

CEG Representations to Policy SP3 and SP5 of the Cotswold Local Plan Regulation 18 Consultation: Development Strategy and Site Allocations

Policies SP3 and SP5 of the emerging draft Local Plan propose to accommodate 2,350 new homes on a 'strategic' site to the south west of Cirencester (the south of Chesterton site) together with land surrounding other towns and villages within the District; including settlements within the Cotswold Area of Outstanding Natural Beauty (AONB).

At the December 2014 Cotswold District Council Cabinet meeting it was reported that in preparing the proposed Regulation 18 Local Plan development strategy that to date no reasonable and available strategic alternatives to the greenfield site south of Chesterton have emerged within the District.

However as summarised below, and comprehensively demonstrated within our supporting 'Vision Document' which will be submitted in hard format to Cotswold District Council (the Council), the redevelopment of the Kemble Airfield (Cotswold Airport) site is a wholly sustainable, suitable and deliverable alternative to the south of Chesterton site and/or other potential greenfield developments around other settlements within Cotswold District, particularly those settlements within the more sensitive Cotswold AONB.

Kemble Airfield is located approximately 6 km to the south west of Cirencester and straddles the Cotswold and Wiltshire administrative boundary. As a general aviation airport the site is currently occupied by aircraft hangars, two runways, and industrial and commercial units. Kemble Enterprise Park, which accommodates a wide range of business units, adjoins the site to the south.

Unlike the south of Chesterton site and other greenfield sites within the District, Kemble Airport is brownfield land (previously developed land). Two of the core national planning principles set out within the National Planning Policy Framework (the NPPF) are to locate development on land of lesser environmental value and to encourage the effective use of land by re-using land that has been previously developed. The NPPF is also clear that great weight should be given to conserving and restricting development within Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.

Our initial concepts for how the site could be comprehensively redeveloped to create a sustainable and vibrant new village, are set out and explained within the Vision Document and associated Technical Appendices. In summary the key benefits that the redevelopment could potentially provide include:

- Effective and efficient use of previously developed brownfield land and therefore the potential to reduce the loss of higher value greenfield land, including land in the particularly sensitive AONB;
- New local employment opportunities that would maintain and seek to increase the level of existing local jobs on the site. The redevelopment would also help support the neighbouring Kemble Enterprise Park; A broad mix of approximately 2,000 new market and affordable homes;
- A new mixed-use local centre which would comprise local shops, and other important new local community, social and education facilities;

- A multi-functional linear park and other extensive areas of public open space, potentially including a new athletics track and leisure facilities for the District;
- Improve local service connections in the area, including the supply of high speed broadband and the opportunity to extend the broadband service to Kemble Enterprise Park and neighbouring villages such as Kemble, Tarlton, Oaksey, Chelworth, Ashley, Culkerton and Rodmarton;
- Ensure the long-term protection of the World War II aircraft hangers through bringing them back into active use for suitable employment, leisure and/or community uses;
- Help support the delivery of a strategic cycleway incorporating the disused railway line, initially linking Culkerton, the new village and Kemble/Kemble Railway Station;
- An improved bus service with direct links to and from Kemble railway station and Kemble Enterprise Park, and the possibility of extending this to Cirencester; and
- Additional car parking facilities for Kemble Railway Station.

It is for the Council to determine how to sustainably meet its housing requirements. However as summarised below, but set out in more detail within our Vision Document, the availability and development potential of the Kemble Airfield site provides three potential alternative Local Plan development strategy options that were not previously open to the Council:

Option 1: Allocate the Kemble Airport site as a direct replacement to the strategic allocation south of Chesterton;

Option 2: Reduce the level of housing proposed on the land south of Chesterton and allocate the residual to the Kemble Airport site e.g. approximately 1,000 new homes on each site;

Option 3: Same as Option 2, but with the level of greenfield development that is currently proposed around settlements within the Cotswold AONB reduced and reallocated to the Kemble Airport site.

The Council's Local Development Scheme, which was approved in September 2014, confirms that the Local Plan is not timetabled to be submitted to the Secretary of State for independent examination until winter 2015. With a further Regulation 18 Draft Local Plan consultation timetabled in spring/ summer 2015 and a Regulation 19 Pre-Submission Draft Local Plan consultation timetabled in summer/autumn 2015 an alternative Local Plan strategy that takes forward one of the potential options outlined above should not significantly, if at all, delay the Local Plan from being submitted to the Secretary of State later this year.

Alternatively, as identified within our Vision Document, if through the emerging Local Plan process it is found that the currently proposed housing requirement of 7,600 new homes over the Plan period is considered to be too low to meet, as required by the NPPF, the Housing Market Area's objectively assessed needs for market and affordable homes in full, the Kemble Airfield site could also be allocated as a strategic allocation in addition to those already identified in the current draft Local Plan.

We consider that the Kemble Airfield site provides an exciting and highly sustainable opportunity for the Council to deliver its housing requirements and look forward to discussing this further with Officers and Members as the Local Plan process progresses.