLP Policy INF2.
- (6) In relation to draft Policy KE2 related to infrastructure it was suggested that the Kemble to Ewen footpath might be added to this.
- (7) In relation to Objective 2 and the protection of local green spaces it was suggested that the objective should read *“to protect and enhance local green spaces”*. Other green spaces in addition to those identified in the local plan were referred to including the open space at West Hay Grove and within the new development at Top Farm.
- (8) In relation to Objective 3 some suggested additions to this policy had already been made and it was noted that the policy relates only to new development within the Kemble

development boundary because at Ewen there is no development boundary the whole area being covered by the more development limiting Policy DS3 of the Local Plan.

- (9) In relation to Objective 5 MK reported the up to date position in relation to the preparation of the design code. There was to be an inception meeting with the consultants, AECOM, on 31<sup>st</sup> October. It was agreed that it would be desirable that the design code should be incorporated into the NP in order to give it additional weight. This would be considered in due course when advice had been received from the consultants preparing the guidance.
  - (10) Draft Policy KE7 needs to also refer to the Ewen Conservation Area.
  - (11) Draft Policy KE8 related to non-designated heritage assets needed to be supplemented by any additional sites that workshop attendees considered were important. Attendees agreed to let MK know what additional sites were thought appropriate.
5. Following the review of the working draft of the NP workshop attendees had the opportunity of raising a variety of issues around the draft policies and objectives from which they had been formulated. MW addressed the questions raised and indicated where amendments to the working draft might be appropriate.
  6. Following the review of the working draft the timetable for future preparation of the NP was considered with the hope that it might be possible to complete the informal NP-wide area consultation before Christmas. That informal consultation, it was agreed, should be undertaken following a NP area-wide leafletting of each house with copies of the consultation version of the NP being made available at convenient locations as well as on the village website.

## OVERVIEW

7. This was another very well attended workshop meeting with contributions which were clearly well informed by a reading of the working draft of the NP. Attendees were clearly engaged by the process and despite the level of detail and reading needed had clearly got to grips with the wording of the working draft NP and the policies which were being presented. There was a very clear desire to see policies brought forward which would enable the villages to continue to thrive but remain as identifiable village communities with clear identifies supported by appropriate facilities which should be enhanced where possible and appropriate.
  
8. The workshop ended at 9.30pm with thanks to MW for his work on the working draft and his presentation of it during the evening.

Michael Whitney, Roger Pettit, Martin Kingston  
Neighbourhood Planning Group  
October 2018

# **IMPORTANT**

## **KEMBLE AND EWEN NEIGHBOURHOOD PLAN CONSULTATION**

The Parish Council is preparing a Neighbourhood Plan (NP).

A NP will, among other things:

- control how development takes place;
- protect important areas and facilities;
- ensure good design of development;
- improve the environment of the villages;
- allow the Parish Council to obtain increased funding.

Working with a group of residents and with the help of its consultants the Parish Council has developed some draft objectives for NP.

**WE WANT YOUR OPINION ON THEM.** Please rate them on a score of 1 to 5 where:

1 is the most important

5 is the least important

If you think we have missed something PLEASE tell us. WE WANT YOUR VIEWS. When we have got the objectives right we will [missing from page]

Objective 1

Score

.....

Objective 2

.....

Objective 3

.....

Objective 4

.....

Objective 5





.....

## YOUR COMMENTS

You can leave this form in the box in the shop or deliver it to Martin Kingston at Kemble House.

Thank you for your help. Return by 3<sup>rd</sup> August please.

If you want to be entered into our prize draw please put your name and telephone number in the space below:

Name:

Tel/Address:

There are 4 really good prizes:

A meal for 2 at The Tavern (up to £35)

A Tesco Stores Voucher (value £35)

A Kemble Stores Voucher (value £35)

A Rainbow Car Valeting Silver Voucher ([www.rainbowvaleting.com](http://www.rainbowvaleting.com))

**THANK YOU FROM THE NP TEAM.**

## ADDITIONAL COMMENTS

- More facilities are required, a Cemetery, new Doctors Surgery, Community Hall x2
- Newer properties for older people wishing to downsize
- Protection of trees, particularly in the Community Gardens x2
- Current developments don't meet the objectives
- There should be more young people on the Parish Council
- Good communications are important particularly if the development is to be for the benefit of the community
- Small scale development is acceptable but larger scale should be resisted
- There are serious problems with traffic, traffic speeding, parking and the control of parking particularly in relation to the station use x11
- Steps should be taken to keep the village history alive
- There is a liking for "*generic*" Cotswold design x2
- It is very important to keep the village feel and the strong sense of community that exists in the village x4
- The footpath between Ewen and Kemble should be formalised and properly maintained x4
- Steps should be taken to assist older/infirm members of the community with garden maintenance
- The development of Top Farm is acceptable but not affordable
- Steps should be taken to encourage team games on the Village sports field
- There is a two-tier village community with the main road operating as a barrier
- All of the objectives are important x3
- More youth or other club facilities are needed
- Generic Cotswold design is not appropriate in Kemble which has particular design features x3

- The Kemble Conservation Group should be a more open forum
- More services are needed if more development is to be promoted
- Road repairs are an urgent consideration
- It is important to keep Kemble Park and local wildlife sites free from development and development pressures
- A gas connection is needed
- Overflying from the airfield is increasing and is inappropriate
- It is important to balance preserving the environment with the need for development to provide housing which is needed
- There has been too much development, development should now be restricted to single dwellings or small-scale only x4

## **KEMBLE AND EWEN NEIGHBOURHOOD DEVELOPMENT PLAN: Pre-Submission Consultation and Publicity.**

The Parish Council is preparing a Neighbourhood Development Plan (NDP) for Kemble and Ewen.

A NDP will, among other things :

- Assist in controlling how development takes place;
- Help to protect important areas and facilities ;
- Promote good design of development;
- Promote the improvement of the environment of the villages;
- Enable the Parish Council to seek an increase in funding.

We have now reached the **Pre-Submission Consultation stage** which is the opportunity to see what is proposed in the draft NDP and make representations on it.

The draft NDP and Design Guide can be **inspected** on the Kemble village website at [www.kemble.co.uk](http://www.kemble.co.uk), look at the Noticeboard Section under the Neighbourhood Plan heading or at the Village shop in Kemble or at The Tavern public house in Kemble. There is a representation form on the website and copies are with the display versions at the shop and Tavern.

Representations should be sent or delivered to Martin Kingston, Kemble House, Kemble, GL7 6AD or sent by email to [mk@no5.com](mailto:mk@no5.com)  
**Representations should be sent by the 4<sup>th</sup> November.**

If you have any questions you can email Martin Kingston at the above address or telephone 01285771040.

# Kemble and Ewen Neighbourhood Plan

## Pre-Submission Regulation 14 Consultation

23rd September to 4th November.

ALL RESPONSES MUST BE RECEIVED by 4th November

### Representation Form

PLEASE COMPLETE AND RETURN ONE FORM FOR EVERY COMMENT MADE

Name	
Organisation	
Address	
Email	
Tel. No.	

Please state to which part of the Draft Neighbourhood Plan your representation refers. (Please indicate with X)

Page Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please indicate with X)

Support	
Object	
Making a Comment	

Please Turn Over

Your Ref  
Our Ref:  
Date: 11th  
September  
2019

Dear Consultee,

**Kemble and Ewen Pre-Submission Neighbourhood Development Plan:  
Regulation 14 Consultation**

I am pleased to inform you that the Kemble and Ewen Neighbourhood Development Plan has been published for public consultation. The consultation period runs from **six weeks from 23rd September to the 4<sup>th</sup> November 2019**.

Copies of the plan and supporting documents can be viewed online at [www.kemble.co.uk](http://www.kemble.co.uk), look under the Neighbourhood Development Plan on the Noticeboard and at Kemble Post Office and Stores and The Tavern public house in Kemble.

I particularly draw your attention to Draft Policy KE3 and the proposed Local Greenspace designations which are shown on the map accompanying the draft plan.

Should you wish to make comments on the plan this should be done using the enclosed representation form ( also available online at the web site above) or from Martin Kingston at Kemble House, Kemble, telephone 01285771040 or by email to [mk@no5.com](mailto:mk@no5.com).

Yours sincerely,

Martin Kingston (on behalf of Kemble Parish Council)

Your Ref  
Our Ref:  
Date: 11th  
September  
2019

Dear Consultee,

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I particularly draw your attention to Draft Policy KE9 and the proposed non-designated heritage asset designations.

Should you wish to make comments on the plan this should be done using the enclosed representation form ( also available online at the web site above) or from Martin Kingston at Kemble House, Kemble, telephone 01285771040 or by email to [mk@no5.com](mailto:mk@no5.com).

Yours sincerely,

Martin Kingston (on behalf of Kemble Parish Council)



Agency	Contact	Comment
Cotswold District Council	<a href="mailto:Joseph.walker@cotswold.gov.uk">Joseph.walker@cotswold.gov.uk</a> <	
Wiltshire Council	neighbourhood.planning.@wiltshire.gov.uk	
Swindon	i;ismith@swindon.gov.uk	
Police	Mark.r.nurphy@gloucestershire.pnn.police.uk	Gloucestershire
Glos Highways	<a href="mailto:Richard.GRAY@gloucestershire.gov.uk">Richard.GRAY@gloucestershire.gov.uk</a>	Local Highways Manager See map for relevant one at <a href="https://www.gloucestershire.gov.uk/highways/communities-and-parishes/parish-and-member-services/">https://www.gloucestershire.gov.uk/highways/communities-and-parishes/parish-and-member-services/</a>
Natural England	<a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>	
Historic England	<a href="mailto:David.Stuart@HistoricEngland.org.uk">David.Stuart@HistoricEngland.org.uk</a>	
Glos County Council	<a href="mailto:Rob.niblett@gloucestershire.gov.uk">Rob.niblett@gloucestershire.gov.uk</a>	
Environment Agency	<a href="mailto:glanning-waliingford@environment-agency.gov.uk">glanning-waliingford@environment-agency.gov.uk</a>	
LEP	<a href="mailto:info@gfirst.co.uk">info@gfirst.co.uk</a>	
Local Nature Partnership	<a href="mailto:info@gloucestershirewildlifetrust.co.uk">info@gloucestershirewildlifetrust.co.uk</a> <	
AONB	<a href="mailto:john.mills@cotswoldsaonb.mg.uk">john.mills@cotswoldsaonb.mg.uk</a>	
Water Park	Matthew Millett <a href="mailto:Matthew.Millett@waterpark.org">Matthew.Millett@waterpark.org</a>	
Thames Water	<a href="mailto:Townplanningpolicy@thameswater.co.uk">Townplanningpolicy@thameswater.co.uk</a>	
All surrounding parish councils,including outside Gloucestershire		
Cirencester	<a href="mailto:info@circencester.gov.uk">info@circencester.gov.uk</a>	Preparing an NDP
Coates	<a href="mailto:clerk@coatesparish.org.uk">clerk@coatesparish.org.uk</a>	
Crudwell	<a href="mailto:parish.clerk@crudwell-12c.gov.uk">parish.clerk@crudwell-12c.gov.uk</a>	Preparing an NDP
Oaksey	<a href="mailto:parishclerk@oaksey.com">parishclerk@oaksey.com</a>	
Poole Keynes	<a href="mailto:notnoddy@hotmail.co.uk">notnoddy@hotmail.co.uk</a>	
Rodmarton	<a href="mailto:rodmartonclerk@btinternet.com">rodmartonclerk@btinternet.com</a>	
Siddington	<a href="mailto:siddingtonclerk@gmail.com">siddingtonclerk@gmail.com</a>	
Somerford Keynes	<a href="mailto:skpcclerk@gmail.com">skpcclerk@gmail.com</a>	Preparing an NDP
Elected members:		
Shaun Parsons	<a href="mailto:Shaun.parsons@gloucestershire.gov.uk">Shaun.parsons@gloucestershire.gov.uk</a>	
Tony Berry	<a href="mailto:tony.berry@cotswold.gov.uk">tony.berry@cotswold.gov.uk</a>	
Other potential consultees		
		Forestry Commission
		HCA
	<a href="mailto:townplanningwestern@networkrail.co.uk">townplanningwestern@networkrail.co.uk</a>	Network Rail
		Highways agency
	<a href="mailto:contact@rfg.org.uk">contact@rfg.org.uk</a>	Railfreight Group
		Telecoms
		Clinical Commissioning Group
		Electricity Board
		British Waterways
		Cotswold Airport (owners/operators and tenants)

Your Ref  
Our Ref:  
Date: 11th  
September  
2019

Dear Consultee,

**Kemble and Ewen Pre-Submission Neighbourhood Development Plan:  
Regulation 14 Consultation**

I am pleased to inform you that the Kemble and Ewen Neighbourhood Development Plan has been published for public consultation. The consultation period runs from **six weeks from 23rd September to the 4th November 2019.**

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Should you wish to make comments on the plan this should be done using the representation form available from online (at the web site above) or by requesting a copy from Martin Kingston at Kemble House, Kemble, telephone 01285771040 or by email to [mk@no5.com](mailto:mk@no5.com).

Yours sincerely,

Martin Kingston (on behalf of Kemble Parish Council)

**KEMBLE AND EWEN NEIGHBOURHOOD PLAN  
PRE-SUBMISSION REGULATION 14 CONSULTATION**

<b>Rep No.</b>	<b>Representee</b>	<b>Policy/Paragraph, page</b>	<b>Representation (Summary)</b>	<b>Response</b>
1	R Collard	KE3/KE4	The large green space at Top Farm should be included in either KE3 or KE4	The area is covered by KE4 and protected by the terms of the planning permission.
2	R Collard	Page 14	The Vision Statement is excellent.	Noted.
3	R Collard	Page 5	Update the map to include Top Farm development.	Agreed*
4	Environment Agency	Whole Plan	No recourses for review. See general guidance.	Noted.
5	Steve Marsh	Map Fig 3 and text	Requires corrections to Fig 3 and text corrections.	Agreed. Amend accordingly*
6	Steve Marsh	Whole Plan	Support	Noted
7	Somerford Keynes Parish Council	Whole Plan	No comments	Noted
8	John Tarratt	Design Guidelines	Textual corrections	Agreed, Amend accordingly*
9	Tony Berry	NDP page 37  Design Guide :GP03  :roof tiles  :smaller dwellings	The view is north west not east  Don't make it like Cirencester market place  Cotswold tiles not always appropriate/necessary  We should resist enlargement to avoid loss of smaller dwellings	Agreed – Amend accordingly*  Agreed.  Agreed. The Guidance is not prescriptive.  The policies do not endorse enlargement. Application will be treated on their merits in the light of prevailing circumstances

Rep No.	Representee	Policy/Paragraph, page	Representation (Summary)	Response
		:grey water	Grey water systems should be encouraged.	which will include the available supply of dwellings.  Agreed.
10	Gloucs Wildlife Trust	Whole Plan	Unable to comment but policies should be included to protect and restore local ecological networks.	Agreed. The NDP protects Green Infrastructure in policy KE6 which refers to wildlife value and net biodiversity gain.
11	CDC	Objective 3	<p>The plan relies on site allocations in the CDC Local Plan</p> <p>The plan can't mandate CDC to take action.</p> <p>Tetbury to Kemble rail line is identified for cycle use in the LP and the Tetbury and Tetbury Upton NDP promotes and protects the route.</p> <p>There is support for the sustainable use of the Cirencester to Kemble line not just for cycling.</p>	<p>These are at an appropriate scale over the lifetime of the Plan to retain village scale and manage changes.</p> <p>Agreed. It doesn't attempt to but encourages action, where appropriate by CDC, GCC and others.</p> <p>Noted.</p> <p>Noted.</p>
12	CDC	KE1	<p>Introduce clause references.</p> <p>Reword clause 1 to be more positive.</p>	<p>Agreed. Action accordingly*</p> <p>Not Agreed. The wording suggests development might be made acceptable because it protected or enhanced the facilities.</p>

Rep No.	Representee	Policy/Paragraph, page	Representation (Summary)	Response
			Clause 2 refer to relevant LP policies.  Clause 3 refer to possible enhancement of facilities and shorten ending.	Agreed. Amend accordingly*  Agreed. Amend accordingly*
13	CDC	KE2	Amend to make clear what priorities are.  Include reference to Tetbury/Cirencester rail lines.	Agreed. Amend accordingly*  Agreed. Amend accordingly*
14	CDC	KE3	The last paragraph is unnecessary and confusing in the light of national at local policies	Agreed. Delete and add paragraph: <i>“Development will only be permitted when it accords with national and relevant local plan policies.”*</i>
15	CDC	KE4	The policy is welcomed in its aspiration but would be difficult to implement. No definition of incidental. Amend or add paragraph to GI policy.	Agreed in part. Amend the policy by deleting <i>“small and/or incidental”</i> in first sentence *
16	CDC	KE5	(i) <i>“Suburbanisation”</i> is not clear. Use suggested wording.  (ii) A bar on subdivision could be detrimental.  (iii) Make para (g) more specific and cross refer to the Conservation Area Appraisal and Landscape Appraisal.  (iv) Amend the reference to Ewen to	(i) Agreed. Wording of sub para (a) to be amended*  (ii) Agreed. Wording amended permit subdivision where clear benefits to character and appearance are demonstrable*  (iii) Agreed. Amend the reference to the Appraisals to be more specific.*  (iv) Agreed. Amend paragraph of

Rep No.	Representee	Policy/Paragraph, page	Representation (Summary)	Response
			avoid suggestion of LP policy DS3 applying.	reasoned justification to refer to “ <i>relevant Local Plan policies</i> ”. *
17.	CDC	KE6	<p>The policy could preclude development on all but “<i>tarmac</i>” sites. New wording suggested.</p> <p>Net gain to biodiversity will be a legal requirement. Nothing more is necessary.</p>	<p>Agreed in part. Add the suggested new wording as amended.*</p> <p>Reconsider net gain when legislation is in place. National policy e.g. NPPF para 170 supports enhancement of biodiversity.</p>
18	CDC	KE7	<p>(i) Language is inconsistent.</p> <p>(ii) There is a comprehensive District Design Code. The NDP should identify where there are differences in Kemble. To read the whole document alongside District guidance is a challenge.</p> <p>(iii) The Kemble DG has a slightly different emphasis to the national policy and District Guidance. How is it to be referenced? See Detailed commentary.</p> <p>(iv) Provide sub-paragraph references in the site brief.</p>	<p>(i) Agreed. Amend accordingly*</p> <p>(ii) Not agreed. The Kemble Design Guide has been prepared specifically for Kemble. No significant effort is required to read it alongside the District guidance.</p> <p>(iii) Agreed. The Kemble DG is settlement specific and prepared as such it will be a part the NDP. It has been out to consultation as a part of the NDP. The detailed commentary is noted with thanks and DG amended as appropriate as per the annotated copy attached at Appendix 7A.</p> <p>(iv) Agreed *</p>

			(v) The policy wording is long. Consider putting detail in the DG.	(v) Not Agreed. The criteria are an important reflection of local
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Rep No.	Representee	Policy/Paragraph, page	Representation (Summary)	Response
			<p>(vi) K1B: avoid reference to “suburban”. Clarify wording.</p> <p>K2A: Remove reference to herpetology.</p> <p>K5: “suburban” can be a confusing term.</p>	<p>preferences to ensure the developments are of high quality.</p> <p>(vi) Agreed in part. Clarify wording.*</p> <p>Not Agreed. Add wording “in particular” which has regard to the particular interest of the site.</p> <p>Not Agreed. The policy is clear as to its objective.</p>
19	CDC	KE8	<p>(i) The policy reflects, in part, what’s in the Kemble DG or EN1 of the Local Plan.</p> <p>(ii) Consider references to low carbon design.</p> <p>(iii) Dealing with 2 similar but different policies can be a problem.</p> <p>(iv) Clause (b) – unclear what materials being referred to.</p> <p>(v) Clause C: policy to prescriptive.</p> <p>(vi) Cause d: remove the words “the local authority should”. There are</p>	<p>(i) This is correct but that is because both are based on an up to date independent and professionally prepared appraisal: see Section 6 of the Conservation Area Appraisal.</p> <p>(ii) Agreed. Amend accordingly.*</p> <p>(iii) The NDP builds on the LP policy using a Kemble specific Appraisal. It is not unusual to have to apply policies in two or more different documents that are to similar effect.</p> <p>(iv) Agreed. Amend accordingly.*</p> <p>(v) Agreed. Amend accordingly.*</p> <p>(vi) Agreed. Amend accordingly. Insert in reasoned justification.*</p>



Rep No.	Representee	Policy/Paragraph, page	Representation (Summary)	Response
			<p>limited powers available.</p> <p>(vii) Clause e: Helpful to illustrate views and vistas on a map with “splay”. Reference the map.</p> <p>(viii) Add a clause f.</p>	<p>(vii) Agreed. Cross reference the views identified in the Landscape Appraisal at p.10.*</p> <p>(viii) Agreed. Amend accordingly.*</p>
20	CDC	KE9	The policy is different to the NPPF policy and the LP policy. No planning balance is included. Amend to rely on the national and LP policy for development management.	Agreed. Amend accordingly.*
21	CDC	KE10	Archaeology is covered in the CDC validation checklist. The policy is called “Archaeology” but refers to heritage assets.	<p>This is correct but the policy is supported by an up to date detailed archaeology assessment referred to in reasoned justification. Policy is an appropriate and necessary response to the assessment.</p> <p>Amend the policy to clarify that it is referring to archaeological heritage assets *</p>
22	CDC	KE11	<p>(i) The policy should use the LP wording or cross refer to the relevant policy to avoid confusion.</p> <p>(ii) The list in the policy differs from the key landscape qualities identified by the Council’s SLA assessment.</p>	<p>(i) Agreed. Amend accordingly *</p> <p>(ii) Agreed. The policy needs splitting to refer to:</p> <p>(a) the SLA;</p> <p>(b) the wider landscape covered by the Kemble Landscape Appraisal</p>

<b>Rep No.</b>	<b>Representee</b>	<b>Policy/Paragraph, page</b>	<b>Representation (Summary)</b>	<b>Response</b>
				(2017). The list in the policy is taken directly from the recommendations on p.22 of the Appraisal.
23	KDC	KE12	<p>(i) The policy should clarify it only applies to the part of the airfield within Gloucestershire.</p> <p>(ii) A travel plan may be advantageous but cannot be applied to existing development.</p>	<p>(i) Agreed. Amend accordingly.*</p> <p>(ii) Agreed. The policy as amended does not seek to control existing development. It applies to new development proposed but with such new proposals they may only be acceptable with a travel plan for the new and existing activity.</p>
24	CDC	Glossary	The Glossary needs to be area specific.	Agreed. Amend accordingly.*
25	CDC	Design Guide	Detailed comments as per Appx 3.	See the annotated version of the detailed comments attached.
26	R Mead	K1B/Whole Plan KE3	An excellent piece of work.  Strong support for the local green space.	Noted.  Noted.
27	Gloucestershire County Council (GCC)	Ecology references	The plan should identify and map the designated ecological sites.	Agreed. Amend accordingly with new paragraph 5.15 and map.*
28	GCC	Transport	Consider references to the LTP and Connecting Places Strategy and role of cycling. Have the needs of those without private transport been taken into account?	Agreed. Add new paragraph referring to both documents and add a criteria to KE5 requiring explicit consideration of need to consider sustainable transport options.
29	GCC	Archaeology	This NDP is exemplary in relation to	Noted.

Rep No.	Representee	Policy/Paragraph, page	Representation (Summary)	Response
			archaeology.	
30	Cirencester Town Council	KE1	Protection of old rail routes should be referenced and a project identified for contributions by s.106/CIL. Would welcome reference to provision/a viable route for light rail transit/driverless pod connection.	The lines are identified in the LP. It is for CDC to address s.106/CIL requirements.
31	Savils on behalf of Kemble Farms Ltd	KE3/2	The requirements for LGS are not met because there is no evidence it being demonstrably special or holding particular local significance.	The Parish Council support the designation. It represents the community. The importance of listed buildings and settings in the Kemble context emerged strongly in the preparation of the Conservation Areas Appraisal by Montagu Evans. Clayfurlong Farm is a listed farmhouse. It was positioned to face out over the farmland around it and not over the road. The importance of KE3/2 in preserving that setting is clear.
32	Savils on behalf of Kemble Farms Ltd	KE7	(i) The Design Guide is too prescriptive as to what is good design and doesn't allow for innovation.  (ii) The weight to be accorded to the DG should be clarified.	(i) The DG is not prescriptive it allows for innovation. At the outset in GP01 the guidance says:  <i>“However, reference to context does not mean to copy or use pastiche solutions ... it could be a contemporary solution.”</i> (ii) The DG is a part of the NDP and will be part of the made Plan.
33	Natural England	Whole Plan	No specific comments	Noted.
34	Cotswold Airport	KE12/Paragraph 40 (page 40?)	The plan appears to be based on unsound advice. The plan suggests	The plan is based on advice from experienced local residents in both the

Rep No.	Representee	Policy/Paragraph, page	Representation (Summary)	Response
			<p>ineffective airport management which is considered slanderous.</p> <p>The plan suggests actionable mitigations which are inappropriate and misleading.</p>	<p>aviation and planning fields. The actions referred to were raised in a meeting at the airport on 28<sup>th</sup> September 2019. It was not suggested that they were inappropriate, slanderous or misleading. The plan does not suggest ineffective airport management. It references possible ways to reduce noise and disturbance created by overflying. Page 40 will be amended as follows:  <i>“The NDP cannot, and does not seek to, address the control of aviation activity but the Parish Council will seek through continued and constructive cooperation with Cotswold Airport to minimise the impacts of aviation and other aspects of the airport site use on the surrounding communities.”.*</i></p>

35	Cotswold Airport	KE12/pages 39 and 40	<ul style="list-style-type: none"> <li>(i) The plan is a load of drivel and factually incorrect and defamatory.</li> <li>(ii) This is an airport not an airfield its status should not be questioned.</li> <li>(iii) There is no understanding or comprehension of operations of a GA airport in class G airspace.</li> <li>(iv) The comments are defamatory and libellous. The reference to “<i>undesirable impacts</i>” is astounding.</li> </ul>	<ul style="list-style-type: none"> <li>(i) Not agreed.</li> <li>(ii) The Local Plan refers to the site as both “<i>Cotswold Airport</i>” and “<i>Kemble Airfield</i>” or “<i>the former RAF Kemble</i>” without apparently any objection. There is no questioning of the status of the area.</li> <li>(iii) The operation is understood. Page 40 has been amended to make the Parish Councils position clear.</li> <li>(iv) The NDP is not considered to be defamatory or libellous. It is a matter of opinion as to whether the impacts e.g. visually or aurally are undesirable.</li> </ul>
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**KEMBLE AND EWEN -GENERAL DESIGN GUIDELINES****Draft March 2019****Comments from the Heritage and Design Service, Cotswold District Council****October 2019****Introduction**

We welcome the production of this design guide and in principle we would support the guidelines, however there are some matters of detail (e.g. choice of images), which we think could be improved. These should not be taken as criticism but as positive suggestions as to how the document could be enhanced.

It would be worth reviewing the guidelines in the light of the recent publication [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835212/National\\_Design\\_Guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835212/National_Design_Guide.pdf) and the updated Planning Practice Guidance.

Have the guidelines been "market-tested" with either developers or householders? For example to check that any technical jargon is easily understood.

Have all the guidelines and suggestions within the CA appraisal and landscape appraisal been incorporated into this guide?

**Detailed Comments**

1.1.

This would be an appropriate point to add in reference to the new national design guide and to signpost users of the Kemble and Ewen guidelines to it.

**Agreed. Add a reference to the national guidance at the end of 1.1.**

It might also be useful to consider how these design guidelines could help to consider climate change and how design can play a role in both climate change mitigation and adaptation. (This is an area in which the Cotswold Design Code, within the Local Plan, is fairly silent and may need to be amplified within the Local Plan review.)

**Agreed. Add references with in the DG: see later**

p.10 and p.11

These are not useful illustrations and show properties that are not particularly in keeping with the character of Kemble and that includes details, such as stormproof windows, stained timber, poor pointing etc. that would not be consistent with the Cotswold Design Code.

**Agreed. Replace the images with more appropriate ones.**

2.1.

An alternative paragraph in which to reference the new national design guide and to signpost users of the Kemble and Ewen guidelines to it. It may be that some of this section is no longer required as there is now government guidance which is referred to in the national Planning Practice Guidance and there is a risk of repetition or contradiction.

**Agreed. Add reference to the national guidance.**

This paragraph refers to "local images have been used to reflect positive examples..."-as mentioned for pages 10-11,we do not consider that some of these images achieve that.

Much of this section repeats what is in the Cotswold Design Code (and the National Design Guide) and it might be useful to reference the code and national guide (and the relevant paragraphs) within the text or in a separate box so that users can see how the different documents work together.

GPOI.

Fully support the starting point being an understanding of the place.

p.13

Same point about the property also shown on p.10

Image in first column third row - poorly placed oil tank which spoils the streetscene

Image in fourth column first row-inappropriate use of timber fencing facing the highway (walls or hedges would be more in character with the setting.)

**Agreed. Replace the inappropriate images.**

p.16

The two images on the LHS do not really reflect the aspirations in the text. They show quite sterile open areas, that are unlikely to encourage social interaction and it is debatable how pedestrian and cycle friendly they actually are.

The use of shared space should be informed by the position of the Highways Authority—they are currently up-dating their manual for streets (which should be referenced.)

Welcome the inclusion of drainage solutions within the street from the initial stages of the design.

**Agreed. Replace the left hand image and add a reference to the GCC Manual for Streets.**

p.18

The example of balconies as a form of street contact raises concerns if a vernacular approach is taken to design, it is more appropriate in a contemporary approach.

The bullet point on boundary features is unclear. We assume this refers to dry stone walls. Brick is not a commonly used walling material locally. The Cotswold Design Code already provides guidance on this point.

Unconvinced that the suggestion that at least one perimeter should be a low wall is not too prescriptive -why would a hedge not be appropriate in some instances?

The illustration needs to be revised. It is showing very slack pitched roofs; overly tall buildings (3.5 stories) for Kemble and Ewen; the fenestration is not appropriate etc.

**Agreed. Amend the images and remove reference to balconies.**

p.19

We suggest that you consider the inclusion of a recommendation that all green infrastructure in new developments should meet the standards in Building with Nature - <https://www.buildingwithnature.org.uk/about>, as this would cover many of the points raised here.

There is much reference to "urban environment" and these villages are very much set in a rural environment and that character should be retained.

This section is fairly generic and does not provide any local context. The Cotswold Design Code provides more detail than is given here.

**Agreed. Remove reference to urban and insert village, add reference to the Building with Nature web link.**

p.21

There is an opportunity here to provide more local detail- perhaps suggesting which species of trees are characteristic of the area.

The last para on Kemble and Ewen refers to trees in front gardens being characteristic. Although planting trees in front gardens is very welcome, within new development it is important that where street trees are required that they are not located within gardens to ensure that they are maintained and retained. In a garden there is a strong risk that they will be removed by the householder.

**Agreed. Add reference to species and refer to trees on street frontages.**

p.22

The lower image shows a car parked on a grass verge, which is not something that we would want to encourage.

**Agreed. Change the image.**

p.23

The upper diagram of perpendicular parking is not necessarily a useful approach as it means there are no front gardens and the houses become dominated by cars.

The upper photo is not a good example of how parking can be resolved. The text mentions softening with the planting however this is minimal in the image.

Integral garages are not usually appropriate if a vernacular approach is being taken.

It might be useful to give some examples of well-designed parking courts, as these can work in certain circumstances.

Consideration may need to be given to how electric vehicles are to be charged.

**Agreed. Change image and amend text.**

p.25

The LHS image is not appropriate. It is not well-integrated with the building.

This section is fairly limited, especially in the light of the recently declared climate change



emergency within the District. If detail is not to be given here, perhaps some signposting to other guidance could be added.

**Agreed. Change the L/H image. Amend text with reference to CDC climate emergency resolution and need for sustainable practices in design and construction.**

p.26

Solar panels do not increase energy efficiency -they are a means of generating energy. It would be appropriate to suggest other alternative means of energy generation as well to give more options e.g. ground source heat pumps, air source heat pumps etc.

It should be highlighted that it is more efficient to save energy by insulation, well-designed buildings, correct white goods etc. than to generate at a household scale.

The suggestions should include ensuring that any panels are located in the correct places/orientation to maximise their potential energy generation.

Again some signposting to additional information may be useful.

**Agreed. Change headings and reorder text with new first paragraph.**

p.27

It might be helpful to add an image of a modern designed green wall or roof, rather than simply where vegetation has been allowed to grow up a conventional wall.

**Agreed. Change 2 of the images.**

p.28

The plastic bike storage is not very sympathetic -the wooden one with a green roof is far better.

The image of the oil tank shows it surrounded by wooden fencing, there may be safety issues with this and that should be investigated.

It might also be worth highlighting that the position of cycle storage and/or oil tanks can be critical- if in front of properties they can be overly prominent, however there are issues of how an oil delivery is achieved as well.

**Agreed. Change top left image and insert new text.**

p.29

An example picture of bin storage with a green roof would be helpful. There are also examples where "bee walls" etc. have been incorporated.

Not convinced that these photos of post boxes are the best examples. **Agreed .**

**Change images to more rural types and remove some.**

p .30

This would be an example where there could be a cross-reference to the Cotswold Design Code (D.64) and National Design Guide (p.38; p.41)

The diagram is a useful one to provide some guidance on suitable approaches .

**Agreed. Insert the references.**

p.31

A reference to Building with Nature might be helpful here.

New developments have to deliver biodiversity net gain under the NPPF and this will be mandated in the forthcoming Environment Bill.

This could be an opportunity to highlight what species and habitats are important (or characteristic) locally that could be used or encouraged in the landscape and habitat schemes for new developments.

**Agreed. Amend the text accordingly.**

p.36

The sentence "The area has an urban/suburban residential character which remained essentially rural with gradual increase in development." seems a little contradictory.

How does this section fit inwith the guidance inGP02?

First bullet point refers to taking inspiration, but it is important to be clear that this should be from high quality developments and buildings. There are bound to be some that we would not wish to see replicated.

**Agreed. Amend text and change sub headings.**

p.37

This page refers to Ewen and then the text on the next page goes back to Kemble-the pages might be better re-ordered.

Not convinced that 3 storeys is appropriate for Ewen- 2.5 perhaps.

Second bullet point refers to "the town" -should be village, I am not sure that this bullet point is well-worded in the Ewencontext.

Third bullet point. Infilling can be problematic where there are important spaces and gaps between buildings.

Fourth bullet point. Are "low" drystone walls characteristic of Ewen? A quick assessment would indicate that the walls are of varied height and not particularly low.

Sixth bullet point -the way in which the countryside permeates into Ewen is one of its key characteristics, so it is more difficult to talk about a transition between the open countryside to settlement edge.

**Agreed. Amend text and change sub headings.**

KE2

It would be useful if a map could be provided which illustrates any key landmarks and views.

**Agreed. Add a reference to the Landscape Appraisal and the Conservation Areas Appraisal where such views are shown on a map base.**

p.39

First paragraph. 3 storeys is fairly unusual in Kemble and 2.5 would be a more usual maximum height option.

**Agreed. Amend to 2.5.**

p.41

Missing word in second sentence. Connections?

There is a contradiction between this para "In addition, a wide variety of verges can be seen within the area which separate residential properties from the street. Footpaths also are drawn along one side of secondary streets and some parts of main roads in Kemble and Ewen.2 and para one on p.40 -"The majority of buildings in the area are tightly arranged at their core, with building lines set immediately on, or close to the rear of the pavement" Need to be clear what is characteristic of which area.

**Agreed. Insert the missing word and delete KE03 second sentence for consistency.**

p.42

reference could also be made to the guidance in the Cotswold Design Code on this matter.

Walling does not mention drystone walls (and the need to follow the local style of drystone walling).

Unclear what is meant by "different stone patterns".

We would not recommend wooden fencing other than between properties, unless it is very carefully specified – low picket type fencing or low hurdles might sometimes be appropriate but high fence panels would not be. Nor would they be suitable as boundaries to the open countryside.

Hedgerows can be used in new developments, but more permanent boundaries are also required as house-holders may remove hedgerows. This is also the reason why any important hedges to be planted or retained should not be located within residential gardens but in shared or open space that is subject to control of some sort.

**Agreed. Amend the text accordingly.**

p.43

We found this selection of materials difficult to see at this scale and some were not correctly labelled.

There is only very limited use of thatch locally

The oolite limestone image is unusual.

The ashlar image is not showing ashlar,

The rubble stonework looks like granite

The render is too smooth and should be rough cast.

The limestone flag does not appear to be limestone flag.

**Agreed. Replace the images as appropriate.**

p.44

We are unclear as to whether the details and materials shown are illustrated as being characteristic or being ones that should be used in new developments. It would not be reasonable (or viable) for all new development to be roofed with natural Cotswold stone slates.

Much of this detail is already available in the Cotswold Design Code – are there any additional parish-specific features that should be emphasised?

Roof form - should refer to Cotswold stone slates.

Thatched roof with clay pantiles-can't see the roof in the image.

Materials-render is not found as a roofing material. Unclear what the black circle signifies.

**Agreed. Amend text, correct images.**

p.45

Walls and fenestration. Form-unclear what point 1 means. It would be useful to specify what colour of Cotswold stone is characteristic of this area.

Point 4 – there should be no mortar or lime with a dry stone wall. Reference could be made to the CDC porch guidance.

**Agreed. Add reference to the grey tone of stone locally.**

p.46

Point 2 refer to doors and stone walls-should this be garden timber doors.

The first paragraph in the detail section needs to state that if stone mullion windows are used that there should be slender metal windows-would be useful to have the image next to the text.

Timber doors- sometimes boarded.

Unclear why oak should always be chosen, other woods may be appropriate particularly if painted.

**Agreed. Correct image labelling and insert text.**

p.47

The image of the stone cobbles is not clear

The bound gravel is very pale in colour for local gravel.

The hedge image is showing a very tall hedge, which would often not be appropriate. The first material image is unclear - what is it?

The cost of natural stone paving is very high and could impact on the viability of schemes, tarmac can work well in being a simple, functional material.

Not sure what images 3 and 4 are indicating.

**Agreed. Amend text, check images are correct and replace as necessary. p.48**

It would be useful to refer to the CDC chimney design guidance.

Much of this repeats the Cotswold Design Code - is there anything specific to the Parish that should be added?

Para 3 - the sentence does not make sense. Are these colours being suggested as suitable or listed as already used in the area? Or is the guide stipulating that these are the only colours that should be used, which would be rather draconian.

Not sure what the image of the paving is indicating.

**Agreed. More Kemble specific examples to be inserted, remove the paving drawing and replace with local craft example.**

p.52

A "tick list" is a useful approach. Has this list been considered alongside the key principles and key considerations within the Cotswold Design Code as there seems to be a degree of overlap? Most of these points and questions are general design issues and do not provide Kemble and Ewen specific context.

Bullet 2 - I am not sure that there are "squares" in Kemble and Ewen. Important that new developments are "inspired" by areas of high quality design, not those that might be of poorer quality.

Bullet 3 - are there any really important gaps towards the countryside - these should be shown on a map.

Bullet 5 - the "prominent ridge lines" should be illustrated on a map for clarity. As well as important long distance views.

**Agreed. Correct the text and provide local examples.**

p.53

Repetition of bullet point on trees

**Agreed. Delete.**

p.55

Comment on image as before

Noted.

p.56

The glossary needs further clarity. Showing features that are not local and there is no explanation of what they mean. The ashlar wall is incorrect and the limestone slate does not show limestone or diminishing courses.

Agreed. Correct the images and titling.