

**Draft Ashton Keynes Neighbourhood Plan:  
Pre - Submission Consultation Version 14<sup>th</sup> September  
2014**

**Representations on behalf of Mr. K. Bowley and  
Castlewood (Commercial) Properties Ltd**

**Date: February 2016**

Our Ref: CCP/003/RG  
Impact Planning Services Ltd:  
Unit 1, The Court Yard  
Copse farm,  
Lancaster Place  
South Marston Park,  
Swindon,  
Wiltshire,  
SN3 4UQ  
Tel: 01793 820158  
Email: [rgillespie@impactps.co.uk](mailto:rgillespie@impactps.co.uk)

## **Contents**

<b>1.0 Introduction .....</b>	<b>2</b>
<b>2.0 Consideration of the Draft Ashton Keynes Neighbourhood Plan (AKNP). .....</b>	<b>3</b>
<b>3.0 An alternative way forward: Land at Cox's Hill. ....</b>	<b>12</b>
<b>4.0 Conclusion.....</b>	<b>14</b>

## **Appendix**

- 1. Land associated with Church Farm Ashton Keynes**
- 2. Illustrative Master Plans**
- 3. Annotated Strategic Development Appraisal**
- 4. Village Context Plan (drng no. UP00087-01-A)**

## 1.0 Introduction

- 1.1 This representation is submitted following an email exchange between Mr. Malcolm Carter – Project Co-ordinator of the Neighbourhood Plan Steering Group and Robert Gillespie of Impact Planning Services (dated 9<sup>th</sup> February 2016) welcoming the submission of comments and representations on the draft Neighbourhood Plan.
- 1.2 Some concern had previously been expressed to the Steering Group within emails and during telephone conversations between Impact Planning Services Ltd and the Steering group regarding the availability of information concerning the commissioning and then consideration of various studies and documentation which were then used by the Steering Group to inform the formulation of the draft Plan.
- 1.3 Notwithstanding those outstanding concerns however, it has been decided to make representations on behalf of a local land owner – Mr. Keith Bowley and Castlewood (Commercial) Properties Ltd. The extent of the land ownership associated with this submission is contained at **Appendix 1** to this report.
- 1.4 In summary it is considered that the emerging Neighbourhood Plan does not accord with the National Planning Policy Framework (NPPF) but more fundamentally the development plan i.e. the Wiltshire Core Strategy (2015), in the proposed location for residential development on part of the former Cotswolds Community site (Ashton Fields).
- 1.5 More specifically the proposed residential development of the site (the subject of draft **Policy HSPC1 Site Allocations** and **Policy HSP3 –former Cotswold Community**) is not regarded as in general conformity with **Core Policy 1 – Settlement Strategy**. **Core Policy 13** defines Ashton Keynes as a “large village” within the Spatial Strategy for the Malmesbury Community Area. Paragraph 4.15 (supporting Core Policy 1) explains that a limited level of development will be supported in order to help retain the vitality of villages. It states:

*“4.15...At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within settlement boundaries. These settlement boundaries will also be reviewed as part of the Housing Sites Allocations DPD as set out in the council’s Local Development Scheme...small housing sites are defined as sites involving less than 10 dwellings...Development outside the settlement boundary will be strictly controlled. Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement*

*boundary to identify new developable land to help meet the housing and employment needs of that community...”*

- 1.6 The formulation of the draft Neighbourhood Plan sought to identify potential sites within the existing settlement boundary as defined on the North Wiltshire Local Plan 2011 Proposals Map 2011 (Sheet 9B). This was the subject of Policy H3 (now replaced by Core Strategy Policies 1 and 2). That process failed to identify any and a number of alternative sites beyond the settlement boundary were then considered through a public consultation process.
- 1.7 That process favoured two sites; the first AB Carter Haulage – Happy Land for a maximum of 11 no. new homes and the second at the former Cotswold Community site – for a maximum of 48 new homes. The selection of the latter site however cannot be regarded as a legitimate review of the existing settlement boundary as the location is some 1.5 kilometres from the existing settlement boundary with open countryside lying between.
- 1.8 Such a remote and detached location, isolated from the village cannot be regarded as consistent with the principles of sustainable development and the clear intention of the Core Strategy. It is not therefore a legitimate result of a review of the settlement boundary as anticipated and sanctioned under the auspices of Core Policy 1. The site’s location for residential development is also regarded as contrary to WCS Core Policy 61 Transport and New Development.
- 1.9 An alternative and far more sustainable location for both residential and employment development is therefore proposed and submitted for consideration by the Steering Group. This land is located adjacent Cox’s Hill on the north western side of Ashton Keynes. Illustrative master plans depicting how the land could provide new homes and employment is attached at **Appendix 2**. It is considered that this location is entirely consistent with Core Policies 1, 2 ,13 and 61 of the Wiltshire Core Strategy (WCS).

## **2.0 Consideration of the Draft Ashton Keynes Neighbourhood Plan (AKNP)**

- 2.1 A great deal of effort has gone into the preparation and formulation of the draft AKNP and the Steering Group should be commended for taking on such an involved project and in attempting to meeting the often conflicting needs and views of the local community which is most concerned to influence the content of the plan.

- 2.2 That however does not diminish or over ride a number of principles which guide the formulation and preparation of neighbourhood plans. For instance the content of the National Planning Policy Framework (NPPF: 2012) is critically important in plan-making in order to contribute to the achievement of sustainable development. The NPPF is a material consideration of considerable weight in the process of both plan-making and decision-taken. As a matter government policy it must be taken into account.
- 2.3 At paragraph 6 the NPPF states that the policies of the NPPF in paragraphs 18-219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.
- 2.4 Paragraph 7 identifies the three dimensions to sustainable development which comprise the economic, social and environmental roles. These are not to be taken in isolation because they are mutually dependent. Therefore to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system and guide development toward sustainable solutions.
- 2.5 Ashton Keynes is located within essentially a rural area notwithstanding the impact of significant areas of current and former sand gravel extraction forming part of the Cotswolds Water Park (sports, leisure, recreation, tourism and nature conservation) which contains a number of "holiday villages". The occupancy of the residential accommodation is restricted to ensure that the properties do not become permanent residential accommodation through the imposition of either conditions imposed on planning permissions or legal arrangements entered into by the land owner or developer. This has been the requirement of both the Cotswolds District Council and Wiltshire Council (formerly North Wiltshire District Council) for some four decades as a consequence of such locations, beyond the defined settlement frameworks being regarded as inappropriate locations for permanent residential development and contrary to planning policy.
- 2.6 The essential policy reasoning being that such locations, isolated and remote from existing settlements, local services, social infrastructure such as schools etc are regarded as unsustainable and would lead to unacceptable environmental impacts in terms of reliance on private car borne journeys (with consequential increased CO2 emissions and traffic generation), pressure for increased provision of services and

facilities well beyond established settlements etc. This is the subject of Wiltshire Core Strategy (WCS) **Core Policy 61 Transport and New Development.**

- 2.7 The former Cotswold Community site, the subject of draft AKNP Policies HSP1 – Site Allocations and HSP3 former Cotswolds Community, is, in principle, no different a location than the “holiday villages” when considered in the context of the application of planning policy by both local planning authorities. Logically therefore, if a need could be demonstrated for further residential accommodation at this location it could only be justified and then permitted, under the auspices of established development plan policy on the basis of restricted occupancy i.e. for holiday purposes and not permanent residential accommodation.
- 2.8 For the purposes of current planning policy the former Cotswolds Community site lies within open countryside. Its historical foundation and function are now no more than matters of general interest of little material weight and do not over-come the policy presumption against development in such a location under the terms of WCS Core Policy 1. The settlement hierarchy essentially restricts residential and employment growth to within and adjacent the identified settlements (in this case Ashton Keynes as a Large Village) and not into the surrounding rural area.
- 2.9 Whilst Core Policy 2 states that the existing *limits of development* may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents (DPDs) and neighbourhood plans, that “alteration” only applies to the adjustment of existing limits to development, and not to the creation of entirely new limits – remote from the existing. The terms of the policy offers no such leeway to generate what are effectively free-standing or detached new development limits or boundaries somewhat distant from the recipient settlement in the way proposed by the draft AKNP.
- 2.10 Whilst paragraph 28 of the NPPF acknowledges the need to stimulate the rural economy (in terms of rural employment sites, sustainable rural tourism and leisure developments which benefit businesses in rural areas), that part of the NPPF relevant to the provision of housing in such a location is set out paragraph 55.
- 2.11 It states that “...to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances...”

2.12 The former Cotswold Community site is not regarded as a “village” (either large or small) for the purposes of the location and distribution of new housing under the terms of WCS Core Policy 1. Furthermore the range of such special circumstances would not justify a development of some 48 new homes at the former Cotswold Community site. The fact that the site lies within the Neighbourhood Plan’s designated area is irrelevant to these locational issues.

2.13 Paragraph 184 (under the subheading Neighbourhood plans) states that Neighbourhood Plans “...*must be in general conformity with the strategic policies of the Local Plan....Neighbourhood plans should reflect these policies...*” In this case it is considered that the draft AKNP is not in general conformity with principally WCS Core Policies 1 and 2 as it seeks to promote residential development distant from a legitimate receptor settlement and would not represent a legitimate alteration of an existing settlement’s limits.

#### **The Site Selection Process**

2.14 In preparing this submission a number of other related documents have been studied. These are:

- i) The Ashton Keynes Conservation Area Statement (January 1998) published by the former North Wiltshire District Council which remains material referred to by Wiltshire Council.
- ii) Ashton Keynes Conservation Area Statement 2015 (November 2015) published by the Ashton Keynes Heritage Conservation Group.
- iii) Housing Report (June 2015)
- iv) Housing Site Consultation Report (September 2015)
- v) Sustainability Appraisal of the Ashton Keynes Neighbourhood Plan 2015-2026

2.15 These documents have informed the production of the draft AKNP. A number of important matters however have emerged regarding the site selection process and which are of concern.

2.16 It is noted that public consultation was undertaken in this process. This is clearly a very important aspect of the formulation of any plan and critical to that consultation process is the presentation of potential residential site options, how they are described, assessed and, importantly the way in which such sites could address the housing needs of the local community.

- 2.17 In this case the consultation process drew upon work undertaken by Wiltshire Council under the auspices of the “call for sites” and in the consequential assessment of the responses within the Strategic Housing Land Availability Study (SHLAA). Some 10 sites were, with one notable exception, taken from that SHLAA process into the consultation process regarding the accommodation of any further residential development at Ashton Keynes in response to the WCS (Core Policy 13). These matters are addressed within the above Housing Report in section 6. Information about our housing.
- 2.18 The 10 sites (Table 9: Possible Housing supply) included Site 1 Church Farm, Cox’s Hill. This comprises a SHLAA site submission (ref: 614) of some 2.38 hectares with an estimated potential capacity of 71 dwellings. The site was regarded as “suitable”. The list also included The former Cotswold Community site (6) with a site area of 10 hectares an estimated capacity of 120 dwellings. This is not however a site which has been included by the SHLAA process and found to be “suitable” under that process undertaken by Wiltshire Council.
- 2.19 Indeed it is notable that the former Cotswold Community site is the only locational option which has not emerged through the SHLAA process within the 10 sites put forward for consideration by the local community.
- 2.20 In presenting the 10 locational options for consideration by the local community each was presented in terms of their optimal estimated capacity. There is no attempt made at that stage to say select or identify parts of the sites to accommodate any fewer dwellings. Each was put forward for consideration by the local community on the basis of the upper limit or capacity of potential dwellings yield.
- 2.21 That consultation process therefore did not suggest for example that the site at Church Farm may be capable of any lesser amount of development which might be regarded by the local community as a more appropriate scale of residential development in relation to Ashton Keynes itself. Therefore the basis of this comparative site selection consultation process was an “*all or nothing*” exercise which is considered far to crude to be considered of any real assistance particularly as the resultant ranking is on a purely “yes or no” basis with no opportunity to support or comment upon a lesser scale of development at each potential site.
- 2.22 The analysis of the comments receive is also of concern. It appears that those promoting the development of the site at the former Cotswold Community site had been provided with an opportunity to present their proposals to the public within the

consultation process. It would appear that no other land owner or promoter of the other 9 sites was provided with such an opportunity to illustrate how the development might appear.

- 2.23 In the case of the Church Farm site it is indeed understood that in attempting to address members of the local community regarding the potential of the site, those representing Castlewood (Commercial) Properties Ltd were denied the opportunity to speak.
- 2.24 Critically in all of this there is a “missing step” in the formulation of the draft AKNP between the Housing Report of June 2015 and Housing Consultation Report containing the analysis of public consultation published in September. This missing step relates to the decision to identify only two housing sites the subject of Policy H1: Number of new homes within the settlement boundary on page 29 of the Housing Report. It has been very difficult for instance to understand how the figure of 48 no. dwellings (reduced from between 120-150 estimated) was finally arrived at or why that site could be so described as “within the settlement boundary”. In fact there is no explanation within the published documentation as to how the former Cotswold Community site emerged from any consideration as to how many new dwellings should be accommodated within the AKNP.
- 2.25 Clearly however the publication of the analysis of the public consultation as set out within the September 2015 report considerably post-dated the consultation events held in January 2015 with the Housing Report being published in between i.e. in June 2015. Unfortunately it had not been possible to find any Steering Group Meeting Agendas or minutes in the period between January and June 2015 until relatively recently when retrospectively posted agendas and minutes became available.
- 2.26 It is considered that this is unsatisfactory and unhelpful in any understanding by those outside the AKNP Steering Group as to how various decisions were arrived at. The recently posted AKNP Steering Group minutes for the meetings held 11<sup>th</sup> May and 9<sup>th</sup> June 2015 appear to represent the only means of understanding how the selection of the former Cotswold Community site emerged as one of the two sites carried into the draft plan as housing allocations.
- 2.27 It would appear that this discussion acknowledged the concerns raised within the consultation process regarding the potential scale of residential development and concern to “restore an historic asset”. This latter aspect of the merit of this location was however only the subject of some 7 comments whereas some 19 regarded the site as

“remote from main village”. What is apparent from the Steering Group minutes is that a reduction in yield to 48 dwellings was proposed on the basis of “...*enabling a viable restoration development and the safeguarding of valued historic assets.*”

- 2.28 Therefore the provision of the 48 new dwellings at the former Cotswold Community site appears to have been influenced by a notional (as there is no evidence within the minutes to suggest that the Steering Group was in possession of any restoration proposals and related financial viability assessment) extent of “enabling development”.
- 2.29 Whilst the same minutes (for 11<sup>th</sup> May meeting) refer, in passing, to the other sites consulted upon, they do not refer to any consideration of the relative merits of each of these sites, their potential contribution in part or in whole toward meeting local housing needs, extent of support, or refer to the issue of the former Cotswold Community site’s remoteness from the main village – the subject of a notable extent of local concern expressed within the consultation process.
- 2.30 Equally as apparent from the minutes is the absence of any acknowledgment of a potential conflict with the WCS in that the remoteness of the site may not be regarded as a legitimate location for residential development through any alteration to the existing settlement boundary under the terms of Core Policy 2.

**Sustainability Appraisal of the Ashton Keynes Neighbourhood Plan (September 2015)**

- 2.31 The sustainability appraisal followed the site selection process; it does not appear to have informed it. It has therefore assessed the emerging AKNP following the selection of the two identified housing sites. The assessment does however examine the plan on the basis of the preferred option (Option 2) for the delivery of in the region of 40-60 dwellings within the plan and then the ten sites noting under 2) Site options, that “...*Due to the existing physical constraints of the village, no sites were made available which are located within the settlement boundary of Ashton Keynes.*”
- 2.32 The appraisal refers to the 10 sites considered, two public events accompanied by a community survey, analysis and the identification of the two preferred sites including the former Cotswold Community site.
- 2.33 Under sub heading (3.9 Transport) the appraisal notes (paragraph 3.9.2) a number of key messages from the WCS which includes:

- **New development should be located and designed to reduce the need to travel and to encourage the use of sustainable transport alternatives.**

- 2.34 Section 5 is entitled: What are the key issues and objectives that should be a focus? A number of Sustainability Appraisal (SA) themes are identified which includes Transport against which (page 25) is noted the objective of reducing the need to travel and promotion of sustainable transport choices.
- 2.35 The assessment also undertook an appraisal of the key constraints present at each of the 10 sites considered at the outset of the AKNP housing sites selection process. It should be noted that in undertaking these appraisals the entirety of the SHLAA sites was considered and no attempt made to consider these in part i.e. to identify the most suitable parts given the identified constraints. The analysis of each site is then presented on the basis of nine environmental factors: biodiversity, land and soil resources, water resources and flood risk, air quality and environmental pollution, climatic factors, historic environment and landscape factors, population and community, transport and finally, economy and enterprise.
- 2.36 The likely effects are identified as: Likely adverse effect (without mitigation), Neutral / no effect, Likely positive effect and finally, Uncertain effects.
- 2.37 In comparing the assessment responses for Site 1 – Land at Church Farm, Cox’s Hill with Site 6 – The former Cotswold Community a number of interesting findings emerge. These are as follows:
- In terms of population and community considerations and transport site 1 is regarded as superior to site 6.
  - Notwithstanding that in terms of transport, and the fact that site 6 is noted as located *“...at some distance (c.2km) from village services and amenities.”* under both population and community and then transport, the finding is one of uncertain effects. Importantly at paragraph 8.6.1 (under Climatic Factors) the SA finds that: *“...of the two sites proposed for allocations through the Neighbourhood Plan, only the AB Carter Haulage site is located in the immediate vicinity of Ashton Keynes village with its services and facilities. This will support climate change mitigation through limiting the need to travel. The majority of housing provision will instead be allocated at the former Cotswold Community, which is located some distance (c2km) from village services and amenities. As such, this allocation has the potential to increase greenhouse gas emissions from transport without a package of sustainable transport enhancements.*

*This is in part recognised by the policy for the site (Policy HSP3), which provides for the provision of a cycleway to the village.”*

- 2.38 This finding is fundamentally at odds with the assessment sheet’s finding that in terms of transport there would be uncertain effects and undermines the credibility of the assessment. There would clearly be harmful and unnecessary effects through increased greenhouse gas emissions and consequently as measured against the identified key message from the WCS contrary to the thrust of policy notwithstanding any limited mitigation offered through the provision of a cycleway link to the village itself. It is considered that the location conflicts with WCS Core Policy 61: Transport and New Development.
- 2.39 The environmental disadvantages of the location as measured against an essential aspect of delivering sustainable developments has therefore been significantly downplayed and notably all of the other options are identified as better placed.
- 2.40 The Likely adverse effects (without mitigation measures) associated with Site 1 are noted as Water resources and flood risk and Historic environment and landscape. The failings in relation to water resources and flood risk are essentially irrelevant as firstly the ground water protection zone aspect relates to surface water nitrate which is not at issue in the case of residential development and secondly the site is confirmed as within Flood Zones 2 or 3 i.e. it is not regarded as any different from the two preferred sites.
- 2.41 The Historic environment and landscape matters are deserving of detailed consideration. Whereas similar sensitivities exist in relation to the (Site 6) former Cotswold Community site, the development potential has not been so found as Likely to have adverse effect (without mitigation). This may be as a consequence of the latter site being reduced in the extent of development as contrasted with all of the other SHLAA sites which have been considered in whole and not in part. This is an unreasonable basis for comparison in relation to the assessment of sites within or immediately adjacent to conservation areas, listed buildings or scheduled ancient monuments.
- 2.42 No attempt has therefore been made within the SA to consider any lesser extent of development or other mitigation measures which could overcome or lessen the extent of potential harm to the significance of the identified heritage assets. The appraisal therefore was not undertaken on the basis of any “sensitivity testing” having been applied where say more appropriately located sites (in relation to say transport

considerations) could have been made acceptable through reduced scale and/or the application of mitigation measures. This is therefore considered an unreasonable basis for comparison and undermines the credibility of the SA.

- 2.43 In conclusion the housing site selection process associated with the draft AKNP is therefore regarded as inadequate, arbitrary and unsystematic leaving the draft AKNP as i) not in general conformity with the WCS most notably in terms of Core Policies 1, 2, 13 and 61, ii) in need of reassessment in relation to the responses to the Pre-Submission Consultation draft and iii) reconsideration of more appropriately located sites which could accommodate the extent of residential development proposed under housing numbers **Option 2: The delivery of in the region of 40-60 dwellings.**

### **3.0 An alternative way forward: Land at Cox's Hill**

- 3.1 As a consequence of the above careful consideration has been given to the meeting the provision of housing and potentially some limited employment development at Cox's Hill on land within the single ownership of Mr. Keith Bowley of Church Farm Ashton Keynes.
- 3.2 The suggested alternative, put forward on the basis of stimulating meaningful discussion with the AKNP Steering Group, is based upon the following principles:
- The location of development must be in general conformity with the WCS.
  - The extent of residential development must be within the Option 2 total of between 40-60 dwellings including the 11 dwelling proposed at Happy Land (Site 4).
  - That the development identified site(s) must preserve and enhance the character and appearance of the Conservation Area and settings of nearby Listed buildings and Scheduled Ancient Monuments.
  - That access, highways safety and public footpath route considerations must all be taken into account and planned for. Footpath linkages between the proposed housing site and the village should be provided avoiding the public highway – Cox's Hill.
  - That the mix and tenure of house types must seek to meet identified local housing needs including potentially specialist housing for the "active elderly" who currently live within the local community but wish to down size and remain within the community. Other types of housing could include affordable / starter homes and possibly self-build.
  - The retention of the paddock between Church Farm and Cox's Lane to remain in agricultural use in perpetuity (under the terms of a restrictive covenant entered into by Mr. Keith Bowley as land owner).

- The retention of a visual gap or break between the body of the village and that part of the village known as North End to accord with the conservation area appraisal.
  - A small employment site (approximately 2.0ha in extent) to meet the needs of local businesses and rural enterprise or relocation of non-conforming uses elsewhere within the village.
  - The location of the employment site at the northern perimeter of the village would be very accessible to the Spine Road and A419. Local traffic management measures could be put in place to restrict vehicles from using the local road network within the village.
- 3.3 Attached to this submission is a location plan (Appendix 1) depicting the extent of land control in this part of the village associated with Church Farm. At Appendix 2 is an illustrative and annotated Master Plan entitled Land at Cox's Hill which depicts some alternative residential development options (A totalling 40 new homes and B 30) on a site of about 1.5ha in extent, together with a potential employment site.
- 3.4 It must be stressed that the employment site and housing proposals are not interdependent but represent the scale of development regarded as compatible with the policies of the WCS and therefore would be in general conformity and in terms of the housing capable of inclusion within a revised settlement boundary.
- 3.5 The paddock retained in agricultural use would similarly be embraced by the revised settlement boundary but could be specifically protected from development through an appropriately worded policy within a revised draft of the AKNP. This would apply development plan policy restriction once the AKNP was adopted in addition to a legally binding covenant applied by the land owner.
- 3.6 Attached at **Appendix 3** is the annotated Strategic Development Appraisal undertaken in order to inform the formulation of the proposals. This draws from a careful assessment of the content of the Ashton Keynes Conservation Area Statement (1998) and more recent Conservation Area Statement 2015 prepared on behalf of the Ashton Keynes Heritage Conservation Group.
- 3.7 To put these ideas into a wider context a Village Context Plan (drng no. UP00087-01-A) depicts the entirety of the village environs in relation to the potential employment and housing sites the subject of this alternative approach. This is at **Appendix 4**.

## 4.0 Conclusion

- 4.1 It is considered that as currently drafted, the Pre-Submission Consultation draft AKNP is not in general conformity with the Wiltshire Core Strategy 2015 and cannot progress any further forward without substantial revision. The draft AKNP is also regarded as contrary to the National Planning Policy Framework in that it will not deliver sustainable development.
- 4.2 As set out above are fundamental concerns regarding the site selection process and the identification of a site which cannot be regarded as a legitimate location to include within any revision to the existing settlement limits and is contrary to the development plan (WCS Policies 1,2, 13 and 61).
- 4.3 As an alternative proposition land at Church Farm is put forward on the basis that both a small scale housing and employment site could come forward in accordance with the Wiltshire Core Strategy which could address both local housing and employment needs. Both would contribute significantly to the vitality and viability of Ashton Keynes without detrimental impacts. Both deserve detailed consideration and the Steering Group is respectfully requested to engage in discussions with the parties associated with this proposal through Impact Planning Services Ltd.

## Appendix 1:

Land associated with Church Farm Ashton Keynes



Appendix 2:  
Illustrative Master Plans

# Land at Cox's Hill Ashton Keynes

**Residential Development**  
The land is capable of accommodating a mix of dwelling types and sizes for both affordable and private sale. The illustrative proposal shows how the site could be laid out, with houses fronting an informal lane, accompanied by a semi-private courtyard complex with smaller dwellings designed with an element of communal living for residents who wish to downsize / retire to smaller homes within walking distance of the village centre.

**Approved Employment Building**  
The plan identifies the position of the consented employment building that will provide additional workshop space for the existing commercial operations of the site. This planning permission includes approval for a new access from Cox's Hill, and it is proposed that this access could be utilised to serve the new residential allocation.

**Public Open Space**  
Future development should provide public open space which is both easily accessible and useful for the residents of the village. A residential allocation at Cox's Hill could incorporate open space to provide for local play and informal recreation, which could in turn provide an intermediate use to act as a buffer between the extent of the built development and the cemetery which forms the setting of Holy Cross Church. This space could be designed and landscaped as a transitional green to protect the setting of the church while providing a pedestrian access route to the south.

**Employment Development**  
The illustrative proposals show how additional employment land could be provided to the east of Cox's Hill to serve the long-term needs of the village. These proposals give an impression of how the site could be laid out for a mixture of B1 office and B2 light industrial uses.

New structure planting to strengthen boundaries and screen potential views of the employment buildings.

Single storey offices and light industrial workshop units.

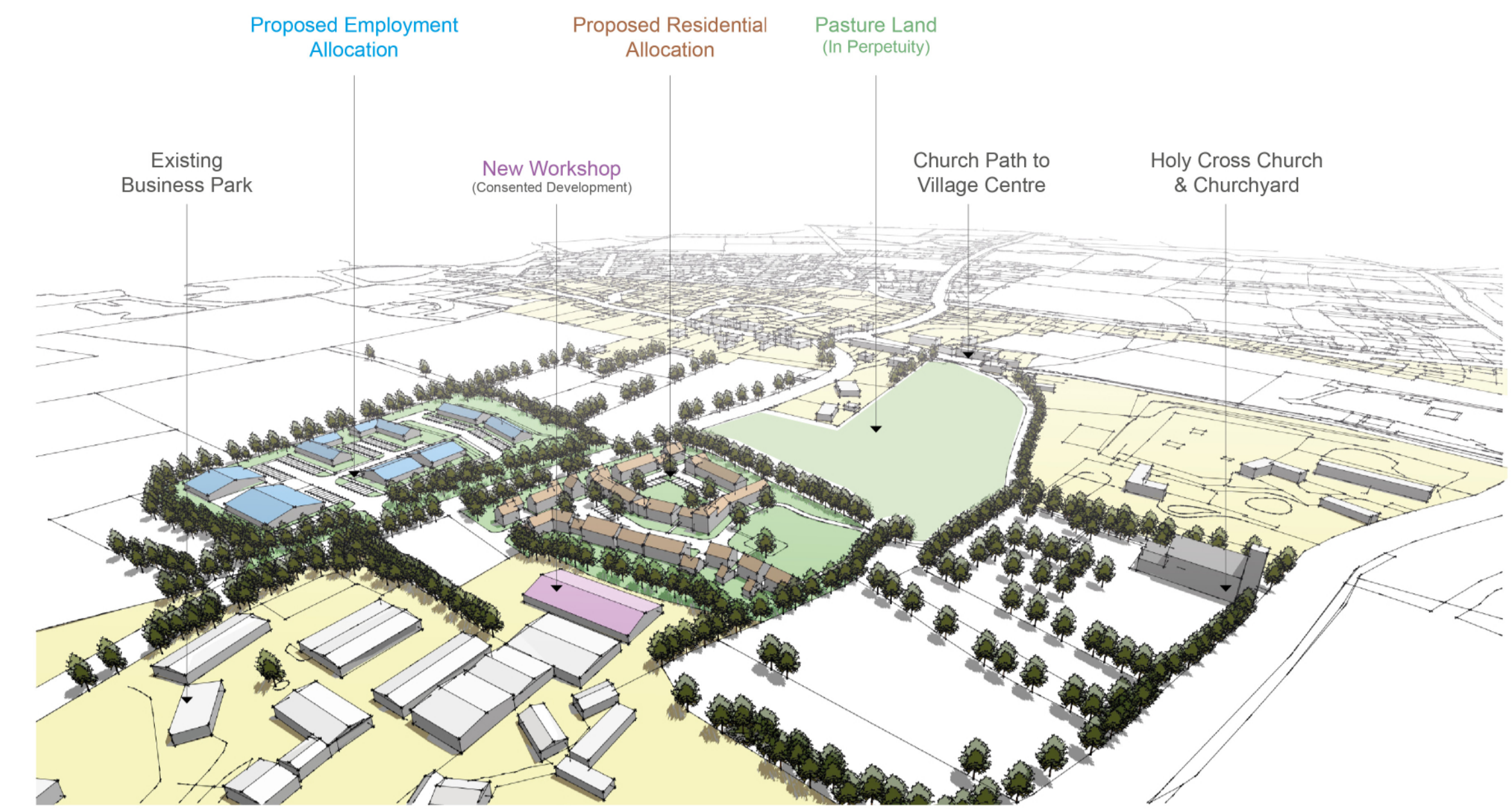
Possible storm water balancing and sustainable urban drainage system.

New homes and employment buildings set back from Cox's Hill with additional planting to screen development and maintain the rural setting of the lane on approaching the village centre from the north.

**Public Transport**  
While it is acknowledged that public transport uptake in rural areas is unlikely to be high across all sectors of the community, it is nevertheless important to consider how future residential development could plan for this to ensure an inclusive and sustainable community for all. There is an opportunity to provide a pedestrian link to Cox's Hill and a 'request stop' for the No 50 Bus route linking the village with Cirencester and Swindon.

**Footpath Connection**  
It is important that new homes have a safe and convenient route to access the services within the village centre. The route of Church Walk provides an opportunity to create a new connection which avoids Cox's Hill and opens up pedestrian access to a future residential allocation with minimal impact on the existing street network.

**Pasture Land**  
In order to maintain the setting of the conservation area and the important views from the River Thames path, it is proposed that a future residential allocation be accompanied by a legal covenant stipulating that the land to the south be maintained as pasture in perpetuity.



## Development Potential (Option A)

The strategic development appraisal, which accompanies this plan, provides a high level assessment of the opportunities and constraints affecting the future development of the village. Land at Cox's Hill is identified as being of good potential to accommodate future development in a sustainable location with least impact on the setting on the special architectural and historic interest of the conservation area.

These illustrative proposals have been prepared to help demonstrate how land at Cox's Hill could be practically designed taking into account the previous appraisal work, and to give an indication of the potential development capacity. At this stage they are not intended as definitive proposals, but rather, as a means of informing and stimulating discussion about the future direction of growth within the village.

The land either side of Cox's Hill has been identified within the red lines on the adjacent proposals plan. It is suggested that there is the potential for a mix of uses, with residential land to the west and employment land to the east of the road.

The residential proposals would take access from the new junction with Cox's Hill that has been previously

approved as part of the planning application for a new workshop building immediately to the north. This junction would be re-prioritised to serve the residential dwellings, and can be designed with no anticipated conflict between the two uses.

The illustrative proposals envisage a mixture of up to 40 new homes on the eastern part of the site, with the western part of the site given over to public open space. This arrangement would preserve the peaceful setting of the Holy Cross Church and Churchyard, while providing easily accessible open space with the potential for a new play area, seating, footpaths and possible surface water balancing ponds.

The new homes are shown arranged around an informal lane, which in turn gives access to a secondary courtyard space. While the proposals are purely illustrative, they give an idea of how open market and affordable homes could be laid out to create a public street, with an element of communal living / retirement type properties arranged around a semi-private courtyard space. The proposals include a mixture of dwelling sizes, with an emphasis on smaller 3 and 4 bed family homes along with an element of 2 bed houses and apartments to provide starter properties.

In order to preserve the setting of the conservation area and permanently exclude the possibility

of further development in the area, it is proposed that the remaining field to the south be retained in perpetuity as open pasture land.

The illustrative proposals also show how the land to the east of Cox's Hill could be laid out for a mixture of employment uses. Crucially, a new access could be provided from the north, negating the need for employment traffic to pass through the village centre while allowing space for new business's to help sustain the economic life of the village.

The suggested layout is based on a series of single storey offices and workshops suitable for small scale business users, which would comfortably provide a GIA of 3720 sqm or approx 40K sqft of floorspace.

It is suggested that substantial structure planting and new landscaping could be introduced to the existing field boundaries to help provide visual containment and shelter. Along with a similar approach to the layout of the residential proposals, this approach would help maintain the semi-rural character of Cox's Hill and preserve its attractive setting on approaching the village from the north.

The aerial view above helps illustrate the relationship between established and proposed land uses and how they relate to the setting of the village.



## Development Potential (Option B)

In order to help demonstrate an alternative approach to the future layout of the residential proposals, this sketch illustrates a revised scheme for 30 new homes.

In this scenario, the open space and access are retained as before, but the internal public realm takes on a more informal appearance that more closely reflects the artisan character of the historic village centre streets.

Open market and affordable homes are distributed across the site, with the emphasis as before on smaller properties and modestly sized family homes which are appropriate to the local needs of the village.

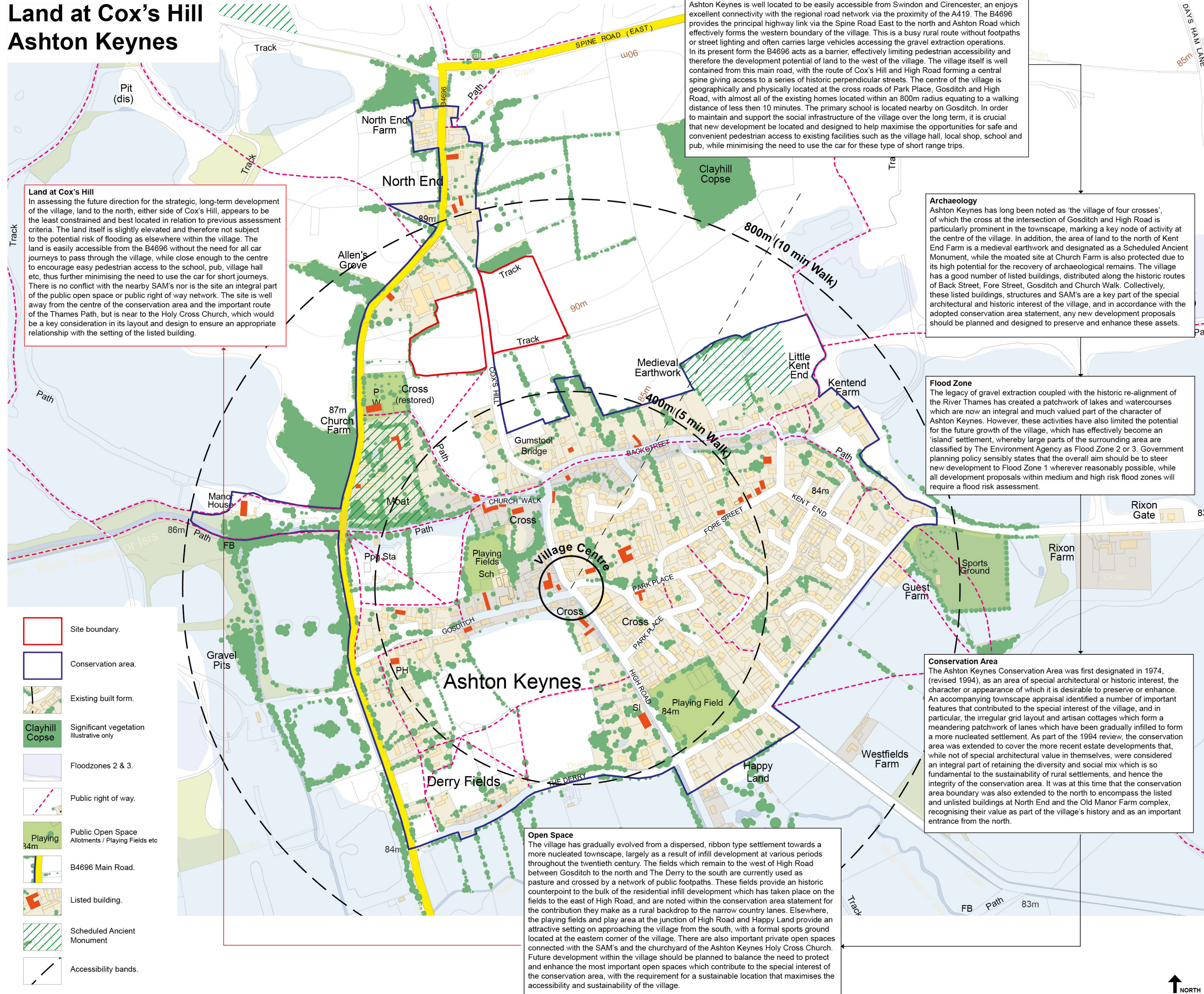
The aim of preserving the semi-rural character of Cox's Hill is maintained by new homes and gardens backing on to a site boundary reinforced with new native tree and shrub planting. The same approach would be applied to the south where homes are now set back from the boundary to allow additional space for planting to screen views from the south.

The proposals provide a larger area of public open space and retain the idea of a pedestrian and cycle path connection to the village centre via Church Walk. The potential for a footpath link and a request bus stop on Cox's Hill is retained in this option.



Appendix 3:  
Annotated Strategic Development Appraisal

# Land at Cox's Hill Ashton Keynes



**Land at Cox's Hill**  
In assessing the future direction for the strategic, long-term development of the village, land to the north, either side of Cox's Hill, appears to be the least constrained and best located in relation to previous assessment criteria. The land itself is slightly elevated and therefore not subject to the potential risk of flooding as elsewhere within the village. The land is easily accessible from the B4696 without the need for all car journeys to pass through the village, while close enough to the centre to encourage easy pedestrian access to the school, pub, village hall etc, thus further minimising the need to use the car for short journeys. There is no conflict with the nearby SAM's nor is the site an integral part of the public open space or public right of way network. The site is well away from the centre of the conservation area and the important route of the Thames Path, but is near to the Holy Cross Church, which would be a key consideration in its layout and design to ensure an appropriate relationship with the setting of the listed building.

**Accessibility**  
Ashton Keynes is well located to be easily accessible from Swindon and Cirencester, an enjoys excellent connectivity with the regional road network via the proximity of the A419. The B4696 provides the principal highway link via the Spine Road East to the north and Ashton Road which effectively forms the western boundary of the village. This is a busy rural route without footpaths or street lighting and often carries large vehicles accessing the gravel extraction operations. In its present form the B4696 acts as a barrier, effectively limiting pedestrian accessibility and therefore the development potential of land to the west of the village. The village itself is well contained from this main road, with the route of Cox's Hill and High Road forming a central spine giving access to a series of historic perpendicular streets. The centre of the village is geographically and physically located at the cross roads of Park Place, Gosditch and High Road, with almost all of the existing homes located within an 800m radius equating to a walking distance of less than 10 minutes. The primary school is located nearby on Gosditch. In order to maintain and support the social infrastructure of the village over the long term, it is crucial that new development be located and designed to help maximise the opportunities for safe and convenient pedestrian access to existing facilities such as the village hall, local shop, school and pub, while minimising the need to use the car for these type of short range trips.

**Archaeology**  
Ashton Keynes has long been noted as 'the village of four crosses', of which the cross at the intersection of Gosditch and High Road is particularly prominent in the townscape, marking a key node of activity at the centre of the village. In addition, the area of land to the north of Kent End Farm is a medieval earthwork and designated as a Scheduled Ancient Monument, while the moated site at Church Farm is also protected due to its high potential for the recovery of archaeological remains. The village has a good number of listed buildings, distributed along the historic routes of Back Street, Fore Street, Gosditch and Church Walk. Collectively, these listed buildings, structures and SAM's are a key part of the special architectural and historic interest of the village, and in accordance with the adopted conservation area statement, any new development proposals should be planned and designed to preserve and enhance these assets.

**Flood Zone**  
The legacy of gravel extraction coupled with the historic re-alignment of the River Thames has created a patchwork of lakes and watercourses which are now an integral and much valued part of the character of Ashton Keynes. However, these activities have also limited the potential for the future growth of the village, which has effectively become an 'island' settlement, whereby large parts of the surrounding area are classified by The Environment Agency as Flood Zone 2 or 3. Government planning policy sensibly states that the overall aim should be to steer new development to Flood Zone 1 wherever reasonably possible, while all development proposals within medium and high risk flood zones will require a flood risk assessment.

**Conservation Area**  
The Ashton Keynes Conservation Area was first designated in 1974, (revised 1994), as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. An accompanying townscape appraisal identified a number of important features that contributed to the special interest of the village, and in particular, the irregular grid layout and artisan cottages which form a meandering patchwork of lanes which have been gradually infilled to form a more nucleated settlement. As part of the 1994 review, the conservation area was extended to cover the more recent estate developments that, while not of special architectural value in themselves, were considered an integral part of retaining the diversity and social mix which is so fundamental to the sustainability of rural settlements, and hence the integrity of the conservation area. It was at this time that the conservation area boundary was also extended to the north to encompass the listed and unlisted buildings at North End and the Old Manor Farm complex, recognising their value as part of the village's history and as an important entrance from the north.

**Open Space**  
The village has gradually evolved from a dispersed, ribbon type settlement towards a more nucleated townscape, largely as a result of infill development at various periods throughout the twentieth century. The fields which remain to the west of High Road between Gosditch to the north and The Derry to the south are currently used as pasture and crossed by a network of public footpaths. These fields provide an historic counterpoint to the bulk of the residential infill development which has taken place on the fields to the east of High Road, and are noted within the conservation area statement for the contribution they make as a rural backdrop to the narrow country lanes. Elsewhere, the playing fields and play area at the junction of High Road and Happy Land provide an attractive setting on approaching the village from the south, with a formal sports ground located at the eastern corner of the village. There are also important private open spaces connected with the SAM's and the churchyard of the Ashton Keynes Holy Cross Church. Future development within the village should be planned to balance the need to protect and enhance the most important open spaces which contribute to the special interest of the conservation area, with the requirement for a sustainable location that maximises the accessibility and sustainability of the village.

## Strategic Development Appraisal

This plan has been prepared on behalf of the promoters of land at Cox's Hill, Ashton Keynes, with the instruction to undertake a considered appraisal of its potential to contribute to the strategic development needs of the village.

The Ashton Keynes Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan in accordance with the Localism Act (2012). Amongst the sites put forward for consideration was land at Cox's Hill, located within the northern half of the village. The promoters of the site have commissioned consultants to review its development potential for a mix of both residential and employment uses, and provide additional information for consideration in the Neighbourhood Planning process.

This plan is intended to present an objective, high-level assessment of the potential for land at Cox's Hill to help meet the aspirations of the Neighbourhood Plan. The plan presents a view of the site as it relates to the setting of the wider village, and is intended to help explain the development constraints associated with the unique form and character of Ashton Keynes.

The generally low density, rather haphazard arrangement of streets and buildings is described in the conservation area statement as reflective of a 'ruggedly artisan' character. The gradual infilling of fields to form an agglomerate irregular grid presents an unusual settlement pattern with a great deal of variation in the built form and public realm, which nevertheless forms an attractive and cohesive townscape.

Notwithstanding the relatively high proportion of modern day development, the historic character of the village feels largely intact for several reasons. The incremental nature of development over an extended period of time has maintained a good deal of variation when viewed from the main streets that make up the historic core of the village. The structure of these main streets is anchored by their relationship to the River Thames, which in turn provides a very strong sense of place associated with the picturesque setting of High Road and Church Walk. The route of Back Street is a particularly interesting example in the way it evokes the meandering of the river that runs parallel, albeit largely concealed to the rear of the building line, so that there is a gradual shifting and progressive realisation of the view, which in turn contrasts with the regularity and more orderly form of Fore Street.

It is this relationship between the riparian and built environment, and the juxtaposition of individual streets and houses that is integral to the character and appearance of the village. This is most obvious in the numerous bridges which jump the Thames along High Road, but is equally expressed in the absence of formal footpaths throughout much of the village and the variable street widths which make for a compelling spatial experience for the visitor making their way along the Thames Path long distant route.

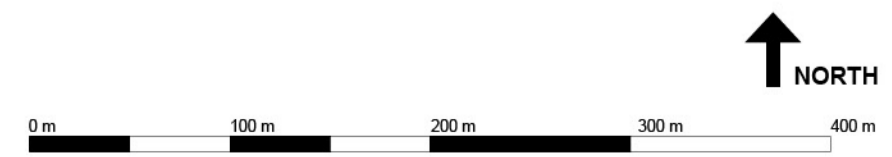
While there are a good number of listed buildings and structures distributed across the settlement, the majority of these are concentrated around the historic routes associated with the river, further underlining that it is this relationship that is of 'special interest' to the conservation area. Hence, in order to preserve and enhance the character and appearance of the conservation area, new development should be located, planned and designed to minimise direct and indirect impacts on these historic routes while ensuring it is able to fully contribute to the long term sustainability of the village.

The land at Cox's Hill has the potential to deliver new development in a location that is both sustainable and sensitive to the special interest of the conservation area. Accepting that any new development in this location would need to be carefully sited and designed to ensure an appropriate relationship with Holy Cross Church, this land has the great advantage of its proximity to the village centre, and the potential benefits this brings for supporting its social infrastructure and minimising environmental impacts. These advantages may be summarised as follows:

- The slightly elevated location of the site is not subject to flood risk.
- The site is easily accessible from the main road (B4696), and does not require all traffic to gain access through the village centre.
- The site is within easy walking distance of the local shop, school, village hall etc, thus reducing the need to use the car for these local trips and minimising impacts on the narrow village streets.
- The site is located well away from the historic streets associated with the route of the Thames Path and will not detract from the special interest of the conservation area.

This high level appraisal has demonstrated in simple terms that the land at Cox's Hill is largely unconstrained and well located in relation to the activities of the village centre. The land could be sensitively developed with minimal impact on the special interest of the conservation area, while delivering new homes and employment in a location that will support the long term sustainability of the village.

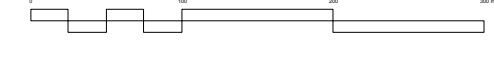
The potential development capacity of the site is explored further in the following proposals plan which shows how it could become a sensitively designed addition to the village capable of providing a range of homes and employment uses appropriate to the local needs of the area.



Appendix 4:  
Village Context Plan  
(drng no. UP00087-01-A)



# ASHTON KEYNES CP



Tel: 01793 744964 / 07766 164794  
 www.urbanperspective.co.uk  
 Notes: This drawing has been prepared for planning use only and is not for construction. Contractors are not to scale from this drawing. All dimensions to be checked on site and any discrepancies, ambiguities and/or omissions between this drawing and information given elsewhere must be reported to this office. If in doubt, ask.  
 Copyright © Urban Perspective Studio Ltd 2016. All Rights Reserved.

Client: **Impact Planning Services Ltd**

Project: **Land at Cox's Hill  
 Ashton Keynes**

Sheet Title: **Illustrative Proposals  
 (Village Context)**

Date: 19.02.16 Scale: 1:5000@ A2 Drawn: CHx

Dwg No: UP00087-01-A

