

STOW & THE SWELLS NEIGHBOURHOOD PLAN – SEPTEMBER 2023 BROADWELL PARISH COUNCIL’S RESPONSE TO REGULATION 16 CONSULTATION

INTRODUCTION

Broadwell Parish Council (BPC) submitted a detailed response to the Stow & The Swells Neighbourhood Plan (SSNP) in March 2023 (copy appended herewith).

STC, in its Consultation Statement, acknowledges the receipt of BPC’s response but fails to address most of the concerns it contains. For this reason, the response is appended herewith and these concerns repeated.

Independently, some residents of Broadwell have commissioned a report (Chadwick Town Planning submitted to CDC 21.12.23). This report has been read and fully endorsed by BPC.

Whilst BPC is broadly supportive of the aims and objectives of the SSNP, it is particularly concerned at the location and size of the development subject to SSNP7. Not only is this site outside the Development Boundary for Stow, but also, its size would be out of proportion with the town, it will have a devastating impact on local infrastructure (particularly road and drainage), it will be damaging to the historic character of both Stow and Broadwell and risks harming rather than supporting local businesses and economy.

In its Consultation Statement, STC makes various references to a ‘template response’ from various residents of Broadwell. In this regard, BPC wants to stress that it is unaware of this approach but confirms that there is widespread concern in the village as to the negative impact of the SSNP and SSNP7 in particular. Furthermore, if residents have co-ordinated their responses using a template, in no way does this invalidate or dilute their value as STC implies.

Regarding the proposal for a 170 or 240 unit development at the North-East site (SSNP7), it is of particular note that subsequent to the issue of the SSNP, CDC has approved a development on Oddington Road for 37 affordable housing units. This meets the Stow affordability requirements in a much shorter timescale on a single site (CDC planning ref 23/01513/FUL). This fundamentally undermines the justification presented by STC for the SSNP7 development and SSNP7 should be removed from the SSNP.

The National Planning Policy Framework states that “the purpose of the planning system is to contribute to the achievement of sustainable development, including... supporting infrastructure in a sustainable manner”. The pressure on local social and economic infrastructure will already be tested by the 250 house development on the Southern edge of Moreton-in-Marsh (Spitfire Homes). This will increase traffic on the A429 Fosseway, increase demand on local drainage and sewage infrastructure (already under strain), increase flooding risk to communities in the Evenlode valley and increase demand on local health, social welfare and education infrastructure. No compelling evidence has been provided by STC to show how any development of a similar scale (such as the proposed 170-240 homes site subject to SSNP7) would not overwhelm local infrastructure.

In the event that the SSNP proceeds to referendum, we strongly argue that all affected communities should be involved, including residents of all adjacent parishes (and not just those residing in the Swells).

Further to reiterating the points in BPC's March submission, we make the following specific comments with reference to National Planning Policy Framework (NPPF) and follow the order of STC's Basic Conditions Statement.

BASIC CONDITION CONFORMITY

The Basic Condition Statement submitted by STC is misleading or unsubstantiated in various respects (same numbering as STC's Basic Condition Statement):

1. Introduction

- 1.5 A Neighbourhood Plan must meet "Basic Conditions" listed in the 1990 Town & Country Planning Act. In this case various parts of the SSNP fail to meet the Basic Conditions:
 - 1.5a) The SSNP conflicts with various provisions of the NPPF as we will demonstrate in Section 4 below.
 - 1.5d) Not all of the SSNP policies contribute to the achievement of sustainable development (also see Section 4 below).
 - 1.5e) Contrary to STC's assertions, in specific circumstances, the SSNP deviates from the strategic policies contained in CDC's development plan for the area as we will demonstrate in Section 5 below.

2. Background

- 2.1 STC states that in producing the SSNP, "it recognised that its neighbours, Lower and Upper Swell, were close by and invited Swells parish to form a multi-parish Neighbourhood Area, which it accepted". STC provides no evidence of the inclusion or support of Swells Parish Council and BPC believes that there is considerable disquiet over the plan in this parish.

Furthermore, if STC was genuinely interested in involving its neighbouring parishes, particularly given the scale of the proposals and the profound effect they will have, in perpetuity, on everyone who lives within many miles of Stow, why did it not meaningfully seek to involve other adjacent parishes that are no further away than the Swells including Broadwell, Mangersbury and Oddington? It should be noted that the impact of the SSNP on Broadwell and the countryside to the north and east will be considerably greater than on the Swells due to the village's proximity to the SSNP7 site and the fact that (unlike the Swells) it shares the same drainage catchment area at the SSNP7 site.

STC acknowledges that "the plan area is wholly located within the Cotswolds Area of Outstanding Natural Beauty (AONB) and it was important to both Councils (Stow and Swells) to present a vision which protects the special qualities of the AONB and encourages development that meets the needs identified by the community". On this basis, the SSNP precludes development in the Swells but, in stark contradiction to this policy, it promotes the development of a much more prominent and sensitive site in SSNP7.

- 2.3 Where STC has consulted its local community, the consultations have not been comprehensive or representative. The SSNP covers the town and a large area to its West

but not adjacent areas immediately to the North, East and South of the town. This creates a distorted view of the needs of the locality and therefore has not created an holistic plan covering the town and its surrounding area that would have reflected the views of BPC or other affected local parish councils. The only engagement with BPC was a short presentation of the draft SSNP to two of BPC's councillors at a small meeting on 24 January 2023. At this meeting, BPC's views and comments were not sought nor given. STC should be required to provide evidence of its proper engagement with neighbouring communities.

3. Condition (A): Regard to National Planning Policy

- 3.1 Parts of the Neighbourhood Plan disregard various national policies set out in the National Planning Policy Framework (NPPF) – see Section 4 below.
- 3.2 STC considers the Neighbourhood Plan contains “only non-strategic policy proposals or proposals that refine strategic policy without [in its opinion] undermining their purpose”. On what basis and with what justification does STC seek to unilaterally amend any strategic policy within CDC's Local Plan (further discussed in Section 5 below)?
- 3.4 STC has commented on those NPPF policies it considers to be most relevant in Table A. Our specific comments in relation to the points in this table are listed below:

SSNP1 – Overriding the Development Boundary: The SSNP redefines the Development Boundary for Stow-on-the-Wold as set out in the Local Plan. No evidence is provided to support why the boundary should be extended save to justify setting-aside CDC's Local Plan in order to develop the North-East Site (SSNP7). This is currently agricultural land in a prominent hill-top location in a sensitive position within the ANOB.

SSNP2 - Development in The Swells and the Countryside: Due to the sensitive nature of the surrounding countryside, which is wholly located in the Cotswold AONB, STC states that “no development here would enhance rather than harm the AONB which no level of architectural quality could redeem”. Yet, bearing in mind that the Swells are low-lying valley bottom villages, STC offers no evidence or justification why the same concerns should be set aside for the prominent hill-top site subject to SSNP7.

BPC argues that the SSNP should have included all adjacent parishes on the same grounds as the Swells. BPC also argues that adjacent parishes, including Broadwell, should be included in the referendum if the SSNP was to progress to the next stage. Given the impact on the wider community this should be a minimum requirement.

SSNP3 – Housing Mix: This recognises the need for affordable homes. However, the SSNP was issued prior to the approval of the Oddington Road development that has subsequently been approved by CDC (ref: [Cotswold town plans for 37 affordable homes approved despite 'dangerous road' fears - Gloucestershire Live](#)). This site meets Stow's stated affordable housing need on a single site. This development is considerably further progressed than SSNP7 and obviates much of the justification presented by the STC in support of developing the SSNP7 site.

SSNP4 – Principal Residence: It is alleged that the policy is in accordance with NPPF Section 31 requiring it to be consistent with relevant and up-to-date evidence and does

not fall foul of Section 78 referring to the local plan for a five-year supply of deliverable housing sites. We show why neither is the case in Section 4 below.

SSNP7 – Land North-East of Stow: STC concedes that development of this site will make the most significant housing contribution in the town for 30+ years (in fact the largest single development ever undertaken in the town). This alludes to the disproportionate scale of the development, aiming to provide nearly double Stow's affordable housing target in a single scheme and disregarding the potential contribution of other, more advanced schemes in the town (including the more advanced application subject to application CDC planning ref 23/01513/FUL).

At the national average for 2.4 inhabitants per dwelling, the population of the SSNP7 site can be expected to be over 400 (assuming 170 dwellings) rising to around 600 if the full site (including a further 70 homes in the area within Broadwell Parish) is developed. This would represent an increase to the population of the town of up to 30% in a single scheme. STC offers no justification for any scheme outside the Development Boundary, let alone one of the proposed scale.

STC argues that a larger scale development should be permitted provided that it is well located and supported by the necessary infrastructure and facilities, yet it offers no compelling evidence to explain why a hill-top location with no existing electrical, water, drainage or sewage infrastructure, poor road links (access off a narrow country lane) and very limited public transport meets these conditions.

STC suggests that this site would be a boost to the size of the town's population and therefore bolster the local economy providing a larger local workforce that a) does not need to commute long distances from more affordable locations outside the Cotswolds, b) that will spend some of its money in the town's businesses, and c) that will use local schools and other services. No evidence has been provided to support these claims, indeed, it is likely that evidence exists to the contrary. Local employment in retirement or nursing homes, leisure businesses, accommodation, shops and cafes is mostly transient and often part-time and employees do not move home to fulfil such roles. Indeed, commuting will increase as new residents move to the development but work elsewhere.

No evidence is provided to show support of the town's businesses, many of which have not been consulted and have expressed concerns that proposed new market square parking restrictions may harm rather than support business, particularly if the commercial centre of Stow shifts away from the Town Square to any extent. What evidence does STC offer to show that town businesses have been meaningfully consulted and their concerns addressed?

We do not believe that the need for the community/business hub is sufficient to justify major development in the AONB, particularly given the existing amount of underused community space. There is no evidence that retail or office space would be viable in this location. Indeed, there is a risk that it would generate additional vehicle trips to access the facility.

There is also a strong argument that the proposed car park is too far and relatively inaccessible from the centre of Stow.

Stow currently only has a primary school which is already at full capacity, secondary schools require transport out-of-town by road and GP services are also at full capacity. It also appears that Stow Surgery were even aware, about the nature, scale or impact of the Plan, let alone consulted.

Economic benefit is also claimed for improvements to the Market Square boosting businesses and driving greater footfall. No evidence is provided to support the contention that reducing car parking spaces in the square will increase footfall, logic suggesting the reverse (replacement parking on the site at SSNP7 is 15 minutes' walk from the centre). It is also claimed without evidence that the new community hub will make "a step change in the provision business facilities in the town" despite the very modest scale of the unit. In reality, this is likely to attract workers from outside the town thereby increasing traffic movements.

STC states that the transport effects have been assessed in principle only. Considering the size of this development and the existing traffic issues in and around Stow, a detailed and impartial study should be commissioned. STC claims that the traffic the site will generate will not be significant in the context of the town and A429 Fosse Way but the only traffic report available was prepared by Bloor, the proposed developer of the site which has assisted Stow in the development of the SSNP, and this does not claim insignificant traffic generation. BPC's own analysis suggests the site could generate up to 400 vehicle movements in the morning and evening peak hours (see Section 4 of BPC's attached March consultation response). Most new residents will work outside the town and there is no evidence that the scheme "should" reduce the need for other trips in and out of the town to access work and services. Despite STC's assertion that the site is well connected to the town centre, access by car from the site would initially be northwards, away from town, and via a narrow country lane leading to a congested junction with the A429. Long delays from here into town are common, especially in the summer and at peak times. Pedestrian access via Well Lane would be a steep 15 minute walk.

4. Condition (D): Contributing to Achieving Sustainable Development

The NPPF states at para 8c) "environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy". There is very little evidence provided by STC to show that the SSNP meets any of these objectives convincingly and SSNP7 in particular will risk harming each of them.

The SSNP7 site is adjacent to and, at over 10 hectares, out of proportion with Stow's conservation area. The site also abuts the historic Wells Lane and its wells of late mediaeval origin. No evidence has been provided to show why these local heritage assets will not be harmed by such a large development.

No evidence has been provided to show why the conversion of agricultural land at SSNP7 "will improve biodiversity" (in fact it can only be harmful) and why a 170-240 home development will not increase the frequent sewage discharges into the River Evenlode rather than "minimise waste and pollution" (discussed in more detail below).

No evidence of increased public transport provision has been offered and no explanation of why up to 400 extra peak hour car movements will minimise pollution, mitigate climate impact or help move to a low carbon economy.

At para 11, that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change and adapt to its effects. The framework also states that protecting areas or assets of particular importance provides a strong reason for restricting the overall scale of development. In the case of SSNP7, the planned growth is excessive and is incompatible with the fabric of existing social and economic infrastructure with no evidence provided as to how this will be improved to meet increased demand. The absence of good transport links will lead to increases in car traffic volumes and associated pollution, noise and disturbance.

At para 13, the NPPF states that neighbourhood plans should support the delivery of strategic policies contained in local plans yet the SSNP requires these to be overridden or amended and the Development Boundaries redrawn.

At para 16, the NPPF states that plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. This work is incomplete as STC cannot evidence that all local communities such as Broadwell have been engaged, businesses effectively consulted (shopkeepers in Stow and the doctor's surgery are unaware of the SSNP) and confirmation that infrastructure and transport providers can increase capacity to meet the growth in demand in a timely and cost-effective manner.

At para 23, the NPPF states that broad locations for development should be designated, land allocations identified and strategic policies provided for bringing sufficient land forward. CDC has done this in its Local Plan yet the SSNP seeks to override or amend this.

Para 29 of the NPPF allows neighbourhood planning to give communities the power to develop a shared vision for their area. In failing to consult and consider neighbouring communities, the SSNP is incomplete and too tightly focussed on the town itself at the expense of the wider area it serves.

At para 31 of the NPPF, it states that all policies should be underpinned by relevant and up-to-date evidence and take into account relevant market signals. In this regard, the SSNP was submitted prior to the approval of the Oddington Road development comprising 37 affordable units and therefore fails to recognise latest evidence and market signals.

At para 70, the NPPF states that neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites defined as no larger than 1 hectare. STC fails to provide adequate consideration for smaller sites in its preoccupation with the site at SSNP7 which is considerably larger at more than 10 hectares.

Para 78 refers to a five-year supply of deliverable housing sites in a 5 year plan. The SSNP is not compliant but surplus to this requirement as CDC already has a Local Plan that meets this requirement.

Para 82 refers to plans being responsive to local circumstances and support housing developments that reflect local needs. Whilst it can be argued that much of the SSNP does

this, SSNP7 is grossly out of proportion to the rest of the plan and therefore dominates it. It greatly exceeds local needs, particularly given local affordable housing need has already been addressed and approved (Oddington Road development) and it disregards local circumstances such as the overburdened capacity of local infrastructure and the lack of engagement with local businesses.

Para 83 promotes sustainable development in rural areas with housing located where it will enhance or maintain the vitality of rural communities. For reasons already discussed, the capacity of local infrastructure is currently unsustainable with no demonstrable plans to upgrade (or in the event of road capacity, no scope to do so without radical new road construction which is unlikely in the AONB). Increased traffic, flooding and pollution risk is likely to harm rather than enhance the vitality of local communities. Broadwell already experiences surface water flooding and sewage escaping into the built environment (a flood alleviation scheme is in progress and takes no account of the additional risk presented by this scheme directly above the village)

Para 89 states plans and sites in rural areas should meet local business and community needs in rural areas, but it is important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). For reasons already discussed, there is scant evidence of meaningful consultation with local businesses, no consultation has been held with adjacent communities (except, arguably, for the Swells), the hilltop location of SSNP7 will be insensitive to the AONB, this site would have an unacceptable impact on local roads, the increase demand on local infrastructure would be unsustainable and no evidence offered to improve access on foot, by cycling or by public transport.

Para 100 refers to faster delivery of public service infrastructure (education, health etc). Stow has no secondary schools and its new GP surgery and North Cotswold Hospital have been designed on existing population demand. The SSNP submits no detail as to how public service infrastructure will be expanded and brought forward.

Para 108 refers to transport issues being considered at the earliest stages of plan-making. There is no evidence that this has been done. As described in the attached BPC Regulation 14 response, currently there is scant provision of local bus services and no rail connections at Stow. Consequently, levels of car ownership and use will be high and the SSNP7 development is likely to increase these levels locally, not reduce them. The potential impact of the SSNP7 development on the road network will be severe with no upgrades or mitigation measures planned. Whilst the SSNP refers to opportunities to walk from SSNP7 site into town, this is a 15 minute walk. No other improvements to walking, cycling and public transport use are identified. The environmental impacts of increased traffic have been down-played and no detailed independent assessment undertaken by STC (the only plan submitted is that for the developer and is unrealistic for reasons discussed the BPC Regulation 14 response).

Para 157 supports the transition to a low carbon future in a changing climate, taking full account of flood risk yet the SSNP only considers flood risk within the development boundary. Due to its hill-top location, the main impact of any development within Stow will be downstream in the Evenlode and Dickler valleys yet no evidence has been provided as to how these rivers and surrounding low-lying communities will be affected. The NPPF also states that plans should contribute to radical reductions in greenhouse gas emissions (SSNP7 will not), minimise vulnerability and improve resilience (SSNP7 will not), encourage the reuse of existing

resources, including the conversion of existing buildings (SSNP7 will not) and support renewable and low carbon energy and associated infrastructure (SSNP7 will not).

Para 165 discourages inappropriate development in areas at risk of flooding by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. The SSNP7 development cannot satisfy these criteria either in terms of current risk to surrounding areas and communities or in terms of mitigating future risk (see discussion under NPPF 175 below).

At para 168, the NPPF encourages new development to be steered towards areas with the lowest risk of flooding from any source and developments should not be allocated or permitted if there are reasonably available alternative sites in areas with a lower risk of flooding. The CDC Local Plan has considered this but been disregarded by the SSNP.

At para 174, the NPPF states that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. There can be little doubt that SSNP7 will negatively impact the AONB and views from various angles to the East and South would be harmed.

At para 175, the NPPF states that major developments should incorporate sustainable drainage systems. Broadwell, located at the foot of the hill, suffers from flooding and flood protection measures are to be constructed in 2024 to mitigate flood risk. However, these are designed on current surface run-off and no evidence has been provided as to how the SSNP7 site would impact this (discussed in greater detail in section 7 of the Regulation 14 consultation document in the Appendix). The SSNP7 policy only considers these issues at or adjacent to the site itself.

The Flood Risk and Drainage Report evidenced with the SSNP was prepared by BWB for the developer, Bloor Homes. It concentrates on the flood risk to the site (this is a hilltop location so unsurprisingly the flood risk is considered low). This report is flawed as it refers to the nearest river being the River Dickler but the site is actually located on the River Evenlode side of the watershed. The report admits that no soakaway tests have been undertaken despite the ground condition being heavy clay soil and proposes outfall to the nearby watercourse or public sewer network if infiltration is inadequate (as seems likely). The SSNP makes no reference to the fact the existing flood risk in local watercourses and that local sewer network is frequently overwhelmed (see below). The report also admits that no Sustainable Drainage Strategy has been prepared and no evidence offered as to the impact of the proposed development on the capacity of the existing surface drainage.

The report also states that foul drainage is likely to be pumped to public sewers located to the south and admits that Thames Water has not been consulted as to system capacities or the infrastructure improvements that will be required (Thames Water's investment programme is already 5 years in delay). This is despite the capacity of the Thames Water sewage pumping station on Oddington Road, Broadwell, being already inadequate for current peak demand causing it to frequently discharge raw sewage into the Evenlode water course. So far this year (2023), the Broadwell treatment plant has discharged surplus untreated sewage into the River Evenlode watercourse for 528 hours (ref: [ECP December Newsletter \(earthwatch.org.uk\)](https://www.earthwatch.org.uk/newsletter/december-2023/)).

Para 176 specifies that "Great weight should be given to conserving and enhancing the landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues" and that "The scale and extent of development

within all these designated areas should be limited.” SSNP7 contradicts the NPPF requirement for the scale and extent of development with the AONB to be limited.

Para 177 specifies that “When considering applications for development within AONBs, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include (amongst other things) an assessment of the cost of and scope for, developing outside the designated area, or meeting the need for it in some other way.” Stow’s affordable housing need has now been met within Stow and there are, in addition, more sites available within Stow and other affordable housing developments in Moreton for which people living in Stow qualify.

5. Condition (E): General Conformity with the Strategic Policies of the Development Plan

In particular, the CDC Local Plan’s strategy is to focus the majority of development in the most sustainable settlements (Clause 6.2.3 refers). As this response demonstrates, the SSNP is inconsistent with the sustainability objective, particularly in relation to SSNP7.

The strategy of the Local Plan is also to protect smaller settlements and the open countryside. Although Stow is considered a Principal Settlement, the Population Census of 2021 shows Stow’s population is just 1,900 inhabitants and, therefore, it is also a smaller settlement. In particular, specific evidence rather than unsubstantiated conjecture should be provided to show that SSNP7 does protect rather than harms Stow, its character, history and economy. Furthermore, SSNP7 threatens to inflict real harm to nearby smaller settlement such as Broadwell, Evenlode, Donnington and Oddington.

CDC’s strategy in its Local Plan (Clause 6.2.5 refers) also includes minimising a direct impact on landscape assets and a large development at a hilltop location such as that in SSNP7 will be visible from many points in the Evenlode valley including as far away as Churchill. There can be little doubt that a development at this location will have a severe impact on the AONB.

CDC’s Local Plan (Clause 7.15.5 refers) supports the development of sports and leisure facilities, new libraries, workshops and B1 uses. Although these feature in the SSNP, they would not be in proportion to the scale of SSNP7 development.

CONCLUSION

BPC, if properly consulted, would potentially support elements of the SSNP, but this would never justify the extraordinary and far-reaching impact on the AONB of SSNP7. The SSNP is dominated by SSNP7, a site that has been promoted by a large private developer. The extent of the involvement of this developer and its financial interest in the SSNP7 site has not been disclosed by STC.

Importantly, since the SSNP has been issued for Regulation 16 consultation before approval of the 37 affordable homes on the land north of Oddington Road, Stow-on-the-Wold (planning application 23/01513). This development alone will meet the need that STC has identified to provide 37 affordable homes between now and 2031. This is a relevant development that at least requires the SSNP to be revised.

Furthermore, BPC believes that the sustainability criteria for SSNP7 has not been met and cannot be adequately demonstrated (in fact the contrary). STC seeks to amend or overturn sections of CDC's Local Plan without offering a compelling case for attempting to do so.

In addition, this plan overrides the first main concern of the residents who did respond to the consultation; The first "main issue and concern raised as a result of consultations" was "Concern that the unique townscape and environment of the town, parish and AONB should be conserved and enhanced and not spoilt by inappropriate development."

Finally, as we have demonstrated above, the SSNP has failed to satisfy many key policies in the NPPF. Protecting the Cotswolds AONB provides a strong reason for restricting the overall scale, type or distribution of development in the NDP area and the adverse impacts of the SSNP7 site significantly and demonstrably outweigh the benefits.

Consequently, BPC is registering its objection to the SSNP and, in particular SSNP7, as part of the Regulation 16 Consultation. Furthermore, if the SSNP proceeds to referendum, then the immediately surrounding parishes should also be included (for the same reasons that the Swells were included within the SSNP).

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Broadwell Parish Council: 13 December 2023

APPENDIX

RESPONSE BY

BROADWELL PARISH COUNCIL

TO

REGULATION 14 CONSULTATION BY STOW TOWN COUNCIL

TO

ITS PROPOSED NEIGHBOURHOOD PLAN.

STOW TOWN COUNCIL NEIGHBOURHOOD DEVELOPMENT PLAN: RESPONSE BY BROADWELL PARISH COUNCIL TO REGULATION 14 CONSULTATION

1. Introduction

Broadwell Parish Council (BPC) arranged an extraordinary general meeting to specifically address the Stow Town Council (STC) Neighbourhood Development Plan (NDP). This attracted a very large attendance. Having considered all comments made, this is BPC's formal response to the STC's Regulation 14 consultation process.

There was some sympathy with STC's objective of building affordable housing within Stow but there were grave concerns about the site location, scale and impact of the proposed housing development at the site North-East of Stow (ref: Policy STOW7, and Site S61 in CDC's Stow Site Assessments in its 2021 Strategic Housing and Economic Land Availability Assessment ("SHELAA") document). This site is referred to as the "North-East Site" throughout this document.

The North-East Site is at a prominent hilltop location in an Area of Outstanding Natural Beauty. It also encroaches on a Conservation Area, is partly outside Stow's permitted development boundary and impinges on land within Broadwell Parish. It risks overwhelming the capacity of local road, water, drainage and social infrastructure. It would not be compliant with Policies EN1, EN4 and EN5 of the CDC's Local Plan.

Our specific concerns are described fully below.

2. Consultations

Contrary to the statement made by STC in its NDP, BPC has NOT been consulted meaningfully by STC in the compilation of this plan. BPC was invited to a small meeting on 24 January 2023 at which STC outlined the main contents of its draft NDP and described the approval process and timeline. BPC's views were not invited, nor given and the NDP has been prepared without any contribution from BPC.

Furthermore, the NDP describes the process through which STC has produced its plan. The NDP states that in 2020, a questionnaire was sent to every address in Stow and 325 responses were received representing 31% of all households. Drop-in sessions were also held at which 170 forms were submitted, representing just 8% of the population. No details of the questions have been given and no statistical or objective analysis of the responses disclosed (ref: NDP 4.12).

Further correspondence was sent to inhabitants of Stow in May 2022 and drop-in sessions held. STC states that this generated 214 responses, representing just 10% of

the population. Again, no details of the questions asked or statistical or objective analysis of the responses received have been disclosed (ref: NDP 4.14).

What is more, discussions with various traders within the town has revealed that many were unaware of the plans, have not been consulted and are duly concerned at the potential impact of the NDP on their businesses.

For these reasons, we do not believe that the consultation process to date has been genuine, meaningful or representative,

However, the main outcome of these consultations stated by STC is concern about impact to the AONB, the provision of affordable housing for the people of Stow, support for the town's economy and provision of additional parking close to the town centre (a full list is at NDP 4.14). Whilst these are supportable aims, for the reasons described below, we do not believe that they will be met by the new development proposed at the North-East Site.

3. Housing

STC has identified the need to provide 37 affordable houses between now and 2031. STC refers to building 170 new homes on the North-East Site but the NDP clearly states that the developer's plans are based on developing the full site, including land lying within Broadwell Parish, to provide 240 homes (5.26 of the NDP refers). Both figures include 70 affordable homes but STC would have no control over who occupied the remaining 70% of the development, whether this be the elderly, commuters or vacation landlords. Therefore, this development would not assure that STC's demographic objectives would be met and is vastly out of proportion to need.

At its meeting with representatives of BPC on 24 January 2023, STC also disclosed that it knows of various vacant plots, unoccupied flats and over 100 empty properties within Stow which potentially could be utilised to help meet housing demand.

Despite the need for more affordable housing in the area, and notwithstanding STC's argument for increased provision for people working in Stow, the simple reality is that most of the affordable housing will be allocated to people currently living and working outside the immediate area. Therefore, rather than specifically serving Stow's needs, this will contribute to the wider need in the area for which CDC has already identified and approved development locations including near-by in Moreton-in-Marsh.

The scale of the proposed development is out of proportion with previous housing development in the vicinity. If STC's affordable housing objective is to be met, a mix of various smaller sites would be more sympathetic to the local historic character of the town, less intrusive within the AONB, less impact to surrounding greenbelt agricultural

land and more manageable with respect to impact on local infrastructure. It is noted that STC has already identified 11 of such sites on its NDP consultation webpage, many of which involve fewer planning obstacles than those associated with the North-East Site.

CDC has appraised various sites for development in its SHELAA document. These include the site adjacent to the new GP surgery site which is deemed potentially suitable for development (ref S55B in CDC's SHELAA document). CDC also identifies that redevelopment of the Mangersbury Road Car Park for housing would be suitable if an alternative location can be found for car and coach parking (ref S64 in CDC's SHELAA document). Both of these sites are included in STC's own site assessments.

In Appendix F of the NDP, STC itself considered a site on Oddington Road (ref S14/S22B in CDC's SHELAA document) before discounting it on spurious grounds which includes poor access (despite it having direct access onto the A436, being located no further from the town centre than the North-East Site and being closer to facilities such as the school and GP surgery). This site, being made available by Stow Community Land Trust for a community led project, would meet many of STC's NDP aims more quickly and with fewer obstacles than developing the North-East Site. Whilst this site had a previous planning application refused, this was before CDC had prepared its Local Plan and the main objection was impact to the AONB, a factor that CDC felt could be addressed with a more sympathetic plan. We are aware that Bayhill Property is developing an affordable housing scheme that would meet STC's affordable housing aims by itself and would have a much reduced impact on the AONB than the proposed North-East Site.

The above clearly illustrates that a mix of smaller developments could meet the objectives described in STC's NDP more sympathetically to the environment, the character of the town and the capacity of local infrastructure than the proposed development at the North-East Site.

4. Public Transport

Stow is poorly served by public transport. There is no railway station in the town, the nearest stations being is at Moreton-in March and Kingham, both approximately 5 miles distant.

There are only 2 regular bus routes that serve the town on a daily basis. One runs at 90 minute intervals between Moreton-in-Marsh and Cheltenham which stops in the town (801). The other, a local bus (802), links the surrounding villages and Stow with Kingham Railway Station, running seven times a day, principally during peak morning and evening rush-hours with just three services during the middle of the day. The last bus services are in the early evening.

Therefore, residents at any new development, many of which will not work in Stow, are likely to be very reliant on car transport.

5. Traffic

Stow is a recognised traffic hotspot and a major crossroad location. Nine roads converge on the town comprising:

1,2). The A429 (Fosseway) from the North-East via Moreton-in-Marsh and the South-West via Cirencester. This is major trunk road from Junction 15 of the M40 at Warwick to junction 17 of the M4 Motorway at Chippenham. As such, it is the main artery through the Cotswolds. It is not only the main entry route for much traffic coming to the Cotswolds but is also, inappropriately, a major route for through traffic.

3,4). The A424 linking the A44 from the North-West via Evesham with the A40 at Burford to the South-East. It is the main route from the West Midlands at Junction 6 of the M5 at Worcester into the North Cotswolds and another busy and popular tourist route into and through the area.

5,6). The A436 from the East linking the A44 at Chipping Norton with the A417 trunk road at the Air Balloon Roundabout and onwards to Cheltenham and Gloucester. This is another major route into and through the area carrying traffic from Oxford and the M40 from the South-East/London in one direction and from Cheltenham, Gloucester and the M5 to the West in the other.

7). B4077 from Tewkesbury and local villages to the North-West of Stow.

8). B4068 from local villages to the West of Stow.

9). Broadwell Lane, a narrow country lane linking Broadwell, Evenlode and Adlestrop to Stow and Tesco (the main supermarket in the area) and increasingly, a route for traffic seeking to avoid delays on the main A roads in and around Stow.

Consequently, the town experiences considerable congestion, particularly at peak times and holiday periods. Traffic is often stationary, particularly from the north with queues backing down the A429 from the town to the Donnington turn 1½ miles to the North.

WYG's (traffic consultants) A429/A433 Corridor Study dated 2018, commissioned by GCC, highlights Stow as one of the 5 collision hotspots on the A429 (para 2.14). It also projects that the route will reach 110% of its capacity by 2031, the acceptable maximum capacity being 90% (para 3.2.10). These volumes will be exacerbated by the approval

or completion of subsequent further developments such as the 250 dwellings at Dunstall Farm and the expansion of Fosseyway Garden Centre. The report also states that congestion on the A429 has already caused 'rat runs' through Broadwell and Oddington.

STC's "Sustainable Transport Report – April 2022", (carried-out by the developer, Bloor Homes) states that the Broadwell Lane-A429 junction would need to be upgraded and signal-controlled and that Broadwell Lane itself would need to be widened with the addition of a pavement for pedestrians. This is hardly consistent with the rural character of this location.

The average number of cars per household in the South-West is 1.45. This will include car-count in urban areas so the car-count per household on the North-East Site, where the majority of dwellings will be family houses, can be expected to be well above 1.5. Assuming the development proceeds on the basis of the full site of 240 dwellings, the likely car-count will be approximately 400. In addition to this, STC proposes to incorporate a 150 space car park on the site increasing the total number of cars using the site to around 550 cars.

STC's own traffic report (referred to above) predicts 180 vehicle movements per hour, 4 per minute at peak times. We believe this is an under-estimate as it assumes that little traffic will be created by the Community Hub (unrealistically, users are expected to walk to the hub from the town or the development itself). Moreover, despite the evidence referred to above of Broadwell already being used as a 'rat run', this report assumes that there will be no 'trip assignments' through Broadwell caused by the development. Therefore, there are serious flaws to this report.

If half of the 550 cars on-site exit or enter the site in the morning and evening rush-hours, this will create an extra 275 car movements per hour, significantly higher than the 180 movements predicted by STC. Currently at peak times, the wait from the top of Broadwell Lane at its junction with the A429 to the A424 junction alone is typically 5-10 minutes (and can be much greater at times of severe congestion). Therefore, even on STC's own predictions, this development can be expected to add up to 40 cars to the queues on the A429. Despite the fact that the Broadwell junction will need to be controlled, traffic will back-up into the development itself. Moreover, a controlled junction will result in greater delays to traffic on the A429, even longer queues down Stow Hill towards the Donnington Turn and therefore causing more traffic to divert through Broadwell (already a problem at peak times).

Furthermore, contrary to STC's traffic report, development traffic not destined for the town itself, will turn right to Broadwell to avoid queues and delays and from there turn North to join the A429 or South to Oddington to head for Chipping Norton, Bicester, Oxford and the M40 South.

For these reasons, Broadwell will increasingly become a 'rat-run'. The village lanes are only wide enough for one car in places, there are two blind bends and the roads are shared with horse riders, cyclists (the village is on National Cycle Route NCR48) and walkers (the village is on the Monarch's Way long distance footpath). There are no pavements or segregated paths. Not only will this adversely impact the rural nature and character of the village but residents are overwhelmingly concerned at the disproportionate increase in through traffic, and its consequences for noise and road safety.

The volume of additional traffic created by the development will also increase congestion within the Stow itself. Traffic held up on the A429 will try to divert through the town centre and Well Lane and Back Lane could also become 'rat runs'. This, combined with the proposed reduction in parking spaces in the town square, will negatively impact trade in the town with local trade diverting to alternative commercial centres at Moreton-in-Marsh, Bourton on the Water and Chipping Norton. It will also further foster the trend towards internet shopping and Stow will increasingly fail to serve effectively its local market.

The alternative to the proposed site entrance on Broadwell Lane is access to the A429 through the existing Tesco access road. This option (not currently proposed by STC) would have the benefit of feeding site traffic onto the A429 at an existing, traffic light controlled junction. It would have the advantage of deterring site traffic from diverting down Broadwell Lane to some extent as there would be less time advantage from doing so. However, this will not diminish total traffic movements and these traffic lights will need to be rephased for the increased traffic volume on the access road. It will not reduce the predicted delays on the A429 and therefore will have the same implications as described above to traffic volumes and their impact on Broadwell.

Additionally, the NDP reveals that such a large development will take up to 5 years to construct resulting in significant construction traffic and demand for additional parking capacity for construction staff over a protracted period in the meantime.

6. Car parking

Residents in Broadwell and other surrounding villages are very concerned that STC plans to reduce the number of parking spaces in the Town Square. Many residents drive to Stow to do quick errands or pick-up provisions (e.g., the post office, pharmacy and to shop at small independent retailers). They may be deterred from doing so not only by the increased congestion but also by the fewer parking spaces planned by STC which will reduce the likelihood of finding a spare space in-town. An alternative car park 10 minutes' walk from the town centre will not constitute a practical alternative for quick

visits and surrounding villagers are likely to divert to more convenient alternatives in Moreton-in-Marsh, Bourton on the Water and Chipping Norton.

There is a real danger that the businesses of independent retailers in Stow will suffer as a consequence. This risk is borne-out by the under-utilisation of the Mangersbury Road Car Park which is closer to the town centre than the new car park at North-East Site. The local community would be better served if current parking restrictions were more rigorously enforced, and people parking for longer periods were encouraged to use the existing long-term car parks rather than blocking parking spaces in the square.

Moreover, the NDP provides contradictory information on the location of the proposed new car park. At Policy Stow7 (D), STC states that the car park will be as close as possible to Broadwell Lane but the development plan at Appendix F shows the car park is at the opposite end of the site, nearest the town and adjacent to the proposed Community Hub. If the car park is to be located at the Broadwell Lane end of the site, this will be over 0.6 miles from the town centre and a 15 minute walk. If the car park is at the South end of the site adjacent to the Community Centre, then access to the town would be down a steep bank and along Well Lane, a walk of 10 minutes. However, the latter location would result in parking traffic having to drive through the whole length of a residential development comprising mainly family homes, hardly desirable. Furthermore, with pedestrian access to the town being via Well Lane, drivers will soon realise that on-street parking in Well Lane is closer to the town centre and more convenient adding to traffic and parking problems within the lane itself. This problem would be largely averted if the site entrance was to be an extension of the Tesco access road rather than from Broadwell Lane.

7. Sewage and Drainage

The sewage pumping station on Oddington Road (Broadwell) has insufficient capacity for current sewage demand. Currently, Thames Water frequently discharges raw sewage into the Evenlode water course and during periods of heavy rain, drains in the village frequently surcharge, emitting raw sewage into Chapel Street and gardens. The scale of the proposed new housing development is likely to greatly exacerbate this problem.

Furthermore, without the use of large capacity soakaways on the development site, surface run-off would greatly increase the risk of flooding in Broadwell. The village experienced a serious flood in 2007 affecting several properties and there have been more recent episodes of the streams breaking their banks and hill run-off flooding village roads. The flood risk in the village is recognised by CDC which has allocated funding for the construction of flood mitigation measures at the bottom of Broadwell Hill directly below the North-East Site. Current plans are being progressed to build swales and field bunds to help prevent flooding but these measures are designed for current

levels of surface water run-off and will be inadequate if this increases as a result of the new development.

8. Social Infrastructure

Attracting more families to the town may be beneficial to the local economy and a worthy objective. However, there is no evidence that the proposed development at North-East Site will improve the sense of community in the town as STC intends and little consideration has been given to the increased pressure this development will create on local social infrastructure.

For example, GP Services and District Nursing are already at full capacity and there is no current provision for increasing their capacities. Other than a restricted hours Minor Injuries Unit at North Cotswolds Hospital in Moreton-in-Marsh, there are no local Accident and Emergency Hospitals. The nearest Emergency Departments are at Cheltenham (20 miles), Gloucester (30 miles) and Oxford (30 miles).

There is a primary school in Stow but no secondary school in the town. Secondary school pupils will have to travel outside the immediate area to the Cotswold Academy in Bourton-on-the-Water or further afield to schools at Chipping Norton, Chipping Camden, Burford or the independent school at Kingham. The Cotswold Academy is at full capacity and would require significant investment to expand to meet the increased demand and it is known that schools in the area generally have difficulty in recruiting and retaining qualified teaching staff.

9. Community Hub

The principle of a Community Hub and Business Centre to support the local economy is supported. However, there are concerns about how this building would be managed, who would use it and the likelihood of it generating additional traffic. There are already two under-used community centres in Stow.

10. AONB

The proposed development site is in a prominent, elevated position on the ridgeline. It will impact the rural views from a large area of the Evenlode valley, Chastleton Hill and the villages of Churchill, Adlestrop and Evenlode. It is not consistent with protecting a conservation area within an Area of Outstanding Natural Beauty.

11. Dark Skies

The size of the development carries with it the risk of significant light pollution which, because of its elevated position, would impact a large area surrounding Stow.

12. Conclusion

In general, we are supportive of the objectives of the NDP and are as keen as STC to see Stow thrive and flourish. However, we do not believe these will be achieved by the development at the North-East Site. Its size is out of proportion with the town, it will have a devastating impact on local infrastructure (particularly road and drainage), will be damaging to the historic character of both Stow and Broadwell and risks harming rather than supporting local businesses and the town's economy.

We believe that there are better ways to meet STC's aims through the development of various small sites that are proportionate to the size of the town, more sympathetic to its location within the AONB and with lesser impact on local infrastructure.

Consequently, BPC is registering its objection to the development at the site North-East of Stow (ref: Policy STOW7 / Site S61 in CDC's SHELAA) in the strongest terms.

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