

Consultation Statement

Preston Neighbourhood Development Plan,

Submission Draft, August 2020

Purpose

1. This Consultation Statement has been prepared in support of the Preston Parish Council NDP as part of its submission to Cotswold District Council under Regulation 15 of the Town and Country Planning, England, The Neighbourhood Planning (General) Regulations 2012.
2. It has been prepared by the Preston Steering Group, acting on behalf of the Preston Parish Council ("the qualifying body").
3. Regulation 15 is set out here:

Plan proposals

15.—(1) Where a qualifying body submits a plan proposal to the local planning authority, it must include—

- (a) a map or statement which identifies the area to which the proposed neighbourhood development plan relates;
- (b) a consultation statement;
- (c) the proposed neighbourhood development plan; and
- (d) a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.

(2) In this regulation "consultation statement" means 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.

4. This Consultation Statement addresses Regulation 15 (2).

Introduction

5. Neighbourhood planning was introduced under the Localism Act 2011 to give communities the right to shape and develop their areas. The Preston neighbourhood plan has been prepared by residents and led by Preston Parish Council, shaped by various surveys and public consultations to accurately reflect the needs and wants of the community.

The Steering Group

6. This neighbourhood plan has been produced by a Steering Group made up of equal numbers of Parish Councillors and community volunteers.
7. As well as time spent on research through interviews and examination of strategic and factual evidence, the Preston Neighbourhood Plan Steering Group has carried out many hours of consultation with residents and has considered comments and concerns about the village of Preston and its surroundings. This work has resulted in a Neighbourhood Plan which sets out a vision for Preston and will ensure that the parish continues to develop as a vibrant community whilst retaining its rural character for future generations.
8. Thanks are given to Cotswold District Council's Officers who have been very helpful in this process.

Description of how consultation was undertaken

Stage 1: Preparing the Draft NDP

9. Early advice was given to members of the Parish Council by Andrea Pellegram MRTPI regarding a planning application for solar farm and another for a housing scheme as early as 2014. The advice at the time was that it would benefit the Preston community to prepare a Neighbourhood Development Plan (NDP).
10. The overall process was managed by the Preston NDP Steering Group that was comprised of members of the Parish Council and the community. The Clerk attended all meetings and posted a minute of the meetings on the Parish Council website.
11. The Parish Council website was updated to contain special pages and up to date information on the progress of the NDP. Documents and minutes were posted in the website. The website can be viewed by following this [link](#).
12. The Parish Council produces regular communications in the form of a newsletter which is emailed or hand delivered (for those who did not wish to receive emails) to all members of the community. The newsletter was used to publicise progress and individual events.
13. The community was invited to the Annual Village Meeting (AVM) in May 2017 to receive a presentation by the consultant Andrea Pellegram MRTPI on the benefits of preparing NDP for the parish. In this meeting, the village agreed to produce a neighbourhood plan. The agenda is shown in **Appendix 1**.
14. A meeting for local landowners was held on 20 July 2017 and a note was prepared and is attached as **Appendix 2**.
15. An NDP "vision" event was held in the Preston Village Hall on 26 September 2017 from 19.30 to 21.00. 49 villagers attended including a number of younger members of the community so that

the entire community was represented. The meeting was opened by Tony Warren, the NDP steering group's Chairman, who explained why the NDP was important, why the Parish Council agreed to proceed, and the basic role of the steering group. He stressed that the steering group's intention was to guide the process not determine its direction. All members of the community were encouraged to comment on the NDP's progress and to make comments and let their views be known throughout the process. Andrea Pellegram led the meeting through a SWOT exercise to learn more about the villagers' views about Preston. The note of the meeting is attached as **Appendix 3**.

16. A community survey was held online for 4 weeks in January 2018. The report of the survey is attached as **Appendix 4**. A business survey was held in January 2018. The report of the survey is attached as **Appendix 5**. Both appendices 4 and 5 are attached as separate documents.
17. Many members of the community provided evidence for the NDP in the form of photographs, drone photography, a full survey of the public rights of way and other routes on the local walking network, and the 2015 design survey that pre-dated the NDP.
18. A member of the Steering Group (who was also the Chairman of the Parish Council) and the consultant attended a training session on NDPs held by the Gloucestershire Rural Community Council in June 2017.
19. The AVM in May 2018 allowed the villagers to consider the first draft of the NDP and the supporting evidence papers. There was overall support of the plan to date. The flyer and minutes are attached as **Appendix 6**.
20. The Local Planning Authority (LPA) was consulted throughout the process. The LPA raised concerns about the approach to Policy 1 of the NDP (as well as other less significant concerns), and the consultant sought to strengthen the evidence on landscape. However, the LPA's concerns regarding policy 1 remained, and the Steering Group decided to commission professional landscape advice. This added over a full year's delay to the programme. The LPA was consulted on the landscape report's first draft, and changes were made to that. The revised NDP which took account of the new landscape evidence (in autumn 2019). The LPA was then provided with a final pre-Reg. 14 draft, and further amendments were made to account for the planning authority's suggested amendments.

Stage 2: Regulation 14 Consultation

21. On 24 February 2020 the Draft Neighbourhood Plan went out for Regulation 14 consultation. The following methods were used to publicise the document and consultation period:

- Where e-mail addresses were known, organisations were e-mailed with the Public Consultation Notice
- Where not known, Public Consultations were posted or hand delivered
- All households in the Parish on the Electoral Role were sent Public Consultation Notices either by email, delivered by hand or posted
- A section dedicated to the Neighbourhood Plan had been set up on the Village / Parish Council website www.prestonpc.org.uk and included the draft Plan, all Appendices and an on-line response form
- 3 Colour copies of the draft Neighbourhood Plan were available for inspection in the Village Hall, 3 colour copies in the Church porch, 2 copies each were available at the addresses of the Chairman of the Steering Group and the Chairman of the Parish Council

- Notices were placed on the Town Council Notice Boards
- Articles were included in the Village Newsletter that was distributed by email to all but 20 households in the parish. The 20 households not receiving emails received printed copies of the notice and the questionnaire with instructions on how to view both online and hard copies of the full Plan document.

22. The following non-statutory consultees were included:

- Members of the public / residents of Preston
- Businesses in Preston
- Individual landowners affected by the draft NP (including those affected by designation of Green Spaces)
- Planning Agents who had indicated an interest and had requested notification of Regulation 14 consultation.

23. The following Statutory consultees were included based on a list provided by the LPA:

- Cotswold District Council
- Gloucester County Council
- South Cerney Parish Council
- Driffield Parish Council
- Siddington Parish Council
- Baunton Parish Council
- Ampney Crucis Parish Council
- Cllr Shaun Parsons (Gloucestershire County Council)
- Cllr Mike Evemy (Cotswold District Council)
- Joseph Walker (Cotswold District Council)
- Wiltshire County Council
- Swindon Borough Council
- Thames Water
- Natural England
- Historic England
- Gloucestershire County Council
- Environmental Agency
- Gloucestershire First
- Gloucestershire Police
- Gloucestershire Highways
- Gloucestershire Wildlife Trust
- Cotswold Conservation Board
- Cotswold Water Park

24. The method of consultation is set out in the table below:

Statutory Consultees

Preston Parish Council	Email
Preston NDP Steering Group	Email
Cirencester Town Council	Email
South Cerney Parish Council	Email

Driffield Parish Council	Email
Siddington Parish Council	Email
Baunton Parish Council	Email
Ampney Crucis Parish Council	Email
Cllr Shaun Parsons (GCC)	Email
Cllr Mike Evely (CDC)	Email
Joseph Walker (CDC)	Email
Wilshire County Council	Email
Swindon Borough Council	Email
Police	Email
Gloucestershire Highways	Email
Natural England	Email
Historic England	Email
GCC	Email
Environment Agency	Email
LEP	Email
Gloucestershire Wildlife Trust	Email
AONB	Email
Water Park	Email
Thames Water	Email

Businesses

Bibury - Landscape Contractors	Email
F J Huck Ltd	Email
Abbey Home Farm	Email
Hunters Equestrian	Email
Hunters, Barchester Healthcare	Post
Ivor Webb & Son Ltd	Email
DMH Cirencester Ltd	Email
Moore Allen & Innocent	Email
Quoin Developments Ltd	Post

Original Architectural Antiques Co Ltd	Email
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Landowners (not included as Parish residents)

Mr M Harris	Post
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Mr R Mills	Post
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Gloucester Diocese	Post
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Mr R Gegg	Post
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Mrs B Carruthers	Email
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Village Farm Units

Quality Office Supplies	Post
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Hang Loose	Post
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J J Hall	Post
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H J Herbert	Post
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Mark's Motors	Post
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Dennis's Motorcycle Resprays	Post
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Snap-on-Tools	Post
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Salazar Designs	Post
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Del's Motorcycles and Tyres	Post
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Cotswold Plumbing & Heating	Post
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iongiant	Email
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The Drum Den	Post
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Ford Flooring	Post
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Edward Van Thiel Ltd	Post
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Planning Agents

Rachel Bird, Impact Planning	Email
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Ben Seward, Impact Planning	Email
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Louise Follett, Pegasus Planning	Email
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25. The Regulation 14 consultation ran for the period starting 24 February for 6 weeks and late responses were considered. A survey was put online and 25 responses were received. The

survey is attached as **Appendix 7**. The response was overwhelmingly positive and is set out in **Appendix 8**.

26. In addition to the survey response, a number of detailed letters of representation were received. The list of responses and how they were taken into account is set out in **Appendix 9**.

PRESTON PARISH COUNCIL

LOCAL GOVERNMENT ACT 1972

NOTICE OF ANNUAL VILLAGE MEETING

THURSDAY, 11 MAY 2017 at 7.00PM in the **VILLAGE HALL**

Local Government electors for the Village will be entitled to vote on any matters arising at the Meeting

HAVE YOUR SAY ON VILLAGE AFFAIRS

www.prestonpc.org.uk

The business to be transacted at the Meeting will be as follows:-

1. **Apologies for Absence**
2. **Minutes of the last Parish Meeting held on 12 May 2016**
3. **Annual Report of Preston Parish Council**
4. **Finance Statement**
5. **Annual Reports from County and District Councillor**
6. **NEIGHBOURHOOD DEVELOPMENT PLAN**
Following a Presentation by Dr Andrea Pellegram residents will be able to ask questions and will then need to decide if it would be beneficial for the Village to embark on a Neighbourhood Development Plan.
7. **Comments from the public**
8. **Any Other Business**

Cllr Mrs J Tomblin
Chairman

2 MAY 2017

Appendix 2: Note of meeting with local landowners, July 2017

PRESTON PARISH COUNCIL

NEIGHBOURHOOD DEVELOPMENT PLAN

Landowners' Meeting – Thursday, 20 July 2017

Present: Tony Warren (Chairman), Alan Stone, Julie Tomblin, Sue Cameron and Regine Freyne
Roger Mills, Scilla Chester-Master, Belinda Carruthers, Roger Gegg, Darril Rogers (Pegasus Planning Group representing Michael Harris), Will Chester-Master, Sue & Howard Spivey, Jane Bainbridge, Nick Price. Dr Andrea Pellegram (Consultant) and Caroline Braidwood (Clerk)

The Chairman introduced himself, the Group, Dr Pellegram and the Parish Clerk. He then gave the Locality definition of a NDP, how and why the decision was made to carry one out and how the Group was formed.

He said that it is hoped that the final document will be available for public consultation in about 1 year's time.

This meeting had been called to explore landowners' views, enable landowners to ask questions and share concerns ahead of the first public meeting in September. The Group has no views of its own and aims to bring together a picture of the community's vision for the future.

Dr Pellegram gave an overview of the process for the NDP and explained where it will sit in relation to CDC's Local Plan. She said that Neighbourhood Development Plans are a new power given to communities to add local detail to the Local Plan. More information can be found on the Locality website.(<http://locality.org.uk>)

The Design Statement was an important work giving local views and had already identified some areas to be developed in the NDP.

The first public meeting in September would be particularly important and it would be crucial to engage with all parts of the community.

QUESTIONS

Q	Has CDC asked Preston to supply a certain amount of housing ?
A	The Parish has not been given a number as it is outside the development boundary and contrary to CDC policy.
Q	Could the NDP be over-ridden ?
A	Not if written correctly.
Q	Will a NDP be enforceable ?
A	It depends how well it is put together and if it works correctly within higher level Plans but if the process is followed correctly then it will have weight.

Q	If the community is asked for an opinion it will always be the 'same' people and not all will engage.
A	Community consultation is an important part of the process and the Group will have to show details of its engagement strategy. The Plan will follow many stages and there will be many forms of consultation to ensure that as many people as possible, from all age groups, are given the opportunity to be involved. Ultimately, the community will be as large as the community of Preston wants to make it. We acknowledge that we won't achieve a 100% response rate. The Design Statement reached a 43% response by hand delivering and consulting face to face on the doorstep.
C	Timings of future consultation events will be important and week day evenings were suggested.
Q	Has Siddington got a NDP and, if so, wouldn't it be better to work with them ?
A	Both Siddington and South Cerney are working on NDP's. Councillors from the 3 Parishes are in contact.

The meeting closed at 16.35

Appendix 3: Vision Consultation Event



PRESTON PARISH COUNCIL

PRESTON NDP – VISION AND OBJECTIVES

PUBLIC MEETING

Held in the Village Hall on Tuesday, 26 September 2017

1. A meeting of the Preston village community was held in the Village Hall on 26 September 2017 from 19.30 to 21.00. 49 villagers attended including a number of younger members of the community so that the entire community was represented.
2. The meeting was opened by Tony Warren the NDP steering group's Chairman who explained why the NDP was important, why the Parish Council agreed to proceed, and the basic role of the steering group. He stressed that the steering group's intention was to guide the process not determine its direction. All members of the community were encouraged to comment on the NDP's progress and to make comments and let their views be known throughout the process.
3. Andrea Pellegram led the meeting through a SWOT exercise to learn more about the villagers' views about Preston.

Strengths	<ul style="list-style-type: none">• Rural character• Edge of countryside• Compact form allows neighbours to meet and know one another• No streetlights• Separate from Cirencester with own identity• Easy access to Cirencester on foot• Own community identity• People know and recognise each other• Has allotments so that people can grow their own food• Village Hall• Church• Feeling safe• Lovely walks• Small village feels like a hamlet• Community activities and community support• Play area• Dog walking• Places to run• Safe when walking• Parents feel children are safe• Near schools• Broadband• History• Cotswold vernacular design• Village fete• Quiet in some parts of the village• Enough parking for personal cars• Employment/agriculture/small industry• Access to evening activities in Cirencester• Birdsong• Private swimming pool available to villagers• Wildlife• Horses/sheep
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Weaknesses	<ul style="list-style-type: none"> • House prices too high for young people • Traffic in village as motorists rat run through centre to avoid other congested areas • Traffic noise from A419 • Rabbits/squirrels • Access on A419 for pedestrians/cyclists is very dangerous and frightening • Access to A419 is also difficult for motorists • Traffic speeds on A419 and in village too high • No pub/no shop • Lack of good quality cycle/footpaths to schools and town • Access to Cirencester on foot is dangerous or unpleasant in places • Fly tipping in laybys • Poor visibility for walking/cycling on South Cerney route past Tesco and into town • Village is long and two ends of the village don't meet socially • Local bus services not good • Rubbish/flytipping • Dog bins – more required • Poor road surfaces • Gas network – not there! • Broadband still not good enough • Low flying aircraft noise
Opportunities	<ul style="list-style-type: none"> • NDP can help control: <ul style="list-style-type: none"> ○ Future development ○ Design ○ Type of housing ○ Size of housing • Public transport <ul style="list-style-type: none"> ○ Routes ○ Timetables ○ Subsidy ○ Access to Kemble • Retain gap between Cirencester and Preston • If development should occur, direct it to the south of Preston • Cycle infrastructure in Cirencester • Gain a better understanding of where improvements are required for walking/cycling infrastructure • Get rid of overhead power lines

Threats	<ul style="list-style-type: none"> • Infill development between Cirencester and Preston • Traffic growth and congestion • More difficult for pedestrians and cyclists as population rises due to new developments • More people rat running through the village • Children's safety • Light/noise pollution will increase • Overspill parking to cater for Cirencester • Increase in HGV traffic • Chesterton development • Village safety • Shortage of school places • Dr surgery – need more spaces • The small new roundabout will encourage development • Need space between Preston and other developed areas • Difficult to manage change which is increasing in pace • Preston is so small it will be swallowed up • Threat to village character • Cemetery space is running out
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4. Andrea Pellegram then asked the villagers what their Vision for Preston was – what sort of village did they want in 2028?

In 2028, Preston would be a village:
<ul style="list-style-type: none"> • That still felt like a village • That had a pub and enough recreational and meeting opportunities to cater for the needs of all villagers and that had a village hall • Where there were good opportunities for play for all ages and access to the countryside • Where younger families could afford to live • There was safe, convenient and attractive access to Cirencester, nearby shops and the countryside for walkers, cyclists and people with mobility difficulties on a network of footpaths and cycleways • Where the character of the village had been preserved as an attractive historic Cotswold village that did not suffer from light and noise pollution • Where the surrounding countryside had been preserved as mainly rural in character with rural businesses and agriculture and where there was a sense of tranquillity and openness • There were opportunities for small commercial enterprises to thrive, where villagers were able to work from home and where small businesses could start up • Where traffic was controlled and the village was not used as a rat run and villagers were able to drive safely into and out of the village

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5. Andrea Pellegram finally asked villagers which main policy areas they felt the NDP should cover.

- Transport – controlling motorised traffic
- Sustainable transport – network of footpaths and cycle ways
- Design and Heritage – preserving the character of the village as set out in Design in Preston
- Character of the countryside – preserving openness, agriculture, tranquillity
- Village amenity – noise, light, flytipping control
- Social infrastructure – village hall, play and recreation, meeting space, etc.
- Housing – restrict size of new housing to discourage large homes in favour of smaller homes suitable for young families
- Economic – protect small commercial areas

Note: at the time that this meeting was held, it was intended to have the plan period end in 2028. This was subsequently changed to allow a longer period for the PNDP to remain valid.

Appendix 4: Community Survey January 2018 (separate file)

Appendix 5: Business Survey January 2018 (separate file)

Appendix 6: AVM where draft NDP was discussed

PRESTON PARISH COUNCIL
ANNUAL PARISH MEETING
PRESTON NEIGHBOURHOOD
DEVELOPMENT PLAN
Thursday, 5 July 2018
at 7.30 pm in the Village Hall

Your opportunity to comment on the **DRAFT PLAN**.



We have done the research and you have completed our questionnaires. **NOW** it's time for **YOU** to tell us if we have it right **before** we enter the final stages of the process.

Please look at the **Draft Plan** before the meeting. Follow the link on the website www.prestonpc.org.uk or contact the Parish Clerk to find out how to access a hard copy.

For more information: <http://www.prestonpc.org.uk> or phone 01285 380040

	Question	Response / Action Taken
Q1	Mr C Huck – Policy 3 Employment Land Mr Huck referred to the resistance in changing units at Village Farm from commercial / agricultural to residential. He said that whilst he wouldn't wish to do so at the moment he may wish to in the future.	Dr Pellegrin replied that whilst Village Farm is currently designated employment land, it doesn't mean that it can never change, and that planning cannot be inflexible.
Q2	Mr C Huck - Development along Swindon Road Mr Huck stated that he saw development along the Swindon Road as the most likely although Figure 6 showed that it would be resisted in that area.	Dr Pellegrin advised that the area shown in Figure 6 has now been changed and is more precise. It had been difficult to identify areas where development would be resisted and not to be too specific. The NDP doesn't have to allocate sites and refinements are being added where there is a wish to retain views.
Q3	Mr M Dyson When will the process be finished ?	Dr Pellegrin confirmed that it is hoped to complete it by the end of 2018 but will depend on Cotswold District Council timescale for consultation and referendum.
Q4	Mrs C Clarke How will the Plan be used ?	Once the Plan is 'made' these will be used by Planners when considering planning applications.
Q5	Mr I Jones (by email) It is a priority to make turning left from the village onto the A417 safer for cars, and make crossing the A417 safer for cyclists and pedestrians ?	

	Question	Response / Action Taken
Q6	Mr I Jones (by email) Reducing noise from the By-Pass should have more emphasis in the documents. Traffic noise travels down to the village from the North-East and is really bad in the current weather pattern. Being a major trunk road, it continues all night.	
Q7	Mrs C Sutton (via Mr Warren) Could the area where development would be resisted be changed to include The Old Farm ?	
Q8	Mrs A Swain Will the Group be meeting with the same Officers at CDC or will it always be different people ?	Likely to be the same Officers
Q9	Tony Warren - Last Point in Policy 4 Connection to PF6 needs clarification.	
Q10	Tony Warren - Inclusion of Hunters Care Home in some of the data Gives a false impression. Can it be amended or clarified to give a more accurate picture?	

PRESTON PARISH COUNCIL

LOCAL GOVERNMENT ACT 1972

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7. **Comments from the public**
8. **Any Other Business**

**Cllr Mrs J Tomblin
Chairman**

2 MAY 2017

Appendix 7: Regulation 14 Consultation Survey

PRESTON PARISH COUNCIL

UPDATE 31

MARCH 2020

PRESTON NDP

YOU MUST

have your say on Planning Policy for Preston NOW

THE STEERING GROUP has been working hard on your behalf to produce the **DRAFT NDP** but **NOW your help is needed** as the final stages of the process are approached.

You are being asked to complete the very short online survey of **ONLY 9 questions** but to do this you need to know something about the Policies arrived at. To make it easier, this leaflet contains details of those Policies and should help you to complete the questionnaire. If you wish to know how the Policies were arrived at, please see the full document on the Village website.

Completing this questionnaire is as important as the original meetings in the Village Hall.

PLEASE FILL IT IN NOW !!

VISION FOR PRESTON TO 2031

Preston Village will retain its Cotswold character within its rural setting, preserving the surrounding countryside and wildlife, whilst maintaining safe, convenient and good quality footpaths and cycleways into Cirencester.

There will be good provision of public and sustainable transport to meet the needs of all residents of the parish.



Preston will continue its strong sense of community with a thriving village hall, and a range of recreational facilities for all ages.

The established small rural and agricultural businesses will be retained and the opportunity for small commercial enterprises will continue.

Any residential development in the parish will have had minimal impact on the area's distinctive character and environment and

Note: the Steering Group subsequently decided to extend the PDNP period to 2036.

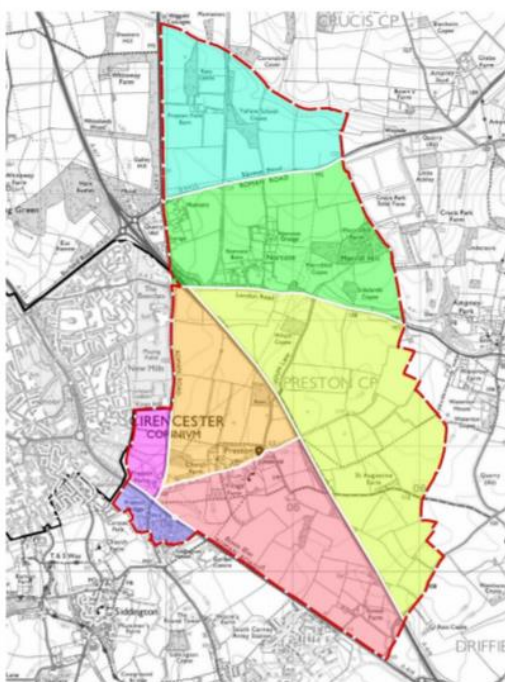
VISION FOR PRESTON TO 2031

Continued

will accommodate everybody.

There will be a reduction in traffic noise and the traffic speed and volume will be controlled through the village.

Light pollution will not be increased, and the tranquil character of the village and surrounding countryside will have been preserved.



Preston Landscape Areas

POLICY 1 : PRESTON COUNTRYSIDE AND LANDSCAPE

- A. Planning applications in Preston parish should address the issues and recommendations set out in the Landscape Assessment for Preston Neighbourhood Plan (November 2019) (LCA) and should respect and preserve the local landscape quality of Preston Parish.
- B. The Areas marked 2 – 5 on Figure 6 and described in Table 1 of the NDP are designated as the “Preston Special Local Landscape Area”. This designation identified the area of special local landscape value that should be afforded protection from development that erodes its identified quality.
- C. Development within the Preston Special Local Landscape Area will be permitted provided it does not have a significant detrimental impact upon the special character and key landscape qualities of the area including its tranquillity.
- D. The open landscape character of the “green wedge” to the north east of the A419/Ermine Way in Preston, and its positive contribution to the setting of Cirencester, should be retained.
- E. Within the Preston Special Local Landscape Area, new development should, where appropriate, enable the following:

POLICY 1 : PRESTON COUNTRYSIDE AND LANDSCAPE. Continued

- i. Replanting of non-native tree plantations with native broadleaved native species as part of the woodland succession planting;
- ii. Avoidance of extensive new woodland planting including new dense linear shelterbelts, particularly in character areas 4a, 4b & 5, which would enclose the character of the landscape at points where it is currently open;
- iii. Managing existing shelterbelts to include selective thinning to retain native specimens and open up views below their canopies; maintain dry-stone wall boundaries and restore any in disrepair;
- iv. Restoring historic hedgerow lines;
- v. Maintaining the existing network of open ditches and streams to ensure continuity of irrigation to fields and surface water management to grass and agricultural fields;
- vi. Protecting open views between buildings of Preston's agricultural setting when viewed from the village main street (Witpit Lane);
- vii. Establishing a pedestrian link using the route of the old railway line to create a public footpath which connects the whole of the parish on a north/south axis;
- viii. Ensuring that any proposed development (including sustainable energy generation) does not encroach on key views across the parish as described in the LCA;
- ix. Resolving footpath links across the dual carriageway to improve connectivity across the parish.

POLICY 2 : DESIGN

- A. Proposals for new development, including extensions to existing building, and conversions of old farm buildings, should be of the highest design standards in accordance with the relevant policies of the Cotswold Local Plan and the Cotswold Design Code.
- B. Proposals should have specific regard to the key local features and development guidelines described in Design for Preston Design Statement (2016).
- C. Publicly accessible green spaces (such as formal spaces around community infrastructure and incidental spaces such as grass verges) within the village built-up areas should be retained if possible.
- D. Proposals should use locally characteristic building materials, for example Cotswold stone and reconstituted Cotswold stone for walling, roofing and timber for windows and doors, where appropriate.
- E. Properties should have high quality boundary features, such as hedges and Cotswold stone walls, particularly where these are visible from public vantage points.

POLICY 3 : LOCAL GREEN SPACES

A. Local Green Spaces are designated at the Preston Playing Fields and the Preston Allotments as shown on Figure 8.

**POLICY 5 : FOOTPATHS AND CYCLEWAYS**

A. Support will be given to proposals that improve the network of cycle ways, footways and footpaths in the parish.

B. Developer or CIL contributions will be sought from new developments to fund improvements to the existing networks as well as the provision of new connections, in particular where there have been identified in the Sustainable Transport evidence paper. This includes:

- i. A new foot and cycle path between Kingshill Schools and the village/other residential development;
- ii. Improvement to the crossing point on the South Cerney Road;
- iii. Slowing of traffic on the A419 and provision of a pedestrian crossing;
- iv. A footbridge over the A417 connecting the Harnhill Road;
- v. Continuation of the village footpath around the corner into Witpit Lane to connect with PF6;
- vi. Establishing a pedestrian link using the route of the old railway line to create a public footpath which connects the whole of the parish on a north-south axis.

POLICY 4 : EMPLOYMENT LAND

A. Proposals to change a B class use to another employment generating use, such as commercial or agricultural uses, will be supported where it is in accordance with the safeguards in Local Plan EC2 unless there is no reasonable chance of B class use.

B. Proposals to change existing B class use to non-B class uses in the Village Farm employment area will be supported when:

1. The proposal is not for the change of use to individual units in the Village Farm employment area to non-B class uses, and;
2. The proposal is for the simultaneous change of use to all B class uses in the Village Farm employment area; and
3. Compelling evidence can be provided that the overall estate is no longer commercially viable. Such evidence should demonstrate that Village Farm has been recently actively and appropriately marketed for at least 12 months, or that the property is in such poor condition that it is no longer viable for class B uses.

POLICY 6 : COMMUNITY INFRASTRUCTURE

A.Support will be given to proposals that improve the provision of community infrastructure, whether as new provision or improvements to existing provision, in the parish.

B.Loss of existing community infrastructure described in the Community Infrastructure Evidence Paper will be resisted unless it can be clearly demonstrated that the asset is no longer financially viable or considered necessary or of value to the community or a sustainable replacement can be provided elsewhere. Any replacement provision should meet or exceed the existing benefit to the community of the current facility especially with regard to safety and accessibility.

C.Where a Design and Access Statement is required as part of a planning application, consideration should be given to:

1. How the development might give rise to increased demand for community infrastructure;
2. Options how the increased demand should be met;
3. Evidence that the community or Parish Council were consulted on the options and their views considered;
4. Provision of appropriate additional community infrastructure or support, as evidenced

POLICY 7 : TRANSPORT AND VILLAGE AMENITY

A.Where appropriate, development proposals that are likely to lead to an increase in traffic in the parish, particularly at the Toll Bar junction, on Kingshill Lane and on the village high street, will be encouraged to manage impacts to maintain the 2018 baseline with regard to:

1. Traffic speeds;
2. Noise and vibration;
3. Conflict with the other road users and feelings of safety.

THANK YOU FOR TAKING THE TIME TO READ THIS AND COMPLETE THE QUESTIONNAIRE.

The full **DRAFT NDP** can be viewed online at www.prestonpc.org.uk or in hard copy in the Village Hall, the Church porch or by contacting Tony Warren (656105) or Julie Tomblin (641111).

Hard copies of the questionnaire can be obtained from Tony or Julie and should be returned to them after completion.

Once the results have been collated, there will be a report in the Village Newsletter and on the Village website. All comments will either be addressed or incorporated into the final document before it is submitted to Cotswold District Council.

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www.prestonpc.org.uk

Appendix 8: Responses to community survey on Reg. 14 Draft of Preston NDP

Resp onde nt ID	Coll ecto r ID	Start Date	End Date	IP Addres s	Em ail Ad dres s	Fir st Na me	La st Na me	Cus tom er Data	Th e Vis ion		Poli cy 1 :		Poli cy 2 :		Poli cy 3 :		Poli cy 4 :		Poli cy 5 :		Poli cy 6 :		Poli cy 7: :		OTHER
1.15E +10	2.54 E+0 8	2020-04- 17 10:40:56	2020-04- 17 10:50:34	23.46.2 10.87					Ag re e		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		
1.15E +10	2.54 E+0 8	2020-04- 16 22:47:59	2020-04- 16 22:48:34	172.23 2.11.21					Ag re e		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		
1.15E +10	2.58 E+0 8	2020-04- 14 11:58:23	2020-04- 14 12:02:18	81.187. 202.13 2					Ag re e			Farmi ng needs have to be taken into accou nt.	Ag r ee		Ag r ee		Ag r ee		Thou gh the owne r would also have to agree .	Ag r ee	Exce pt for the old railw ay line. Too man y road s to cros s.	Ag r ee	At the mome nt the Counci l and the Police undere stimate this proble m.	Ag r ee	
1.15E +10	2.54 E+0 8	2020-04- 06 19:55:34	2020-04- 06 20:01:35	2.17.20 9.129					Ag re e		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		
1.15E +10	2.54 E+0 8	2020-04- 06 18:09:22	2020-04- 06 18:13:31	92.123. 66.124					Ag re e		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		
1.15E +10	2.54 E+0 8	2020-04- 04 21:17:20	2020-04- 04 21:18:10	92.123. 66.124					Ag re e		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		
1.15E +10	2.54 E+0 8	2020-04- 03 12:46:18	2020-04- 03 12:47:40	23.15.2 41.61					Ag re e		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		
1.15E +10	2.54 E+0 8	2020-04- 02 20:27:59	2020-04- 02 20:28:18	172.23 2.10.77					Ag re e		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		
1.15E +10	2.54 E+0 8	2020-04- 02 20:23:51	2020-04- 02 20:24:52	184.51. 206.78					Ag re e		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		Ag r ee		

1.15E +10	2.54 E+0 8	2020-03- 27 11:34:35	2020-03- 27 11:36:16	184.51. 206.20 4					Ag re e		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		
1.15E +10	2.54 E+0 8	2020-03- 27 10:36:41	2020-03- 27 10:37:41	104.98. 116.16 4					Ag re e		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		
1.14E +10	2.54 E+0 8	2020-03- 21 17:38:10	2020-03- 21 17:45:52	92.122. 206.48					Ag re e		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		
1.14E +10	2.54 E+0 8	2020-03- 18 17:14:09	2020-03- 18 17:15:37	23.52.0 .39						mo stl y agr ee	Agr ee		Agr ee		Agr ee		Agr ee		Agr ee	agre e exce pt form er railw ay line foot path	Agr ee		Agr ee		
1.14E +10	2.54 E+0 8	2020-03- 16 21:38:07	2020-03- 16 21:39:34	23.212. 3.108					Ag re e		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		Agr ee		A very good and well though t out plan

1.14E+10	2.54E+08	2020-03-15 20:58:00	2020-03-15 21:02:23	92.123.66.124							Mostly agree but v.should say "Maintain AND RESTORE WHERE NECESSARY the existing network..... and (vii) north/south axis	Agree		Agree		Agree		Agree		Agree		Agree		Agree		None
1.14E+10	2.54E+08	2020-03-15 19:25:40	2020-03-15 19:27:57	23.54.147.95					Agree		Agree	Agree		Agree		Agree		Agree		Agree		Agree		Agree		None
1.14E+10	2.54E+08	2020-03-15 19:21:31	2020-03-15 19:22:33	23.45.12.22					Agree		Agree	Agree		Agree		Agree		Agree		Agree		Agree		Agree		No
1.14E+10	2.54E+08	2020-03-15 19:02:49	2020-03-15 19:06:25	23.45.12.45					Agree		Agree	Agree		Agree		Agree		Agree		Agree		Agree		Agree		None
1.14E+10	2.54E+08	2020-03-09 18:32:11	2020-03-09 18:38:31	184.50.26.196					Agree		Agree	Agree		Agree		Agree		Agree		Agree		Agree		Agree		

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												you can put in your house or what flower s you can plant where in your garde n? Of cours e not. It is blatan tly obvio us that long term devel opme nt will be up the old Swind on Road, mayb e instea d of trying to block such progr ess, it might						e if this is due to the fact that all farm units could be conve rted to house s with the relev ant permi ssions . Do I tell you what to do with your busin esses ? No, so in effect dont try and dictat e to me re my busin ess. Utter disgra ce.							
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Appendix 9: Results of Regulation 14 Consultation (letters)

TABLE 1: BACKGROUND TO CONSULTEES

Consultee name	Background to the consultee
Natural England, 6 April 2020	No comment
Environment Agency, 1 April 2020	No comment
Impact Planning Services Ltd, 2 April 2020	On behalf of the landowners, James Gegg, Roger Gegg, Robert Gegg and Emily Robertson, Impact Planning Services Ltd (the 'agent'), is instructed to submit representations in respect of the Preston Neighbourhood Plan Consultation (the 'consultation'), supporting proposals at Land adjacent to the A419, Preston, Cirencester (the 'site'). This representation is made to support the development of the site at Preston for the accommodation of a low-density residential development specifically for the needs of active older person's over 55 years of age.
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	Robert Hitchins Ltd have land interests within the south of the Neighbourhood Plan Area. (WEST OF KINGSHILL LANE , SOUTH OF PRESTON)
Cotswold District Council, no date	The Local Planning Authority

TABLE 2: VISION FOR PRESTON

Consultee name	Consultee comment
Natural England, 6 April 2020	No comment
Environment Agency, 1 April 2020	No comment
Impact Planning Services Ltd, 2 April 2020	No comment
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	No comment
Cotswold District Council, no date	No comment

TABLE 3: POLICY 1 – PRESTON COUNTRYSIDE AND LANDSCAPE

Consultee name	Consultee comment	NDP response
Natural England, 6 April 2020	No comment	
Environment Agency, 1 April 2020	No comment	
Impact Planning Services Ltd, 2 April 2020	<p>Whilst the plan notes the desire to retain the identity of the village and rural context of the surrounding fields and landscape, the plan does not identify opportunities for small scale development to support the existing community, within the constraints and opportunities identified, or the types of development which may be suited to support the community.</p> <p>The draft plan is accompanied by a supporting landscape and character analysis. These should be tools used to develop a strategy moving forward and not a defence mechanism to promote a restriction on any further development. For example, Policy 1 Preston Countryside and Landscape, does not identify opportunities within the landscape analysis. The policy only identifies constraints and areas of protection / preservation.</p>	<p>No, because to identify development opportunities would require the NDP to contradict strategic Local Plan policies DS2-4. In addition, the NDP sets out clear policies that can shape development schemes as they are prepared.</p> <p>This statement misunderstands the purpose of the Character Assessment which describes the existing character and seeks mechanisms to preserve this. It does not identify opportunities because this is for applicants to do, and the NDP does not allocate sites because the parish is outside the development boundary.</p>
Pegasus letter on behalf of Robert Hitchins	2.11 It is necessary to consider whether the designation of the Preston Special Local Landscape Area is in general conformity with the Cotswold Local Plan.	See responses below.....
	2.16 It is noted from the Policies Map for the CLP that land within Preston falls outside the Settlement Boundary for Cirencester. Land to the north of the B4425 is within the national designation of the Cotswold Area of Outstanding Natural Beauty. The remainder of the Parish has no other landscape designation identified in the CLP.	<p>Agree. Local Plan policies DS1, DS2 and DS3 indicate that in Preston, only small scale residential development is supported. Part of the Parish is in the AONB and there is no other landscape designation.</p> <p>The NDP policy is enshrines the residents' aspirations to preserve the landscape setting because no other landscape designation exists within the CLP. To do this, it defines the local landscape character and sets out considerations for planning decisions.</p>

	<p>2.18 The preparation of the Cotswold Local Plan afforded the Council the opportunity to reconsider the designation of areas of 'Local' landscape value and also afforded the opportunity for consideration of whether currently non-designated open countryside should be included within any extended or new areas of 'Local' Landscape Value.</p>	<p>The CDC "Local" designations are not fine grained and cover a very large area (far beyond Preston Parish boundaries). Neighbourhood plans may contain non-strategic policies (NPPF18) and may establish design principles and conserving and enhancing the natural environment (NPPF 28).</p> <p>If the Local Plan consideration of 'local' landscape value did not take into account the value of openness and picturesque views of a medieval village in its historic farmland setting, the NDP policy can provide this. Neighbourhood plans add detail to Local Plan policies and this is what has been done in this instance in accordance with the provisions of the NPPF.</p>
	<p>The PNP has sought to justify the inclusion of the Preston Special Local Landscape Area on the basis that the CLP designates areas of Local Landscape Value. The landscape evidence prepared to support the PNP, the Portus and Whitton Assessment, (PWA) considers that Preston Parish has a landscape comparable with the nearest CLP local landscape designation - 'North Cirencester Special Landscape Area'.</p>	<p>This may be a misunderstanding of the wording of the NDP text and policy. The "value" (i.e. what local people perceive and cherish) is comparable between the North Cirencester Special Landscape Area' and the area of land not designated in the Local Plan.</p> <p>The Locality Toolkit on "Neighbourhood Planning for the Environment" specifically mentions value and how this should be interpreted in the development of NDPs and also discusses how NDPs can address landscape and views. The P&W report is fully compliant with this Locality advice.</p> <p>Local Plan Policy EN6 (10.6.1) Special Landscape Areas (SLAs) says. 'The purpose of SLA designation is to protect locally significant and valued landscapes that have particular intrinsic qualities or character'.</p> <p>As seen by the residents, the Preston landscape does have a "value" linked to its role in keeping separate Preston village and Cirencester and as a historic village in its rural setting. Therefore it is the value that is attached to the landscape that is comparable, not the landscape</p>

		character itself which remains similar. On that basis, the wording of 'comparable' will be retained since this is an accurate representation of local opinions.
	2.21 Given the CLP failed to identify that any land within Preston Parish merited a local landscape designation it is considered that the PNP is not in general conformity with the CLP in proposing a Parish-wide landscape designation that takes its reference from Special Landscape Area status.	<p>The CDC plan considered the landscape widely across the District. A neighbourhood plan considers local character. The Preston NDP has fully described the local character in the Landscape Character Assessment. NPPF (28) has already been referred to, as has the advice from Locality.</p> <p>NPPF 20d considers landscape to be a strategic policy. However, NPPF 141 sets out that planning authorities should positively retain and enhance landscapes. The underpinning of this are set out in the Cotswold District Special Landscape Area Review: Landscape context and physical changes (May 2017). This concluded that the 2014 designations did not need to be amended in Cirencester.</p> <p>In the 2014 "Study of land surrounding Key Settlements in Cotswold District Update", Preston was describes to have a "distinct and separate identity"(para 10.13). Para. 10.29 – 10.43 describes Preston's landscape character. Para. 10.48 states that Preston village is separate from Cirencester and development there is not suitable.</p> <p>Therefore, the LPA's evidence concludes that the landscape in Preston Parish maintains the separate identity of Cirencester and that the village and the Town developments should be kept separate.</p> <p>The Character Assessment works within this framework to define what is locally significant in a fair manner so that these important landscape features can be understood in more local detail.</p>

<p>MHP Chartered Landscape Architects</p>	<p>The conclusion that the whole of the Parish outside of the AONB would benefit from a policy that would afford an equivalent status and enforceability to that of a Special Landscape Area fails to recognise that the qualities of the landscape of the North Cirencester SLA are quite distinctive and unique to its location and that the landscape in that location forms a seamless transition of the AONB that surrounds it on three sides.</p>	<p>P&W have phrased it as equivalent importance (page 15)..... <i>‘The landscape of Preston parish is of a comparable quality and character to that of the North Cirencester SLA and it forms another important transition zone with the adjacent Cotswold AONB. Whilst the parish does not hold a recognised designation, because of its equivalent importance, it should be protected in a similar manner’.</i></p> <p>However, whilst there is an identified degree of uniformity in the landscape features, i.e. its constituent parts, that Preston parish embraces different character types is recognised both in regional classifications and within the NDP’s LCA.</p> <p>Notwithstanding this, Sub Area 1 and Sub area 2 are of a common landscape character as illustrated in the landscape character of sub- area 1 shown in Figure 15 view east from A429 and Figure 16, view north from B4425 compared to the landscape character of sub- area 2 shown in Figure 18 view south from B4425.</p> <p>Sub-areas 3,4 and 5 are characterised by their openness and visibility. Therefore, while the above sub-areas are different in character, they are all of value, sensitive and vulnerable to harm. While there are some parallels between the North Cirencester SLA and the proposed Preston Special Local Landscape Area (adjacent to the AONB, commercial development, pylons, etc..) , it is this vulnerability to change that makes them of comparable value and which makes Preston worthy of equivalent policy protection.</p> <p>To consider the SLA report in particular, The second bullet point of Para. 7.11. in the last review in 2017 is particularly relevant.....</p>
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		<p><i>The qualities of the area as defined in the SLA report are still relevant. In addition the following apply:.....The simple, relatively unenclosed valley bottom which, with the valley sides, create a clear and unspoilt rural green corridor between Cirencester and Stratton.</i></p> <p>If one of the purposes of the protected landscape is to keep Cirencester and Stratton separate, this is to avoid coalescence as with Cirencester and Preston. Also, if the adopted assessment has uses the word ‘unspoilt’, then it must be accepted that if it were developed, it would be spoilt.</p> <p>Finally, the 2017 document which was a review did not highlight any necessary changes to Preston’s landscape significance from the 2014 conclusions.</p> <p>It should be noted that the 2014 report (and thus the 2017 update) considered specific planning proposals, none of which were near Preston. Preston was therefore not given significant consideration in the analysis.</p>
	The landscape of the Preston Parish has value, but it is not all of the same value.	Agree, that is why there are different character areas.
	The northern most area represented by sub area 1 has the greatest landscape and scenic beauty recognised by its inclusion within the Cotswolds AONB designation.	<p>This is not correct.</p> <p>The landscape value of each sub-area is not prioritised. For instance, open landscape that allows views of an historic village set within farmland (Preston), or of a medieval church tower (Cirencester) are of equal scenic beauty to the more enclosed AONB landscapes. They are different but each have their own value.</p>
	Areas south of sub area 1 also reflect some of these qualities but not to the same extent.	This is not correct. They have some qualities of the AONB and SLA but they have other values not related to these designations. Again, their value is not prioritised.
	Areas immediately around Preston which contribute to its immediate setting similarly have a high sensitivity but	We can agree that the ‘areas immediately around Preston which contribute to its immediate

	there is no evidence base to justify all of the landscape of the parish having the same high value equivalent to that of the North Cirencester SLA.	setting.....have a high sensitivity'. Its sensitivity and high equivalent value derives from the openness of its landscape, allowing it to be seen as a picturesque village settlement in its farmland setting, close to but visibly distinct from Cirencester.
	The PWA assessment acknowledges the varied features within this transitional landscape including significant potential detractors.	Detracting features are already referenced A417/A419, pylons etc.
	The assessment then fails to translate changes in the landscape and its condition to variations in landscape and visual sensitivity. Instead, the assessment simply concludes that the Preston Parish is of high landscape quality throughout.	This is not true. The assessment details the range of landscape and visual sensitivities but does not prioritise. That each of the sub-areas 2,3,4 & 5 are assessed and for differing reasons, each is assessed to be of high landscape quality does not negate the fact that all are worthy of policy protection. Their contribution to the landscape character is as a whole and greater than the sum of their individual parts.
	Previous study undertaken by Cotswold District Council did not identify the landscape to have sufficient merits to justify designation and evidence provided in the PWA is not sufficiently robust to change this	Correct, but that was done for a Local Plan, and this is a neighbourhood plan which uses more local detail and describes more local character. In addition, the fact that the parish lies outside the Development Boundary is a designation and measure of protection in itself. The LCA details the landscape character and visual sensitivity of the landscape. Sub area 2 is shown to be comparable to sub area 1 which is AONB status. Areas 3,4 and 5 are shown to be open landscapes with a high degree of sensitivity to the setting of Preston village. The justification for designating this landscape derives from this assessment and is underpinned by the public consultation process that took place. In addition, the Local Plan landscape review discussed above focused mainly on the impact of strategic development proposals and did not consider Preston in much detail.

	Existing national and local policies which seeks to protect intrinsic character and beauty of the countryside and the landscape and scenic beauty of the Cotswolds AONB remain sufficient to protect the areas of higher landscape sensitivity within the parish.	<p>This is incorrect.. The AONB and SLA character, plus the countryside designation (outside the development boundary) do NOT afford sufficient protection as evidenced by changes that the LCA notes over time and a steady degradation of the character surrounding Preston Village and Cirencester Town.</p> <p>This is demonstrated by the now completed housing at Kingshill, which notwithstanding prevailing national policy was consented on previously undesignated land. This highly visible development enlarged the urban boundary of Cirencester and by the same process, diminished the boundaries of Preston Parish boundary.</p>
Cotswold District Council	<p>On review of the Portus and Whitton report, we would contend that the landscape of the Parish is not proven to be "of comparable quality and character to the North Cirencester SLA" (p. 15 of the P and W report), although the character is similar. The Cotswold District SLAs were designated following an overall assessment of the whole non-AONB parts of the District, including the area around Preston, establishing which areas were considered to be most appropriately designated as SLA. There is no evidence in this report to show that they have undertaken a District-wide assessment to validate their assertion that Preston is "of comparable quality". No evidence was given at the Local Plan EiP to suggest that the District SLAs were not correctly designated or that their boundaries needed to be reassessed (a review of the SLAs was undertaken as part of the preparation of the evidence base for the most recent Local Plan). Please see comments on the November version of the NDP (p.2).</p>	<p>A District-wide assessment to validate the assertion that Preston is "of comparable quality" is not required. As stated before, as seen by the residents, the Preston landscape does have a 'particular intrinsic quality' and 'value' in that the openness of its landscape cannot be disassociated from its role of separating Preston village and Cirencester</p> <p>So while we agree that the landscape character is similar but it is the value of its open character that's comparable. The wording of the supporting text will be modified to make this clearer.</p> <p>In addition, as explained above, the NPPF and Locality advice, allow NDPs to assess local character and to prepare policies accordingly. Great care has been taken to ensure that the proposed NDP policies meet the letter of the Local Plan policies.</p>
	pp.15-16, para 49, The description suggests that additional policies are required to protect the landscape,	This policy relates to ALL development, not only open market housing which as CDC says, is already prevented

	<p>yet references the policies DS3 and DS4 which already prevent open market housing in the countryside. Because the Local Plans 'DS' policies limit the scope for development outside principal settlements, the policy may not be impactful. We believe there is a risk that the examiner will determine that this policy is strategic rather than local, and thus outside of the scope of the NDP. Furthermore, we note that as a Neighbourhood Plan policy, it will not act as a barrier to strategic growth required in the district(e.g. it is not green belt) but would form part of the evidence base and list of constraints that the Council would consider as part of the plan making / site allocation process..</p>	<p>by DS3 and DS4. The reason that the community wished to have this policy included is that even with DS3 and DS4, there has been a perceived steady deterioration of the local landscape and village character. Therefore, this policy is local, not strategic, and fully within the scope of the NDP. Agreed, it would form part of the evidence base and list of constraints that the Council would consider as part of the decision and plan making process.</p>
	<p>para 49. Following the point raised on para. 42 above, we have some concern over the statement that "Preston Parish is of an intrinsically high landscape quality" - the parish is not wholly included within the AONB nor within any of the district-designated Special Landscape Areas. However, we recognise that residents value the landscape, and that it has been subject to the review by Portus and Whitton. We'd suggest this statement could be qualified, e.g. Residents value the high quality landscape described in the Portus and Whitton report.</p>	<p>The residents of Preston Parish value the landscape as being of an intrinsically high quality. No changes proposed.</p>
	<p>Policy 1, Clause B The use of the phrase "special local landscape area" within the context of Preston may cause confusion, given this is very similar to the District-wide designation title - Special Landscape Area for second tier landscapes, although we appreciate the change from SLA, and it could be argued that using a similar name but with "local" added might give consistency to the system. We are concerned that by making the whole Parish either AONB or SLLA that it does not show any hierarchy in landscape quality across the NDP area and could</p>	<p>We do not agree that there is no hierarchy of landscape quality: AONB is national, SLA is District-wide, and SLLA relates specifically to Preston. Within Preston however, the areas are not prioritised, but expected to be considered in planning decisions on their individual merits. The policy does not "preclude" development but seeks to have landscape value respected and preserved and protected from development that erodes its identified quality. This is a</p>

	<p>undermine its purpose by being a blanket policy. The clause covers the whole of the parish other than the AONB and precludes all development that "erodes its identified qualities". It would be helpful to the Development Management process if these qualities are clearly listed.</p>	<p>test that can be applied in planning decisions and will assist with Local Plan policies DS2,3 and 4.</p> <p>Local Plan policy EN1 states that new development will promote the protection conservation and enhancement of the historic and natural environment. NDP Policy 1 sets out the local characteristics to be considered in Policy EN1. Local Plan policy EN2 states that proposals should respect the character and distinctive appearance of the locality. Again, NDP Policy 1 sets out the local considerations for this Local Plan policy.</p> <p>Sub area 2 states that 'due to the level of enclosure and topography, the area to the north of the A417 London Road may have some potential capacity to absorb a limited amount of new residential development in association with the prevailing agricultural use.</p> <p>Sub areas identify a range of landscape qualities but to prioritise them would not assist in assessing their value – all are worthy of policy protection.</p>
	<p>Rather than using a new designation of SLLA the policy could just say that any new development should respect the landscape character and quality of the each landscape area as described in the P&W report. This would ensure that it was not a prohibitive policy but more a positive design policy. This approach would be in line with our comments on the previous version of the NDP - and might be more robust at examination, and avoid confusion with other landscapes designations.</p>	<p>We feel that a stronger policy than one that "respects" the landscape is required. As an example, a new warehouse could "respect" the landscape by being painted green but this would only be mitigation against harm caused. We feel that it is not a prohibitive policy but a design policy that seeks to protect identified valued landscape features which adds value to Local Plan policy EN4. No changes proposed.</p>
	<p>p.23 Policy 1, Clause D We'd suggest it's a little unclear exactly what area is being referred to as the 'green wedge' - it would be useful to show this on a plan, which we can assist with, if requested.</p>	<p>A map showing the key view (the green wedge) has been added to recognise this comment.</p>

	Policy 1 E. As a minor point, we wonder whether 'promote' or 'include' might be an alternative to 'enable'. 'Enable' could be interpreted as the developer facilitating or not obstructing a third party in the delivery of the policies aspirations, whereas we would understand the intention to be that the developer should themselves deliver, where appropriate	Agreed to change "enable" to "promote"
	E(ii) Please note that in the light of the declaration of a Climate change crisis, we may be looking for larger areas of tree planting and woodland to address carbon sequestration in the future,	It may be appropriate to plant more trees across the District, but this is not necessarily appropriate in Preston Parish. Individual proposals will need to be tested on their merits. Large scale tree planting is not current policy and is not a characteristic of the Preston Landscape. The science of carbon sequestration by planting trees has also recently been challenged by international bodies.
	E(iii) We believe this should read 'thinning' and not 'thinking'.	changes made.

TABLE 4: POLICY 2 – DESIGN

Consultee name	Consultee comment	NDP response
Natural England, 6 April 2020	No comment	
Environment Agency, 1 April 2020	No comment	
Impact Planning Services Ltd, 2 April 2020	No comment	
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	No comment	
Cotswold District Council, no date	<p>p.25, Map The title suggests the map shows the Conservation area, listed buildings and the AONB, however, the map itself only shows the listed buildings and conservation area. Further, we feel the maps could be a little clearer, and would be happy to use our GIS capabilities to assist with this.</p>	changes made
	<p>p.28 Policy 2. Design Clause A We welcome the intent of this clause, but note that the Cotswold Design Code forms part of the local plan and is an integral part of the policies so it would be better to say "in conjunction with local plan policies, including the Cotswold Design Code."</p>	changes made

Clause C To aid decision makers a map should be included to show these areas; as above, we have some capabilities to assist with this.

"Publicly accessible green spaces" is considered to be a term that is easily understood. When a planning application comes forward, and it contains land that is publicly accessible green space such as a grass verge, it is clear that the decision-maker should ensure that this land is considered as part of the proposal and that it should be retained if possible.

TABLE 5: POLICY 3 – LOCAL GREEN SPACES

Consultee name	Consultee comment	NDP response
Natural England, 6 April 2020	No comment	
Environment Agency, 1 April 2020	No comment	
Impact Planning Services Ltd, 2 April 2020	No comment	
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	No comment	
Cotswold District Council, no date	p.29 Policy 3. LGS We welcome the inclusion of Local Green Spaces, and no comment on the areas or the policy wording. We have developed a toolkit to assist with the development of a robust evidence base for Local Green Spaces, should there be any challenge or proposals for more extensive designations	Noted with thanks.

TABLE 6: POLICY 4 – EMPLOYMENT LAND

Consultee name	Consultee comment	NDP response
Natural England, 6 April 2020	No comment	
Environment Agency, 1 April 2020	No comment	
Impact Planning Services Ltd, 2 April 2020	No comment	
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	No comments	
Cotswold District Council, no date	<p>p.35, Policy 4 The supporting text in paragraph 62 refers to permitted development rights and how such rights 'would compromise the integrity of the employment area as a whole. Therefore, the loss of individual units will be resisted.' It appears that the parish council is seeking to prevent changes which are currently covered by permitted development rights. This cannot be done through NDP policy, so we have significant concerns about whether this policy will meet the Basic Conditions.</p>	Suggested changes will be made.

However, there are precedent for some conditionality in planning policy - such as this from North Devon; 'If the requirement for affordable housing thresholds is removed from national planning policy or guidance then clauses (1)(a) and (1)(b) above will no longer have effect' (North Devon and Torridge Local Plan 2011-2031). Arguably a similar device could be added to this policy 'Where relevant permitted development rights do not apply or are removed from national planning policy', although we're not aware of a precedent in a neighbourhood plan.

It would make sense if the policy was split into two elements – one specifically relating to employment units located outside the EES and one relating to the EES.

Part A could read:

A. Class B Employment Units located outside Village Farm employment site

Proposals to change the use of existing units falling within Class B of the Town and Country Planning (Use Classes) Order 1987 (as amended) will be supported where:

a. The economic or environmental benefits of the proposed change of use outweigh the loss of the employment use; or b. Detailed evidence is provided to demonstrate that the unit(s) can no longer practicably or viably be used for Class B employment purposes. The evidence should demonstrate that unit has been actively and recently marketed for a period of at least 12 months.

5

Part B could read:

B. Class B Employment Units located inside Village Farm employment site

Proposals to change the use of existing units falling within Class B of the Town and Country Planning (Use Classes) Order 1987 (as amended) will be supported where:

a. The proposal is for the simultaneous change of use of all Class B units on the site; and b. Detailed evidence is provided to demonstrate that the overall estate can no longer practicably or viably be used for Class B employment purposes. The evidence should demonstrate that Village Farm employment site has been actively and recently marketed for a period of at least 12 months.

TABLE 7: POLICY 5 – FOOTPATHS AND CYCLEWAYS

Consultee name	Consultee comment	NDP response
Natural England, 6 April 2020	No comment	
Environment Agency, 1 April 2020	No comment	
Impact Planning Services Ltd, 2 April 2020	No comment	
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	<p>4.2 Attention is drawn to the fact that CIL is not a contribution it is a levy payable on development to be put towards the provision of community infrastructure. Once the PNP is 'made' the Parish will receive a proportion of any CIL contributions paid with regard to development within the Neighbourhood Area. It is suggested that reference to CIL is removed from the wording of Policy 5.</p> <p>4.6 It will therefore be necessary for Cotswold Council to determine the merits of those schemes identified in Policy 5 as part of any negotiated S.106 Legal Agreement in terms of the legal tests for planning obligations.</p> <p>Policy 5, Clause B There is an approved CIL in operation in Cotswold District, thus CIL will be collected from qualifying developments, and distributed as per the adopted process. It is not open to NDP policy to determine when this will be collected</p>	<p>The wording of the policy makes clear that developer contributions (S106) and CIL receipts will be sought towards the improvements. When the NDP is made, the Parish Council will receive 25% of the receipts. The NDP is not the Parish Council and the CIL contribution will be sought from the Parish Council. No changes proposed.</p> <p>Agreed.</p>
Cotswold District Council, no date		

or to or indeed to direct how this will be invested.
The words 'or CIL contributions' should therefore be deleted from this policy.

However, we would suggest that the supporting text of the neighbourhood plan is absolutely an appropriate place to flag the community's priorities for the expenditure of its share of CIL - this could be given real prominence, but would need to be distinguishable from policy, e.g.

'An initial list of infrastructure improvements or projects, are included below to guide/progress the use of the Preston Neighbourhood Portion of CIL within the Neighbourhood Area, in particular those improvements identified in the Sustainable transport evidence paper. This includes support for the delivery of:....'.

Pegasus also raised concerns about this wording so the policy and text wording will be modified to clarify that this refers to the Parish portion of CIL.

TABLE 8: POLICY 6 – COMMUNITY INFRASTRUCTURE

Consultee name	Consultee comment	NDP response
Natural England, 6 April 2020	No comment	
Environment Agency, 1 April 2020	No comment	
Impact Planning Services Ltd, 2 April 2020	In addition, the plan notes the restrictions of the existing village hall and lack of room for expansion. There is some note of support for proposals which improve or offer new provision of facilities in the village, and no detail regarding what kind of facilities would be of benefit to the community.	
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	Policy 6 should be amended to accurately reflect the relevant Development Management Procedure Order by removing the need to specifically reference community infrastructure in a DAS.	Agreed. Wording will be amended.
Cotswold District Council, no date	p.40. Policy 6, Clause A. This clause would read better if either the final comma before 'in the parish' is removed, or this sub clause is deleted. It can be taken as read that the policy covers the parish, so is unnecessary, but could reasonably be judged as further description of what is considered existing provision.	comma will be deleted

Policy 6, Clause B. Previous NDP examiners have made modifications to policies drafted as 'resisting', as policy should either support or not support. This sentence then goes on to specify a number of circumstances, making it rather awkward to read. These would be easier to use and reference as an numbered list. The policy as drafted is designed to maintain existing community infrastructure, but provides no protection to any additional facilities that may be developed during the lifetime of the plan - we'd suggest wording to enable this protection to be extended to other facilities where appropriate.

Loss of existing community infrastructure such as, but not limited to that described in the Community Infrastructure Evidence Paper will be resisted will not be supported unless it can be clearly demonstrated that: i) the asset is no longer financially viable; or ii) considered necessary or of value to the community; or iii) a suitable replacement can will be provided elsewhere in the parish.

agreed to include new wording

Any replacement provision should meet or exceed the existing benefit to the community of the current facility especially with regard to safety and accessibility.

Policy 6 clause C Listed Building Consent applications require a DAS yet such applications do not feel particularly relevant to the scope of this policy - it would feel unduly onerous in such a scenario.

wording changed to be clearer

TABLE 9: POLICY 7 – TRANSPORT AND VILLAGE AMENITY

Consultee name	Consultee comment	NDP response
Natural England, 6 April 2020	No comment	
Environment Agency, 1 April 2020	No comment	
Impact Planning Services Ltd, 2 April 2020	No comment	
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	<p>4.12 With regard to Policy 7, it will be for the highway authority to consider how impacts on any increase in traffic resulting from development will be managed on the local highway network. They will also determine what increase in traffic is considered to be 'reasonable' and will negotiate any solutions required concerning highway safety matters.</p> <p>4.13 Any '2018 baseline' would need to have been modelled to a standard acceptable to the highway authority and to be sufficiently robust to be used as evidence for the purposes of planning policy.</p>	<p>The evidence provided in support of this policy is sufficient to set a baseline for speed (which demonstrated that existing speed limits were largely adhered to) noise, vibration and safety at the 2018 level. The Parish Council has very limited funds and the evidence provided is proportionate to support this policy. When a planning application comes forward that may lead to increases in traffic impacts, these matters will be accounted for and an approach to mitigation agreed between the highways authority, the planning authority and the applicant. No changes proposed.</p>

	<p>18. Though the survey evidence indicates a strong feeling amongst villagers that traffic speeds are too high and that traffic volume is a problem, the data supplied by Gloucestershire Police indicates that though there is speeding, this is generally within tolerable limits (less than a mean of 5 miles per hour over the posted limit.) Therefore, no management action is currently required to control the amenity impacts of traffic volume which can lead to noise or speeding and which can lead to feelings of being unsafe. (emphasis added)</p>	<p>This is correct. "Currently" implies when the plan is made and with the amount of development in place at that time. When a new proposal comes forward, it will not longer be "current" but "proposed". Therefore, this matter will need to be considered in terms of the proposal's impacts. Wording changed to specify 2018 baseline is referred to.</p>
Cotswold District Council, no date	<p>p.42. Policy 7 While we understand the intention of the phrasing 'maintain the 2018 baseline' to be to avoid additional negative impacts from the growth in traffic, we'd like to encourage a more positive phrasing to reflect the increasing emphasis on sustainable transport and decarbonisation, for example 'maintain or reduce the 2018 baseline'.</p> <p>Traffic management is often beyond the remit of planning. Policy could highlight the localised traffic or safety issues to be considered by a new development. 'Where appropriate, consideration should be given to [potential impacts of proposals] in particular at'</p> <p>With this in mind it might also be preferable/possible to add the last point as another clause to Policy 5: footpaths and cycleways, a policy with which this clearly has synergy.</p>	<p>Agreed - wording changed</p> <p>Comment is not clear. The policy is concerned with motorised traffic and the suggested revisions are not understood. Policy wording amended.</p>

TABLE 10: OTHER COMMENTS

Consultee name	Consultee comment	NDP response
Natural England, 6 April 2020	No comment	
Environment Agency, 1 April 2020	No comment	
	Whilst paragraph 30 notes that the community is dominated by the older population, with an average age of 54.8, the plan does not consider the requirements of this age group for the plan period until 2031. The plan does not consider how the plan area may provide for these residents as they age further, or how to plan for new development to attract newer members of the community, perhaps with families or first-time buyers.	The survey asked if people wished to downsize and this was not indicated. In addition, Hunters Care home provides high quality care for older people in all states of health. No additional provision was required.
Impact Planning Services Ltd, 2 April 2020	5.9 It may transpire that alternative sites to Chesterton need to be considered in advance of the Local Plan review in order to ensure that the plan period housing requirements of the town are met, particularly if the strategic allocation fails to deliver at rates assumed acceptable by the Local Plan Inspector.	Yes, this may occur. However, the NDP must be in conformity with the policies in the adopted plan and cannot anticipate what may happen in the future. There are no material planning considerations other than what is in the adopted Local Plan.
Pegasus Group on behalf of Robert Hitchins Ltd., April 2020	5.11 To make land west of Kingshill Lane and land to the south of Preston subject to a landscape designation in the PNP risks the ability of the town to meet its housing and employment needs, not only in the current plan period up to 2031, but also beyond. p.5, para 3. We suggest moving the final sentence of this paragraph, which introduces the Basic Conditions, to the start of the paragraph, as an introductory point then elaborated upon in the explanation of 'general conformity'.	There is currently a 5 year housing land supply. The Local Plan policies are therefore up to date. Preston is located outside the Cirencester Development Boundary. Preston has no identified strategic role in providing for Cirencester's housing need. No changes proposed.
Cotswold District Council, no date		agreed

27.

p.5 We welcome the information box listing the evidence in support of the policy proposals. However, we wonder why the landscape character assessment tops the box, rather than appearing as a bullet in the list beneath the title 'Evidence papers'.

It was given precedence because of its complexity, but it can be moved under the Evidence heading.

p.8 para 23. reference to the AONB should be 'Cotswolds' not 'Cotswold'

correction made

p.9, para 28. a couple of typos in the second line affecting the clarity of the sentence. Final line should read 'electoral roll'.

corrections made

p.11 para 34. This would benefit from rewriting - it introduces an average number but provides a percentage.

corrections made