Respondent	Policy	Comment
Carole Gandon	Policy SD1	Why aren't minor developments also required to submit a completed sustainability checklist? A number of minor developments in a town is surely the equivalent of a major development as far as sustainability is concerned?
yvonne o'callaghan	Policy SD1	River/water pollution due to failure to upgrade infrastructure must be secured prior to any further construction in Moreton in Marsh - commercial, community or residential.
yvonne o'callaghan	Policy SD1	Affordable housing should be delivered based on evidenced need - the proposal to concentrate development of, say, 1500 new homes in Moreton in Marsh should not automatically mean 40-50% affordable homes. It will force people from where they currently live/work in the south of the district to move in order to access affordable housing. Affordable Housing should be provided where it there is an evidence of demand/need - the council should not discharge its duty by offering people homes in areas just because that's where housing has been delivered. That is not strategic planning.
Andrew Brian Crump	Policy SD1	The protection of the natural, historic and built environment should take specific account of the proximity of the AONB to the existing settlement development boundary and be particularly cognisant of the views to and from the AONB and thus any impacts any development may have on its setting.
Chipping Campden School	Policy SD1	The School supports sustainable development and the objectives. Of Policy SD1
Andrew Higson	Policy SD1	Policy SD1, 1i) - Wellbeing, not welling?
Geoff Tappern	Policy SD1	Look forward to seeing this policy carried out in practice. We have had presentations from CDC on a site they own. But do they take into account feedback - No. Keep the same density, lack of car parking. Sounds very negative I know but that is how it is. Be interested in other opinions.
Brad Hooker	Policy SD1	Concerning commitment to maximise use of sustainable travel, I can point out that, having commuted to work via train from Moreton-in-Marsh to Reading for 26 years until 2019, I saw only a handful of people commuting to work in Oxford, only a couple of people commuting to work in Reading, and only about 20 commuting to work in London, which is little wonder, since commuting to work in London via train from Moreton now costs £11,120 per year! Any suggestion that Moreton will become a commuter hub is crazy.
Nick Loat	Policy SD1	There is no mention in SDI of employment. Surely sustainable development requires a mix of good quality employment opportunities. Those opportunities, may not be conveniently located on a railway line.
Fairford Town Council	Policy SD1	SD1 etc. – Use of the words 'minimise', 'maximise', 'optimise' – What does this mean in practice, when there are different aspects of sustainability that are interlinked and potentially need to be balanced, with different priorities in different places? Can development (and planning policies) actually do all the things suggested?

Respondent	Policy	Comment
Rosalie Callway 123	Policy SD1	SD1: Sustainable development - Flagship strategic policy Some of the points are very broad for example g), and others very specific for example l). Consider condensing and re-ordering the points a)-n) focused on broad strategic aims of sustainable development. Consider re-wording f) maintains and improves the health and wellbeing of residents and communities, encouraging healthy lives by tackling the causes of ill health and inequalities;
Susie Stephen (Stantec)	Policy SD1	Draft Policy SD1 sets out the principles of sustainable development for the District against which development proposals will be assessed (including through the completion of a Sustainability Checklist for all major applications). Overall, the thrust of Draft Policy SD1 is supported. However, as a general observation part c) would benefit from adjustment to reflect the now mandatory 10% biodiversity net gain required under legislation. Further clarity on the content and structure of the Sustainability Checklist required for major applications, would also be welcomed.
Gloucestershire Wildlife Trust	Policy SD1	We are pleased to see that this includes a point on delivering ecologically meaningful biodiversity net gain (BNG) in locations that deliver nature recovery.
Judith Montford The EA 207	Policy SD1	1.1 Policy SD1: Sustainable Development For point b) In aligning with ethos of "creating a future that is green to the core" it is imperative that the local plan takes a proactive stance in protecting and enhancing our natural environment. This includes not only preserving green spaces for recreational use, but also for the promotion of biodiversity conservation and ecosystem resilience. To emphasize this message, we recommend an additional point follows Policy SD1 1. b) . Example wording below: Protect, enhance and create ecologically valuable spaces that serve the conservation and resilience of biodiversity. For point d) We support the above however to further strengthen this point, we ask that the point d is amended to read. Reduces pollution and waste which actively promotes the circular economy principles. For point e) Again, in order to reinforce the message of "green to the core" we recommend more direct, proactive wording: Avoid development on diverse, ecological valuable landscapes that support biodiversity. We advise that the above proposed wordings are added for accuracy and clarity.

Respondent	Policy	Comment
Sean Lewis	Policy SD1	Our client is supportive of the general intention of new policies that seek to improve the economic, social and environmental conditions of the District. 31. Meeting development needs, improving the environment and mitigating climate change lies at the heart of the NPPF's presumption in favour of sustainable development, and the proposed allocation of the Site has the potential to positively address these objectives. 32. Given the Site lies adjacent to one of the District's largest Principal Settlements, the proposed allocation would contribute towards reducing carbon emissions; promoting sustainable transport modes (I.E. walking and cycling); reduce air quality impacts and ensuring at least a 10% biodiversity net gain.
Nicholas Dummett 186 (CPRE)	Policy SD1	It is unclear how many of the sustainable criteria a new development has to deliver. They are introduced as aspirations rather than requirements. It is clear that not all can be delivered as some will have no relevance to a particular development or if they did then it is likely that development cost would be substantially increased and it will be a major burden on minor development.
Sarah Hart (Morton-in-Marsh Town Council) 156	Policy SD1	In order to ensure BNG is retained a hierarchy needs to be established as follows by amending point SD1c: Settlement (priority 1), District (priority 2), County (priority 3) in support of SD2 point 6.
Sarah Hart (Morton-in-Marsh Town Council) 156	Policy SD1	In order to ensure BNG is retained a hierarchy needs to be established as follows by amending point SD1c: Settlement (priority 1), District (priority 2), County (priority 3) in support of SD1 point 6. Noting the intention to update Appendix H Strategic Principles for Green Infrastructure in Gloucestershire to be included or updated in next Local Plan consultation, A BNG spatial operating strategy combined or overlaid with a spatial development strategy within the District would at least enable residents to understand how their environment is being planned and managed in support of nature recovery, wellbeing and climate emergency.
Anne	Policy SD1: Sustainable Developme nt	Test test test test

Respondent	Policy	Comment
Geoff Tappern	Policy SD1: Sustainable Development	You cannot be truly sustainable without a control of population and the resources they need for water, food, power, and general resources e.g sand
jamie ball	Policy SD1: Sustainable Development	Proposing new housing that overwhelms the current size of Moreton In Marsh on known floodplains, some areas actually zone 3b, will create even more flooding problems than Moreton In Marsh and surrounding areas already suffer. This is truly an ecological problem that needs serious review. Even with no new housing flooding gets worse each year as climate change brings more severe rain storms. Building on the most sustainable way to deal with these known problems is completely wrong. Why is it that these functional floodplain are considered suitable for development? Flooding problems in Moreton In Marsh are pushed further along the Evenlode and its tributaries and re-surface to cause adjoin gin villages with flooding and sewage problems as well.
jamie ball	Policy SD1: Sustainable Development	Added to flooding issues, how can the current inadequate sewage and waste water infrastructure in Moreton In Marsh be considered sustainable? Thames Water must fund and supply new infrastructure in order for new development to be sustainable. Is there a demonstrable 'buy-in' from Thames Water (not Developers) to provide this? Without their involvement and pre-building of such infrastructure how can over 1,500 new houses be proposed?
Brad Hooker	Policy SD1: Sustainable Development	Flooding is a known problem in Moreton-in-Marsh. Much of the town was underwater in July 2007. Roads leaving Moreton---especially the road to Evenlode---floods 3 or 4 times every year. Don't build houses that will flood and/or cause other houses to flood.
David Eglise	Policy SD1: Sustainable Development	In policy SD1 council should proactively involve Parish Councils with all aspects including access to planning officers, etc.

Respondent	Policy	Comment
Clare Charlton	Policy SD1: Sustainable Development	Policy SD1: "support proposals that improve the economic, social and environmental conditions of" change to read "support proposals that improve the environmental, social and economic conditions of". SO environmental comes first in the list not last. Generally - policies should consider a behavioural science approach to bring people alongside the changes as these will inevitably require local communities and residents to change their behaviour.
Rohan Torkildsen 158	Policy SD1: Sustainable Development	As the Government's adviser for the historic environment, Historic England is keen to ensure that its significance is sustained and opportunities for enhancement are fully considered. As your Local Plan will be a statutory planning document we have considered it within the context of the NPPF and its core planning principle that to achieve sustainable development heritage assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. As such we acknowledge, in particular, proposed Policy SD1 Sustainable Development, and the welcome commitment to supporting proposals that "Promotes the protection, conservation and enhancement of the historic, built and natural environment."
Highways England 133	Policy SD1: Sustainable Development	Policy SD1: Sustainable Development National Highways supports the inclusion of a specific sustainable development policy which seeks to maximise 'the use of sustainable travel to support increased levels of accessibility to local services and facilities;". However, we note that the greatest opportunity for the Local Plan to influence sustainable development is through the site allocations process, and the cumulative impact of the proposed spatial strategy should be assessed to ensure any severe impacts on the SRN can be appropriately mitigated. This should be considered with the development of the evidence base to support the extension of the Local Plan horizon year to 2041 in the emerging Local Plan should this policy be carried forwards. Measures to mitigate the impact of development inclusive of sustainable travel options should be set out within an IDP and signposted within relevant Local Plan policies. Mitigation identified as necessary to safely accommodate the impact of individual sites including measures to facilitate modal shift should be site out in site allocation-specific policies to ensure they are delivered alongside the development they are required to support.

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy SD1: Sustainable Development	GCC officers recognise that climate considerations have been developed thoroughly and welcomes the incorporation of new policy and legislation. Responses below may be of use, and expands upon existing chapters within the Cotswold Local Plan: Chapter 5A: comments are supported, and considerations should be made to development location to minimise private vehicle use. Development sites should be selected with existing public transport links and active travel provision in place. Any new developments should also provide within itself measures to minimise private vehicle use such as: • Car Clubs. • Secure and waterproof cycle stores. • Reduced car parking spaces. • Electric vehicle charging points that go beyond the DHLUC Building Regulation's new requirement of "Approved Document S: Infrastructure for the Charging of Electric Vehicles."
Bathurst Estate 175	Policy SD1: Sustainable Development	Please find below a schedule of the policies included within the Regulation 18 Local Plan Update (Draft Policies) document. The table below answers the questions proposed within the Local Plan Update (Draft Policies) Survey Questions document but also provides commentary on some additional policies. We have separated the policies out into those which are new policies and those which are existing policies, but changes have been made. Policies where there has been no change, there is no recommendation for comments as there is no change from the baseline position. General support of the inclusion of the sustainability objectives. The requirements are all matters which would be addressed in the normal preparation of a planning application and to demonstrate sustainable development. It would be useful if the policy could clarify the differences between this policy and other policies within the plan that focus on a specific sustainable element as there is significant overlap.
Royal Agricultural University	Policy SD1: Sustainable Development	Overall, the Royal Agricultural University (RAU) are supportive of draft chapter 5A regarding Sustainable Development and the policies that are part of it. For Policy SD1 (Sustainable Development), the RAU is supportive of the specific sustainable development principles listed in that policy and will adhere to them as part of any application.

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy SD1: Sustainable Development	Policy SD1 – Sustainable Development 3.9. This is a new overarching draft policy within a chapter which focusses on sustainability and climate change mitigation and adaptation. The policy addresses the three overarching objectives of sustainable development included in Paragraph 8 of the NPPF. These consist of economic objectives (e.g. the importance of protected employment sites), social objectives (e.g. the provision of affordable homes), and environmental objectives, including mitigating against climate change, biodiversity net gains (BNG), and sustainable travel. These issues are returned to and discussed in more detail below. 3.10. Further details should be provided on what is meant by a Sustainability Checklist, whether in the policy or within the supporting text. In addition, there should be a clear justification for referencing this within the policy, and the requirements which will need to be met. The checklist must not place onerous requirements on developments which exceed the requirements of the national Building Regulations. 3.11. The policy also states that development should be avoided on best and most versatile (BMV) agricultural land. Clarification should be provided on what is meant by this, with reference to Natural England's give Agricultural Land Classification Grades, and the fact that BMV consists of Grades 1-3a. Whilst it is generally accepted that this land should be protected if possible as per the Government's Planning Practice Guidance (PPG), Paragraph 180 of the National Planning Policy Framework (NPPF), and policy documents such as A Green Future: Our 25 Year Plan to Improve the Environment (page 35), development should not be precluded altogether if a site consists of BMV. Natural England do not need to be consulted if less than 20 hectares of BMV will be lost, and if a site falls below this threshold in particular, it will be important to weigh the loss of smaller areas of BMV against the significant benefits which a scheme could provide, such as the provision of more housing, including affordable units, which is encouraged elsewhere within the same policy. Summary of the amendments required 3.12. Further information on the sustainability checklist, which should not be too onerous, and clarification on BMV and there should be an emphasis on the fact that loss should be weighed against any benefits. This will ensure that the pre-submission plan is justified in providing an appropriate strategy.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy SD1: Sustainable Development	Policy SD1 – Sustainable Development 3.9. This is a new overarching draft policy within a chapter which focusses on sustainability and climate change mitigation and adaptation. The policy addresses the three overarching objectives of sustainable development included in Paragraph 8 of the NPPF. These consist of economic objectives (e.g. the importance of protected employment sites), social objectives (e.g. the provision of affordable homes), and environmental objectives, including mitigating against climate change, biodiversity net gain (BNG), and sustainable travel. These issues are returned to and discussed in more detail below. 3.10. Further details should be provided on what is meant by a Sustainability Checklist, whether in the policy or within the supporting text. In addition, there should be a clear justification for referencing this within the policy, and the requirements which will need to be met. The checklist must not place onerous requirements on developments which exceed the requirements of the national Building Regulations. 3.11. The policy also states that development should be avoided on best and most versatile (BMV) agricultural land. Clarification should be provided on what is meant by this, with reference to Natural England's give Agricultural Land Classification Grades, and the fact that BMV consists of Grades 1-3a. Whilst it is generally accepted that this land should be protected if possible as per the Government's Planning Practice Guidance (PPG), Paragraph 180 of the National Planning Policy Framework (NPPF), and policy documents such as A Green Future: Our 25 Year Plan to Improve the Environment (page 35), development should not be precluded altogether if a site consists of BMV. Natural England do not need to be consulted if less than 20 hectares of BMV will be lost, and if a site falls below this threshold in particular, it will be important to weigh the loss of smaller areas of BMV against the significant benefits which a scheme could provide, such as the provision of more housing, including affordable units, which is encouraged elsewhere within the same policy. Summary of the amendments required 3.12. Further information on the sustainability checklist, which should not be too onerous, and clarification on BMV and there should be an emphasis on the fact that loss should be weighed against any benefits. This will ensure that the pre-submission plan is justified in providing an

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy SD1: Sustainable Development	Call for sites. New emerging Policy SD1 'Sustainable Development' supports development proposals that improve the economic, social and environmental conditions of the district and lists a number of principles that development should look to demonstrate to meet this test.
Sarah Hart (Morton-in-Marsh Town Council) 156	Policy SD1: Sustainable Development	5.1.2 MTC supports points under the 4th bullet and notes the intention to update Appendix H Strategic Principles for Green Infrastructure in Gloucestershire to be included or updated in next Local Plan consultation, however the final point under the 4th bullet is unclear. CDC has signed up to the Gloucestershire Nature and Climate Fund (GNCF) linked to biodiversity net gain (BNG) principles and spatial operating strategy. Policy (EN7, EN8, EN9) needs to be clearer about developer contributions to BNG and links to the CDC Green Infrastructure Strategy December 2023 and GNCF in order to ensure BNG is retained in a hierarchy needs to be established as follows by amending point SD1c: Settlement (priority 1), District (priority 2), County (priority 3) in support of SD1point 6.
David Hindle	Policy SD2: The Climate and Ecological Emergencies (i)	5a.2.10 As plan only goes up until 2031, I would have expected statement to be more like, 'Place a commitment for development to work towards delivering development that is Net Carbon Zero, and delivers Nature recovery.
Chipping Campden School	Policy SD2: The Climate and Ecological Emergencies (i)	The School supports Policy SD2

Respondent	Policy	Comment
gina stephens	Policy SD2: The Climate and Ecological Emergencies (i)	With the weather predicted to become increasingly wetter, the proposed increase in houses for MIM will only result in more flooding. The additional run off of water created by the increased building (in number, volume of concreted area, loss of green space, land to absorb the runoff etc) will cause flooding of the Evenlode (flood warnings from the environmental agency issued for MIM are already significant) as well as adversely impacting on the already high water table experienced in the town.
Geoff Tappern	Policy SD2: The Climate and Ecological Emergencies (i)	Cost impact and timescale must be taken into account and at present that does not appear to be happening.
Geoff Tappern	Policy SD2: The Climate and Ecological Emergencies (i)	Fully support climate control policies but building regulations must be in force. Also timescales and costs must be realistic and make certain the average person can afford.
jamie ball	Policy SD2: The Climate and Ecological Emergencies (i)	SFRA 1 & Gov.uk mapping shows dark blue (highest risk) flood risk in a number of areas that are 'proposed' for new Development in Moreton In Marsh. Most of these are in the areas 'proposed' south of the A 44, but there are also dark blue ribbons of known high flood risk in the eastern section of the 'proposed' Fire College land. Building on these areas where there is already ongoing flood and surface water flooding after heavy rains is ecologically foolhardy. As the Climate changes and we experience more severe downpours often resulting in flash flooding building on known problems is completely at odds with Policy SD2.

Respondent	Policy	Comment
Brad Hooker	Policy SD2: The Climate and Ecological Emergencies (i)	While I wholeheartedly agree that moving to net-zero must be a top priority, I cannot see how building a lot of houses a long way from significant employment opportunities (in Cheltenham, Banbury, Stratford, etc.) won't increase car travel in the area significantly, and thus be bad for global warming.
john shelton	Policy SD2: The Climate and Ecological Emergencies (i)	policy sd2....CDC must ensure that development carbon offsetting should be achieved in the immediate vicinity of any development not for example an african mangrove swamp or some fields in the hebrides. Biodiversity net gain (BNG) has to real and monitored to achieve enforceability
Nick Loat	Policy SD2: The Climate and Ecological Emergencies (i)	If truely green to the core, then it makes sense to build housing where the jobs are, to reduce journeys. Homes have to be built with the future in mind, the demands of modern living, changing demogrpahics. Any BNG mitigation for development needs to be done in the locality affected not elsewhere in the region or country
Jonathan Collins	Policy SD2: The Climate and Ecological Emergencies (i)	Agree with SD2. In Mickleton we need to travel for most things so provide frequent, electric/hydrogen buses to major towns nearby or to rail at Honeybourn, connecting once more to Stratford. This enables workers to travel to Stratford, Birmingham, Oxford, Worcester etc. reducing car use and give many leisure opportunities with benefits for the environment.

Respondent	Policy	Comment
Rosalie Callway 123	Policy SD2: The Climate and Ecological Emergencies (i)	5a.2.3 A warm environment will lead to more unpredictable and extreme storm events, which can have notable implications for building and landscape design, right down to the need to install larger capacity gutters. Need to mention implications for human health and wellbeing, in terms of the effects of excess cold and heat to people, as well as impacts to mental health from flood events.
Ruth Hall 155	Policy SD2: The Climate and Ecological Emergencies (i)	Wessex Water are supportive of the environmental policies within the Plan. We welcome the introduction of Policy SD2 which states that proposals will be supported where they ensure that development does not increase sewer overflow pollution. The policy element supports the principles of good rainwater management as stated in the Government's Storm Overflows Discharge Reduction Plan section 2.5, which is that rainwater should be treated as a resource and not mixed with sewage or other contaminants. The issues of sewer flooding and storm overflows are essentially due to poor rainwater management at source. To make drainage truly sustainable, policy needs to be in place that prevents new development having any net increase in rainwater flow to existing combined sewers. Improving rainwater management through the planning process is essential to reduce flood risk and improve storm overflow discharge occurrences.
Bathurst Estate 175	Policy SD2: The Climate and Ecological Emergencies (i)	Comment: The climate and ecological criteria are those which would normally be considered in the preparation of development proposals in the context of the NPPF. However, it would be useful if the policy could clarify the applicability to Reserved Matters Applications.

Respondent	Policy	Comment
Royal Agricultural University	Policy SD2: The Climate and Ecological Emergencies (i)	The RAU are supportive of the aims of Policy SD2 (The Climate and Ecological Emergencies) and believe that this is consistent with the university's teachings and aspirations for the Campus. The RAU's core purpose, dating back from 1845 – to care for the land – is more relevant and vital than ever. All depends on it. Climate resilience, nature recovery, food security, health, wellbeing and thriving communities all rely on how we treat the land. To care for the land is central to the RAU's teaching and research, as they equip each new generation to address these big global challenges. But it is equally important to ensure that they lead by example and ensure that how we use and develop the university's own estate, speaks to that same core purpose. The RAU, therefore, support this policy. Going forward, the RAU are proposing an Innovation Village as an expansion to their main campus, and an application is currently being prepared. It is viewed that the Innovation Village can be at the forefront in achieving the aims of these policies and lead the way to improving and responding to climate change. The Innovation Village will be a cluster development that will accommodate organisations and expertise from academia, industry and policy-making – in order to generate real-world solutions to the global challenges of food production, climate change and land health One of the university's three strategic objectives is Sustainability and to be 'a showcase for sustainable and resilient management, through their land and estate, finances and culture'. This is reflected in the Estate Masterplan, which sets a target to achieve a net zero campus by 2040. The detail of the university's ambition and actions required to achieve this are set out in the RAU's Net-Zero and Sustainability Strategy: Built Environment, but a summary of the key elements are provided below: •The Innovation Village development will have ultralow energy use buildings far in excess of current and emerging Local and National policies and will set the standard for the future •The RAU is investigating the aim of the decarbonising existing buildings so they can be net-zero. •The establishment of onsite composting, waste separation at source, food waste and zero to landfill initiatives. •To Develop a Circular Economy at the Innovation Village. •To achieve Net-Zero a by 2040. As part of this the RAU have set decarbonisation roadmap which will include milestone targets up to 2040. •High-quality Pedestrian and cycle routes •High level of EV Charging facilities •Additional Cycle storage and changing facilities •A site wide approach to Landscape within the village which breaks up tarmac with the planting of trees, grasses and other fauna. It is our view that the sustainability measures provided for the Innovation Village and wider campus go above and beyond the principles of this policy and will be an exemplar of sustainable design, construction and operation for the District. The measures incorporated into the Innovation Village proposals can be summarised as follows: •The RAU seeks to achieve high building and Infrastructure accreditations such as BREEAM, Well Standard, Passivhaus Plus and Premium and Building with Nature (BwN). All of the development will seek to achieve these accreditations

Respondent	Policy	Comment
Judith Montford The EA 207	Policy SD2: The Climate and Ecological Emergencies (i)	Policy SD2: The Climate and Ecological Emergencies While we are pleased to see the encouragement for development to invest in achieving key ecological objectives, we strongly encourage referencing the pressures that new development imposes onto biodiversity and blue infrastructure. There is significant risk associated with development and this issue needs to be emphasized. We therefore, encourage that this point is raised as an additional section to those that precede the outlined policy (Sections 5a.2.5, 5a.2.6 and 5a.2.7). Please find example wording below: While acknowledging the need to meet housing demands and accommodate development of infrastructure, it is crucial to recognize the significant pressures that new development imposes onto biodiversity. The expansion of urban areas, infrastructure projects, and land use changes associated with development threatens biodiversity through habitat loss, fragmentation, and degradation, and consequently poses a substantial risk to local ecosystems. Therefore, it is imperative that new development not only prioritizes the conservation of biodiversity but also takes proactive steps to enhance and restore ecosystems. By incorporating measures to mitigate these pressures and actively promote the restoration and enhancement of green and blue infrastructure, development can play a vital role in improving biodiversity and contributing positively to ecological resilience.
Sean Lewis	Policy SD2: The Climate and Ecological Emergencies (i)	Our client is supportive of the general intention of new policies that seek to improve the economic, social and environmental conditions of the District. 31. Meeting development needs, improving the environment and mitigating climate change lies at the heart of the NPPF's presumption in favour of sustainable development, and the proposed allocation of the Site has the potential to positively address these objectives. 32. Given the Site lies adjacent to one of the District's largest Principal Settlements, the proposed allocation would contribute towards reducing carbon emissions; promoting sustainable transport modes (I.E. walking and cycling); reduce air quality impacts and ensuring at least a 10% biodiversity net gain.
Chris Marsh (Pegasus Group) 334	Policy SD2: The Climate and Ecological Emergencies (i)	Policy SD2 – The Climate and Ecological Emergencies 3.13. This policy seeks to support the delivery of a carbon neutral Cotswold District by 2045. This is a creditable aim, which will not be achievable before then. Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 states that development plans should include policies designed to contribute to the mitigation of, and adaptation to, climate change, whilst the NPPF identifies plans should take a proactive approach to mitigating and adapting to climate change. Therefore, the policy is consistent with national policy in this respect. However, it is important to emphasise that the need to mitigate and adapt to climate change must ultimately be balanced against the need for housing and economic development.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy SD2: The Climate and Ecological Emergencies (i)	Policy SD2 – The Climate and Ecological Emergencies 3.13. This policy seeks to support the delivery of a carbon neutral Cotswold District by 2045. This is a creditable aim, which will not be achievable before then. Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 states that development plans should include policies designed to contribute to the mitigation of, and adaptation to, climate change, whilst the NPPF identifies plans should take a proactive approach to mitigating and adapting to climate change. Therefore, the policy is consistent with national policy in this respect. However, it is important to emphasise that the need to mitigate and adapt to climate change must ultimately be balanced against the need for housing and economic development.
Morgan Elliot Planning 340	Policy SD2: The Climate and Ecological Emergencies (i)	Call for sites. New emerging Policy SD2 'The Climate and Ecological Emergencies' looks at ways in which to mitigate and adapt to climate change and to address the ecological emergency and support nature recovery.
Andrew Brian Crump	Policy SD2	It is clear that, if modal shifts are to be made away from reliance on private motor vehicles, then future development needs to be concentrated in locations where there is either locally based employment, or a sustainable public transport network. Simply adding to dormitory communities by permitting development where reliance in placed primarily on private motor vehicles will not be green to the core in view of the air, noise and light pollution generated, added to the congestion on local roads. Where flooding has been an issue in existing developments, then adjacent locations should be avoided as potential future sites to prevent similar problems for existing and potential residents.
gina stephens	Policy SD2	CDC will not be able to achieve its policy commitment of delivering biodiversity net gain with the proposed increase in residential and business development in MIM. Large areas within the SLA will be built on which will adversely impact on the biodiversity of the town and its surroundings wiping out fragile ecosystems, flora and fauna.
jamie ball	Policy SD2	Policy SD2 p.3) states measures will be incorporated into the plan to increase flood resiliency. A very simple and Ecologically sound way of doing this in the Moreton In Marsh area is to NOT Build on Known Floodplains. These floodplains have the Evenlode river running through them and currently flood. Paving over them and building houses will only be the cause of more flooding and also increasing the flooding that surrounding villages experience.
john shelton	Policy SD2	CDC's proposed concentration of development in and around Moreton will make achieving SD2 objectives impossible.
john shelton	Policy SD2	Specifically SD2.6, 8, 9, 10.....all of which will be impossible to achieve given the size of the proposed concentration of developmeny around Moreton

Respondent	Policy	Comment
David eglise	Policy SD2	The policy mentions measures will be incorporated into the Plan to increase flood resiliency. A very simple and ecologically way of achieving this in Down Ampney is to not build on known or adjacent floodplains. Floodplains are there for a purpose so more housing developments will only bring about yet more surface water flooding in the surrounding village area. Where flooding has been an issue in existing developments, then adjacent locations should be avoided as potential future sites to prevent similar problems for existing and potential residents. This is a global undertaking, and to be effective the costs locally will be immense. What is not shown is the local costing to make this policy feasible.
Blockley Parish Council	Policy SD2	SD2: Blockley Parish Council supports Policy SD2
Gloucestershire Wildlife Trust	Policy SD2	A more recent state of nature report has since been published which sets out even greater declines in biodiversity than the 2019 report, showing nearly 1 in 6 species (16.1%) are now threatened with extinction (State of Nature, 2023). We appreciate it may be too late to update this in the draft plan. Point six should read 'delivering net gains of at least 10%' rather than just 'delivering biodiversity net gain' to be in line with national policy and legislation. We would like to see the plan be more ambitious around biodiversity net gain (BNG), especially in relation to development that might occur in medium or high priority opportunity areas as per the Nature Recovery Network maps. Development in these areas would not be preferable and could significantly impact opportunities for connecting habitats and securing natures recovery. A line could be added to state that development occurring in these medium and high opportunity areas should maximise opportunities for BNG. Point 6 (d) could be amended to include this, to make sure that if/ when development does occur in these areas, it at least must go further to incorporate more ambitious gains for biodiversity.
Judith Montford The EA 207	Policy SD2	In the policy box, we note this policy states that developments that meet the listed climate and ecological principles "will be supported". The inclusion of these measures within development plans should not just be supported but expected. We suggest strengthening the message with the revised version: Development proposals will be expected to adhere to the following climate and ecological principles: For point 7, we recommend highlighting the need for the mitigation of these risks within the policy itself. We therefore suggest expanding point 7 to read; "incorporate measures that mitigate impacts of new development's construction and operation on the natural functioning of watercourses and river corridors, their associated habitats and dependant wildlife." Whilst we welcome the inclusion of point 8, we recommend that part 7 is re-worded as it is not clear what point 7 is trying to achieve. Is this point encouraging natural flood management and if this is the case, we ask that this is reworded or clarified. We advise that the above proposed wordings are added for accuracy and clarity.
Martin Barnett 429	Policy SD2	Media reports continues that our planets temperature core to a pre-monstural level by 148% last year changing the global climate. If this means we will have great levels of precipitation then by its very name Moreton-in-the-Marsh is not the place to build more homes.

Respondent	Policy	Comment
Nicholas Dummett 186 (CPRE)	Policy SD2	Similarly to SD1 this is long list of worthy objectives. However the introduction is unclear whether applications which do not deliver the principles will be rejected and whether all criteria should or could apply to all developments. It would be clearer if the introductory paragraph read "Developments will only be approved which, where appropriate, deliver:". We support the list of requirements.
Andrew Brian Crump	Policy EN2: Design of the Built and Natural Environment SD3:	Heritage assets, such as the iron age hillfort of Meon Hill, and the Heart of England Way which traverses it, need to be preserved and not encroached upon by burgeoning development. Meon Hill is part of the AONB and its setting in relation to Mickleton is part of the settlement's character. Hence, open spaces that facilitate its access are vital in terms of its future preservation and for recreational amenity. With dark skies and tranquillity also prevalent in this location, there would be clear adverse impacts of light and noise pollution being created by future development adjacent to Meon Hill, in addition to intrusive visual impacts to and from it.
Chipping Campden School	Policy EN2: Design of the Built and Natural Environment SD3:	The School supports Polcy SD3
gina stephens	Policy EN2: Design of the Built and Natural Environment SD3:	CDC does not live up to its claim of sympathetic house design in relation to its surroundings. I refer to the Backhouse development in MIM which at best can only be described as sterile, with no resemblance to the pretty cotswold houses which are also environmentally sound, built 300 m down the road by a small private developer.

Respondent	Policy	Comment
Geoff Tappern	Policy EN2: Design of the Built and Natural Environment SD3:	Down Ampney has a new design guide and a recommended density of housing which keeps a good environment and balance. Unfortunately CDC approves developments with a housing number and density that completely spoil the rural village feel. Not realistic on car parking.
Geoff Tappern	Policy EN2: Design of the Built and Natural Environment SD3:	Fully support this policy. Down Ampney has just produced a Design guide as part of the Neighbourhood Plan.
jamie ball	Policy EN2: Design of the Built and Natural Environment SD3:	Moreton In Marsh is a tiny pocket which sits between AONB land and has been designated its own SLA. In all previous CDC Planning, CDC has been at great pains to spell out its special nature and the fact that it sits sit by side with tranquil and rural villages. In this latest plan can CDC demonstrate the highest standard of 'evidential testing' to show it complies with Policy EN4 para 10.4.12 & 13 such that there will be no detrimental impact if new excessive increase in housing numbers (1,500 plus houses'proposed to be added', more than 50% growth) will not spoil the SLA designation?

Respondent	Policy	Comment
Geoff Tappern	Policy EN2: Design of the Built and Natural Environment SD3:	Down Ampney has produced a Design guide and just hope that CDC planners will take note of it. Good design is very important but generally over development and car parking spoils any major developments.
john shelton	Policy EN2: Design of the Built and Natural Environment SD3:	the CDC seems to be totally ignoring the importance of the Moreton Special Landscape Area (MSLA) which was codified specifically to protect it from overdevelopment, CDC's plans inconsistent with the plans under consideration
David Eglise	Policy EN2: Design of the Built and Natural Environment SD3:	To preserve the local character this policy should include some control over "front facing permitted development" which can change street scenes without permission!

Respondent	Policy	Comment
David Eglise	Policy EN2: Design of the Built and Natural Environment SD3:	Within the natural environment where flooding has been an issue in existing developments, then adjacent locations should be avoided as potential future sites to prevent similar problems for existing and potential residents.
Jonathan Collins	Policy EN2: Design of the Built and Natural Environment SD3:	All new building must have mandatory solar power, ground or air-source heating if at all possible, NO gas boilers, NO fireplaces, water retention to us rainwater to flush lavatories and perhaps communal underground water for this purpose and garden irrigation / car washing metered for all houses from the tank. No builder excuses, more builder education and powers to refuse planning without these features.
Jonathan Collins	Policy EN2: Design of the Built and Natural Environment SD3:	Agree that we should encourage active travel and make it easier for people to walk, wheel and cycle in their neighbourhoods, as well as improving access to public transport. In Mickleton we need a village redesign to resolve pedestrians and cyclists being separated from vehicles more, with better parking for shops, ideally in a newly designed area which is safe, can be accessed by foot or bicycle and is accompanied by 20s Plenty. The latter is supported by the local police but NOT GCC which is spreading fake news about its ineffectiveness!

Respondent	Policy	Comment
David Hindle	Policy EN2: Design of the Built and Natural Environment SD3:	1. Adding daylight, to the part where overshadowing and overbearing are also refereed too. This is as daylight is a separate matter to overshadowing. 2. a) There needs to be variable garden size guidelines for residential, depending on the number of bedrooms (or occupancy). A specific item to include is that balconies are normally only appropriate for one bedroom units. There has to be a flexibility where gardens are impossible, for example conversions over shops. b) There also needs to be a logical, and successfully defended elsewhere guide for P.O.S. Those are usually expressed on the basis of overall population served by P.O.S, in a total area, and related to the specific size of a new development. This normally relates to larger individual developments.so that suggests there is a threshold, and at that level a minimal size, increased by inceaments.. c) The same issue relates to children's' play space that would normally relate to a new development, therefore size of development, and numbers of children is likely criteria, but with a number of unit staring point, that should be expressed, then incremental increase above that d) Probably for the Local Plan itself, the potential issue of a commuted payment, for enhancing of nearby safely accessible, may be a plausible acceptable alternative. 3. The detail on dark skies implementation needs to be within the Design Guide, not within the Local Plan, and needs to set within the context of safety, security, and feeling safe. As the officer will note my view that there should be two approaches: a) Principle, and Non - Principle Settlements, and immediately adjoining, dark skis not a material consideration, with standards set to reflect that, with safety, security and feeling safe being the key consideration. b) In other areas, particularly in isolated locations, dark skies is a material consideration, and the standards set within the Design Guide to be set accordingly, but not to the detriment on safety, security, and feeling safe. 4. If not already existing there needs to be a Section on Secure by Design. This could be brief, primarily based on directing applicants to existing respected guidelines, which already exist elsewhere. 5. The issue of matters of replacement of existing windows on Listed Buildings, and Buildings in Conservation Areas, with slimline double glazed units, needs to be covered. It should be worded to give a presumption in favour of normally allowing this (reducing climate change, and energy retention taking priority). The exceptions to

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy EN2: Design of the Built and Natural Environment SD3:	The GCC Transport Planning would like the reference to public transport to be changed to "high frequency public transport". In addition, access to services should be included.
Royal Agricultural University	Policy EN2: Design of the Built and Natural Environment SD3:	For Policy SD3 (The Cotswold Design Code), the principle of this objective is supported insofar that the design of any development should aim, where appropriate, to meet high standards of design and to minimise carbon emissions. The client team will aim to ensure this is met with the delivery of the Innovation Village.
Cirencester Town Council 211	Policy EN2: Design of the Built and Natural Environment SD3:	Regarding the important elements of; Climate resilience, Energy efficiency and Architecture/built form & appearance, why is CDC not just proposing amendments to the existing design code to reflect changes in legislation, emerging technology and those needed to address climate change? Regarding The Steadings, why has the development (Phase 1A) not addressed all the things needed to mitigate climate change, for example, Solar PV? Considering the housing (Gardener Way, Clappen Close) high-lighted on the CDC map, CTC would like to make the following comments: 1) There are excessive amounts of road space with only two surfaces which make for bleak surroundings; 2) Minimal green space in front of houses with the same result as (1) 3) Almost no variations in roof angles and materials, resulting in monotonous appearance; 4) Comparatively small windows, giving a closed-off appearance to the streetscape

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy EN2: Design of the Built and Natural Environment SD3:	Policy SD3 – Cotswold Design Code 3.14. This is a new policy which is proposed to replace Policy EN-2 (Design of the Built and Natural Environment). Rosconn support high quality design. The policy provides a list of design considerations which will be taken into account when considering applications. It is, however, important that innovation and the need to respond to the requirements of a site are not unduly inhibited by an overly prescriptive approach. Indeed, the individual character of each site and settlement should be considered on a case by case basis in terms of design. For example, the separate Design Code (referred to within the policy) suggests that Cotswold Stone should be used for new buildings, but in a settlement such as Mickleton, red brick is prevalent in many parts of the village. Insisting on a 'blanket' approach such as this will not respond to the circumstances of individual sites.
Chris Marsh (Pegasus) 335	Policy EN2: Design of the Built and Natural Environment SD3:	Policy SD3 – Cotswold Design Code 3.14. This is a new policy which is proposed to replace Policy EN-2 (Design of the Built and Natural Environment). Rosconn support high quality design. The policy provides a list of design considerations which will be taken into account when considering applications. It is, however, important that innovation and the need to respond to the requirements of a site are not unduly inhibited by an overly prescriptive approach. Indeed, the individual character of each site and settlement should be considered on a case by case basis in terms of design. For example, the separate Design Code (referred to within the policy) suggests that Cotswold Stone should be used for new buildings, but in a settlement such as Bourton, other materials including brick and render are prevalent in parts of the village. Insisting on a 'blanket' approach such as this will not respond to the circumstances of individual sites.
Morgan Elliot Planning 340	Policy EN2: Design of the Built and Natural Environment SD3:	Call for sites. Policy EN2 looks to ensure that development is of a design quality that respects the character and distinctive appearance of the locality.

Respondent	Policy	Comment
David Hindle	Policy EN2 SD3	b) 'daylight' needs to be added, as it is distinct from sunlight. 5.3.8 The sentence at the bottom does not read quite right, as the emphasis should surely be on not repeating poor design, but seeking to have positive design appropriate to the Cotswolds. The point on transition to the Countryside is still of relevance, but should be a separate sentence. Sa.3.11 will become Sa.3.10, then paragraph numbering will change after that.
David Hindle	Policy EN2 SD3	I forgot to add on the Design Guide to add two additional items in Sa.3.11 - Addressing the the principles of 'secure by design' - Addressing the principles of 'dark skies', emphasising its relevance to isolated development, and giving appropriate guidelines for larger development, on lightning for isolated development, and larger development. (see Policy EN16 and the Design Code).
David Hindle	Policy EN2 SD3	b) add daylight after overshadowing as they are distinctive issues.
David Hindle	Policy EN2 SD3	Second a) add in the more isolated locations.
yvonne o'callaghan	Policy EN2 SD3	Design at planning stage should also secure the long term management of new neighbourhoods. Too often, well meaning planning conditions are not properly discharged by developers and residents then pay the price. Planning and s106 obligations must be enforced. All the ecological / environmental / climate policies in the world make no difference if the on-going management regime does not respect the principles upon which permission was granted. There a lessons to be learnt from existing developments, e.g. Moreton in Marsh.
Andrew Brian Crump	Policy EN2 SD3	The distinctive character of a settlement is as much about its setting within is natural environment as it is the buildings within it. Being able to readily access the adjacent countryside, without the need to negotiate burgeoning housing estates in order to do so, promotes well-being by encouraging physical exercise by the use of the Heart of England Way, for example. Allied to this recreational amenity is the ability to breathe in clean air on the approach to locations such as Meon Hill, without the harmful effects caused by vehicle fumes. It is clearly an important feature of the social objective that open spaces in settlements, or adjacent to their boundaries, are preserved for social and cultural well-being. If development is constructed further away from the centre of a settlement then this will encourage the use of vehicles. The same applies if access to schools, workplaces, health and other facilities can only be reasonably achieved by the use of private motor vehicles.

Respondent	Policy	Comment
David Hindle	Policy EN2 SD3	To must, add 2 more letters. -- All new residential development providing more than 50?? residential units gross, must ensure the provision P.O.S, to the standards in the Design Guide. (the standards would be set in 2 ways, by P.OS per population in total served by existing, and new P.O.S; and s set standard for 50 new units, and then increased in increments of each additional 10 units. The standards being set out in the Design - use established figures, and other adopted and successfully defended Standards from other LPSs). -- All new residential development providing more than 30 residential units gross, must ensure the provision of equipped Children's Play Space, to the standards in the Design Guide. In exceptional circumstances the enhancement of nearby existing,, safely accessible Play Space via a commuted sum will be accepted as an alternative to on-site provision. (Standards in Design guide to be established recognised ones, or those in adopted Local Plans, where the standards have been successfully defended.)
David Hindle	Policy EN2 SD3	New residential to must incorporate private variable sized gardens, to minimum sizes by number of bedrooms, as set out in the Design Guide. Only one bedroom units, are appropriate for balconies, or communal gardens.---------- (for this and the other 2 suggestions, some reference in the text would be needed as well)---------- (Design Guide needs to have the actual standards, reference any Neighboring Authorities, if they have such, or look further for LPAs with adopted guidelines, that have been successfully defended).---------- The person updating the DG needs to draw up the Policies for my last 3 proposed additions, if they are broadly agreed, but with wording that fits the context right).
Clare Charlton	Policy EN2 SD3	Section d: Apply the EAST principles to active travel, ie designs need to make walking and cycling Easy (easier than by car for short journeys), Accessible, Sociable, and Timely.

Respondent	Policy	Comment
gina stephens	Policy EN2 SD3	CDC Planning department have to date not enforced the commitment by CDC to 'ensure (new housing) be of design quality that respects the character and distinctive appearance of the locality by having regard to scale, height, density, layout, appearance and material' if 1500+ houses are to be built in a town that has already seen more residential development in any other town in the area. The scale and density of the proposed new development does not uphold this point.
Richard Gunner	Policy EN2 SD3	Please note that the public transport itself must be as near to zero emissions as possible - CO2 and paticulates being particularly significant.
Geoff Tappern	Policy EN2 SD3	Down Ampney has produced a Neighbourhood Plan and design guide. Work to that and residents will be happy.
Geoff Tappern	Policy EN2 SD3	Same comment as to EN2 which will be deleted
Geoff Tappern	Policy EN2 SD3	I seem to be giving the same answer to very similar questions. Work to our Neighbourhood Plan and design guide.
john shelton	Policy EN2 SD3	CDC is committed to avoid/minimize light pollution....their plans fly directly in the face of this commitment
David Hindle	Policy EN2 SD3	In the fist clause of should, the part relating to light pollution should be changed to avoid or minimise light pollution in isolated locations.
Coates Parish Council	Policy EN2 SD3	Policy SD3: Under 'Development must...' the following words should be added at the end of b) after ...'adverse impacts' 'such as blocking out views and vistas of open spaces and the natural environment;
Coates Parish Council	Policy EN2 SD3	At Policy SD3 under 'Development must' at the end of b) the following words should be added after 'adverse impacts' 'such as blocking out views and vistas of open spaces and the natural environment;'
Clare Charlton	Policy EN2 SD3	•Policy SD3 agree with the change from "should" to "must" SD3 - Design code: b) consider reference to preventing impact on renewable energy devices eg solar panels SD3 - d) "make it easier for people to walk, wheel and cycle in their neighbourhoods, " consider including - making it easier to store and access bicycles and other active travel vehicles - this relates to avoiding the storage of bicycles in sheds in gardens which is a barrier to their use. Accessing a safely stored bicycle needs to be easier than accessing a car if there is to be a mass shift to active travel. SD3 3.11. "Create space and connections for people to walk and cycle more, " make this more robust: eg Create space and connections for people to walk and cycle so they become the easier, more accessible and sociable option, so walking and cycling can be faster than car travel for shorter journeys.

Respondent	Policy	Comment
Blockley Parish Council	Policy EN2 SD3	SD3: Blockley Parish Council supports Policy SD3
National Grid (represented by Avison Young (UK) Ltd)	Policy EN2 SD3	Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET. NGET and National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets, and underground gas transmission pipelines and other National Gas Transmission assets. Therefore, to ensure that Design Policy SD3 is consistent with national policy we would request the inclusion of a policy strand such as: "x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."
Rosalie Callway 123	Policy EN2 SD3	Welcome the use of the phrase 'Development must:' Would suggest re-wording d) support an improvement in public health and a reduction in health inequalities by minimising adverse impacts on health; providing healthy living and working environments; supporting healthy lifestyles and active travel and promoting social and economic inclusion. Would be interested to know if the Design Guide will include requirements / guidance on: •Ambient and indoor air quality: passive ventilation •Thermal comfort: Fuel poverty, overheating, insulation •Accessibility, adaptability and inclusion: designing for ageing population and disabilities
Susie Stephen (Stantec)	Policy EN2 SD3	It is noted that work is ongoing to update the Cotswold Design Code which is likely to result in further changes to Draft Policy SD3. Against this background, what is set out under Draft Policy SD3 as part of this consultation (showing the Council's direction of travel) is generally supported. However, acknowledging that there will always be circumstances whereby it may not be feasible or sustainable to reuse existing buildings we would suggest a minor amendment to criteria b) listed under 'Development should', as follows (changes shown in Bold): b) consider the reuse of existing buildings rather than constructing new ones;

Respondent	Policy	Comment
Bathurst Estate 175	Policy EN2 SD3	Support. Comment. We agree that policy which ensures that development accords with the design code to require the development to represent high quality design, avoid unacceptable impacts, and provide suitable service facilities for the development should be included within the new local plan. The introduction of the requirement to re-use existing buildings rather than constructing new ones is supported but this point requires additional details as it is too broad. If this point relates to Policy CC1 then 'retrofitting' should be included. References to sites, such as The Steadings have their own requirements for Design Codes. The policy should be clear about how the different guides should be used to inform emerging plans.
Sean Lewis	Policy EN2 SD3	Our client supports the delivery of high quality, sustainable design that respects the character and distinctive appearance of the locality which, alongside the Council's commitments in Policy SD3, sit hand-in-hand with our client's legacy aspirations. 34. In addition, minimising carbon emissions and reducing the impacts of climate change can in turn be achieved by good planning and high-quality design. 35. The proposed allocation of the Site has the potential to utilise best practice design to promote community living and provide a walkable neighbourhood that is in close proximity to local services and amenities.
Star Planning 269	Policy EN2 SD3	High quality design of development is supported by Richborough. However, any Design Code prepared on a Districtwide basis can only really be guidance because it cannot address every circumstance and Policy SD3 needs to retain flexibility. Indeed, for larger schemes, the National Planning Policy Framework envisages developers may choose to prepare Design Codes in support of a planning application for sites they wish to develop. The proviso is that whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. It is not the sole province of a Council to prepare a Design Code for a scheme and Policy SD3 should be further amended to reflect this flexibility.

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy EN2 SD3	The draft policy (criterion e) states that carbon emissions should be minimised through achieving energy efficiency. Energy efficiency and the need to make significant improvements towards the pathway to net zero has been addressed at a national level through increasingly stringent Building Regulation requirements. The recent Ministerial Statement on Local Energy Efficiency Standards (13th December 2023) is clear that Local Plans should not be placing onerous requirements on developers which exceed the requirements of national Building Regulations; this is discussed in more detail in paragraphs 3.18 – 3.21 below. 3.16. The second part of the draft policy (criterion a) states that "development should… reuse existing buildings rather than constructing new ones". It is unclear what type of "buildings" are being referred to; if it were all, this would discourage the erection of new build dwellings. Without these, Cotswold District will not be able to meet its housing need. This would also be inconsistent with the Council's approach to housing delivery, which includes a range of non-strategic and strategic allocations for newly constructed homes. Clarity should be provided on this, and for residential development to be excluded, so that the policy is positively prepared. This aspect of the policy may have been influenced by the Secretary of State's decision refusing the demolition and reconstruction of Marks & Spencer's Oxford Street store, which suggested that older buildings should be re-used wherever possible, referencing Paragraph 152 of the NPPF [2021]. However, this decision has recently been overturned in the High Court (Marks and Spencer plc v SSLUHC [2024] EWHC 452 (Admin)), partly as the Court found that the Secretary of State misinterpreted the NPPF with regards to this matter. Paragraph 152 is now Paragraph 157 in the December 2023 NPPF, and its wording remains unchanged. Therefore, taking the High Court Judgement into account, draft Policy SD3 is also arguably contrary to national policy. Summary of the amendments required 3.18. Removal of reference to energy efficiency given that this is covered by Building Regulations and clarification that construction of new dwellings is not discouraged over reusing buildings. This will result in a positively prepared policy which is consistent with national guidance.
Edgars Ltd 338	Policy EN2 SD3	Cotswold District Council have declared a climate and ecological emergency. This is a key priority leading into the emerging Local Plan - to focus on sustainability and biodiversity. There is clear potential to incorporate sustainable measures into the proposed development at Land north of Main Street, Bledington, including a fabric first approach and the use of solar panels for electricity generation, and water efficiency measures to reduce the amount of water used by the development. This would directly align with the climate ambitions of the Council; by comparison these measures may not be comparatively viable at other more constrained sites where viability may reduce the scope for sustainable design. This site will be able to deliver this type of sustainable design from the outset.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy EN2 SD3	The draft policy (criterion e) states that carbon emissions should be minimised through achieving energy efficiency. Energy efficiency and the need to make significant improvements towards the pathway to net zero has been addressed at a national level through increasingly stringent Building Regulation requirements. The recent Ministerial Statement on Local Energy Efficiency Standards (13th December 2023) is clear that Local Plans should not be placing onerous requirements on developers which exceed the requirements of national Building Regulations; this is discussed in more detail in paragraphs 3.18 – 3.21 below. The second part of the draft policy (criterion a) states that "development should… reuse existing buildings rather than constructing new ones". It is unclear what type of "buildings" are being referred to; if it were all, this would discourage the erection of new build dwellings. Without these, Cotswold District will not be able to meet its housing need. This would also be inconsistent with the Council's approach to housing delivery, which includes a range of nonstrategic and strategic allocations for newly constructed homes. Clarity should be provided on this, and for residential development to be excluded, so that the policy is positively prepared. 3.17. This aspect of the policy may have been influenced by the Secretary of State's decision refusing the demolition and reconstruction of Marks & Spencer's Oxford Street store, which suggested that older buildings should be re-used wherever possible, referencing Paragraph 152 of the NPPF [2021]. However, this decision has recently been overturned in the High Court (Marks and Spencer plc v SSLUHC [2024] EWHC 452 (Admin)), partly as the Court found that the Secretary of State misinterpreted the NPPF with regards to this matter. Paragraph 152 is now Paragraph 157 in the December 2023 NPPF, and its wording remains unchanged. Therefore, taking the High Court Judgement into account, draft Policy SD3 is also arguably contrary to national policy. Summary of the amendments required 3.18. Removal of reference to energy efficiency given that this is covered by Building Regulations and clarification that construction of new dwellings is not discouraged over reusing buildings. This will result in a positively prepared policy which is consistent with national guidance.

Respondent	Policy	Comment
David Hindle	Policy SD4: Health and Well-being	I realise that 3 is Corporate Policy, but The bottom line is that it would not pass the 6 planning condition tests in my view, nor the 3 S106 ones. Therefore the words required should be replaced by 'expected'. That is unless such a Policy has been successful elsewhere. IN effect this is a CIL matter, that Neighborhoods should deal with. 5a.4.19 Needs to make it clear that it is of the District's accomodation. 5a.4.21 What is meant by a Hospital? Maybe it should clarify that it is referring to an Urgent Care and Minor Injuries Unit. Or state which Hospitals, are being actually referred too. Also check the 5 minutes, as perhaps it should be 10 minutes, but I may be wrong. That would relate to an Urgent Care and Minor Injuries Unit.
Andrew Brian Crump	Policy SD4: Health and Well-being	The distinctive character of a settlement is as much about its setting within is natural environment as it is the buildings within it. Being able to readily access the adjacent countryside, without the need to negotiate burgeoning housing estates in order to do so, promotes well-being by encouraging physical exercise by the use of the Heart of England Way, for example. Allied to this recreational amenity is the ability to breathe in clean air on the approach to locations such as Meon Hill, without the harmful effects caused by vehicle fumes. It is clearly an important feature of the social objective that open spaces in settlements, or adjacent to their boundaries, are preserved for social and cultural well-being. If development is constructed further away from the centre of a settlement then this will encourage the use of vehicles. The same applies if access to schools, workplaces, health and other facilities can only be reasonably achieved by the use of private motor vehicles. A
Bob Sharples	Policy SD4: Health and Well-being	Sport England welcomes the reference to our Active Design guidance in paragraph 5a.4.32.

Respondent	Policy	Comment
Bob Sharples	Policy SD4: Health and Well-being	Sport England is supportive of the Policy SD4: Heath and Well-Being as proposed.
Geoff Tappern	Policy SD4: Health and Well-being	Fully support Health and Well being policies. Ref to 5a.4.3 where it states "the majority of our health outcomes are explained by factors other than healthcare and then you go on about natural environment impact. Fully agree but our village was rural and is at present having three development sites going on at the same time. Grass verges are being destroyed and roads breaking up. Density of housing too high, no public transport.
Geoff Tappern	Policy SD4: Health and Well-being	Agree that health issues are very important. Keep rural villages as rural villages and not over develop and put in as many houses as you can cram in. They are constructing houses behind me now, noise of backing up trucks, banging of buckets to remove sodden soil is not doing health any good.
jamie ball	Policy SD4: Health and Well-being	Health & Well-being (Policy SD4) states in 5a.4.1& 5a.4.2 refer to safe places and ensuring health infrastructure. The current sewage and waste water infrastructure in Moreton In Marsh is consistently overwhelmed after severe rainfall. Raw sewage is known to flow through the river Evenlode and its tributaries and many sewers bubble back up, not only in Moreton In Marsh but also in the surrounding rural villages where this waste water is pushed. The Water cycle study in this plan is known to be out of date and a new one is pending. No consultation has taken place with the Environment Agency of Thames Water who would need to install new infrastructure. How can CDC propose to keep residents of Moreton In Marsh Healthy if these issues are not even addressed in this Plan, a Plan that proposes increasing dwelling numbers in Moreton In Marsh by 100%
DAvid Eglise	Policy SD4: Health and Well-being	The improvements required for existing (ancient) villages and townships where the built environment and infrastructure doesn't lend itself to change/modernisation, has not been fully addressed

Respondent	Policy	Comment
Clare Charlton	Policy SD4: Health and Well-being	SD4 a) amend to read local food growing and add cyclable in addition to walkable - this extends the distances people can travel to reach services etc and so reduces short motorised journeys b) refer to the lifetime homes standard I agree with the defibrillators requirement but I think this is missing the point for the health and wellbeing section. 4.9 - include reference to micro growing plots on community land, also add a requirement for every garden to have a fruit tree planted with suitable pollination group.

Respondent	Policy	Comment
Stephen Andrews 183	Policy SD4: Health and Well-being	I do have the following comments to the subsequent section where the policy is justified and further explained in the following way: Community Public Access Defibrillators (CPADs) 5a.4.22.Cotswold District Council have passed a motion to improve the provision of Community Public Access Defibrillators (CPADs) on major new developments in the District and ensure better health outcomes for local people. Defibrillation (an electric shock to the heart) can restart the heat after cardiac arrest but needs to be delivered as soon as possible. Most (80%) out-of-hospital cardiac arrests occur in residential areas and on average, it takes 7 minutes to get to the person with cardiac arrest, but in more rural areas, this may take longer. 5a.4.23.The CPAD(s) will either be physically provided or secured by an agreed financial contribution. It should be registered on an appropriate defibrillator network such as 'The Circuit' (British Heart Foundation), preferably be of a type approved for use by Southwest Ambulance Service NHS foundation Trust; and be within a safe, walkable, prominent and easily accessible location; and acceptable in planning terms where consent is required, such as on a heritage asset. The CPAD may be located inside an open structure, such as a porch to a building or bus stop, to provide additional protection from the weather [delete 'and where possible'], [include instead, 'but must'] be provided with an electricity supply to ensure it is kept at the right temperature in cold weather to protect it from damage. 5a.4.24.An agreement on the guardianship of defibrillators between the owner of the public place (usually the Town or Parish Council) where it is intended to be installed and the developer, must be demonstrated, to ensure the device is ready in an emergency and for the future. This should be similar to provision for example of a play area, whereby the ownership, and maintenance responsibility of which, is once it is delivered by the developer, is then transferred to either the local Town or Parish Council or to a Management Company. As well as registration and the designation of a Guardian, maintenance of the CPAD should include routine checks and replacement of any item in order to maintain its status as "Rescue Ready" as required by The Circuit The reason for this amendment is that power is needed for a small heater located in the CPAD box and is not therefore an option.
Rohan Torkildsen 158	Policy SD4: Health and Well-being	To supplement this welcome policy, it may also be helpful to refer to the relationship between wellbeing and the Historic Environment. Our research has shown that interaction with heritage can be a positive factor in supporting individual and community wellbeing. Our website includes relevant case studies and research evidence most notably https://historicengland.org.uk/research/results/reports/18-2024 'Cultural Heritage Capital and Wellbeing: Examining the relationship between heritage density and life satisfaction'.

Respondent	Policy	Comment
Bathurst Estate 175	Policy SD4: Health and Well-being	Support: We agree there is an increasing importance of amenity and that creating healthy places should be a focus within design development

Respondent	Policy	Comment
The Planning Bureau on behalf of McCarthy Stone 190	Policy SD4: Health and Well-being	Policy SD4 Health and Wellbeing requires the submission of a Health Impact Assessment for planning applications for major development. The Council should note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals. Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources. A report "'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that: ☐ 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. ☐ Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. ☐ On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.' In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptions such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder. We also note that point 3 and 4 of policy SD4 requires 'Major development proposals to install sufficient, community public access defibrillator(s) (CPADs) for the development, where there is currently no existing coverage, so that no part of the development is further than 400m away from a safe, walkable access to a defibrillator as illustrated by the latest public access defibrillator location mapping'. Paragraph 002 Reference ID: 23b-002-20190901 identifies when a planning obligation can be requested and this confirms that 'Planning obligations assist in mitigating the

Respondent	Policy	Comment
Royal Agricultural University	Policy SD4: Health and Well-being	Policy SD4 looks into Health and Well-Being. The RAU are generally supportive of the proposed policy measures which seek to ensure that new developments promote improvements to health and well-being. In particular, we are supportive of the aims to remove barriers to cycling and walking, offer a genuine choice of sustainable and active travel in accordance with the agreed travel hierarchy, and street designs which provide direct, good connections to the existing or future neighbourhood, the addition of more green spaces.
Chris Marsh (Pegasus Group) 334	Policy SD4: Health and Well-being	Policy SD4 – Health and Wellbeing 3.19. This is another new policy proposed to be added as part of the partial review, seeking to broadly align with Paragraph 96 of the NPPF in support of health and wellbeing within the district. The policy states that development should provide opportunities for healthy food growing (criterion a), among other things. Whilst referenced in Paragraph 96(c) of the NPPF, there should be a degree of flexibility as this may not be possible depending on the scale and nature of the development and any site-specific constraints which may mean that the provision of allotments, for example, is not feasible or viable. In addition, the policy disregards the fact that these opportunities may already exist near a site, as is the case in larger settlements such as Mickleton. 3.20. The policy again makes reference to providing energy efficient and adaptable housing, as well as the provision of affordable homes. The points raised above with regards to the former being covered by Building Regulations remain applicable here. We contend that it is unnecessary to repeat these points within the Health and Wellbeing policy. Indeed, these issues are not referred to within this context in Chapter 8 of the NPPF, and their relevance to health can therefore be questioned. As such, they should be deleted from this policy. 3.21. It is considered that the requirement for major developments to provide defibrillators (detailed in the third part of the policy), where there is not already one within 400 metres, though well intentioned, is unnecessary. This is not a requirement within either national policy or legislation. In any case, defibrillators should be provided in the most accessible locations, to benefit as many residents as possible, rather than isolated within particular residential developments. Furthermore, 400 metres only equates to a 5-minute walk; it is considered that a 10-minute walk, i.e. an 800-metre distance, would be reasonable were this policy to be retained. It is also questions whether existing coverage is satisfactory, despite the fact that numerous defibrillators are already present in many of the district's settlements, based on a review of the online Defib Finder map (https://www.defibfinder.uk/). Therefore, the need for the policy is not sufficiently justified. Summary of the amendments required 3.22. To ensure that this policy is sound in the pre-submission version of the plan, reference to energy efficiency and affordable housing should be removed here due to repetition and irrelevance. Reference to defibrillators should likewise be deleted, or more clearly justified, with the distance increased to 800 metres to benefit larger areas and numerous developments, to help reduce the onus on developers.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy SD4: Health and Well-being	Policy SD4 – Health and Wellbeing 3.19. This is another new policy proposed to be added as part of the partial review, seeking to broadly align with Paragraph 96 of the NPPF in support of health and wellbeing within the district. The policy states that development should provide opportunities for healthy food growing (criterion a), among other things. Whilst referenced in Paragraph 96(c) of the NPPF, there should be a degree of flexibility as this may not be possible depending on the scale and nature of the development and any site-specific constraints which may mean that the provision of allotments, for example, is not feasible or viable. In addition, the policy disregards the fact that these opportunities may already exist near a site, as is the case in larger settlements such as Bourton on the Water The policy again makes reference to providing energy efficient and adaptable housing, as well as the provision of affordable homes. The points raised above with regards to the former being covered by Building Regulations remain applicable here. We contend that it is unnecessary to repeat these points within the Health and Wellbeing policy. Indeed, these issues are not referred to within this context in Chapter 8 of the NPPF, and their relevance to health can therefore be questioned. As such, they should be deleted from this policy. It is considered that the requirement for major developments to provide defibrillators (detailed in the third part of the policy), where there is not already one within 400 metres, though well intentioned, is unnecessary. This is not a requirement within either national policy or legislation. In any case, defibrillators should be provided in the most accessible locations, to benefit as many residents as possible, rather than isolated within particular residential developments. Furthermore, 400 metres only equates to a 5-minute walk; it is considered that a 10-minute walk, i.e. an 800-metre distance, would be reasonable were this policy to be retained. It is also questions whether existing coverage is satisfactory, despite the fact that numerous defibrillators are already present in many of the district's settlements, based on a review of the online Defib Finder map (https://www.defibfinder.uk/). Therefore, the need for the policy is not sufficiently justified. Summary of the amendments required 3.22. To ensure that this policy is sound in the pre-submission version of the plan, reference to energy efficiency and affordable housing should be removed here due to repetition and

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy SD4: Health and Well-being	Call for sites. New emerging Policy SD4 refers to 'Health and Well-being', stating proposals for new development must demonstrate regard for healthy places.
Chipping Campden School	Policy SD4	The School supports Policy SD4
Robert Irving	Policy SD4	It seems wrong to embed the specific defibrillator technology in this Plan which runs over such a long time. The equipment used for this purpose could move on and so, if possible, a more general way of expressing the requirement should be found.
gina stephens	Policy SD4	There are no specific (or even general) proposals on how this important area of Health and Well Being will be incorporated into he Local Plan for MIM. The sheer scale and density of the proposed development will impact negatively ion the existing community of the town which will not be able to absorb the development proposed. This includes maintaining the community feel of the town, the green spaces and access to the countryside and even the ability of residents from the proposed residential areas to be able to access the town centre by foot because of the distance.
Brona Langton	Policy SD4	I do not see any reference to the safety and well being of females - 50% of the Community- in the proposals. The choice to walk at night should not require a risk assessment. We need safe, well lit routes to walk and cycle to and Ffrom our homes, especially as there is no public transport at night.
Fairford Town Council	Policy SD4	SD4 3 a) – How is the "governance/ guardianship throughout the lifetime of the installation" to be ensured? Does the "installation" mean the defibrillator or the development? Will permission for the development be refused if no-one is prepared to guarantee this?
Jonathan Collins	Policy SD4	Agree that development proposals must meet the needs of different groups in the community, including older, younger people and those with disabilities. This applies particularly to providing good cycling and walking opportunities linking all areas of Mickleton to allow safe use of facilities in the village.
Blockley Parish Council	Policy SD4	SD4: Blockley Parish Council supports Policy SD4

Respondent	Policy	Comment
Rosalie Callway 123	Policy SD4	SD4: Health and wellbeingConsider bringing more of the supporting text into the policy itself. Planning Inspectors may be entitled to rely on the wording of policies rather than supporting text to determine whether a development proposal is in accordance with the Local Plan. See: https://www.landmarkchambers.co.uk/wp-content/uploads/2019/06/Planning-Case-Law-Update-4th-June-2019.pdf PLANNING CASE LAW UPDATE TIMOTHY CORNER, QC, LANDMARK CHAMBERS and Paragraph 85 PAS Local Plan Route Mapper v2.0.pdf https://www.local.gov.uk/sites/default/files/documents/PAS%20Local%20Plan%20Route%20Mapper%20v2.0.pdf. Much of the text at 5a.4.5 through to 5a.4.13 could be incorporated into the policy itself e.g. Proposals for new development must demonstrate regard for healthy places and take account of national guidance and best practice that promote healthy development principles. Development will be supported which protects, promotes or contributes to securing a healthy and safe environment and minimises health inequalities by: a)Being walkable, designing in active travel opportunities including footpaths, bridleways and cycle routes for example, with convenient access and connectivity from new development to amenities like schools, workplaces, health and local community facilities, parks and public transport, so activity is encouraged and becomes part of our day-to-day lives and connects local communities within and beyond the new development (see policy XXX); b)Encouraging social interaction and providing social spaces (whether green or public realm spaces) that are accessible, well maintained and flexible in use to enable social cohesion and encourage social pride in an area; and healthy living through formal and informal physical activity, recreation, rest and play, including support for multi-use proposals such as community hubs; c)Being inclusive, and promoting age friendly environments to meet the needs of different groups in the community, where possible aiming for dementia-friendly communities; d)Providing and enabling access to green settings such as multifunctional open spaces, gardens, green and blue infrastructure and nature. Water features, street trees, wall and roof planting can reduce pollution, encourage active travel, and can contribute to creating wildlife habitats and improve air quality and mental health (see policy XXX); e)Being designed to create safer streets and spaces (by improved lighting, being easy to navigate 'legible', clean, uncluttered, walkable routes, for example). Safety should be designed 'in' to help reduce the fear and perception of crime, as well as the anti-social behaviour, such as ensuring sufficient natural surveillance; f)Providing public art to enhance public spaces with long term management agreements to provide accountability (see policy XXX); g)Providing healthy homes (see policy XXX) which are energy efficient, resilient to climate change, with good access to amenities, green spaces and play areas, sufficient provision of daylight (in line with BRE guidance), meeting nationally described space standards, ensuring accessibility and safety (see policy XXX). The best examples of strategic health and wellbeing policies cross reference with the relevant development management policies within the plan. For adopted examples see: Hounslow Local Plan 2016-2031 (adopted November 2021) https://www.hounslow.gov.uk/localplan

Respondent	Policy	Comment
Stephen Andrews 183	Policy SD4	I have no comment to make on the first part of the coverage of this issue where it is currently proposed that under SD4, Health and Wellbeing, the following policy shall be included: Major development proposals will also be required to install sufficient, community public access defibrillator(s) (CPADs) for the development, where there is currently no existing coverage, so that no part of the development is further than 400m away from a safe, walkable access to a defibrillator as illustrated by the latest public access defibrillator location mapping; and a) Such development proposals will be required to ensure that the said CPAD(s) will be registered and supported with governance/ guardianship throughout the lifetime of the installation. The CPAD must be permanently maintained to be 'rescue ready' and accessible by anyone at all times.
Susie Stephen (Stantec)	Policy SD4	We have no substantive comments on Draft Policy SD4 other than to query the inclusion of the word 'and' at the end of Parts 2 and 3. Part 3 already includes the word 'also' which ensures it is read as a requirement for all major development to address, alongside Part 2. Similarly, criteria a) is to be read in the context of Part 3 such that the 'and' here appears superfluous.
Sean Lewis	Policy SD4	Our client is supportive of the general intention of a new policy that promotes health and wellbeing in the LP Update. Ensuring good health and wellbeing is one of the United Nations' core sustainability goals, and the allocation of the Site creates an opportunity to foster an inclusive community that encourages active travel.
David Hindle	Policy CC1: Retrofitting and Decarbonisation of Existing	CC1 1. needs to be deleted, as primarily would relate to internal matters, with the possible except of flues, but not small one. 2. This matter also goes beyond the impact of the planning permission, and is not currently defensible. The Policy should be a positive one, not what cannot be done. It could for example state in a clause that climate change reduction measures within new buildings, will normally be permitted.. 5b.1.3. A rather illogical basis for Policy, as targets are based on worldwide, the UK ones. They do not readily translate into District ones, as CDC is not an 'island'. An extreme example is that Somerset have to do nothing, as they will have a Nuclear Power Station. In addition, there are no building off -shore benefiting from that renewable source. If I am misunderstanding the stats, apologies. I am also certainly not saying the District should not make contribution, to the reduction in fossil fuels.

Respondent	Policy	Comment
Jennifer Skillen	Policy CC1: Retrofitting and Decarbonisation of Existing	While it is laudable to demand that no more oil boilers be installed, for rural areas with many homes which would require extensive retrofitting, the technological replacements are not always viable. Far from improving fuel poverty, this could lead some households with no heating at all. There should be more understanding and staged changes to retrofitting rural stone buildings, only making retrofitting necessary if the building is undergoing extensive renovation. Those for whom renovation and retrofitting is too expensive, but they don't qualify for grants, may have no alternative but to buy another oil boiler.
Robert Irving	Policy CC1: Retrofitting and Decarbonisation of Existing	Moving away from fossil fuels must be PRECEDED by energy efficiency retrofit, viz. insulation, draught-proofing etc., since this will not only reduce the electricity requirement, but provide a degree of resilience in the event of power cuts, in that well-insulated homes will stay warm for longer
Fairford Town Council	Policy CC1: Retrofitting and Decarbonisation of Existing	5b.1.1 etc – Should there also be reference to sustainable biomass?
Blockley Parish Council	Policy CC1: Retrofitting and Decarbonisation of Existing	Blockley Parish Council supports the inclusion of a policy around retrofit. Retrofitting can help address fuel poverty, as highlighted in the "Hidden Hardship" report published by Coventry University in February 2023 as well as reduce greenhouse gas emissions.

Respondent	Policy	Comment
Blockley Parish Council	Policy CC1: Retrofitting and Decarbonisation of Existing	With reference to the hierarchy of retrofit measures, one of the issues that must be addressed alongside the upgrading of insulation in old housing stock is the replacement of unsuitable (impermeable) building materials that have been used in previous renovations, preventing historic buildings to breathe, which can cause damp and mould. Improving thermal efficiency might must take priority over other measures, such as heat pumps, which may not be a suitable choice for older, historic buildings.
Rohan Torkildsen 158	Policy CC1: Retrofitting and Decarbonisation of Existing	Climate change is one of the most challenging issues of our time, with potential negative consequences for both people and heritage. Historic England strongly supports your local plan's focus on urgent climate action and, crucially, believes that as part of this, heritage is part of the solution. Policy CC1: Retrofitting and Decarbonisation of Existing Buildings Historic England acknowledge the importance of these policies relating to climate change, mindful of your commitment to making the Local Plan Green to the Core, and promoting the protection, conservation and enhancement of the historic environment. We note and welcome the promotion of energy efficiency measures which ensure the features that contribute to the significance of heritage assets are safeguarded.
Amartya Deb (Gloucestershire County Council)	Policy CC1: Retrofitting and Decarbonisation of Existing	Chapter 5B (CC1-CC4): it is promising to see consideration has been made to retrofitting, renewable energy generation, net zero buildings and district heating. As a helpful reference, the Cheltenham Borough Council SPD on "Climate Change" may prove beneficial. Furthermore, passive building design that enhance energy efficiency should be encouraged (e.g. window orientation, size, glazing and deciduous vegetation that can provide cooling in summer and solar gain in winter). Installation of roof solar panels, heat pumps, district, and communal heating, etc. should be promoted, with gas connection avoided where possible. However, the incompatibility of district heating within the Cotswold area is noted. For improving air quality, wood burning stoves should not be incorporated into new development where air quality issues are severe. In other places, wood stoves must adhere to high efficiency and clean environmental standards. The SPD should be applied when retrofitting existing housing stock also.

Respondent	Policy	Comment
The Planning Bureau on behalf of McCarthy Stone 190	Policy CC1: Retrofitting and Decarbonisation of Existing	Whilst Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal…. 'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and
Chipping Campden School	Policy CC1	Whilst the School supports Policy CC1 we are conscious that our ambitions to refurbish and redevelop the existing stock of School buildings relies on the allocation of significant funding. There is nothing in the Local Plan that clearly demonstrates how such vital parts of the local infrastructure such as schools are to receive adequate investment and in a timely fashion so that improved facilities become available before demand outstrips existing supply.
Jerry	Policy CC1	Is item 2 saying that if you want to add an extension to your home you have to decarbonise the whole heating system of the existing house? If yes I do not agree with this as it could be impractical or prohibitively expensive.

Respondent	Policy	Comment
Colin Godfrey	Policy CC1	The distribution network will face a major challenge in meeting demand for electric vehicles and heat pumps. Many building will require strengthened connections with larger building requiring an upgrade to three phase supply. Has CDC any evidence that the distribution network operators (DNOs) can achieve this level of upgrade and at what rate. There may be limited scope for installing renewables such as solar. Currently permission from the DNO is required for solar arrays of greater than 4kW. Again the feasibility of the ambition needs to be verified by the DNOs. On the specific draft policies: 1. Not all buildings will be able to have low carbon heating systems. 2. The very prescriptive rules that will apply to extensions/modifications could either make such projects unfeasible or expensive and could delay energy efficiemcy improvements or even see residents ignoring the planning syystem. 4. In some circumstances demolishing existing buildings might be the better and most practicable environmental option. There is specific policy in the South Cerney Neighbourhood Plan for the demolition and redevelopment of garage within the Conservation Area. This CDC policy should not interfere with the NP policy. 5/6 Again this is incredibly prescriptive and will leave expense and complication. There is a risk that some improvements may be deferred or undertaken without permission.
Mike McKeown	Policy CC1	I agree a key policy should be to prevent oil or gas heating on retrofits. Particularly with new high temperature heat pumps coming to market that can work with existing radiators and insulation (but of course improved insulation should be encouraged). There is an opportunity to make an improvement where an extension is added to an existing building - the extension can use renewable heating, such as an air-to-air heat pump or infrared heating or electric underfloor heating, even if the existing building heating isn't changed.
Mike McKeown	Policy CC1	The Cotswolds has many listed buildings and building in conservation areas where most retrofit currently requires planning permission which acts as a cost and complexity barrier. I suggest having a design planning guide that makes retrofit "permitted development" where it meets the conditions of the guide. Thus leaving only more complex or sensitive retrofit needing full planning permission
Fairford Town Council	Policy CC1	CC1 etc. – Need to be clearer in the wording where policies do not apply to existing/retrofit installations and there needs to be a general qualification “as far as practicable”. Clause 1 needs some clear definitions of ‘heating system’ and ‘low carbon’. Clause 2 seems to be asking for an awful lot for what might be a very/fairly minor change, e.g. internal alterations.

Respondent	Policy	Comment
Ramon Gater	Policy CC1	Additional planning measures will be needed to meet the ambitions alluded to in this paper. A) Nothing here encourages improvement in carbon-efficiency of existing buildings not also altering layout, maybe because it affects heritage Listing not Planning per se. Better guidance on "preferred styles" on the CDC website would be helpful. B) Measures for Listed buildings include 1) appropriate double-glazing, 2) ground heat sources 3) high-efficiency thermal insulation such as aerogel. C) The above demand cooperation between stakeholders (ie suppliers, owners and council) to provide innovative solutions that are both affordable and sympathetic to the AONB (as can be seen from other comments above).
Gloucestershire Wildlife Trust	Policy CC1	We would support the inclusion of an additional point within this policy to encourage the integration of green infrastructure in the retrofitting of buildings. Natural England published an article last year on the benefits of integrating GI into buildings which can be found here. The main benefit is its ability to provide urban cooling. Warmer summers as a result of climate change are likely to lead to the use of more air conditioning in buildings which are energy intensive. GI on buildings, especially in more urban areas, can also support nature connectivity, well-being, pollution prevention and provide natural drainage and flood mitigation. We appreciate this won't be feasible on some buildings but where it is, opportunities to integrate it should be sought.
Bathurst Estate 175	Policy CC1	In general support of the policy in that it considers the replacement of fossil fuel energy systems and adapting to climate change. It is an appropriate policy but in practice may not be achievable due to the electricity demand for some buildings. A level of flexibility should be built into the policy wording. Point 1. should include 'fuel heating system will not be accepted unless sufficient evidence is provided…' and Point 2 include 'where possible improve its energy efficiency, de-carbonise its heating system…' The other points should be amended to include phrases which increase the policies pragmatism where necessary.
Geoff Tappern	Policy INF10: Renewable and Low Carbon Energy Developme nt	This is such an important subject and has a possible major impact on rural villages that this subject must be circulated to all parish councils for discussion with relevant villages. Too much to adsorb when reading a 394 page document.

Respondent	Policy	Comment
David eglise	Policy INF10: Renewable and Low Carbon Energy Development	A major proportion of the Cotswold District (80%) is included in the AONB which means to achieve the amount of renewable energy planned (12.5%) this equipment will have to be installed in the remaining 20%. This level would be unacceptable and over-development would prevail. This would inevitably harm the intrinsic character of the remaining 20% landscape. When considering renewable energy schemes the grid "interconnection" required is a major consideration and has not been mentioned in this policy.
Fergus Dignan 126	Policy INF10: Renewable and Low Carbon Energy Development	11.10.2 [in bold]...'new development will be expected to contribute toward the cutting of carbon emissions'. [end bold] -This effectively means that a new development will result in lower emissions, i.e. there will be fewer emissions with the development in place than there would be without the development. This means that renewable generation on new developments must be in excess of the energy used by the development. This clause should be reworded, so that this is made explicit, such as [in bold] 'developments will be permitted that are carbon negative'. [end bold] I can't see any stipulations of the extent to which new developments must generate their own renewable energy, other than the vague phrase in clause 11.10.2. There needs to be more detail, specifying the expectation that new developments MUST be generating a considerable (specified) proportion of their energy and have methods in place to maximise the benefit gained from produced energy (e.g. insulation specifications). -The welcome strengthening of the planning regulations will only hold any value if the district council has a watertight method of policing the developments once they're in place and holding developers to account. There is a history of developers not meeting their obligations when plans are realised and the district council having limited means by which to effect any change. The local plan needs to address this.

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy INF10: Renewable and Low Carbon Energy Development	Given the modular nature of solar panel structures, a range of brownfield sites, may be explored for solar energy generation. Solar farms may also be built on pastures as sheep grazing can happen alongside its operation. This notwithstanding, renewable energy site developers are to be mindful of any potentially adverse social or environmental impacts from the installation of technologies. Relevant assessments should be carried out in identifying and pre-empting resolution to potential issues. To take solar panels for example: glint and glare surveys are to be provided, alongside acoustic assessments demonstrating necessary British Standard compliance of associated Battery Energy Storage Systems.
Coates Parish Council	Policy INF10	We object to the complete deletion of original Policy INF10 which contained safeguards protecting the Cotswold natural landscape from the negative impacts of renewable energy systems, such as solar and wind farms.
Chipping Campden School	Policy CC2: Renewable Energy	The School supports Policy CC2 but notes that there is no mention of tidal energy as a source of renewable energy. As an island surrounded by significant tidal movements the opportunity to exploit this resource should be supported across the country: when the wind does not blow or the sun does not shine the tides will move constantly. National policies have supported and subsidised wind power so that the industry has become efficient, the same support needs to be invested in tidal power where the technology is now being proven but needs volume to drive down costs. Building cost parameters for school building will need significant increases to cover the additional capital cost of installing renewable energy generation. School sites will need to be expanded if such installations as solar arrays are to be laid out as there can be no encroachment onto playing field space.
Jerry	Policy CC2: Renewable Energy	It would not be acceptable to support the development of wind farms in areas of outstanding natural beauty such as the Cotswolds.

Respondent	Policy	Comment
Colin Godfrey	Policy CC2: Renewable Energy	I requested sight of the supporting documents behind this policy from the Forward Planning Team and have been informed that the reports are not yet available. Therefore my comments are generic. There appears to be an over emphasis on onshore wind power. The Cotswolds is an area of relatively low wind speed and as the energy production of a wind turbine is proportional to the cube of the wind speed I can see no reason why developers would want to devlop schemes in the District. Over the past 25 years only 200kW of wind capacity has been installed which clearly demonstrates that the Cotswolds is not an attractive location for onshore wind. I am not aware of wind projects that have failed to gain planning permission either from the CDC or on appeal. Similar exercises to the CSE/LUC studies have looked at resources before and have been spectacularly unsuccessful in shaping the mix and capacity of renewable uptake. For example the Government Office of the Sout West commissioned REvision2010 and REvisio2020 reports of this type that were used to set regional targets beofe these were abandoned. Table CC2i is misleading. Major wind turbine manufacturers (Vestas, Siemens etc) only make turbines of 2MW plus with a minimum tip height of 130 to 140m. Who make turbines in the 60 to 125 m range? It is very difficult to comment on Table CC2iii without the reports. However I would like to make the point that proposals should be considered on their individual merits and impacts and a single turbine scheme may be acceptable whereas a multi turbine scheme may not. The draft text make no comment on single/multi turbine implications or separation distance between wind farms to avoid the landscape character being dominated by wind turbines. Has any consideration been given to grid connection issues. It would encourage development if indications could be given as to where there is easy grid access and where there is not. Liaison with the DNO is required. Policy CC2a a) the planning balance should be determined by the decision maker not the applicant b) there is a need to recognise that landscapes outside of High or Moderate Sensitivity areas are still important to local communities and developments cannot be crammed into lower lanscape areas. Impact on natural habitats needs to be taken into consideration. c) noise should be added to the list g) this normally dealt with as a condition Para 5b.2.26 This table looks wrong. Surely switching transport to electricity and heating to electricity will lead to an increase in electricity use in the future scenario as para 5b.2.27 suggests?
geoff tappern	Policy CC2: Renewable Energy	Fully agree with the use of renewable energy but do not agree with on shore wind farms and extensive solar arrays. Wind farms are noisy let alone unsightly. The use of off shore wind farms, wave and tide energy to be used more. The thought of 5b.2.35 of achieving 21% of districts electricity supply by local wind farms or solar arrays are worrying. Look at the reaction in Wiltshire to large solar arrays.

Respondent	Policy	Comment
Geoff Tappern@hotmail.co.uk	Policy CC2: Renewable Energy	This section on renewable energy needs very careful study as the impact on rural villages is massive. The aim to produce 21% of energy requirements in the CDC area concerns me. In actual fact as 80% is AONB then that leaves just the other 20% to fulfil the requirements. Would like to see this document as a separate paper. Very much against wind farms on shore as very noisy plus infrastructure to distribute produced power.
Mike McKeown	Policy CC2: Renewable Energy	I agree with the importance for encouraging more renewable energy generation, generally the south west of England has a "dirty" grid which needs more renewables
Mike McKeown	Policy CC2: Renewable Energy	Hopefully national policy will change and wind farms can be considered. They obviously need careful management so the local plan should cover this, including size, location and number of turbines. Community Energy wind should be encouraged (when national policy is changed)
Mike McKeown	Policy CC2: Renewable Energy	Sound should be given some consideration - this shouldn't effect giving a solar farm permission, but could effect exact location of Inverters within a solar farm, to ensure they aren't sited to close to homes or footpaths where they can be heard. This can be mitigated by use of low noise inverters.
Mike McKeown	Policy CC2: Renewable Energy	Land type should not automatically exclude solar farms on high grade agricultural land. A mitigation should include agri-voltaics where farm land is continued for crop use under a solar farm, this is a growing area likely to become more significant as costs fall. This isn't just letting sheep graze.
Mike McKeown	Policy CC2: Renewable Energy	Community energy should be encouraged and supported. Certainly encouraging communities being able to earn a % of a commercial solar farm is good. But another good option is co-location where a community solar farm is developed next to a commercial solar farm, sharing some of the infrastructure costs. The other improvement should be special pre-planning advice rates for community energy, it currently costs £4,000+ which is fine for commercial solar farms but very expensive for community energy.
Mike McKeown	Policy CC2: Renewable Energy	Biodiversity improvement should be a material consideration for wind, solar and storage farms - where a developer commits to this in the plans it should have weight and potentially allow a wider range of acceptable locations, for example on higher grade agricultural land. For example beyond leaving grass on the site the developer could plant wild flowers, etc that increase biodiversity.

Respondent	Policy	Comment
Mike McKeown	Policy CC2: Renewable Energy	Car Parks are a potentially good location for solar power, and should be encouraged. France has strong regulations on this.
Coates Parish Council	Policy CC2: Renewable Energy	New Policy CC2: Renewable Energy 5b.2.9 refers to community support being demonstrated by support from Parish Councils, but CPC is unlikely to be able to support wind or solar systems which negatively impact its natural environment.
Coates Parish Council	Policy CC2: Renewable Energy	5b.2.21. Coates is situated within the Cotwold National Landscape and should be regarded as an area of high landscape sensitivity.
David Hindle	Policy CC2: Renewable Energy	Like another respondent I noted the absence of access to the 2021 and 2023 studies. These should be made publicly know and a reconstitution carried out on the Policies that rely on them. In addition comments should be invited on the reports themselves, using the same 'bubble' format. I have made earlier comments on the descriptions used, but I would refine this to within the Natural Landscape no wind turbines in areas with greater than low sensitivity. Even then the wind turbines must not be clustered, and seen in the context of no more than one other. I think that singular, or maybe 2 for a Farm, or for the benefit of the community is a totally different matter to clustered wind turbines in the Natural Landscape, on occasions where the location is more than one with low sensitivity. My redefinition of the heights of the first three heights into small, medium and large, and totally excluding the top two is also important.. This is as that enables my 3 redefinitions to be related to an appropriate location.
Ramon Gater	Policy CC2: Renewable Energy	I could not see ground heat source mentioned. Surely this would be the most appropriate to an AONB. From a planning perspective this means setting aside suitable area close to every new development. If horizontal arrays are used, of 2-3 times the area of the provided living area may have to be set aside in gardens/public spaces. Less area for deep array, which nevertheless requires access for drilling machinery.
Historic England	Policy CC2: Renewable Energy	Historic England notes that a Landscape Sensitivity Assessment (LSA) for Renewable Energy Development study will be used to identify potentially suitable areas for wind and solar energy. Of particular relevance to the scope of this particular piece of work is national Planning Practice Guidance for Renewable and Low Energy Generation which indicates that "in considering locations, LPAs will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts", and also that "Suitable areas for wind energy development will need to have been allocated clearly in a Local or NP. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient".

Respondent	Policy	Comment
National Grid (represented by Avison Young (UK) Ltd)	Policy CC2: Renewable Energy	NGET assets within the Plan area Following a review of the above Development Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below. Asset Description ZF ROUTE TWR (209 - 337): 400Kv Overhead Transmission Line route: FECKENHAM - WALHAM ZFB ROUTE TWR (001A - 001 - 060A): 400Kv Overhead Transmission Line route: FECKENHAM - WALHAM ZF ROUTE TWR (337A - 424B): 400Kv Overhead Transmission Line route: COWLEY - MINETY 4TE ROUTE TWR (024 - 208): 400Kv Overhead Transmission Line route: COWLEY - WALHAM ZFB ROUTE TWR (060A - ZF337): 400Kv Overhead Transmission Line route: FECKENHAM - WALHAM ZFB ROUTE TWR (060A - 060B - 4TE208): 400Kv Overhead Transmission Line route: COWLEY - WALHAM 4TE ROUTE TWR (208 - ZF337A): 400Kv Overhead Transmission Line route: COWLEY - MINETY Central Square Forth Street Newcastle upon Tyne NE1 3PJ T: +44 (0)191 261 2361 F: +44 (0)191 269 0076 avisonyoung.co.uk A plan showing details and locations of NGET's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to NGET assets.
Paul Hinton 161	Policy CC2: Renewable Energy	Policy INF10 (Renewable and low carbon energy development) has been deleted and replaced by new policy CC2a. INF10 previously required renewable and low carbon energy development to be compatible with surrounding land uses, such as military activities. Our response to the Issues and Options consultation explained there is the opportunity to strengthen the policy, in our view, for defence purposes this proposed new policy is a weaker position. The new policy provides no protection for military operation contrary to paragraph 101 of the NPPF (Dec 23).
Bathurst Estate 175	Policy CC2: Renewable Energy	a -d .No Comment - neutral

Respondent	Policy	Comment
The Planning Bureau on behalf of McCarthy Stone 190	Policy CC2: Renewable Energy	Whilst Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal…. 'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and

Respondent	Policy	Comment
Royal Agricultural University	Policy CC2: Renewable Energy	Chapter 5B looks into Climate Change and Mitigation. It provides a list of policies to promote the use of renewable energy within new developments in response to climate change. Overall, the RAU are supportive of the draft chapter with its ambitions to ensure that any future sustainable development is "green to the core" through mitigating climate change. Going forward, the RAU are proposing an Innovation Village as an expansion to their main campus, and an application is currently being prepared. It is viewed that the Innovation Village can be at the forefront in achieving the aims of these policies and lead the way to improving and responding to climate change. The Innovation Village will be a cluster development that will accommodate organisations and expertise from academia, industry and policy-making – in order to generate real-world solutions to the global challenges of food production, climate change and land health One of the university's three strategic objectives is Sustainability and to be 'a showcase for sustainable and resilient management, through their land and estate, finances and culture'. This is reflected in the Estate Masterplan, which sets a target to achieve a net zero campus by 2040. The detail of the university's ambition and actions required to achieve this are set out in the RAU's Net-Zero and Sustainability Strategy: Built Environment, but a summary of the key elements are provided below: •The Innovation Village development will have ultralow energy use buildings far in excess of current and emerging Local and National policies and will set the standard for the future •The RAU is investigating the aim of the decarbonising existing buildings so they can be net-zero. •The establishment of onsite composting, waste separation at source, food waste and zero to landfill initiatives. •To Develop a Circular Economy at the Innovation Village. •To achieve Net-Zero a by 2040. As part of this the RAU have set decarbonisation roadmap which will include milestone targets up to 2040. •High-quality Pedestrian and cycle routes •High level of EV Charging facilities •Additional Cycle storage and changing facilities •A site wide approach to Landscape within the village which breaks up tarmac with the planting of trees, grasses and other fauna. It is our view that the sustainability measures provided for the Innovation Village and wider campus go above and beyond the principles of this policy and will be an exemplar of sustainable design, construction and operation for the District. The measures incorporated into the Innovation Village proposals can be summarised as follows: •The RAU seeks to achieve high building and Infrastructure accreditations such as BREEAM, Well Standard, Passivhaus Plus and Premium and Building with Nature (BwN). All of the development will seek to achieve these accreditations. •A minimum of 20% EV charging points at the opening of the development with a target of 100% by 2035. •Holistic Travel Plan

Respondent	Policy	Comment
CR Ayers 223	Policy CC2: Renewable Energy	Solar Power Generation. The Cotswold National Landscape and the need to produce food are at odds with planting solar panel farms on green land. These ugly structures also need expensive connectivity into the power distribution system. See Policy CC2 5b.2.13 (Suitable Area for Solar Development). Large areas of supermarket roof space and associated car parking space exist across the country. These buildings have few windows, use a lot of power for air conditioning, refrigeration, lighting and other activities and thus already have suitable high level power connections. Why not make it compulsory for them to instal solar panels on roof and raised above parking areas? This could also be extended to other large industrial and commercial buildings. This should mitigate against wasteful use of land for solar farms.
CR Ayers 223	Policy CC2: Renewable Energy	Affordability of "Going Green". The Government is now realising that this policy can be expensive but does not offer to pay all of the costs. All the unfunded will in the world is not going to achieve this objective and consequently if the money is not there; it will not be done. These pie in the sky political desires need a touch of reality injected into them. The idea that fossil fuel boilers must cease at a specific date without suitable affordable replacement is laughable. Why has hydrogen as a power source been left out (see the FutureGrid project) when its use and manufacture has been under consideration and development for over 20 years? More flexibility in your plan is needed rather than impossible deadlines that will result last minute panic changes.

Respondent	Policy	Comment
David Hindle	Policy CC2a	5b.2.16 height definitions not agreed with. The bottom two height pentameters should be excluded. The 3 remaining ones to be redefined as small, medium large. 5b.2.17 Agree with solar definitions of sizes. 5b.2.18 Refinement needed of stated livelihood for wind and solar. High sensitivity, add wind turbines will not be approved. Solar no greater than medium may rarely be permitted. High to medium sensitivity, add wind turbines will not be permitted. Solar no greater than medium may be permitted. Moderate, add wind turbines will not be permitted. Solar up to large may be permitted. Low - moderate, add wind turbines up to medium may be permitted. Large solar may be permitted. Low add wind turbines up to large may be permitted. Solar up to very large may be permitted. 5b.2.20 Have a look at this in the context of what I say in all the above. There should be a clear narrative difference between wind and solar. Wind is contentious to me, whereas solar of the right scale and inconspicuously located I do not regard as so much of an issue. - To the Policy itself add something like 'clustering of wind turbines must be avoided, with single wind turbines not visible in the context of others are more likely to be approved. - Previously permitted or concurrent applications for solar, will also be a material consideration. 5b.2.22 reference to wind turbines, state will not be permitted, in areas greater than low - moderate sensitivity. and then only if there is no clustering, and they represent single or duel turbines, that do not give the visual impression of being a cluster. Solar up to moderate may be permitted.

Respondent	Policy	Comment
David Hindle	Policy CC2a	In CC2 1. I note the justification for it, but it remains an arbitrary figure, that has been calculated. I do not however object to it, unless it becomes a tool by which developers try to place clustered large wind turbines in parts of the Natural Landscape. There is a real danger of that if less than substantial harm is thought to exist, and the Public Interest comes in.
David Hindle	Policy CC2a	In CCa I By 'it', I meant the 20%, but I also want to make it clear that I support the Policy.
Steve McKinty	Policy CC2a	The comment that replacing fossil fuel use with electricity "will result in higher electricity demand in the district, but at much higher efficiency" is completely spurious. You may, of course, require fewer kWh of electricity than, say, gas, for a given outcome but this is an apples and oranges comparison, the two are not interchangeable. You can't generate gas from a wind turbine, and we don't want to burn gas to generate electricity, so directly comparing efficiencies is meaningless. It just confuses the issues.
Geoff Tappern	Policy CC2a	Need more time to study this very important issue. Have lots of concern about where wind farms/solar arrays are going to be proposed. There is also the distribution network to be considered.
Geoff Tappern	Policy CC2a	As I have said earlier I think this topic of renewable energy must be discussed also outside the Local Plan. A document circulated on just this topic would be useful. The thought of all these turbines and panels you are thinking of remembering there is only 20% of the CDC land area that can be used really concerns me.
David Hindle	Policy CC2a	I remain skeptical about using the 20% target in the Policy referencing support, as it will inevitably mean that developers, will quote that often, in relation to off-setting significant impact on the Landscape, that is particularly an issue within the Natural Landscape. I would much prefer to include no %, as such is also a mathematically, manufactured one, and is in reality arbitrary. ----------I think that the Policy should instead be more like. ----------in the context of the climate emergency, the Council will do what it it is able to do, but in the constraint of 80% of the area being Natural Landscape, and other constraints; to support proposals for renewable energy etc etc.etc They must meet the following requirements: .
Coates Parish Council	Policy CC2a	Policy CC2a 2. This states that renewable energy development may be acceptable in the CNL, provided its benefits outweigh harm to the area. However, this is subjective, and should only be the decision of the affected local community.
Fairford Town Council	Policy CC2a	CC2a – 1.: Is the 20% only an overall 'aim' or does the scheme have to demonstrate that it is meeting this as a target? If the latter, doesn't this penalise smaller developments unnecessarily? Clause 2 seems to be trying to 'compare chalk and cheese'. Clause 3 probably needs to distinguish between 'balancing' and emergency backup generation.

Respondent	Policy	Comment
Historic England	Policy CC2a	It would also seem appropriate to include conditions in this Policy setting out how proposals will be considered regarding the historic environment, and no doubt other matters to ensure new infrastructure is located in the right place.
David Hindle	Policy CC2b	Add to wind energy.Policy - They do not result in the clustering of wind turbines. Please also note my suggested changes to sensitivity earlier. As far as I know members of the Public were not consulted on the 2021 and 2023 reports, so this is the first chance to Challenge the criteria,and definitions. If my suggestions are agreed, the basis of this Policy would meed to be altered. For community led wind schemes, no more than 2 wind turbines are seen within the same context, and they are not on sites of more than low - moderate sensitivity.
Colin Godfrey	Policy CC2b	Again the lack of supporting documentation make comment difficult. 1a) repowering of small or very small sites with large turbines cannot be supported. The scale of impacts will be of a different scale. They should be considered as applications for a new site and have no preferrential weight in the planning terms.
Geoff Tappern	Policy CC2b	Same as previous comment.
Coates Parish Council	Policy CC2b	Policy CC2b Wind Energy development This centres on identification of areas for onshore wind turbines, but is based on an incomplete Renewable Energy Strategy, & specific sites are not identified. The location of such sites is critical. It is noted that unacceptable impacts will be avoided, but will this be decided by locally affected communities?
Fairford Town Council	Policy CC2b	CC2b – Where is the 'broadly suitable area'? Presumably this excludes Brize Norton and Fairford flight paths
David Hindle	Policy CC2b	5b.2.36 No explanatory text yet. The absence is critical, as justifying wind energy will be the hardest thing to justify, given the 80% of land area being in the Natural Landscape, and a significant amount of other areas with Landscape, or Habitat sensitivity. There needs to be a separate consultation, regarding this text.
David Hindle	Policy CC2c	rooftop and ground mounted solar 2. add 'the solar panels are well screened, and located where they are not unduly visible from public vantage places.'

Respondent	Policy	Comment
Colin Godfrey	Policy CC2c	Policy CC2c - What are the health and safety implications of incorporating public access? So long as footpaths are maintained is anything further required and if so why?
David Hindle	Policy CC2c	Add to 2.---------- d) Clustering of ground mounted solar in areas is avoided.---------- e) Areas of landscape sensitivity, particularly within the Natural Landscape, and the Landscape sensitivity areas, are not significantly affected.---------- f) Visibility from public areas must be avoided. g) The scale of the installation, is appropriate for the particular site.---------- Note that the current controversy over the 2000 acre solar farm, covering linked areas in Wiltshire (near Mntey/Malmesbury), demonstrates that tight guidelines are needed. That area is not even within the Natural Landscape.
David Hindle	Policy CC2c	To section dealing with ground mounted solar. include under 2 an additional alphabet letter.----------The ground mounted solar does not exceed, large , as described in the table in 2b.1.17. Between 2 and 3 add, 'Within the Natural Landscape, and other designated Landscape Areas the size of size of the size of the ground mounted solar does not exceed medium, as set out in paragraph 2b.1.17.
Coates Parish Council	Policy CC2c	Policy CC2c This supports solar farms, but their poposed location is critical & currently unknown.
Gloucestershire Wildlife Trust	Policy CC2c	The Wildlife Trusts actively support effective and suitable solar energy generation projects, to avoid delay in the delivery of low carbon energy and meet net zero by 2050. They must be designed, operated and built in the right location and in the right way, to contribute to nature's recovery. We would like to see more prioritisation of small-scale wind and solar installations on buildings or within built/fabricated structures (e.g solar panels in pavements on cycle paths), especially where they can produce and distribute electricity supplies to help meet local demand. This is providing they can be developed with no additional land-take and their installation and operation avoids damage and disturbance to wildlife, particularly birds, bats, their roosts and nests.
Coates Parish Council	Policy CC2d	Policy CC2d Community support is crucial, but how will this be measured?

Respondent	Policy	Comment
Steve McKinty	Policy CC3.0: Net Zero Carbon New Buildings (i)	Good to see the statement on "no carbon offsetting". Carbon offsetting just moves the problem elsewhere and is not useful.
Robert Irving	Policy CC3.0: Net Zero Carbon New Buildings (i)	Building net zero carbon homes ought surely to be accompanied by other measures to reduce impact, viz. waterless toilets.
Robert Irving	Policy CC3.0: Net Zero Carbon New Buildings (i)	The 'staircased' approach to energy efficiency will still leave the District with houses that require retrofit to reach passivhaus standards. It is likely that retrofit of these houses will be complex and expensive. It would be better if the Policy went straight to passivhaus. A Policy of allowing sub-passivhaus construction (< 15 kWh/m2 GIA/yr) would mean that these buildings could not be certified as passivhaus with purchasers left uncertain of the build quality. Passivhaus construction techniques are sufficiently widely known that the 'staircasing' policy is un-necessary.
gina stephens	Policy CC3.0: Net Zero Carbon New Buildings (i)	Will CDC commit to enforcing this policy on the large developers that will be building out these developments. To date there has been no evidence of this including the current development underway by Spitfire with the building of 250 properties in the town of MIM.

Respondent	Policy	Comment
Blue Fox Planning (representing Redrow Homes)	Policy CC3.0: Net Zero Carbon New Buildings (i)	Emerging Policy CC3 – New Zero Carbon New Buildings requires that all new buildings should be designed and built to be Net Zero Carbon. Redrow takes seriously its obligations to reducing the impact of development on the environment through delivering sustainable development both in terms of the design of their homes and developments, the materials used, and the information provided to new homeowners. Redrow support the LPPU in the principle of bringing forward a positive strategy for renewable energy as required by the National Planning Policy Framework (NPPF). As a further example of Redrow's commitment to climate change and carbon reduction and in preparation for upcoming regulation changes and the Government's announcement of Future Homes Standard (FHS) by 2025, our client is trialling new technology including infrared panel heating combined with solar PV, battery storage, invertor, a smart hot water cylinder and full home automation systems which are intended to substantially reduce CO2 emissions. Redrow 'Eco Electric' properties went on sale in December 2022, which achieve an average of 77% emission reduction in comparison to previous house design, thus fully prepared to meet the FHS 2025 requirements. With the additional installation of PV cells, homeowners will receive an EPC rating of A and the guarantee that their Redrow home is 'net zero carbon ready'. Notwithstanding Redrow's commitment to the environment, we are concerned that the Policies and LPPU as drafted, apply too stringent a requirement on developers. Whilst Redrow fully supports low carbon development we are concerned that at the current time, zero carbon development may not be realistically achievable across every site. The emerging policy introduces 6 'sub policies', a to f, noting that Policy CC3 will be achieved through adhering to the requirements of the noted categories. The following factors are of relevance: ☐ - The particular characteristics of individual sites in terms of location, constraints and opportunities; ☐ - The existence and availability of the required technology; ☐ - - Potential implications on viability and affordability. Therefore, whilst we fully support the aspiration for reducing carbon emissions, we are concerned that the noted policies CC3a – CC3f, do not afford enough flexibility to developments coming forward and represent an inflexible policy approach that does not allow individual factors/considerations to be taken into account.

Respondent	Policy	Comment
Bathurst Estate 175	Policy CC3.0: Net Zero Carbon New Buildings (i)	a - f. Comment: General support of the policy as it encourages energy efficient development and reducing carbon emissions. However, we agree with the concerns identified by the Council in regard to the Written Ministerial Statement (WMS) from the 13th of December 2023 provided by the Government. The policies appear to contradict the clear advice in the WMS. The Council should defer to Building Regulations and government standards as made clear within the WMS that 'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.' Furthermore, where planning applications involve an approved Design Code where future Reserved Matters Applications must comply to its contents, the new buildings will need to comply with the energy requirements of this policy and would likely conflict with the Design Code. We advise removing the contents of this policy and amending it to state that 'local energy efficiency standards must comply with Building Regulations and if possible, go beyond them.' In addition, in relation to Policy CC3a and b – it will not possible to enforce monitoring of space heating and energy use in buildings once occupied. The policies are therefore superfluous. Buildings can be designed to a defined standard but use of energy will be highly dependant on how the building is occupied and run by its inhabitants. It is not possible to turn off the energy tap when a standard is exceeded. This policy should be amended to relate to design standards and not running costs or ideally deleted in favour of Building Regulations. As mentioned in the covering letter the full cost of these policy requirements should be reviewed in a full plan viability assessment.
The Planning Bureau on behalf of McCarthy Stone 190	Policy CC3.0: Net Zero Carbon New Buildings (i)	Whilst Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal…. 'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and

Respondent	Policy	Comment
Tony Buxton 199	Policy CC3.0: Net Zero Carbon New Buildings (i)	Some general comments which apply to the whole policy. 1. The design and construction industry is a competitive business. It is also an industry open to moving away from business as usual and build 'green'. The effect of this is, if the District sets policy with a range, 15 to 20kWh/m2/year for example, then the industry will if it makes its business more competitive build to the higher end of the range. Produce policy with a single figure the industry should prepare proposals to achieve the figure. 2. For similar reasons bring in the new policies as soon as possible, say when the updated plan is adopted. There is sufficient skill within the industry now to build to Passivhaus standards, the industry needs the incentive to use this skill without losing competitive advantage. So, there is no reason to delay the introduction of updated policy standards and every reason to bring this forward as soon as possible. The lead time for the updated plan to emerge and applications to go through planning should be sufficient notice for developers, the construction industry and planning officers. Much of the construction industry is already familiar with what is needed. In fact many construction and project managers quote for Passivhaus (for example) but are then forced to row back from this to remain competitive. There are many consultants, project management companies, and other entities that can provide technical guidance quickly. 3. The policies should apply to new proposals and developments with an existing grant of outline permission. Taking Cirencester as an example most its housing will come from a single development, the steadings, and to meet challenging targets (5b.3.1) those parts of the steadings still to be built should comply with proposed policy CC3. Appreciate this is not straightforward but with a developer wishes the Steadings to provide a legacy for Cirencester, and is already building more energy efficient buildings, support in the town for climate change measures, and political support there should be a way of achieving this. 4. The policy should emphasise the importance of building dwellings with low running costs because there is a direct trade off between construction costs and running costs. You will be aware that the CCC and others estimates a modest increase in construction costs (2-4%) compared to a very significant reduction in running costs (40-50% or more). Any increase in development cost to design to Passivhaus, say, will be low to zero because of the way in which design fees are typically calculated. Appreciate that it is mentioned but the importance of low long-term running costs to those occupying and owning the building (and, arguably, a benefit to the District) should be emphasised as a purpose of the policy. 5. For non-domestic buildings follow BREEAM (or similar standard which achieves same or better outcome). This is not related to energy use per se but would provide a good basis for monitoring the design and implementation. Noted than a BREEAM assessment is proposed for water management. 6. The process of proposal, initial design, and detailed proposal is important. Including the requirement to use an accredited company or the Passivhaus package or

Respondent	Policy	Comment
Newland Homes 241	Policy CC3.0: Net Zero Carbon New Buildings (i)	This policy sets out and requires all buildings to be designed and built to be Net Zero Carbon in operation. Whilst Newland Homes are committed to delivering zero carbon homes. However, this will not be possible for all developments, and the justification for this policy must be made on evidence which has had its viability assessment. Having regard to the wider picture nationally, It is noted within the consultation document that the Written Ministerial Statement published in December 2023 states: "The Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. In addition, there has been a recent consultation on "The Future Homes and Buildings Standards: 2023 Consultation", which ran until 6th March 2024. As part of this consultation, it is intended that the updated building regulations "will set the performance requirements at a level which ensures new homes and non-domestic buildings have high fabric standards, use low-carbon heating and are 'zero-carbon ready' (meaning no further work will be needed for them to have zero carbon emissions once the electricity grid has fully decarbonised). Importantly we present options to reduce running costs, while maintaining thermal comfort, balanced against build costs." It is anticipated that based on the current consultation this updated Building Standards Legislation would come into force in 2025, most likely before the Local Plan Review has been adopted. Therefore, if it is the case that Building Standards legislation is updated prior to the Local Plan Review then this policy should be deleted to avoid duplication. Otherwise, it should be justified on detailed viability evidence. Equally the following policies CC3a-f, should also be deleted to ensure compliance with national policy. At the present time, and in light of the recent Written Ministerial Statement published in December 2023, and the forthcoming changes to building regulations, it is likely that this policy should be deleted. Whilst Newland Homes are committed to delivering zero carbon homes. However, this will not be possible for all developments. Noting the uncertainty around this policy, Newland Homes reserves the right to comment further on this in the future should matters change

Respondent	Policy	Comment
Bloor Homes Western 244	Policy CC3.0: Net Zero Carbon New Buildings (i)	This policy sets out and requires all buildings to be designed and built to be Net Zero Carbon in operation. It is noted within the consultation document that the Written Ministerial Statement published in December 2023 states: "The Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. In addition, there has been a recent consultation on "The Future Homes and Buildings Standards: 2023 Consultation", which ran until 6th March 2024. As part of this consultation, it is intended that the updated building regulations "will set the performance requirements at a level which ensures new homes and non-domestic buildings have high fabric standards, use low-carbon heating and are 'zero-carbon ready' (meaning no further work will be needed for them to have zero carbon emissions once the electricity grid has fully decarbonised). Importantly we present options to reduce running costs, while maintaining thermal comfort, balanced against build costs." It is anticipated that based on the current consultation this updated Building Standards Legislation would come into force in 2025, most likely before the Local Plan Review has been adopted. In light of this, this policy should be deleted so that it does not duplicate forthcoming changes to building regulations. Equally the following policies CC3a-f, should also be deleted to ensure compliance with national policy. At the present time, and in light of the recent Written Ministerial Statement published in December 2023, this policy should be deleted to avoid duplication. Bloor Homes supports the objectives of The Future Homes and Building Standards, albeit it is considered appropriate for building standards at the National Level. However, noting the uncertainty around this, Bloor Homes reserves the right to comment further on this in the future should matters change.

Respondent	Policy	Comment
Walsingham Planning 260	Policy CC3.0: Net Zero Carbon New Buildings (i)	Notwithstanding our in-principle objection to the partial review based upon the issues identified with the Council's assessment of housing need and the scope of the proposed changes which seek to change the overarching strategy of the plan (i.e. a green to the core plan), we have provided further concerns on the new / updated policies below: Policy CC3.0 to 3f Government have outlined their intention to produce a national approach to reducing carbon emissions through new development. This is highlighted in the written ministerial statement1 published on the 13th of December 2023 which states, "Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes". The statement goes onto clarify "the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale." Consequently, the Government are taking forward a national approach via the Future Homes Standard which will deliver a national standard for building through building regulations. This has not been considered within the draft policies and the intended requirements may result in policies which fall below or exceed the national approach causing confusion for applicants and decision makers if adopted. Furthermore, where the proposed requirements would exceed national standards, the Council must consider the consequences this will have on the viability of development schemes without this information available the policies should not be taken forward in their current form.
Star Planning 269	Policy CC3.0: Net Zero Carbon New Buildings (i)	The suite of policies starting "CC3" is the subject of objection. Richborough recognise that there is a climate emergency and this does need to be addressed, including directing housing and employment growth to Principal Settlements such as Stow-on-the-Wold. However, the approach should be addressed through the consistent application of national policies and guidance related to such matters as sustainable construction, connections to the gas grid (assume here the methane grid rather than, for example, a hydrogen grid), achieving net zero carbon new buildings, biodiversity net gain and sustainable drainage rather than the patchwork approach established through local policies which, in some cases in this emerging Local Plan includes standards which exceed national policy on sustainable homes. 26. Further, there is a requirement in Policy CC3e for monitoring of a development's energy usage and yearly reporting. Richborough question whether the practicality of the policy has been considered where dwellings are sold individual owners and the quantum of monitoring reports which the Council would need to review.

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy CC3.0: Net Zero Carbon New Buildings (i)	Policy CC3 – Net Zero Carbon New Buildings 3.23. This policy stipulates that new buildings should be designed and built to be net zero, which exceeds the requirements in the Building Regulations. The Government's latest response to the Future Homes Standard (FHS) consultation stated that any policy should not be prescriptive on methodology and technology and that until there is an upgrade to the grid, developers only need to demonstrate dwellings are Zero Carbon enabled. The written ministerial statement, dated 13th December 2024 and referred to above, states: "The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures: April 2024 | ARG | P23-1414 12 • That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. • The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)." (emphasis added) 3.24. It is understood that, to date, the Council have not undertaken any viability assessments with regards to this or followed the above guidance required by the Ministerial Statement. The industry is moving towards zero-carbon ready housing as standard, and it is imperative for the transitional arrangements to be in place to ensure that this can be done smoothly. Taking account of these significant changes, the plan must ensure that it does not place onerous requirements on development which may jeopardise delivery in the short-term. It is also important to note that the achievement of net zero is unlikely to be feasible for all developments. This is particularly the case in urban brownfield developments. The policy should accordingly be flexible/deferential to changes in national standards. 3.26. Self-evidently, the stepped change to Zero Carbon under the programmed future Building Regulations changes gives developers certainty and allows the industry to develop solutions collaboratively. Following this standard allows the industry to benefit from the cost efficiencies and certainty associated with the delivery of mass-produced proprietary products, which will better address viability and delivery of development to meet the Council's planned housing trajectory. Summary of the amendments required 3.27. The policy and supporting text should be amended to ensure that the policy aligns with national policy and the WMS. This will require the authority to be supportive but not requiring developments to go beyond the Building Regulation requirements.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy CC3.0: Net Zero Carbon New Buildings (i)	Policy CC3 – Net Zero Carbon New Buildings 3.23. This policy stipulates that new buildings should be designed and built to be net zero, which exceeds the requirements in the Building Regulations. The Government's latest response to the Future Homes Standard (FHS) consultation stated that any policy should not be prescriptive on methodology and technology and that until there is an upgrade to the grid, developers only need to demonstrate dwellings are Zero Carbon enabled. The written ministerial statement, dated 13th December 2024 and referred to above, states: "The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures: That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. ☐ The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)." (emphasis added) 3.24. It is understood that, to date, the Council have not undertaken any viability assessments with regards to this or followed the above guidance required by the Ministerial Statement. The industry is moving towards zero-carbon ready housing as standard, and it is imperative for the transitional arrangements to be in place to ensure that this can be done smoothly. Taking account of these significant changes, the plan must ensure that it does not place onerous requirements on development which may jeopardise delivery in the short-term. It is also important to note that the achievement of net zero is unlikely to be feasible for all

Respondent	Policy	Comment
Tony Buxton 199	Policy CC3a: Space Heating Demand	Some comments specific to individual policy Policy CC3a The skills to construct Passivhaus already exist within the construction industry. What the industry needs is policy to justify including the modest increase in construction costs within its proposals and costings. Without policy requiring Passivhaus or similar, the competitive nature of the construction industry means the modest additional cost will not be included. This provides a strong argument for the 15kWh/m2/year. CC3a and CC3b - Predictive modelling – More detail of the predictive modelling used (Passivhaus package or similar) and accreditation and when predictions are required would, without being overly prescriptive, make the assessment of proposals straight forward, comparable from application to application, and provide the District with confidence that the proposed performance can be achieved. What happens if the proposed performance is not achieved. Will there be a payment under the energy offsetting policy?
Chris Marsh (Pegasus Group) 334	Policy CC3a: Space Heating Demand	Policy CC3a – Space Heating Demand 3.28. The policy places an unduly onerous requirement on developers to undertake predictive energy modelling, and ambitious space heating demand targets from 2028. The supporting text notes that technical guidance will need to be provided by the Council to train developers and architects to achieve compliance. It is unclear how the preparation of this material will be resourced in an already stretched planning department and where the technical expertise will come from. In addition, space heating demand is again already addressed within the Building Regulations and the Future Homes Standard. Summary of the amendments required 3.29. This policy should be deleted as it is not justified or consistent with national policy – it would be unduly onerous for developers and generate additional work for the Council in providing guidance and training. It is considered that this issue is sufficiently covered by the Building Regulations.
Chris Marsh (Pegasus) 335	Policy CC3a: Space Heating Demand	Policy CC3a – Space Heating Demand 3.28. The policy places an unduly onerous requirement on developers to undertake predictive energy modelling, and ambitious space heating demand targets from 2028. The supporting text notes that technical guidance will need to be provided by the Council to train developers and architects to achieve compliance. It is unclear how the preparation of this material will be resourced in an already stretched planning department and where the technical expertise will come from. In addition, space heating demand is again already addressed within the Building Regulations and the Future Homes Standard. Summary of the amendments required 3.29. This policy should be deleted as it is not justified or consistent with national policy – it would be unduly onerous for developers and generate additional work for the Council in providing guidance and training. It is considered that this issue is sufficiently covered by the Building Regulations.

Respondent	Policy	Comment
Chipping Campden School	POLICY CC3	The School supports Policy CC3 but believes that construction cost parameters for school buildings will need to be increased significantly to allow these policy requirements to be met.
Jerry	POLICY CC3	Net zero building have a higher capital cost. This requirement will impact on the amount of affordable housing that can be provided. Housing should be required to only comply with current Building Regulations.
David Hindle	POLICY CC3	Has anybody recognised the obvious flaw in going all electric. I do dot oppose the sentiment, but question the logic. It is well known that most power lines are not underground. Therefore, with floods that with floods and winds bringing lines down sometimes, houses will be left with no alternative, if not permitted to connect to the grid. I recall well the minors and electricity workers strikes of the 80s, including the 3 day week. So how are people in the future supposed to. cope with only only electricity connection permissible. This is a real issue, so has to be considered.
Tom Howard	POLICY CC3	There should be greater emphasis in this policy on embodied carbon/ embodied energy. It's mentioned in the notes, but not the policy, and is v important
Susie Stephen (Stantec)	POLICY CC3	Whilst we support the overarching objectives of Draft Policy CC3 (and associated sub-policies), we would also welcome a move to nationally applied standards (as set out within the Government's Ministerial Statement (December 2023)) in order to provide much-needed clarity and consistency for the industry. We would therefore urge the Council to defer to building regulations and government standards on this matter. If, however, the decision is made by the Council to pursue Policy CC3, we understand that it will be necessary to provide a well-reasoned and robustly costed rationale to justify this approach and would welcome the opportunity to comment on this in due course. It will also be important for the Policy to acknowledge and allow for instances whereby it may not be technically feasible for the requirements to be met (and to allow sufficient flexibility). Against this context, the draft Policy should be amended as follows (changes shown in Bold): 1. All new buildings should be designed and built to be Net Zero Carbon in operation subject to feasibility and viability considerations. They should be ultra-low energy buildings, use low carbon heat, contribute to the generation of renewable energy on-site and be constructed with low levels of embodied carbon.

Respondent	Policy	Comment
Bloor Homes Western (Ridge and Partners)	POLICY CC3	This policy sets out and requires all buildings to be designed and built to be Net Zero Carbon in operation. It is noted within the consultation document that the Written Ministerial Statement published in December 2023 states: "The Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. In addition, there has been a recent consultation on "The Future Homes and Buildings Standards: 2023 Consultation", which ran until 6th March 2024. As part of this consultation, it is intended that the updated building regulations "will set the performance requirements at a level which ensures new homes and non-domestic buildings have high fabric standards, use low-carbon heating and are 'zero-carbon ready' (meaning no further work will be needed for them to have zero carbon emissions once the electricity grid has fully decarbonised). Importantly we present options to reduce running costs, while maintaining thermal comfort, balanced against build costs." It is anticipated that based on the current consultation this updated Building Standards Legislation would come into force in 2025, most likely before the Local Plan Review has been adopted. In light of this, this policy should be deleted so that it does not duplicate forthcoming changes to building regulations. Equally the following policies CC3a-f, should also be deleted to ensure compliance with national policy. At the present time, and in light of the recent Written Ministerial Statement published in December 2023, this policy should be deleted to avoid duplication. Bloor Homes supports the objectives of The Future Homes and Building Standards, albeit it is considered appropriate for building standards at the National Level. However, noting the uncertainty around this, Bloor Homes reserves the right to comment further on this in the future should matters change.
David Hindle	Policy CC3b: Energy Use Intensity (EUI)	1 and 2 revise in the obvious place 'aim to achieve'.
Chris Marsh (Pegasus Group) 334	Policy CC3b: Energy Use Intensity (EUI)	Policy CC3b – Energy Use Intensity 3.30. The comments raised in relation to Policies CC3 and CC3a likewise apply here. It is noted that predictive energy modelling would also be needed to demonstrate compliance with this policy in addition to Policy CC3a.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy CC3b: Energy Use Intensity (EUI)	Policy CC3b – Energy Use Intensity 3.30. The comments raised in relation to Policies CC3 and CC3a likewise apply here. It is noted that predictive energy modelling would also be needed to demonstrate compliance with this policy in addition to Policy CC3a.
David Hindle	POLICY CC3a	Net carbon Zero Buildings under 1 add in design/orientation To the criteria add a 6th Cotswold Design Code - design and orientation of new buildings. Note for person doing the design code update, do not forget about matters that affect climate credentials of development.
David Hindle	POLICY CC3a	In 1 and 2, make it clear that this is talking about new buildings. not existing buildings, nor when relating to extensions.
Jerry	POLICY CC3a	If a new dwelling complies with Building Regs then there should be no further requirement to comply with these heating demand rules. These could make new dwellings unaffordable. Has the Council procured studies to identify the cost implications of complying with all of these extra requirements?
Fairford Town Council	POLICY CC3a	CC3a – Does this apply to all developments or only to new buildings?
Susie Stephen (Stantec)	POLICY CC3a	Noting our comments in relation to Policy CC3 (above), if a decision is made by the Council to pursue Policy CC3a, it is noted that the evidence for the stated targets is heavily oriented towards dwellings and this is also reflected in the supporting text. There are clearly wide variations in the use of non-domestic buildings and the supporting text should recognise this. Further evidence should also be cited to confirm that the proposed target is indeed appropriate, and deliverable, for all buildings. The policy should also include the caveat which allows an application to demonstrate that the requirement may not be technically feasible (as per Draft Policy CC3b).

Respondent	Policy	Comment
David Hindle	Policy CC3c: No Fossil Fuel Use	change 'essential' to 'important' . All add words like 'A new building will have a long life, therefore planning and designing them in a way that it they are initially Net Zero is logical, and more economic, as the use of fossil fuel will be phased out.
David Hindle	Policy CC3c: No Fossil Fuel Use	Well beyond appropriate planning wording. Change to more like; '1. All new buildings should not to to linked to the gas grid nor use fossil fuels, in recognition of the transitioning from the use of fossil fuels for climate change reasons. 2. Incorporating air or ground heat source pumps, at the outset is strongly recommended, as they will help to 'future proof' new buildings.'
Tony Buxton 199	Policy CC3c: No Fossil Fuel Use	CC35b.3.17 the national grid will be developed to meet demand albeit this has fallen in recent years. The issue with the burden on the national grid relates more to pinch points. Not sure this is relevant to a local plan. CC3.5b.3.19 Add 'blue and green hydrogen' unless the intention is to allow blue hydrogen. Why rule out green hydrogen now when it may become commercially viable within the timeline of the updated plan.
Chris Marsh (Pegasus Group) 334	Policy CC3c: No Fossil Fuel Use	Policy CC3c – No Fossil Fuel Use 3.31. This policy seeks to prevent the use of fossil fuels on site as part of new developments, on the basis that low carbon alternatives are already available. However, this goes beyond the requirements and guidance in the NPPF, and there is currently no blanket ban on use of fossil fuels as part of new development. Therefore, this policy would be contrary to national guidance. It must be emphasised that, whilst low carbon energy forms an increasingly larger proportion of the UK's energy mix, according to the latest data from National Grid, this type of energy is subject to variations, given that renewable output can be unreliable at times. Until other technologies, such as battery storage, become more widespread to address this, fossil fuels are still required to help provide flexibility and ensure that demand can always be met at peak times. Summary of the amendments required 3.32. Given that the policy exceeds national requirements and fossil fuels may still be required in addition to renewable sources, this policy should be deleted.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy CC3c: No Fossil Fuel Use	Policy CC3c – No Fossil Fuel Use 3.31. This policy seeks to prevent the use of fossil fuels on site as part of new developments, on the basis that low carbon alternatives are already available. However, this goes beyond the requirements and guidance in the NPPF, and there is currently no blanket ban on use of fossil fuels as part of new development. Therefore, this policy would be contrary to national guidance. It must be emphasised that, whilst low carbon energy forms an increasingly larger proportion of the UK's energy mix, according to the latest data from National Grid, this type of energy is subject to variations, given that renewable output can be unreliable at times. Until other technologies, such as battery storage, become more widespread to address this, fossil fuels are still required to help provide flexibility and ensure that demand can always be met at peak times. Summary of the amendments required 3.32. Given that the policy exceeds national requirements and fossil fuels may still be required in addition to renewable sources, this policy should be deleted.
Tony Buxton 199	POLICY CC3b	Policy CC3b Why refer to 'where technically feasible'. In the buildings specified it is technically feasible to achieve the energy use intensity. However, it would be good for the policy to allow exceptions for certain sectors, for example buildings designed for vaccine production or where certain materials are used leading to the need for many air changes per hour. CC3b.2.iii reduce 75kWh/m2/year with the lower end of the range, that is 55kWh/m2/year CC3b.3 again the energy use target should apply from the date the updated plan comes into effect although in this case before the end of 2024 for the updated plan may be ambitious. CC3a and CC3b - Predictive modelling – More detail of the predictive modelling used (Passivhaus package or similar) and accreditation and when predictions are required would, without being overly prescriptive, make the assessment of proposals straight forward, comparable from application to application, and provide the District with confidence that the proposed performance can be achieved. What happens if the proposed performance is not achieved. Will there be a payment under the energy offsetting policy?
Jerry	POLICY CC3c	Can the Council confirm that there is sufficient capacity in the existing electrical generation system to allow for this requirement? Has the Council investigated the cost impact of reinforcement of the existing system for any new housing developments?
Colin Godfrey	POLICY CC3c	Policy CC3c This policy will stall development in parts of the District where there is unsufficient grid capacity for heat pumps or other electrical heating.

Respondent	Policy	Comment
Fairford Town Council	POLICY CC3c	CC3c – What are the implications if/when the gas grid is converted to non-fossil hydrogen? What does 2 apply to?
Tony Buxton 199	POLICY CC3c	CC3c – agree with the overall approach but wonder if the wording needs to be clarified. For example, electricity generation will in part be generated from fossil fuel sources for some time which means electricity used on site for domestic hot water and catering. Can natural gas be used for catering albeit not for space heating and hot water heating. And if hydrogen is transported by the gas grid will this be allowed. Maybe this comment is overly pedantic?
Steve McKinty	Policy CC3d: On-site renewable energy	The reference to "free" electricity is disingenuous, please remove it. Nothing is "free", there are always maintenance and depreciation costs involved.
David Hindle	Policy CC3d: On-site renewable energy	It is illogical to use 'must' in 2 when should is used in 1 and elsewhere if in 3, so please change 'must' to should. 4. Needs to be deleted, as if it is not technically feasible it is not refuse-able. Solar from new buildings is very desirable to achieve, but I dot think that in-leiu off site is reasonable if on-site is not technically feasible.
Steve McKinty	Policy CC3d: On-site renewable energy	It is almost never the case that on-site generation will completely align with on-site demand, even for quite large sites. If on-site generation is privileged, then either on-site storage should be required (batteries add expense and ongoing replacement costs, and have safety concerns - at the very least the fire authroities need to be consulted), or there should be a requirement that sites are interlinked with sufficient network capacity that surplus/shortfall can be mutualized across multiple sites.
Tony Buxton 199	Policy CC3d: On-site renewable energy	5b.3.21 and 22 – generally supportive of roof mounted solar but do wonder if the District may be heading to a future with redundant and deteriorating roof mounted solar panels? Something similar happened in the west of the USA where policy incentivised the installation of renewables but not the maintenance, replacement or decommissioning of renewables. A problem for now or the future? 5b.3.23 – fourth line. Electricity is not free even if it is placed in parenthesis. Fuel for true renewables is free but there is a capital cost, a maintenance cost, a decommissioning cost, and a replanting cost if replanting is approved. How significant savings will be is subject to scale and the cost of grid supplied electricity at the time. This may or may not be substantial.

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy CC3d: On-site renewable energy	Policy CC3d – On-Site Renewable Energy 3.33. The policy stipulates that renewable energy should be generated on-site for new development. It suggests that this can be achieved through the inclusion of solar panels on the roofs of dwellings. However, this may not always be feasible due to technical reasons which may arise from the dwelling's orientation, roof pitch, or the nature of the site and its surroundings. In these scenarios, the policy states that applicants should fund renewable energy generation elsewhere in the Cotswolds. However, there is no requirement in the NPPF for renewable energy to be generated as part of new residential developments, and therefore this also goes beyond national policy. It will be onerous and costly for developers to have to install solar panels/renewable energy technologies on every dwelling across a site, which may adversely affect viability and, in turn, deliverability. Summary of the amendments required 3.34. It is considered that this policy should be removed as it is not justified. Residents will be able to choose whether they wish to install solar panels on their homes at a later date.
Colin Godfrey	POLICY CC3d	Policy CC3d) Again this will stall development where there is insufficient grid capacity. Will this policy lead to a reduction in the use of traditional Cotswold Tile roofs? Is this desirable? 5b3.22 Which of these roof designs will be acceptable by the Cotswold Design Code or the Design Codes in Neighbourhood Plans? Will consideration be given to reducing the minimum 45 degree roof pitch in the Code to the optimal slope for solar photovoltaics? Will good design criteria apply to buidling orientation?
Mike McKeown	POLICY CC3d	Home/Business Energy storage (batteries) should be encouraged and be a requirement at sites where rooftop solar is not possible. They work well with solar to storage locally generated energy for overnight use and when there is no local generation they contribute to CO2 reduction as they enable more use of low CO2 off-peak electricity. In all cases they also help the resident reduce energy costs.
Fairford Town Council	POLICY CC3d	CC3d – This may not be practicable for all developments. Insert "where practicable"?
Tony Buxton 199	POLICY CC3d	CC3d should not limit the development of renewable generation close to the development as a preference because this may be possible. Generally, all renewable generation should remain an option subject to it complying with other policies.
David Hindle	Policy CC3e: Assured energy performance	Wording is fine in itself, but if kept it is better relocated elsewhere, as the Policy below should be deleted.

Respondent	Policy	Comment
David Hindle	Policy CC3e: Assured energy performance	Unnecessary should be deleted. It is far too onerous, and who would monitor compliance. Not agreeing to do this would never hold up as a reason for refusal, nor be capable of an appropriate condition. The end point of planning a new building is ensuring the correct design of the building (including orientation), and that appropriate climate change reduction matters are incorporated. The monitoring of an individuals use is down to them.
Chris Marsh (Pegasus Group) 334	Policy CC3e: Assured energy performance	Policy CC3e – Assured Energy Performance 3.35. This policy will require developments to monitor their energy use and renewable energy generation, submitting annual figures to Cotswold District Council. Clarity should be provided on which party would be responsible for undertaking the monitoring, and what form this would take. It is contended that this is an onerous and unnecessary requirement, particularly if it is expected that developers need to continue monitoring the energy use of homes sold some time ago, and how they would do this is unclear. Overall, the policy is unjustified, with little foundation in national policy. As such, this policy should be deleted.
Chris Marsh (Pegasus) 335	Policy CC3e: Assured energy performance	Policy CC3e – Assured Energy Performance 3.35. This policy will require developments to monitor their energy use and renewable energy generation, submitting annual figures to Cotswold District Council. Clarity should be provided on which party would be responsible for undertaking the monitoring, and what form this would take. It is contended that this is an onerous and unnecessary requirement, particularly if it is expected that developers need to continue monitoring the energy use of homes sold some time ago, and how they would do this is unclear. Overall, the policy is unjustified, with little foundation in national policy. As such, this policy should be deleted.
Colin Godfrey	POLICY CC3e	Policy CC3e Building Regulations require SAP reports that will satisfy this policy. What further is required? What is the purpose of supplying figures for 5 years to CDC. What will they do with the figures? All it will tell is the temperature that individual occupiers set their thermostats.
Tony Buxton 199	POLICY CC3e	Policy CC3e – who will do this. The most straightforward method would be through smart meters and an agreement with supply companies. Who pays for this?

Respondent	Policy	Comment
David Hindle	Policy CC3f: Energy offsetting (as a last resort)	Totally remove, as if a new building cannot, or does not play its part on climate change, that is the end of it from a planning perceptive, so off -setting, is not a relevant Policy . For new buildings or sites, planning should stick to orientation, site layout, fenestration, the visual acceptability of solar, and matters related to air or ground heat source pumps.
David Hindle	Policy CC3f: Energy offsetting (as a last resort)	Totally remove, not appropriate, for reasons given previously.
David Hindle	Policy CC3f: Energy offsetting (as a last resort)	Also totally remove all the remaining paragraphs.
Tony Buxton 199	Policy CC3f: Energy offsetting (as a last resort)	Policy CC3f – could you provide an example calculation. For the types of building mentioned in the plan, and ignoring building for purposes requiring many air changes an hour there should be no technical reason why the net-zero aims of the updated plan cannot be achieved. The purpose of this is not clear. Some questions: Is it intended to be compensation or punitive? Will payments be ring-fenced into a PV fund? Who pays and over what time period? It should not be the owner or occupier of the building. If it is the developer then the payment should be made from out of the rate of return on the development, otherwise it would be simply passed on in the price of the building.

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy CC3f: Energy offsetting (as a last resort)	Policy CC3f – Energy Offsetting 3.36. This policy repeats elements of those which precede it, expanding on Policy CC3d by stating that energy offsetting can be acceptable as a last resort, with applicants able to pay a sum of money equivalent to the shortfall in renewable energy generation. Again, it is contended that this is an unjustified policy, which goes beyond national guidance. Furthermore, the policy does not acknowledge that as a consequence of offsetting, developments may become unviable depending on the scale of contribution which has to be made. Summary of the amendments required 3.37. This policy is again considered to be unjustified, particularly given that it goes so far beyond the requirements and guidance in the NPPF. The fact that viability is overlooked is also a significant omission.
Chris Marsh (Pegasus) 335	Policy CC3f: Energy offsetting (as a last resort)	Policy CC3f – Energy Offsetting 3.36. This policy repeats elements of those which precede it, expanding on Policy CC3d by stating that energy offsetting can be acceptable as a last resort, with applicants able to pay a sum of money equivalent to the shortfall in renewable energy generation. Again, it is contended that this is an unjustified policy, which goes beyond national guidance. Furthermore, the policy does not acknowledge that as a consequence of offsetting, developments may become unviable depending on the scale of contribution which has to be made. Summary of the amendments required 3.37. This policy is again considered to be unjustified, particularly given that it goes so far beyond the requirements and guidance in the NPPF. The fact that viability is overlooked is also a significant omission.
Colin Godfrey	POLICY CC3f	Policy CC3f Offsetting should not be done at the District level. If there is any need for offsetting it should be prescribed and undertaken at the national level. The Council have no expertise in this matter.
Chipping Campden School	Policy CC4: District Heating	The School supports the broad principle of District Heating Schemes but agrees that these are likely only to be justifiable on large, dense and compactly laid out developments such as mixed use town centre schemes, or where (waste) heat is a by-product of significant commercial or industrial uses. It might be possible to consider attracting clean but large energy users such as data centres into some locations within the district but these locations would also have to have large capacity grid connections for economic connections to primary energy (clean electricity). Some smaller scale schemes have been undertaken where, for example, a small data centre has provided its waste heat to a local swimming pool.

Respondent	Policy	Comment
Bathurst Estate 175	Policy CC4: District Heating	Support: Agree that heat networks should be supported to aid the reduction in carbon emissions and improvement of the energy efficiency of buildings where they are feasible and viable.
Fairford Town Council	Policy CC4	CC4 – What does "unabated" mean in the context of biomass and waste?
Fairford Town Council	Policy CC4	CC4 b) – Need to clarify that the 'gas' is fossil gas and not e.g. non-fossil hydrogen.
Ramon Gater	Policy CC4	Has the heat distribution flow been computed for the CDC planning area, or somewhere else?
Ramon Gater	Policy CC4	CDC website produced error message whilst commenting "has the heat distribution flow been computed for CDC area"
Carole Gandon	Policy EN14 CC5: Managing Flood Risk (i)	Why use the word 'should' so often in this section - should it not be replaced with 'must' if CDC believes in eg the Water Cycle Study recommendations?
David Hindle	Policy EN14 CC5: Managing Flood Risk (i)	5b.5.2 state which 'PPG'
Andrew Brian Crump	Policy EN14 CC5: Managing Flood Risk (i)	The Cala Development at Shepherd's Fold/Furrow Way, Mickleton, which was constructed within the existing Local Plan period, created considerable flooding issues for a number of its residents and remedial works were still being undertaken three years after the completion of the development. The run off from Meon Hill had clearly not been given sufficient consideration when the site was put forward and its is inevitable that similar difficulties will ensue should additional housing be considered closer to Meon Hill.

Respondent	Policy	Comment
Chipping Campden School	Policy EN14 CC5: Managing Flood Risk (i)	The School supports Policy CC5.

Respondent	Policy	Comment
EVENLODE PARISH COUNCIL	Policy EN14 CC5: Managing Flood Risk (i)	1. FLOOD RISK AND MANAGEMENT I. CDC own definition1 of a SLA is that it is "an area of COMPARABLE QUALITY to the CNL"; □ II. The Cotswold District Special Landscapes Final Report 2017 Chapter 6 Moreton in Marsh & Surrounds at paragraph 6.7 and 6.8 (among other observations) reinforces the fact that the area - including the village of Evenlode – is poorly drained; and has a remote rural character especially away from the A429, and the area is generally tranquil and feels remote short distances away from the A429 and the Fosseway. All of these observations in reports commissioned by CDC point to the fact that development is unwarranted if it is in an area so contiguous to the CNL. III. The specifications of CDC's POLICY EN4 and paragraph 10.4.12 & 13 (in the Cotswold District Local Plan Update Consultation Accepted) demonstrate the high standard of the evidential test required to show that there is no significant detrimental impact if development is allowed. IV. Evenlode PC submits that the adverse impact of CDC's proposals for the South of the proposed development area would be significant: V. The centre of the village itself occupies land classified as Flood Risk 1. VI. However the area on and around the road from Evenlode to Moreton, one quarter mile from the boundaries of the civil parish of Evenlode and Moreton in Marsh has, according to the Level 1 SFRA (a) a High Risk of Flooding from surface Water (RoFSW); (b) a risk of flooding to both surface assets and may emerge at significant rates, and (c) that this Southern area of proposed development is in a functional Flood Zone 3b. VII. These three Flood data from CDC's own Level 1 SFRA clearly show of picture which contra-indicates development in this area. VIII. The River Evenlode and its tributaries in this area have historically and regularly resulted in flooding which effectively cuts the village off from Moreton in Marsh. IX. To develop the area for residential use would aggravate this level of flooding; further overwhelm the capacity of the River Evenlode and its Tributaries, and have a significant detrimental impact on the area. This is further considered under the heading SEWAGE AND WASTE MANAGEMENT next in this submission. X. Throughout Policy CC5, CDC seeks to rely upon the evidence base outlined in paragraph 5b.6.3. This is the very Level 1 SFRA which identifies the issues at paragraph VI above and the significant impacts on the village of Evenlode. XI. In Policy CC5 at paragraph 5b.6.12 (regarding Flood Storage Area long term future proposals vis-a-vis Cirencester) it states " ...much of this area is functional floodplain and therefore2 is unlikely to be developed …". If the parts of Cirencester are in a functional Flood Plain, how then can the southern part of Moreton in Marsh close to the functional flood plain around Evenlode be justified as suitable for development? The same considerations apply. XII. Paragraph 1. of Policy CC5 places a duty on CDC to "...avoid areas at risk of flooding…" and specifies that "surface water flood risk will be considered as equal importance as fluvial risk". In fact, the Level 1 SFRA illustrates that all three flood maps (RoFSW & Flood Zones & Groundwater Flooding) demonstrate that of the potential development sites cross-hatched red and situated to the South of the SFRA diagram ALL fall within the avoidance prohibition on development. Why does CDC seek to develop in an area, in contradiction to its own policy in its Local Plan? XIII. Policy 18 at paragraph 7.21.9 discusses a proposed road effectively to by pass the town of Moreton in Marsh and alleviate traffic problems going south to north and vice versa. Also the proposed 'safeguarded landscape led road' will encounter exactly the same issues of the Level 3b functional flood plain and impingement upon the particular character of Evenlode village as detailed at paragraph II above and CDC's own definition of a SLA.

Respondent	Policy	Comment
jamie ball	Policy EN14 CC5: Managing Flood Risk (i)	Policy CC5 talks of moving development away from known risk areas. And 5b.5.4 refers to an updates SFRA1 and Water Cycle Study (2015). Surely this Water Cycle Study which is now nearly 10 yrs old needs to be updated. Even using these tools and adding to them the Gov.uk independent mapping, CDC is proposing adding additional housing in Moreton In Marsh to land which is marked dark blue (highest risk of flooding) or right up against these known flood areas. How does this reconcile to their stmts in this Local Plan? The excessive level of new building CDC is proposing for Moreton In Marsh is out of character and also unsustainable, both for flooding risk and also because of known lack of sewage and waste water infrastructure. Developers can not provide this infrastructure only Thames Water can. Where is the agreement from Thames Water to provide? Where is the timeline in order to accomplish this?
Brad Hooker	Policy EN14 CC5: Managing Flood Risk (i)	Moreton-in-Marsh is well named --- this is a very wet, marshy low-lying area. The town flooded in 2007. Many areas and roads regularly flood, especially the road to Evenlode Village. The scale of building proposed would multiply what is already a big problem.
john shelton	Policy EN14 CC5: Managing Flood Risk (i)	No further development in or around Moreton should be contemplated until a comprehensive independant Flood Risk Assessment is undertaken encompassing the whole Evenlode river system...ask the residents of Bledington who are flooded more year by year and they are directly downstream of the CDC'd proposed developments in and arond Moreton
Geoff Tappern	Policy EN14 CC5: Managing Flood Risk (i)	Fully support flood control policies but the developer should not only be responsible to ensure the surface water from new developments "leaves" the site within the discharge limits approved by CDC but ensure that pipework that it is connecting to offsite has the capacity and not damaged or collapsed in many places. Also land levels to be carefully monitored by CDC enforcement to ensure heights of land are as approved drawing or surrounding flooding could occur.

Respondent	Policy	Comment
David Eglise	Policy EN14 CC5: Managing Flood Risk (i)	The policy mentions a sequential test to steer new development to areas with the lowest probability of flooding. A very simple and ecologically way of achieving this in Down Ampney is to not build on known or adjacent floodplains. Floodplains are there for a purpose so more housing developments will only bring about yet more surface water flooding in the surrounding village area. Where flooding has been an issue in existing developments, then adjacent locations should be avoided as potential future sites to prevent similar problems for existing and potential residents. A vast amount of drainage schemes around established villages include free flowing open ditches, and antiquated drains. Therefore these have to be re-specified/constructed to cope with the increased requirements. Correspondingly all new developments should be held back from connecting to the drainage/sewage network until the drainage/sewage system can cope with any additional capacity.

Respondent	Policy	Comment
Jamie Ball 116	Policy EN14 CC5: Managing Flood Risk (i)	As we discussed yesterday, below are some relevant photos of recurrent flooding on the Evenlode Road at Heath End Bridge, less than a 1/4 of a mile from where AECOM have currently ended the mapping of the flood areas on the "Points of the Compass Appraisal" for Moreton in Marsh. Let me say these are not one off events, the flooding at this point occurs regularly. And when the road floods only very large 4x4 cars are able to pass through, effectively cutting Evenlode off. I only attach a few photos of varying dates to demonstrate current levels of flooding as of today; this is all ongoing history. The wooden bridge photos are incorporated to show the point the flooding shifts from CDC land on to WODC land. I have also attached a copy of the UK Gov map of known flooding areas. It appears to show more than your 'Compass' map includes. Also the UK Gov map I've attached shows you how close the Stratford District Council and West Oxon District Council's boundaries are to Moreton in Marsh (see key at bottom of the page). Further, you can see that significant dark blue watercourses are identified in each Council that have the potential to be directly impacted by any additional housing proposed in Moreton in Marsh. As I understand it a number of these areas are zone 3b floodplains. Zone 3b floodplains are defined: "Planning law splits the country up into three zones with regard to flooding: zone one is low risk and two is medium risk. Zone 3 is split into 'a', which is a high risk area but one you can 'potentially' build houses on and b, which is a functional floodplain, where you cannot.' If additional housing continues to be added surely the residents in the 2 councils that border Moreton in Marsh need to have a say as they will experience the backlash of additional flooding issues (& potential sewage issues) when floodplains that have traditionally held these waters in check are built on. Experience shows developers merely push flooding from their developments onward without due regard for those further along the watercourse. (Not being sarcastic or cynical- just know this from experience). There is deep concern about the ongoing and over active use of these Moreton in Marsh floodplains (as I said yesterday there is a big clue in the word Marsh in the name) and the knock on effect this has on the smaller agricultural villages that surround it. Scenario 7 in the New Cotswold Plan to 2041, suggests another 1,500 houses be added to Moreton In Marsh because of its railway station link. On the Moreton Town Council website as of today they state there are 2,500 houses in Moreton (this is before the additional 600+ currently approved new builds in the 2031 Plan are added in), and local neighbouring villages have flood issues today. Adding another 1,500 is just irresponsible. It is growth rate of 50%. What looks workable on paper to someone who doesn't live near by, and doesn't routinely experience the flooding that happens more and more, may appear workable. But the overuse of surrounding floodplains, not giving sufficient regard to the heavy clay soil which is poor draining is just refusing to face the fact that these floodplains serve an ecological function. I welcome CDC's motto "Green to the Core", but surely sustainability is not just about efficient energy usage, but it must also include understanding the landscape on which new and graduated levels of building take place.

Respondent	Policy	Comment
Jamie Ball 116	Policy EN14 CC5: Managing Flood Risk (i)	Flood photographs in relation to previous comments.
Ruth Hall 155	Policy EN14 CC5: Managing Flood Risk (i)	Thank you for consulting Wessex Water on the Cotswold District Council Local Plan Update. Wessex Water serve a limited area of the Cotswold District with wastewater services (principally Tetbury and surroundings). We support the proposed changes to the Local Plans 'Managing Flood Risk' Policy (Policy CC5, formally Policy EN14). We welcome the requirement that surface water should not exceed current rates of runoff from a site and where possible betterment should be achieved. Planning policies need to ensure that new development makes sufficient space for rainwater management on site rather than piping it off-site which exacerbates downstream capacity issues. As such we welcome the identification that SuDS and other solutions to flood risk will be expected to be complementary and fully integrated into the overall layout design of any new development with sufficient space being allowed for SuDS from the outset. We welcome the identification within the supporting text to Policy CC5 that opportunities should be sought to disconnect surface water from combined sewerage systems and that surface water from development should not drain to the combined sewer. In order to make drainage truly sustainable, policy needs to be in place that prevents new development having any net increase in rainwater flow to existing combined sewers.
Bathurst Estate 175	Policy EN14 CC5: Managing Flood Risk (i)	General support of the policy in that it highlights the importance of SuDS provision within a development's layout. However, we seek clarity whether this policy refers solely to open storage SuDS or includes other types of SuDS. For some smaller sites open storage SuDS are not always possible, so further details on the specified SuDS or flexibility is requested.
Judith Montford The EA 207	Policy EN14 CC5: Managing Flood Risk (i)	We note policy EN14 (Managing Flood Risk) is to be replaced with policy CC5 in the Climate Change section of the emerging local plan. Flood risk is an issue in its own right and existed before climate change. Please can you clarify why flood risk issues are being moved into the climate change section? We would not raise this as a soundness concern but require that this is addressed as a point of clarity and accuracy.

Respondent	Policy	Comment
Judith Montford The EA 207	Policy EN14 CC5: Managing Flood Risk (i)	We also have the following comments on the supporting text for draft policy CC5: 5b.5.1 – We believe the reference here is to paragraph 165 of the NPPF rather than paragraph 59. 5b.5.4 – This paragraph discusses your SFRAs and will need updating once your site allocations have been chosen and so it is clear whether or not a Level 2 SFRA is required. 5b.5.5 – We suggest the following is added for accuracy and clarity: 'It is clear that flood risk will increase with climate change within Cotswolds District'. 5b.5.12 – This section should be updated. The FSA upstream of Cirencester is not going ahead and so the text in 5b.5.12 is out of date. Please see our comments above on point 6 of CC5 for more information. Please can you also let us know more about the FSA south of Abbey Way bridge, as we cannot find a record of this project. Is this a natural flood management project? 5b.5.13 – We suggest the following addition is included in the first sentence to highlight that not only should there be no increase in flood risk elsewhere, but also that where possible there should be reductions in flood risk: When determining planning applications, the Council will seek to ensure flood risk is not increased, where possible reduced, elsewhere.
Sean Lewis	Policy EN14 CC5: Managing Flood Risk (i)	Our client recognises the significance of flood risk, particularly in respect of delivering more vulnerable uses such as residential, and supports the principle of a policy addressing this matter. Environment Agency Flood Maps indicate that the site is at low risk of flooding.

Respondent	Policy	Comment
David Wilson Thames Water 305	Policy EN14 CC5: Managing Flood Risk (i)	Comments in relation to Flood Risk and SUDS The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Masterplan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."
Morgan Elliot Planning	Policy EN14 CC5: Managing Flood Risk (i)	Call for sites. 349. Policy EN14 relates to managing flood risk, it specifically states that development proposals must avoid areas at risk of flooding, in accordance with a risk-based sequential approach that takes account of all potential sources of flooding. Proposals should not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment as a result of flooding.

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy EN14 CC5: Managing Flood Risk (i)	Call for sites. Policy EN14 relates to managing flood risk, it specifically states that development proposals must avoid areas at risk of flooding, in accordance with a risk-based sequential approach that takes account of all potential sources of flooding. Proposals should not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment as a result of flooding.
Morgan Elliot Planning 340	Policy EN14 CC5: Managing Flood Risk (i)	Call for sites. The site lies within Flood Zone 1, and therefore there is minimal risk of flooding to the development from any nearby fluvial sources, or from local drainage infrastructure. Therefore, residential development on this land would be consistent with Policy EN14 and Paragraph 173 of the NPPF.
Sarah Hart (Morton-in-Marsh Town Council) 156	Policy EN14 CC5: Managing Flood Risk (i)	MTC support policy CC5 and notes point 5b.5.1 citing the NPPF: "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, … Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere".
Bob Sharples	Policy EN14 CC5	Sport England is concerned that developers will create playing fields on flood plains because Annex 3 in the National Planning Policy Framework states outdoor sports and recreation and essential facilities such as changing rooms, is Water Compatible Development. However, Sport England would argue this is true for water-based sports but it cuts across the proposed Policy SD4, as when the playing pitches are flood and unplayable for several weeks at a time both formal and informal healthy activity cannot take place. Therefore, we would urge CDC to resist any new playing fields to be located on flood plains.
Rosie Walker	Policy EN14 CC5	It would be good to reference here 'Nature Based Solutions' as well as SuDS. There are time when flooding needs to be resolved off a development site and elsewhere in the catchment.

Respondent	Policy	Comment
Fairford Town Council	Policy EN14 CC5	CC5 – Soakaway type SuDS do not work effectively in some locations which are prone to very high groundwater levels – This results in increased risk of surface water and other types of flooding in critical periods. Need to clarify that this does not conflict with the requirement in FNP4.2 re Flood Zone 1 (including 'land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use') (Para and footnote numbers are the same in the December 2023 NPPF as in the July 2012 version) Need to cross-refer to Neighbourhood Plan policies (including use of more specific information, e.g. where there bespoke requirements to address specific local issues) - See PPG ref 61-006-20190723
Louise Follett	Policy EN14 CC5	Representation is made on behalf of our client with regard to emerging Policy CC5 Criteria 4. It is considered that the wording of the policy in the Regulation 18 consultation goes beyond the requirements of both the NPPF and the online Planning Practice Guidance with regard to Natural Flood Management (NFM) in so far as it states that 'it must' be used where mitigation is required. The NPPF is clear at paragraph 167 (c) that NFM is one technique that can be used from a basket of tools to achieve an integrated approach to flood risk management; NPPF (Dec 2023) "167. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: (c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management);" (our emphasis) Similarly Planning Practice Guidance Flood Risk and Coastal Change1 Para's 062 – 067 clearly state that NFM is just one approach that can be employed. Paragraph 063 (Reference ID: 7-063-20220825) cites other sustainable drainage techniques; Paragraph 064 (Reference ID: 7-064-20220825) states that "in many cases" NFM "will need to be used in a complementary way alongside more conventional flood risk management techniques." Paragraph 66 (Reference ID: 7-066-20220825) states that "Policies could promote the use of natural flood management techniques" it does not require that 'it must' be used. That the following amendment be made to the emerging draft Policy CC5; "Where a mitigation scheme is required, opportunities for Natural Flood Management techniques should be incorporated to assist with reducing overall flood risk and the implementation of suitable SuDS." [See attachment for their emphasis e.g. bold, strike through]

Respondent	Policy	Comment
Judith Montford The EA 207	Policy EN14 CC5	Policy CC5 - Managing Flood Risk (formerly EN14) There are key points that are missing from draft policy CC5 that we would expect to see in a flood risk policy. Without including these points we will find the plan unsound. These include: a) Identifying what types of development, in terms of flood risk vulnerability, are appropriate in certain Flood Zones, including Flood Zone 3b (the functional floodplain). For example, ensuring only new water compatible and essential infrastructure are located in Flood Zone 3b. b) Setting out how you will ensure flood risk will not increase, such as by protecting, compensating and safeguarding areas of floodplain storage and ensuring flood flows are not impeded. c) Setting out how you will ensure the safety of occupants, such as by raising finished floor levels We suggest our point 'a' is covered either as a new point or in your point 2, and that our points 'b' and 'c' are included in your point 3 – please see below for more information. Point 1 refers to a 'risk-based sequential approach'. The meaning of the approach being 'risk-based' is not clear, therefore we suggest this is either changed to match the wording of paragraph 167 of the NPPF or removed such that the policy reads as follows: Development proposals must avoid areas at risk of flooding, [strikethrough] in accordance with [add] and apply a sequential approach that takes account of all potential sources of flooding including fluvial, surface water, groundwater and flooding from sewers and potential cumulative impact. Point 2.a. refers to when the Sequential Test should be applied. In accordance with the PPG, the Sequential Test should consider all sources of flood risk over the lifetime of the development (taking the impacts of climate change into account). Therefore point 2.a. is not in line within national guidance. It is also not clear when the Exception Test is required. We suggest point 2.a. is changed as follows: applying the sequential test [strikethrough] for assessment of applications for development in Flood Zones (Appendix B) 2 or 3, [add] and where necessary (in accordance with the PPG) applying the exception test [strikethrough] where necessary [end] and in that event requiring developers to demonstrate that both limbs of the exception test can be satisfied; Point 2.b. refers to critical drainage areas. However, as far as we are aware there are no critical drainage areas in Cotswolds District. We therefore request that this reference is removed and that this reference is removed and replaced with the following requirements for an FRA as set out in page 13 of Appendix E of your Level 1 SFRA (October 2023): 1. in areas at risk of flooding from other sources of flooding as identified in the SFRA, including surface water, groundwater, reservoir and sewer flooding 2. on land identified in the SFRA as being at increased fluvial flood risk in future 3. situated over a culverted watercourse or where development will require controlling the flow of any watercourse, drain or ditch or the development could potentially change structures known to influence flood flow Point 3 should be developed further to include requirements on how you will ensure flood risk will not increase and how future occupants will be safe from flooding, as highlighted in our points 'b' and 'c' above. This may include requirements for floodplain compensation, raised finished floor levels, safe access and egress, etc, and should be based on findings from your Level 1 SFRA (such as those on page 41 of your Level 1 SFRA dated October 2023). We would be happy to discuss these points further. Whilst in most cases we welcome the addition of point 4 on the requirement for Natural Flood Management (NFM) measures, there are cases where inappropriately located and designed NFM can increase flood risk to communities, such as by holding more water within a settlement (rather than, for example, holding flood water upstream of the settlement). We suggest a slight change to the wording to ensure NFM is delivered in an appropriate way. We have concerns with point 6. Whilst we have no comments on the South of Abbey Way Bridge WILD Project, in 2017 it was decided that the FSA upstream of Cirencester would not go ahead. This decision was taken by partners, including Cotswold District Council, following a study that concluded that reducing flood risk to the town with one large upstream storage reservoir wasn't achievable due to the number of constraints and cost of the scheme. Therefore, we are [illegible]
Nicholas Dummett 186 (CPRE)	Policy EN14 CC5	We support the amendment to this policy to cover flooding from sewer overflows and surface water flooding. Pollution of local rivers is a continuing concern and reinforces the need for the Council to rigorously enforce the provision that occupancy of new development cannot take place until and unless the required infrastructure is in place.

Respondent	Policy	Comment
David Hindle	Policy INF8 CC6: Water Management Infrastructure (i)	1. Needs degree of revision, as there are the needs of the development, and cumulative impact via proposals intimated up to 2031. 2b Not at all sure this would be enforceable. It could work if the condition relates to the design of the system, to maximum occupancy. 3. Again needs to make it clear that the potential cumulative impact by 2031, will be considered.
David Hindle	Policy INF8 CC6: Water Management Infrastructure (i)	5b.5.12 Add - There is also a need to consider the cumulative impact of planned growth up to 2031.
Carole Gandon	Policy INF8 CC6: Water Management Infrastructure (i)	Again, why not 'must' instead of 'should' in 5b.6.4?

Respondent	Policy	Comment
EVENLODE PARISH COUNCIL	Policy INF8 CC6: Water Management Infrastructure (i)	SEWAGE & WASTE MANAGEMENT I. According to the Water Cycle Study (WCS), Thames Water (TWUL) has stated it can provide the water requirements1 for the proposed developments BUT that study specifically states that in terms of sewage and Water treatment, upgrades to infrastructure will be required. As there are multiple proposed developments in the Local Plan Update Accepted, these infrastructure upgrades will need to be undertaken before development commences. Where is the documentary evidence that Thames Water has agreed to this within the time frame of the local plan update; stated that it will fund this, and will undertake such upgrades? II. The WCS states in its Executive Summary "Executive Summary Introduction In January 2014, JBA Consulting was commissioned to undertake a Phase 1 Water Cycle Study (WCS) for the Cotswold District Council (CDC). New homes require the provision of clean water, safe disposal of wastewater and protection from flooding. It is possible that allocating large numbers of new homes at some locations may result in the capacity of the existing available infrastructure being exceeded. This situation could potentially lead to service failures to water and wastewater customers, adverse impacts to the environment or high costs for the upgrade of water and wastewater assets being passed on to bill payers. Climate change presents further challenges such as increased intensive rainfall and a higher frequency of drought events that can be expected to put greater pressure on the existing infrastructure. . ." III. This summary outlines at the very outset the challenges to CDC in ensuring the provision of infrastructure before development in certain areas even gets to planning permission stage. Given that CDC has no specific statutory or planning leverage to ensure the infrastructure upgrades or improvements will be implemented other than the imposition of Planning Conditions, the need for documentary evidence to demonstrate that all utility and statutory stakeholders will comply and how they will comply is even more important than in a development scheme where all necessary infrastructure is already in place. Where is the documentary evidence that Thames Water and other utilities or relevant organisations have agreed to this within the time frame of the local plan update; stated that they will fund this, and will undertake such upgrades ? CDC itself acknowledges that the Environment Agency has not yet responded and there is no documentary evidence of when it will respond, let alone an indication of the nature of its response to this Local Plan. IV. Where is the evidence of Thames Water WRMP Annual Statements demonstrating TWUL plans for Moreton in Marsh? Without this, there is no assurance of TWUL investing in repair and maintenance let alone upgrades. V. Where is the evidence of the Statement of Common Ground to be jointly prepared by CDC, EA and TWULin the Local Plan Update Accepted? VI. The CDC Local Plan Update Accepted has been selective in the conclusions it draws from the WCS. The Executive Summary of the WCS and the following sections ALL are based on assumptions as to upgrading - but there is no documentary evidence in the Plan to demonstrate that such upgrading is funded and planned. VII. The WCS's Recommendations : i. "Primary responsibility for the provision of water and wastewater services to new developments lies with the Water Companies and Sewerage Undertakers. Cotswold District Council should facilitate their planning by providing clear information and updates on the location, scale and timing of allocations. This would necessarily be a very long term project -where in the Local Plan is this information for them? 2

Respondent	Policy	Comment
jamie ball	Policy INF8 CC6: Water Management Infrastructure (i)	This Plan does not indicate Thames Water buy-in to any of the new development infrastructure that would be required for proposed new houses in Moreton In Marsh. This is not something CDC can provide. It must be installed by Thames Water. There is no reference to discussions or consultation. Current sewage & waste water Management is insufficient for current needs. After heavy rainfall sewage finds its way into Evenlode river and its tributaries that circle around Moreton In Marsh. Rural villages further along the water course suffer too.
john shelton	Policy INF8 CC6: Water Management Infrastructure (i)	Bring forward Thames Water's recently postponed upgrade to the chipping Norton (it feeds into the Evenlode) and Moreton sewage treatment Plants....both of which discharge raw sewage regularly
John Playfair	Policy INF8 CC6: Water Management Infrastructure (i)	The most worrying aspect of these plans is the lack of planning re. sewage and flood management. The Evenlode valley frequently floods, the water table has risen remarkably in recent years, and the sewage treatment plant has been flooded by run-off from over-development. It would be foolish to trust developers to adequately plan to mitigate further flooding.

Respondent	Policy	Comment
Sheila Thomas	Policy INF8 CC6: Water Management Infrastructure (i)	Policy CC6. 5.6.11. my front door is just a few yards from the River Evenlode. In 2007 my house along with many others in my Road in Moreton was flooded. The insurance assessor told me that I should not stay living in the house as it had been contaminated by sewage and that the company would reimburse me for rental expenses. In 2019 the odour from sewage was so bad I could even smell it inside my home. CDC case ref C/19/02 997 refers. Since then numerous social media posts by others have complained of bad smells in the town. Surely it is wrong to even consider more houses being built before this situation is properly remedied.
Fergus Dignan 126	Policy INF8 CC6: Water Management Infrastructure (i)	11.8.8 Wastewater treatment works in Ampney St Peter, Blockley, Chipping Campden, Cirencester, Honeybourne and Tetbury are assessed as having capacity to accommodate the proposed growth that will connect to these facilities. - [In bold] In 2022, this sewer storm overflow spilled 41 times for a total of 519.50 hours , discharging into the River Avon [End bold]. The water treatment works doesn't meet the needs of the existing population, so cannot accommodate growth without significant infrastructural improvements to prevent storm overflows. 11.8.11 In relation to water quality, the Study finds that it is not possible for the watercourses receiving discharges from several settlements to achieve Good Ecological Status in relation to the chemical element Phosphate. The Local Plan has limited scope to improve Phosphate levels because many actions are outside planning control. However, Policy INF8 aims to reduce demand for water in new developments, which will assist in reducing the risk of exacerbating a deterioration in standards. This policy criterion is also effective in helping to manage demand and increase water efficiency in line with sustainable building standards and to mitigate against the potential impacts of water abstraction. -[In Bold] This doesn't make sense. A reduced demand for water in new developments CANNOT assist in reducing the risk of exacerbating a deterioration of standards, unless the development brings improvements to waste water collection and treatment.[End Bold] A development with a reduced demand will still bring with it a huge increase in waste water discharge, which will in turn increase the pressure on existing infrastructure and, without improvements, increase incidences of raw sewage overflow.

Respondent	Policy	Comment
Bathurst Estate 175	Policy INF8 CC6: Water Management Infrastructure (i)	No comment.
Stephen Andrews (Kempsford Parish Council)	Policy INF8 CC6: Water Management Infrastructure (i)	Regular tankering at the Kempsford and Whelford pumping stations is indicative of the requirement to upgrade relevant work associated with the Kempsford STW before any further development is consented in the Parish.

Respondent	Policy	Comment
Judith Montford The EA 207	Policy INF8 CC6: Water Management Infrastructure (i)	The Cotswold experiences significant levels of infiltration that can lead to sewer surcharging and extended periods of storm overflows from sewage treatment works and combined sewer overflows. It would be beneficial to see this recognised within the water quality section and a commitment that development will take all reasonable measures to minimise adding to the pressure. Similarly, a commitment to reduce the impact of surface water inundation into the sewers as much as possible. These are discussed in the paragraphs below, but it would be beneficial to use it to strengthen the policy. It is encouraging to see reference to a water cycle plan, which we would strongly support the development of. It includes a commitment for appropriate wastewater infrastructure to be in place prior to occupancy of a development. However, the water cycle study on the website is from 2015. It is very likely this is no longer a reliable evidence base and should be updated to include more recent data, capacity, and legislation. It is not appropriate to use this study, without updates, to support the statements in paragraphs 5b.6.10 and 5b.6.11. It is good to see a recognition in paragraph 5b.6.14 that infrastructure improvements can take several years to materialise. It should also be referenced that failure to upgrade sewerage infrastructure in line with development could prevent development proposals going ahead. This highlights how important an up-to-date water cycle study is, so that infrastructure improvements can be identified at the earliest opportunity. From conversations with Cotswold District Council Policy Planners, we understand plans are in place to produce a more current water cycle study and we look forward to reviewing it and working with Cotswold District Council to update aspects of the policy to reflect the findings/outcome of the water cycle study. We would also like to highlight that without an up-to-date Water Cycle Study evidence base which reflects the plan period and also informs the water quality policy in the plan, we will find the plan to be unsound. Paragraph 5b.6.8 states that there would be improvements to water efficiency (low flow showers etc.) to reduce the volume of wastewater that the sewer system has to accommodate. However, there is no suggested objectives which details how this would be achieved. Paragraph 5b.6.14 states, "Where there is a capacity problem and no improvements are programmed, a financial contribution may therefore be required from the developer towards the provision of, or improvements to, infrastructure in order to meet the need generated by their development". Can the LPA clarify how this can be achieved? When considering water resources, in Paragraph 5b.6.3, we are pleased to see that the local plan acknowledges the area is severely water stressed and that a water efficiency standard of 110 litres per person per day is expected to be adhered to by developers in line with the recommendations in the Water Cycle Study. However, we would encourage the wording to be altered slightly in order to challenge developers to go beyond the required efficiency standard of 110 litres per day per person to make the proposition more resilient to future changes in water supply and demand.
Hugh A. V. Wainwright 225	Policy INF8 CC6: Water Management Infrastructure (i)	[See also Preferred Development Strategy] Moreton had the longest discharge of sewage through the town into the local water course than any other settlement in the U.K. The Local Plan Update does not solve the existing sewage capacity issues. It places all the responsibility of resolving the sewage problem on Thames Water, a failing business that has missed two previous commitments for local capacity increases and is unlikely to meet future upgrades whilst their finances are in the current state, or they go bust. The simple solution is to build NO MORE HOUSES. The 310 houses proposed on Fire College land will place an unwelcome and unavoidable strain on the already broken system and the 1500 to 10000 proposed houses set out in 'The Garden Village' proposal would be overwhelming.

Respondent	Policy	Comment
Walsingham Planning 260	Policy INF8 CC6: Water Management Infrastructure (i)	This policy amends the existing policy wording to require applicants to demonstrate there is adequate water and wastewater infrastructure to serve the development and ensure this provision is in place prior to the occupation of the development. The need to demonstrate sufficient water and wastewater infrastructure is not considered to be necessary as the capacity of the sewage network is not a planning matter for consideration on an application. This is due to Water companies being subject to statutory duties under Sections 37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies. Section 106 of the WIA 1991 confers a power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer. Therefore, it is inappropriate to include a policy in the local plan requiring applicants to demonstrate the capacity of the water company to provide water supply and wastewater connections as applicants are not legally responsible for these matters. Instead, it is the responsibility of water companies, collaborating with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans. If the water company is unable to supply those needs, this needs to be disclosed in a Water Resource Management Plan (WRMP). If unforeseen events occur after the WRMP is adopted, meaning that the water company is now unable to provide the water services required, then the local authority must reflect those issues in its local plan.

Respondent	Policy	Comment
David Wilson Thames Water 305	Policy INF8 CC6: Water Management Infrastructure (i)	Chapter 11 : Infrastructure - Comments on Water Supply and Wastewater/Sewerage Infrastructure. We consider that there should be a separate policy covering water supply and wastewater infrastructure in the new Local Plan. Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure. Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for… infrastructure for waste management, water supply, wastewater…" Paragraph 11 states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects" Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure…" Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary…." The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306). It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling. From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has

Respondent	Policy	Comment
Josephine Anne Lane-Burford 420	Policy INF8 CC6: Water Management Infrastructure (i)	Page 64 Policy CC6 Paragraph 5.6.11 AGREE AT PRESENT THE INFRASTRUCTURE IN Moreton IS WOEFULLY INADEQUATE AND, NOTHING HAS BEEN ADDRESSED FOR YEARS DESPITE THE CENSUS FIGURES SHOWING AN ALREADY MARKED INCREASE IN THE POPULATION OF Moreton, ANY INCREASE IN BUILDING MORE PROPERTIES, WILL ONLY SEE MATTERS GETTING MUCH WORSE. Before Any New Builds Are Considered, Thames Water Must Address And Greatly Improve The Waste Water Treatment Works, Thus Drastically Upgrading The Works To Cover The Whole Of Moreton, At Present Thames Water is Discharging Polluted Water into the River Evenlode Daily, The Effect Is Killing Fish And Wild Life for the whole length of the river, The Pollution Is Causing Great Distress to Everyone
yvonne o'callaghan	Policy INF8 CC6	Water management proposals must adopt a zero tolerance to discharge into water courses. It is accepted that rainfall is increasing with climate change and new developments should not be permitted if infrastructure cannot guarantee no discharge into adjacent water courses/rivers.
Chipping Campden School	Policy INF8 CC6	The School supports Policy CC6
gina stephens	Policy INF8 CC6	MIM has a Sewage Pumping Station that os not fit for purpose . Thames water has already issued a CSO for the town/area, resulting in ever increased amounts of sewage released into our waterways. The Spitfire development cannot build and sell more than 50 houses until the sewage issue has been resolved. CDC will not enforce this as it won't enforce the upgrade proposed by Thames water for 2028. This is out of the control of CDC yet despite this CDC you propose to build another 1500+ properties plus businesses in MIM?
Brad Hooker	Policy INF8 CC6	The streams and the river here is already too polluted for swimming or for fish. No one here can have any faith that Thames Water will clean up existing pollution, much less prevent it increasing. Water, wastewater, and sewage must be adequately provisioned before any more houses are built!
john shelton	Policy INF8 CC6	Policy CC6 requires suitable infarstructure prior to development...CDC must adhere to this...infrastructure must come before development

Respondent	Policy	Comment
Sam Frith	Policy INF8 CC6	CC6 5b.6.15: The with ever increasing amount of sewage being dumped into the centre of Moreton-in-Marsh (MiM) CDC must ensure that all Thames Water (TW) infrastructure has been fully upgraded and future-proofed BEFORE any development starts. With no way to police the occupancy of new homes once built I feel that this will be the only way to make sure that all the extra bottoms will not exacerbate Moretons already failing sewage network. TW have already pushed back on the date for their planned upgrades and with their current financial predicament there is absolutely no guarantees that TW will not stick to their current AMP8 plans (which are also inadequate), if they survive the coming months at all! CC6 5b.6.16 TW have made promises to install phosphate stripping technology but have failed to deliver. Although the unacceptably high phosphate levels are undisputedly causing huge harm to the River Evenlode, it is all the other chemicals that are a concern to public health. EVERY chemical that is currently poured down our drains is released into the River Evenlode. Nothing smaller than 6mm is removed. So toxic, corrosive household cleaning chemicals, pharmaceuticals, drugs... The River Evenlode will never achieve a GOOD status in ecological or chemical health while TW are allowed to release this toxic cocktail labelled "treated and cleaned". CC6 5b.6.21 MiM had over 2000 hours of raw, untreated sewage dumped onto land in the middle of town, just meters from residential dwellings. Every year the total of hours increases. The smell coming from this land which forms part of the Sewage Pumping Station at Primrose Court is regularly unbearable. Has an Odour Impact Assessment been carried out for this site? The Primrose Court permit was issues in 1984. No upgrades have been made since, yet even now new developments are being connected to this site. Poor maintenance practice by TW have also exacerbated this smell with failure to clean out the storm tanks after emptying.
Sam Frith	Policy INF8 CC6	You'd change your mind if you had to put up with the smell coming from the sewage pumping station on a daily basis.
Lisa Davies	Policy INF8 CC6	Policy CC6 5.6.11 clearly states that waste water works in Moreton in Marsh are already inadequate. They are already polluting water courses with sewage on a regular basis, poisoning natural habitats. There is no clear date by which Thames water have agreed to fix the current issues let alone upgrade to future proof for additional development, and cope with the effects of the changing climate. 5b.6.12 why agree to build at all in there is inadequate water management provision, rather than try and impose occupation restrictions?
Nick Loat	Policy INF8 CC6	Policy CC6 5.6.11 acknowledges that the Sewage system in Moreton is already inadequte, and results in Thames Water regularly exploiting the "storm overflow" loophole to discharge raw sewage. The Dunstal Farm development will hit the 50 house occupancy restriction. Thames have no timeframe in place by which they will fix the existing problems let alone build a system with a capacity for the planned expansion of Moreton.

Respondent	Policy	Comment
Prue Leith	Policy INF8 CC6	Thames Water are in trouble. They have delayed promised improvements to the Moreton sewer, which is inadiquate for the existing population. It would be crazy to trust them not to break future promises. The bald fact is they have no money. Moreton-In-Marsh is not called 'In- Marsh' for nothing. It has always been prone to flooding, not helped by recent years of exessive rain, combined with building on the former marsh, and with the water table permanently higher now than it used to be. As it is, we have a sewage problem mainly caused by the run-off from the new housing flooding the pumping station. We need to know that developers will be obliged to submit independatly verified flood management plans BEFORE any contracts are signed.
Carole Gandon	Policy INF8 CC6	5b.6.11 "Moreton-in-Marsh and Northleach are anticipated to require upgrades to the relevant works" - there is no question of anticipation, as Moreton in Marsh already requires a major upgrade - Thames Water's own figures make it clear that the current sewage treatment works (STW) in Moreton in Marsh is not fit for purpose now, even before the houses currently being built are connected up, let alone any further houses as per CDC's plan; for example they have claimed that the current STW handles 6120 PE but in 2018 they calculated its capacity as 5502 and in 2020 as 5708 (despite no alterations to the STW in between or to date!) - and they have pushed back any improvements to it till AMP8 (2025-30), making it clear as they do so that any such improvements depend on them getting the necessary funding, something that seems highly unlikely given the latest news about their finances. How can CDC's Local Plan ensure that the appropriate infrastructure is in place in good time ahead of further developments being built?
Fairford Town Council	Policy INF8 CC6	CC6 – 1. It is highly desirable to require a binding agreement on the delivery of the necessary infrastructure improvements before granting permission, to avoid difficulties with the enforcement of planning conditions and/or risk of non-delivery.
Sheila Thomas	Policy INF8 CC6	Policy CC6. 5.6.11. my front door is just a few yards from the River Evenlode. In 2007 my house along with many others in my Road in Moreton was flooded. The insurance assessor told me that I should not stay living in the house as it had been contaminated by sewage and that the company would reimburse me for rental expenses. In 2019 the odour from sewage was so bad I could even smell it inside my home. CDC case ref C/19/02 997 refers. Since then numerous social media posts by others have complained of bad smells in the town. Surely it is wrong to even consider more houses being built before this situation is properly remedied.
Blockley Parish Council	Policy INF8 CC6	CC6: Blockley Parish Council welcomes any strengthening of policy around wastewater infrastructure. Performance by the water companies has thus far been unacceptable and future development should not be permitted without appropriate infrastructure in place.

Respondent	Policy	Comment
Blue Fox Planning (representing Redrow Homes)	Policy INF8 CC6	Policy CC6 (Water Management Infrastructure) replaces former policy INF8. The policy seeks to ensure that adequate water and wastewater infrastructure Is available to serve a proposed development. The policy also seeks to incorporate water conservation measures following the classification of the Thames Water region by the Environment Agency as 'seriously water stressed'. Paragraph 5b.6.10 notes that adequate capacity in existing infrastructure exists in Tetbury to accommodate planned growth. Wastewater treatment works are also confirmed as having capacity to accommodate the growth connected to these facilities. Utilities Assessments completed by Redrow, also confirm appropriate connection points and infrastructure capacity which confirm that this would not be a constraint to the development moving forwards. With regards to water consumption, Redrow homes are designed to an industry-leading water efficiency rating of 105 litres, per person, per day. This is well below the Building Regulations standard which is set at 125 l/p/d and betters the optional standard of 110 l/p/d now being more commonly imposed by local authorities in water stressed areas, and emerging policy CC6. We thus support the aims of this policy to reduce water consumption across the District.
Christopher Kenney-Herbert	Policy INF8 CC6	Moreton-in-Marsh's water treatment upgrade cannot be described as "anticipated" to require an upgrade. This policy needs to be changed to must be upgraded before any new developments are permitted or occupied. This is necessary to be compliant with Policy CC6. The Dunstall Farm 250 dwelling application 19/02248/FUL, under condition 27 of the decision notice, was restricted to 50 dwellings, Thames Water, as a statutory consultee, advised that this was the maximum number of dwellings the current system could accommodate. Therefore, it is not an "anticipated" upgrade, it needs to be a "requirement". There were 64 sewage dumps into the River Evenlode at Moreton-in-Marsh in 2022 and 128 in 2023 as reported in the Guardian newspaper on 27th March 2024, England's Sewage Crisis, an increase of 100%. Both CDC and GCC have done nothing to ensure raw sewage is not released into the M-i-M water courses despite repeated requests by M-i-M Town Council and residents. CDC has continued to permit development e.g. Dunstall Farm, Evenlode Road, Mosedale and Stockwells without addressing the problem. There have been no sewage upgrades in the last 10 years, despite CDC authorising developments that have increased Moreton's population by 43%. A new sewage treatment plant must be commissioned, or the current one upgraded, to accommodate existing and future developments. It is important to recognise that this plant must address existing issues as well as new developments. To help prevent pollution of existing water courses, CDC must not permit new developments unless the utility services can accommodate. For example, CDC should only have approved 50 dwellings at Dunstall Farm, not 250, with the proviso that additional dwellings would only be approved when there was sufficient sewage and run-off water capacity. This will have avoided the situation at Dunstall Farm where they are likely to have to enforce condition 27. If they don't, CDC will be in breach of their own policies such as the proposed CC6, and strategies such as Cotswold District Green Infrastructure Strategy (January 2024).

Respondent	Policy	Comment
Judith Montford The EA 207	Policy INF8 CC6	Policy CC6 - Water Infrastructure Management (Formerly INF8) Given the importance and profile of water quality, the Water Quality section of Policy CC6 could be more robust. We have highlighted a number of issues to be addressed and also suggested changes and without including these in the local plan we will find the plan unsound. Point 3 within the water quality section of Policy CC6 could be strengthened by including explicit reference to achieving the objectives of the Water Framework Directive (WFD). This would include ensuring that development does not lead to a deterioration of WFD status; does not prevent a waterbody achieving 'Good' status for WFD, and where possible leads to improvements to current WFD status. We suggest the following. Proposals will be permitted that do not result in a demonstrable deterioration in the water quality of the water environment as required by the Water Framework Directive (WFD). Development should not prevent a waterbody achieving 'Good' status for WFD, and where possible should leads to improvements to current WFD waterbody status. Where a need for improvement or a risk of deterioration in water quality is identified, the Council will require satisfactory improvement or mitigation measures to be implemented in full prior to occupation of the development. The Cotswold Waterpark designated bathing water is within Cotswolds District Council. This designated bathing water is currently at 'Excellent' status, however, has previously been at risk of deterioration. Policy CC6 would benefit from referencing it to ensure that its status is not put at risk by development within the local plan. It would be helpful to reference the Environment Act (2021) obligations on storm overflows and phosphorous discharges. Developments should not be approved until the infrastructure is in place to ensure these targets can be met and continue to be met.
Debbie Taylor (Rangeford Villages)	Policy INF8 CC6	Flooding and public services - Moreton in Marsh area is poor for drainage/pollution. Can't cope with existing houses.
Nicholas Dummett 186 (CPRE)	Policy INF8 CC6	This requires adequate waste water treatment capacity to be in place before the first unit is occupied. We would support this approach. It also covers management of water consumption to a target rate per person and demonstration that development will not pollute existing water sources. More details need to be given as to how both will be monitored; without this the policy is simply an aspiration.

Respondent	Policy	Comment
Sarah Hart (Morton-in-Marsh Town Council) 156	Policy INF8 CC6	Policy point 1 Where such infrastructure is required, it must be in place prior to the occupation of the development, or, if it is demonstrated that delivery within that timetable is not possible, within a timeframe that has first been agreed by the LPA. (vi) Proposals will be subject to conditions to ensure that the first and/or subsequent occupancy is aligned with the delivery of the necessary infrastructure upgrades; (vii) MTC notes the policy wording, however reference vii from Thames Water includes: '…which result in the need for off-site upgrades…' Should this wording be included in the policy? vii Thames Water Representation example policy clause – used in part (I&O Reg 18 consultation, 2021) We recommend the Local Plan include the following policy: "Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."; NPPF 2023, para 11; SFRA L1 draft also recommends the phasing of development.
David Hindle	Policy INF7 CC7: Green Infrastructure	1. Needs re-wording, as it is not be achievable in all developments. 3. Leave in 'be expected to', as isolated GI will not be able to be linked in to new, and visa versa. 5b.7.9 Reword, or delete reference to all development being able to contribute, as it is not reality. 5b.7.12 Re-word the concept of off -site contributions will only be relevant over a certain threshold, then at some point they become irrelevant, as the GI would be capable of being on -site. 5b.7.14 linked to the above. If 5b.7.13 is deleted,then paragraph numbering changes.
David Hindle	Policy INF7 CC7: Green Infrastructure	Note: Are children's play spaces mentioned anywhere. Logically should be within the Design Code.
Andrew Brian Crump	Policy INF7 CC7: Green Infrastructure	Fields adjacent to a development boundary and traversed by the Heart of England Way are part of the settlement's existing GI. In the event of them being built upon in the future, that could hardly be regarded as a contribution to the provision of new GI, as it would be a reduction if it. Similarly, it would not be an improvement of the exsiting GI.

Respondent	Policy	Comment
Bob Sharples	Policy INF7 CC7: Green Infrastructure	In paragraph 5b.7.3 we could suggest that sport should be added before the word pitches for clarity: allotments, parks, playing fields and SPORTS pitches, hedgerows
Geoff Tappern	Policy INF7 CC7: Green Infrastructure	Green infrastructure is very important to give green breaks within villages. When it comes to planning of a new site it would be preferable for the developer to have discussions with the village to ensure some breaks in housing scene and give wildlife and good views.
Rosalie Callway 123	Policy INF7 CC7: Green Infrastructure	Major developments should apply clear, third-party assessed, Green Infrastructure principles, such as Building with Nature, that ensures the long-term delivery of multi-functional benefits to: human wellbeing; water efficiency and safety; and biodiverse wildlife. See example: https://www.essexdesignguide.co.uk/supplementary-guidance/essex-green-infrastructure-standards/
Bathurst Estate 175	Policy INF7 CC7: Green Infrastructure	No comment.
Sean Lewis	Policy INF7 CC7: Green Infrastructure	Our client supports the retention of a policy setting out the expectations for delivery of GI, as this is a key component of delivering development that provides appropriately for the communities it is creating. The site provides opportunities to deliver 10% Biodiversity Net Gain (BNG) in accordance with the Environment Act 2021.

Respondent	Policy	Comment
Sarah Hart (Morton-in-Marsh Town Council) 156	Policy INF7 CC7: Green Infrastructure	CC7 point 3 A BNG spatial operating strategy combined or overlaid with a spatial development strategy within the District would at least enable residents to understand how their environment is being planned and managed in support of nature recovery, wellbeing and climate emergency.
Chipping Campden School	Policy INF7 CC7	The School supports Policy CC7. We are exploring ways in which to enhance the biodiversity of the school campus without impinging on school playing pitches. We believe that students can find it beneficial to become involved with the planting and management of green spaces and studying at first hand the flora and fauna. For reason of safeguarding and security the School cannot permit free access to its campus.
gina stephens	Policy INF7 CC7	What green infrastructure proposals are there for MIM? The proposed development of 1500+ residential properties will impact adversely the micro and macro green infrastructure of the town. How will this be retained and enhanced ?
Bob Sharples	Policy INF7 CC7	Policy CC7 - Green Infrastructure should be backed up by a robust evidence base such as a playing pitch strategy, which we note and welcome is referenced in 5b.7.16.
Gloucestershire Wildlife Trust	Policy INF7 CC7	We support the strong references made here to the nature recovery network. CC7 (2) should be amended to read 'Development proposals will be permitted where they contribute to the provision of high-quality, new Green Infrastructure and/or improvements to existing Green Infrastructure assets and linkages'. Without this it reads that the addition of any GI will see development permitted, but we often see development with poor GI that will add little ecological value.
Highways England 133	Policy INF3 CC8: Sustainable Transport	Policy CC8 Sustainable Transport Point 3 of revised Policy CC8 which requires the early delivery of sustainable transport infrastructure and measures necessary to achieve modal shift is welcomed by National Highways. We suggest that the policy is further revised to ensure early provision of sustainable and active travel infrastructure and services will be provided by sites which result in a severe impact on the SRN. Paragraph 5b.8.7 also references specific thresholds of development size that are expected to complete a Transport Assessment. However, the reference to where the size is set out is simply listed as "XXX." We request clarity as to what the threshold is and where this is located.
Fergus Dignan 126	Policy INF3 CC8: Sustainable Transport	11.3 (INF3) h. considers the needs of people with disabilities by all modes of travel. -Change to [In bold] 'meets'. 'Considers' [end bold] suggests that someone will think about it but doesn't demand that needs are met.

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy INF3 CC8: Sustainable Transport	GCC officers welcome the addition of "reducing transport carbon emissions" to the objectives of the Local Plan. This will address particular challenges in a mostly rural Cotswold district where private car use is high and there is a lack of reasonable alternatives for transport. GCC officers support the ambitions to create space and connections for more people to walk and cycle; increasing public transport provision and enhancing access to 'key destinations'; and Policy CC8's specific reference to links with green infrastructure. The Local Plan states that the Government requires sustainable development to be pursued in a positive way, which means meeting development needs, aligning growth and infrastructure, improving the environment and mitigating climate change as well as adapting to its effects. The plan reads, "to enable healthy lifestyles, development will need to … maximise opportunities to encourage a modal shift in transportation from fossil fuelled transportation to accessible active travel and sustainable transport; a genuine choice", which means that there should be a presumption towards the following criteria, whilst allowing for the rural nature of most of Cotswold District: • Residential properties or workplace entrances should be within c. 800 m walking distance of a wide range of local amenities which may include but not be limited to a food shop, park or green space, indoor meeting space, primary school, post office or bank and GP surgery. (NB: the emphasis is on a wide range of amenities – particularly those likely to be attended on a frequent basis). • Significant development and growth sites are allocated to existing high frequency (more than 4 buses per hour during a weekday) corridors or in locations where frequencies are currently at least 2 services per hour and could be increased (commercially) to 4 per hour as a result of the development. Please note that isolated locations such as town in the northern Cotswolds may struggle to achieve this. • All other development is within a 400m walk of a direct bus corridor served by at least an hourly bus service (during a weekday). • Walking routes to bus stops comply with healthy streets principles, for example, including rest stops, adequate surveillance, and direct coherent routes. • Bus stops and interchanges are provided to the appropriate quality/standard in the appropriate locations. • Significant residential development should be within a maximum of one hour travel time by public transport of a main town or city centre with significant retail, employment, further/higher education opportunities. • Quality of walking and cycling links should comply with up-to-date guidance (i.e., LTN 1/20) for majority of their length. The full length should make provisions so that all types of users are able to access and use the infrastructures. Please refer to Local Cycling and Walking Infrastructure Plans (LCWIPs) at www.gloucestershire.gov.uk/lcwip especially those for Cirencester and the county. • Healthy streets design principles should be provided which support walking and cycling by people (of all ages and abilities); as well as include measures including SUDs and tree planting to manage drainage impacts and encourage biodiversity.

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy INF3 CC8: Sustainable Transport	The GCC Transport Planning team are supportive in principle but would like to see the details of the comprehensive update.

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy INF3 CC8: Sustainable Transport	With officer experience of development process in Oxfordshire: Mandating all residential properties to be within 400 metres of a high frequency bus route does have significant implications for built spatial form and the directness of bus routes, and hence their long-term viability. New developments are typically located in oddly shaped fields or a series of such fields. To achieve a maximum 400 metres walking route in this type of geography results in developers proposing a network of labyrinthine roads across these fields to meet such a 400 metres requirement. Such bus routes are indirect and generally unattractive to bus users, especially if this results in a diversion of inter-urban bus services into a lengthy detour. This contradicts the philosophy of the emerging 'express bus strategy'. To achieve a 400-metre walking objective without diverting main inter-urban bus services requires new development to be in the form of a 'long sausage' no wider than 400 metres from a main road along where an inter-urban route already operates. This cuts across the current UK practice of developers acquiring oddly shaped fields. Whilst such an urban form may be appropriate on the edge of a large city (for example in the development plans between Cutteslowe and Water Eaton on the A4165 north of Oxford – Cherwell District Council), I do have my doubts whether this approach would be achievable in smaller Cotswold towns / villages. There also needs to be some realism about the pattern and frequency of proposed bus route enhancements. Moreton is quite some distance from major towns, and whilst there is a reasonably good bus service to Cheltenham which could be expanded with the assistance of developer funding, the end result would not be 'high frequency'. This is mainly due to the general absence of other main population centres along the route which would contribute patronage. The journey between Moreton and Cheltenham currently takes over 70 minutes, probably without much scope for reducing this. The train service to Oxford and Worcester may be more attractive to the new residents, which would reduce the actual patronage on the bus to Cheltenham. With current operating costs of £200,000 per bus per annum and rising, then the section 106 request for an enhancement to the existing service to operate every 30 minutes, with later evening services etc. would be considerable. A development of 1,500 dwellings is of 'moderate' size and there will be many other calls on the list for developer funding. Any thoughts of 'four buses per hour' for this location would be unaffordable and unsustainable in my view. An enhanced level of bus service needs to be commercially viable by the end of the s106 funding period. This brings into question the sustainability of this proposal.

Respondent	Policy	Comment
Bathurst Estate 175	Policy INF3 CC8: Sustainable Transport	No comment
Sean Lewis	Policy INF3 CC8: Sustainable Transport	Our client supports the retention of a policy the promotes sustainable transport objectives. This is necessary to, amongst other things, help guide the delivery of a sustainable approach to new development. These representations are supported by a transport technical note, prepared by Jubb, setting out the high-level transport considerations for the Site, illustrating how a proposed allocation could facilitate safe and suitable access in accordance with national planning guidance.
Morgan Elliot Planning	Policy INF3 CC8: Sustainable Transport	Call for sites. 349. Policy INF3 focuses on sustainable transport stating development will be permitted where it actively supports travel choice and gives priority to pedestrians and cyclists whilst providing access to public transport facilities taking into account the travel and transport needs of all people. Further, it supports development where links with green infrastructure including Public Rights of Way are ensured.
Morgan Elliot Planning 340	Policy INF3 CC8: Sustainable Transport	Call for sites. Policy INF3 focuses on sustainable transport stating development will be permitted where it actively supports travel choice and gives priority to pedestrians and cyclists whilst providing access to public transport facilities taking into account the travel and transport needs of all people. Further, it supports development where links with green infrastructure including Public Rights of Way are ensured.
Morgan Elliot Planning 340	Policy INF3 CC8: Sustainable Transport	Call for sites. New emerging Policy CC8 (amending Policy INF3) adds that development must provide and optimise walking, cycling and public transport connections to key off-site origins and destinations.

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy INF3 CC8: Sustainable Transport	Call for sites. The site has two potential access points, one pedestrian access to the south east of the site from Chapel Walk and to the west on the existing alignment of St. Arild's Road. The potential access to the west is the only vehicular access point to the site and is within the 30mph limit of Didmarton. 4.17 Given the existing access points, it is considered safe and suitable access into the proposed allocated site both for pedestrians and vehicles. 4.18 As demonstrated above, the closest bus stops are found to the south of the Site on The Street. As detailed previously the number 69 bus service provides a sustainable transport option toward a number of settlements including Tetbury. Therefore, access to the extensive range of leisure, retail and employment services can be achieved via sustainable modes of transport. 4.19 With the above in mind, it is considered allocating the site for residential development will seek to encourage active travel modes and public transport, aligning with draft Policy CC8. Further, allocating the site for residential development is not considered to have a severe residual impact in accordance with Paragraph 115 of the NPPF.
David Hindle	Policy INF3 INF3 CC8	1. Wording would seem better to start 'Traffic generating development must' etc Add 4. Development of Infrastructure related to the objectives of the Local Transport Plan will normally be permitted. 5b.8.7 Need to define somewhere the expected contents of a Travel Assessment Plan, and a Travel Plan - maybe an SPG
yvonne o'callaghan	Policy INF3 INF3 CC8	new development in Moreton in Marsh should deliver public transport routes to adjacent towns - it continues to amaze most people that there is no regular bus route between Chipping Norton and Moreton in Marsh. Any survey would I'm sure demonstrate a significant trip reduction with the introduction of a decent bus service.

Respondent	Policy	Comment
Andrew Brian Crump	Policy INF3 INF3 CC8	If emission reduction targets are to have any prospect of being reached, then it is imperative that future housing is built adjacent to settlements which are close to existing employment centres, or where there is a good public transport network that can reduce the need for residents to use private motor vehicles. The problem at Mickleton is that neither of these imperatives has been met. Instead, the residents of the additional 257 dwellings constructed since the commencement of the existing Local Plan have to use their private vehicles to access employment locations, and for shopping, health and leisure facilities that are not readily accessible by any other means, including public transport. The prospect of any additional development can only add to this and duly exacerbate the position through the creation of detrimental effects upon the local environment, via unacceptable levels of noise, vibrations, or atmospheric pollution. It is difficult to gauge how an effective travel plan assessment can be conducted in terms of projecting modes to be required by potential residents, whose transportation requirements cannot possibly be known. Instead, it would make sense for existing residents to be asked how they have to travel to fulfil their various needs, as this would then address the need for improvements in transport infrastructure, prior to any additional development being either considered or constructed. If cycling and walking are to be regarded as priorities in any new developments, then it would make sense for access to primary schools to be achievable by these means. At present, in Mickleton, considerable reliance is placed upon taking children to school by private vehicles. A contributory factor is the distance from Furrow Way, at the extreme northern end of the village to the primary school at the opposite end of the village.
Chipping Campden School	Policy INF3 INF3 CC8	The School supports Policy CC8. The School is anxious to see resolved the twice daily traffic congestion caused in Chipping Campden town centre as a result of inadequate existing access to and parking on the School site for 16 buses to arrive and depart each morning and afternoon, combined with a large number of private cars and taxis delivering pupils to school or collecting them. The very wide catchment area for the School is unlikely to be adequately covered by regular public transport that could reduce this traffic volume. The proposed solution to this congestion has been agreed in principle by all stakeholders for the past 5 years but apart from certain resolutions in Council nothing has been progressed in detail. This vital matter is holding back development of the School campus, is delaying the provision of the new doctor's surgery and delaying the opportunity to develop affordable homes on the land off Aston Road to the north of the School. The School recently completed the development of 13 affordable homes which are let to young teachers. The provision of further affordable housing in the locality is vital if the school is to successfully attract both teaching and support staff. With a current staff role of 160+ the School is a significant employer in the town. Progress on the above matters will allow the School to open its existing car park fully as a public parking facility which will support the economy of the town centre. The School has already installed 3 no electric vehicle charging points and has provision to extend this to 6.

Respondent	Policy	Comment
EVENLODE PARISH COUNCIL	Policy INF3 INF3 CC8	BY PASS ROAD I. The CDC Local Plan Update Accepted states that a landscape led new by pass road will be built to alleviate traffic congestion which is already a major problem in the middle of Moreton in Marsh. II. The By Pass road is envisaged to alleviate North - South traffic where the A429 runs through the town. III. The Plan makes no mention of the significant traffic which uses the A44 East-West across the town, This traffic needs to come through the town to continue on its route crossing two roundabouts. IV. There is little point in concentrating on one direction of travel if the mitigation features do nothing for the other traffic. V. The details of the proposed By Pass road are vague as to where and how the route will go from Dorn to the north of the town to link again with the south of the town further along the A429. VI. The proposals merely move one pinch point of traffic from one point to another. VII. Once the proposed By Pass road has gone around the Fire Service College it will have to cross SLA land to access the A429 again. VIII. As previously stated in this document, that land should be protected and avoided by virtue of its SLA status; its particular character & that of the village of Evenlode which would run so close to it. The fact that it is in part a Functional Flood Plain - and where not 3b, it is regularly flooded by surface Water (RoFSW), with a risk of flooding to both surface assets which may emerge at significant rates is another reason to avoid development in this SLA. IX. The costs of such road building are enormous; do not fall within the remit of CDC, and will involve building a road across the railway line which will cost even more. Where is the documentary evidence that GCC has, and will have in the future, the funds for such an undertaking, and is minded to make this investment? X. The structural engineering involved in building abridge over the railway will affect the railway. Where in the Plan is the documentary evidence to demonstrate that Great Western Railways have agreed in principle to this?
gina stephens	Policy INF3 INF3 CC8	The local plan refers extensively to The Transport Hub in MIM. The transport hub is an illusion - it comprises a train station with a limited north south service, a car park, a bicycle shed and a bus stop. How is this "Transport Hub" one of the key points fopr identifying MIM as a strategic place for development?
Richard Gunner	Policy INF3 INF3 CC8	The Sustainable Transport policy CC8 is an excellent set of principles and guidance. However, it should distinguish between different forms of public transport and their impacts on the environment, the travelling public and the climate crisis. Modes of public transport which generate emissions, which damage the roads and which are less favoured by passengers such as buses should be given lower priority than those with better environmental characteristics.

Respondent	Policy	Comment
Brad Hooker	Policy INF3 INF3 CC8	Traffic is already terrible in Moreton, especially on the 429, and this is before the 219 houses currently being built by Backhouse and Spitfire are occupied. Any by-pass will require the construction of a bridge across the train tracks, unless the by-pass begins just beyond the bridge in front of Co-op and goes around the west side of Moreton, rejoining the 429 just beyond the Fosseway Garden Centre. Yes, this route would be through ANOB land. But it would also be about 4 times shorter than going around the east side of developments. And Broadway's by-pass is mostly on ANOB land and in Gloucestershire.
Geoff Tappern	Policy INF3 INF3 CC8	Great in theory but where is the public transport which of course has to go to the place you want and return in a reasonable time.In 5b.8.3 I note the phrase "by constraining the annual mileage in a fossil fuelled car. The council will adopt a "Decide and Provide" approach to managing. Really???
David Eglise	Policy INF3 INF3 CC8	This may be a political imperative, but the infrastructure required to achieve an acceptable level of ST is very expensive. Not clear how this can be achieved by this policy without finances to support it.. Costings have not been considered/addressed.
Mike McKeown	Policy INF3 INF3 CC8	Encouraging and supporting the adoption of EVs is critical to reducing CO2, transport is the UKs largest source of CO2. Ease and cost of charging is critical - part of CDCs policy should be "charge in 10" meaning wherever possible residents and visitors should be no more than 10 minutes walk away from where they can leave their EV to charge. For the ~40% of homes without off street parking there should be a strong preference to enable them to charge from their domestic electricity supply as this is ~7x less expensive (source ZapMap). For example in a new housing development if parking is not on the property there should be a strong preference that parking spaces are have electrical connection back to the homes, and not to rely on expensive public overnight charging whenever possible. For homes along the street the Department for Transport is about to issue guidelines to councils on allowing over/under pavement charging charging
Jonathan Collins	Policy INF3 INF3 CC8	Agree with all in 5b8.3 but it won't happen becasue you'll be overruled by the power of builders and their lobby with the Government. In Mickleton we need far better bus connections using environmentally friendly vehicles to give an option to the car. Rail to Stratford with a new station at Long Marston industrial park is a no-brainer but Government will block this because thy have no strategic plan, no strategic thinking and always an eye on pandering to voters rather than do something positive and decisive to improve the environment with all th benefits on health, welfare and biodiversity. You know that and so alrgely all this writing by you and me is a 'nice-to-have but unattainable paper exercise'.
Ramon Gater	Policy INF3 INF3 CC8	Several Cotswold Towns have limited numbers of restricted (i.e. narrow) routes in/out of their centres, particularly for cycle/bridle ways. When the towns also suffer traffic congestion, surrounding lanes tend to become rat-runs, increasing danger to cyclists and riders. Explicit provision for improved cycle and bridle - ways in future developments would support local health / sustainability outcomes and promote tourism. Longer distance ways to and from hubs would also benefit tourism. Without these, the policies are just wishful thinking.
Rosalie Callway 123	Policy INF3 INF3 CC8	Can more detail go into the policy? See SD4 comments above. All good stuff about hierarchy, cycle storage, wayfinding, rest, shade outside of policy itself

Respondent	Policy	Comment
David Hindle	Policy DS1: Development Strategy	Fine - my only suggestions are 6.1.10 table, increase Chestertons by up to 50. 6.1.12 again increase Chestertons by up to 50. I will explain in the Chestertons part of the Plan, why.
David Hindle	Policy DS1: Development Strategy	Support continuation, and minor changes.
Matthew Dent	Policy DS1: Development Strategy	As we are hitting the targets, we should ensure housing development doesn't exceed this. I.e don't over deliver housing as we use up the land supply for the future. We need to build sustainably so infrastructure can develop with it and the Cotswold isn't a constant building site. The Cotswolds has delivered a lot of housing in recent years.
Chipping Campden School	Policy DS1: Development Strategy	The School generally supports Policy DS1 but caveats its support by commenting that if the secondary school pupil yield is to increase within its catchment area then well funded and well programmed and advanced redevelopment of the existing school buildings may allow for some increase in total pupil numbers. The nature of these developments will be complicated and by necessity staged over a period of years. We believe that the setting out of a master plan for the School should be undertaken as soon as possible with some parallel commitment on funding. Even without an increase in pupil numbers remodelling and enhancement/replacement of significant elements of the existing buildings is necessary to avoid overcrowding and shortage of teaching and ancillary accommodation.
Brad Hooker	Policy DS1: Development Strategy	There are far too few employment opportunities in Moreton-in-Marsh to absorb the amount of people in these new homes looking for work. They will have to travel to Stratford, Banbury, or Cheltenham to find employment. Hence, no one I know thinks that building a lot of new homes in Moreton is sane.

Respondent	Policy	Comment
Richard Grant	Policy DS1: Development Strategy	Local Plan Updates - Process 2.2 The process that the Council have embarked upon is a Regulation 18 consultation, which is seeking views on two key Local Plan documents: a. The Local Plan Update – Draft Policies. This document is a partial update of the adopted Cotswold Local Plan, which retains the current plan period. Although the main element of the update appears to be the addition of a new set of policies dealing with climate change, there are also a significant number of changes to policies included in the update, including a change to the Objectively Assessed Need for new homes which the plan aims to meet. b. The Development Strategy, Vision and Objectives (2026 – 2041), which begins the process of developing a full update of the Cotswold Local Plan to cover a new plan period up to 2041, and also includes a new Objectively Assessed Need for new homes, and changes to key parts of the adopted Local Plan including the Vision and Objectives. This document also includes options for developing a development strategy which will be used to identify sites to meet the need for new homes. 2.3 In effect, this means that the consultation is seeking comments on two Cotswold Local Plans – the partial update of the adopted Local Plan, and the full update of the adopted Local Plan. It appears from the guidance accompanying the consultation that this process has been put in place for the following reasons: a. The Cotswold Local Plan was adopted in 2018 and is therefore over 5 years old. The Council has decided that some elements of the plan are out of date, and wishes to change the plan to make it "green to the core". b. The Council also wishes to commence the process of creating a new Local Plan to cover the next plan period to 2041, and has therefore produced an Options document setting out how that plan could be formulated. c. The Council is concerned to ensure that a plan can be submitted for Examination before the 30th June 2025 deadline for plans to be examined under the existing Local Plan system. d. The Council is concerned to ensure that it can put in place a new up to date plan as quickly as possible. 2.4 The Local Development Scheme sets out how these drivers have translated into the plan process that the Council is now following: a. If sufficient progress has been made on the Full Update to the Local Plan during 2024, the Council propose to merge the Full Update and Partial Update processes and content into a single Full Update Local Plan to be submitted before 30th June 2025. b. If the Full Update process has not made sufficient progress, the Council will keep the two plans separate and will submit the Partial Update Local Plan for Examination before 30th June 2025, and will then transition the Full Update to a new style Local Plan during 2025. c. A new Local Development Scheme will be published later in 2024 to clarify the route the Council will take. 2.5 We understand these drivers, and acknowledge the challenges and uncertainties that exist regarding the process for producing a Local Plan. There are clearly going to be a number of changes to policy and procedure throughout 2024, and as the Council acknowledge, a General Election may result in a change of Government which could then result in further significant change. We recognise that the Council is attempting to put in place a process which can deal with all of the uncertainties while providing the optimum opportunity to progress a plan to adoption. 2.6 However, the process that has been put in place seems to have the potential to create significant confusion amongst consultees, residents and anyone seeking to engage with the plan making process. There are essentially two variants of the same Local Plan being consulted upon, both containing elements of strategy and policy that

Respondent	Policy	Comment
David Eglise	Policy DS1: Development Strategy	The question of meeting future housing and employment across established villages is difficult to ascertain from this policy. Recently there has been 3 new development sites in Down Ampney with little to no consideration for or generating employment opportunities in the village; why and how would more houses generate employment when there is limited to no infrastructure to support it.
David Hindle	Policy DS1: Development Strategy	I note the criticism of the Housing figures given by a few others, that insufficient Housing is being allowed for up to 2031. These comments have obviously been written by Planning consultants, as they are hard to get the head around, As a Local resident, I agree with the CDC conclusion, and methodology I took the time to read the CDC paper in Autumn 2023, on the issue of competitions, and outstanding permissions, that arrived at the conclusion that CDC has already sufficient capacity relating to need up to 2031. The 5 year supply was also not at risk. What is apparent is that need originally set and updated, is already been exceeded. The just over 9,000 units, are anticipated to be exceeded by 9%. It is wrong to conclude that the already ahead of delivery, is a refection of need, as it is instead a refection of demand. Demand is not the basis of planning, rather need is. To an ordinary person it is perfectly reasonable that a residual trajectory is considered, as otherwise the more permissions that are granted, the more will need to be granted in order to maintain the five year supply. To the average person that is totally illogical, as planning is 100% about need not demand,and the established need is already boosted by a substantial uplift, in order to reflect high prices, by giving an 'affordable housing uplift'. Please do not increase the need figures in the draft. The CDC approach in D1 is sound. .

Respondent	Policy	Comment
Zesta Planning	Policy DS1: Development Strategy	1.7. The adopted Local Plan became more than 5 years old in August 2023 and at that point needed reviewing. Moreover, now that plan's strategic policies are over 5 years old the Council is required to identify a 5 year housing land supply against its Local Housing Need calculated using the Standard Method in accordance with NPPF paragraph 77. 1.8. It is noted that the Council have carried out a footnote 42 review of the relevant policies in August 2023 and concluded that Policy DS1 does not require updating. On this basis, the Council propose to maintain the adopted housing requirement and only make minor changes to the development strategy through a partial update to the Local Plan. 1.9. This is however considered to be a flawed outcome. It is clear that the housing requirement in the adopted Local Plan is now out of date and the standard method Local Housing Need should be applied instead. 1.10. Paragraph 33 of the NPPF makes it clear that relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly. 1.11. Paragraph 62 of the Planning Practice Guidance (PPG) on Plan Making then states that: "Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for a quickly as reasonably possible (Reference ID: 61-062-20190315)." 1.12. The PPG on Housing and Economic Needs Assessment addresses whether or not the standard method is mandatory for strategic policy making purposes and states that: "No, if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances (Reference ID: 2a-003-20190220)."1.13. It is therefore clear that:

Respondent	Policy	Comment
Zesta Planning	Policy DS1: Development Strategy	1.26. The proposed changes to Policy DS1 are somewhat confused. Amended paragraph 6.1.1 states that the need for the period 1 August 2023 to 31 March 2031 is based on the standard method for calculating housing need, but then the plan makes no update to the housing requirement at Policy DS1 and Tables DS1A – both still state 8,400 dwellings. Furthermore, the annualised requirements at Table DS1B show that the standard method Local Housing Need is not proposed to be applied until 2031/32 (i.e. after the end of the current plan period). 1.27. It is CO's position for the reasons set out at paragraphs 1.13 to 1.31 above, that the standard method Local Housing Need must be applied now. Thus, if the Council is seeking to demonstrate a 5 year supply through the partial update (notwithstanding our objections to the Council's approach in this regard), this should be based on the Local Housing Need of 493 dwellings per annum. 1.28. Instead, the Council are seeking to persist with the adopted Local Plan requirement, but with a significant reduction to factor in previous over delivery during the plan period. A reduced annualised requirement of 265 dwellings per annum is used which is some 228 dwellings/annum lower than the standard method requirement. 1.29. The Housing and Economic Needs Assessment PPG makes it clear that the standard method identifies a minimum annual housing need figure. Basing a five year housing land requirement on a figure that is below the minimum annual requirement (multiplied by five) is therefore clearly inconsistent with the Government's intended approach. Moreover, having regard to paragraph 77 of the NPPF and the expectation atparagraph 33 for strategic policies to be updated at least once every five years if their applicable local housing need figure has changed significantly, including past delivery against a now out of date housing requirement is not considered to be a sound approach. This approach has recently been endorsed at a number of appeal decisions at Malvern and Wychavon Districts including Land at Leigh Sinton Farms (APP/J1860/W/21/3289643) and Land off Morris Road, Broadway (APP/H1840/W/21/3289569) amongst others. 1.30. Thus, it is considered that first, the higher figure of 493 dwellings/year should be used as the basis for calculating 5 year supply, and, second, the Council's previous over

Respondent	Policy	Comment
Highways England 133	Policy DS1: Development Strategy	Policy DS1: Development Strategy Policy DS1 states that CDC are able to demonstrate they can provide in excess of their 5-year housing needs (currently 7.2 years of housing land supply). The high potential land requirement and supply in the district should be considered in the context of delivering the most active and sustainable access for residents and other users of each site, as well as cumulatively across the District. This will enable demand on the SRN to be managed down to ensure the safe and efficient operation of the SRN, particularly at the A417/A449 Cirencester junction.

Respondent	Policy	Comment
Mark Chadwick 184	Policy DS1: Development Strategy	We act on behalf of Newland Homes Ltd and submit the following comments in response to the Local Plan Update Regulation 18 Consultation. Newland Homes is a major stakeholder in the delivery of new homes within the Council's administrative area and has a long and successful record of working with communities and delivering climate change responsible homes, with a focus on addressing reduced carbon emissions and improved biodiversity levels. We welcome the Council's commitment to the review of its Development Plan. It is recognised that such a challenge requires significant and difficult decisions, and we applaud the Council's leadership in undertaking this process. With that in mind, these submissions have been made in a spirit of constructiveness and collaboration, as we seek to ensure that a robust and resilient local plan is put in place. These submissions are informed by our experience of the likely conclusions the Inspector/s appointed by the Secretary of State might draw on the emerging development plan when set against the tests of paragraph 35 of the National Planning Policy Framework (NPPF). Where shortcomings are identified, this submission identifies potential solutions to address those potential challenges and does so in a constructive manner. POLICY DS1: DEVELOPMENT STRATEGY It is vital for the Council to make a full and proper assessment on whether sufficient sites have been identified to deliver the district's housing requirement over the plan period. It is also essential the Council can robustly demonstrate a strong and enduring housing land supply is secured to achieve the delivery of new homes by the end of the plan period. In this context 'delivery' means the completion of new homes suitable and available for occupation. We are pleased to see the Council is seeking to steer the emerging Local Plan Update to meet its housing requirement of at least 8,400 dwellings, as defined by the Standard Method. In responding to the 2022 Issues & Options consultation we urged against the then suggested approach to use an alternative approach to calculate the local housing need. At Issues & Options stage, on behalf of Newland Homes, we made detailed representations setting out that it is inappropriate to make a tilted balance away from meeting the economic or social needs. We highlighted that such an approach would bring about far too many unintended negative social and economic consequences. We are pleased to now see the Standard Method is being deployed as the 'starting point' as required by the NPPF. Table DS1-A of the emerging Local Plan Update sets out assumptions on the component elements proposed to make up the Council's land supply between 2011-2031. The table presents an unduly over optimistic figure for 'Windfalls'. The suggested windfall figure of 843 dwellings represents around 10% of the total housing requirement. That, windfall figure is to be delivered over the very narrow 7-year period, representing a delivery rate of 120 dwellings per year. In contrast, the adopted local plan set a windfall figure of 1,191 dwellings to be delivered over a 14-year period, at a rate of 85 dwellings pa. The increased reliance on windfalls to deliver much required new homes is considered to present a significant weakness in the emerging plan's development strategy. The proposed increased of the annual windfall allowance by around 141% is wrong and misguided. It is considered that approach fails to meet the soundness tests for the following reasons: • While the Council has benefited from strong levels of housing delivery from the windfall supply side since the adoption of the operative local plan, it needs to be emphasised this source of supply is a finite resource and a diminishing one, not a self-replenishing element. Moving through the plan period the windfall numbers, as a finite

Respondent	Policy	Comment
Bathurst Estate 175	Policy DS1: Development Strategy	Support. We agree that Kemble should be identified as a Principal Settlement given its public transport infrastructure, making it a transport node for the District. It is well connected to surrounding Principal Settlements and has greenfield adjacent to the settlement boundary which is suitable for development.
Bathurst Estate 175	Policy DS1: Development Strategy	BE notes the reasons for the updates to various policies and why new policies have been proposed. We have provided detailed comments against each of the draft policies within the accompanying table. These comments align with the Survey Questions document. In particular BE supports the continued classification of Cirencester and Kemble as Principal Settlements under Policy DS1. Cirencester's recognition as the District's main service centre to deliver future growth establishes it as the most sustainable area for development. Kemble's continued classification shows the settlement would be suitable for allocation of residential development, particularly given its public transport infrastructure. There is a need to carry out a full plan viability assessment to ascertain the impact of the new policies on the deliverability of sites in the plan. The policies propose significantly higher development costs. Elsewhere, for example, in Oxford City, where similarly high environmental policies have been proposed, these have been offset by a decrease in the level of affordable housing (reduced from 50% to 40%). BE therefore reserves the right to comment on the policies in detail until such viability work has been carried out.
CR Ayers 223	Policy DS1: Development Strategy	Use of Land for Housing. The identification of land plots suitable for housing development does not currently ensure that the housing for local needs will occupy them. Profit rules and larger houses will fetch the £million plus price from outsiders. See the Camp Gardens development in Stow. There needs to be a method of directing what type of housing will be built where,
CR Ayers 223	Policy DS1: Development Strategy	Building for Gloucestershire (Cotswold) Local Needs. New builds and vacant properties in Stow are quickly snapped up. The permanently resident population of Stow now is slightly less than when I came here from Gloucester 44 years ago (on move of work location), despite that during this time there has been almost continuous infill and conversion building, thus indicating the high level of non resident owners. Restriction on local ownership for any restricted local user new builds are only applied for 3 months before the developer can offer them on the open market. This means that inevitably the need to sell to pay for the development draws in many non local to Cotswold / Gloucestershire residents. The larger the development the more "outsiders" are drawn in the urge to fill the houses. Indeed, it is almost the case that building permission is granted on the basis of local need but this becomes a simple tool to actually filling the development on an open market basis. This 3 month rule needs to be extended to 12 months and for the housing involved to be sequentially released onto sale in small batches to prevent importing more outsiders. The improvements in the Cotswold railway line have made Stow a viable commuting, or more recently part week, commuting, location. Both Kingham (which has better car parking) and Moreton in Marsh stations are well used.

Respondent	Policy	Comment
CR Ayers 223	Policy DS1: Development Strategy	Use of Census Data for Planning Purposes. During a major planning appeal some years ago, it was discovered that false vehicle ownership data was used to justify low traffic rates on a well known local congested road. This was because ownership rates were based upon census data. However, such data only showed vehicles belonging to those resident at the time of the census and not those, of the people, of 2nd home owners whose data was collected at their primary away residence. This inaccuracy was well illustrated at the start of Covid 19 lockdown restrictions when hardly any vehicles were parked on the road. In normal circumstances there is more traffic than parking spaces especially during weekends.
Guy Wakefield, Ridge (on behalf John Hackling Holdings) 243	Policy DS1: Development Strategy	It is agreed that Bourton-on-the-Water should remain a principal settlement. This Policy sets the development strategy for the Local Plan area. We support the statement contained in Paragraph 6.1.4 in the Plan: "To achieve sustainable, balanced communities, the delivery of housing for the District needs to be accompanied by appropriate employment growth" However, there are no additional employment allocations proposed as part of the Local Plan update. The current plan period runs until 2031, this means that there are seven years remaining. Many businesses including Hacklings (a significant local employer within Bourton-on-the Water) are looking at their expansion plans for the next 8-15 years. There is clearly a need for additional employment land within the district, with many of the allocations already having been built out and businesses needing certainty about where they can expand in the future. There is a real risk that if additional employment site allocations are not made as part of the Local Plan update, then local businesses may be forced to move out of the district to ensure that they can expand and grow in the future. As can be seen in the accompanying Call for Sites submission, Hacklings are actively promoting land to the north of Bourton Business Park as an additional employment allocation so they can ensure that their future growth will allow them to remain in Bourton on the Water. As such, in order to ensure that "appropriate employment growth" is achieved in the Plan period and to provide key local businesses with certainty, additional employment allocations should be made as part of the Local Plan update. We recommend planning for a greater number of jobs, and allocating a greater number of employment sites, to help support the economy of the Cotswolds.

Respondent	Policy	Comment
Bloor Homes Western 244	Policy DS1: Development Strategy	In terms of the principal settlements identified, Bloor Homes is in agreement that Stow-on-the-Wold should be identified as a principal settlement, it is also identified as a key centre within proposed new policy EC8. There is clearly a need to locate development in the most sustainable settlements in the district. More specific comments are made in relation to Stow within the response on policy S13. There are concerns however with the approach taken within the Local Plan update to include over-supply within the calculation and taking a stepped approach for the remainder of the plan period which consequently only requires 265 homes to be delivered per year. The NPPF is clear at paragraph 61 that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance" (our emphasis). These issues are addressed in more detail in the note prepared by Emery Planning attached to this response. Ultimately, however it must be noted that the housing figure on which the original Local Plan was prepared was based on the guidance available at the time. This is now outdated following the Local Plan preparation in 2016 and does not necessarily reflect current housing needs. The Local Plan update must be in accordance with the current NPPF and PPG. Whilst the PPG does allow for additional supply to be used to offset any shortfalls against requirements from previous years (ref ID: Ref ID: 68-032-20190722), it must also be acknowledged that the Standard Method now being applied by the Council already takes into account past delivery. Since the Local Plan was adopted, local housing need has increased because affordability has worsened over the plan period since 2011. This was reflected in the recent consultation on the "Cotswold Housing Strategy 2024-2029." This document set out the Council has declared an affordability crisis with a key aim of the Corporate Plan being to tackle this. This report goes on to state that there are approximately 2,500 households who are unable to afford market rented housing in Cotswold District and 1,460 people are currently on the Housing Waiting List. Priority 2 of this Report further acknowledges that "The Local Plan is one of the most powerful tools at the Council's disposal, which can be used to boost the delivery of affordable housing. We are currently undertaking a partial update of our adopted Local Plan. One of the principal objectives is to boost the delivery of genuinely affordable housing, particularly social rented housing." As has been set out in the Emery Planning Note which accompanies this submission past delivery is accounted for in the standard method and this results in a local housing need of 493 dwellings per annum from 1st April 2023 based on affordability ratios dated 2022 and published in March 2023. Using the latest data inputs i.e. the annual average household growth over the period 2024-34 and the most recent median workplace-based affordability ratios published on 25th March 2024, the local housing need for Cotswold is 504 dwellings per annum from 1st April 2024. This increase in need shows that affordability is continuing to worsen in the district despite an oversupply against the adopted housing requirement. Over the remainder of the plan period to 2031, the local housing need using the standard method is therefore 4,032 dwellings (i.e. 504 X 8 years = 4,032). This is significantly greater (i.e. by 1,909 dwellings) than the proposed residual requirement of 2,123 dwellings. The proposed stepped (residual) requirement would not therefore address the identified need and therefore the plan update has not been "positively prepared" in accordance with paragraph 35a) of the Framework and is not sound. The Local Plan Update currently only proposes one additional allocation (at Moreton in Marsh). With the majority of affordable housing across the district being delivered as part of the larger allocations, it would be sensible to allocate additional sites (in the most sustainable settlements) as part of this Local Plan Update to help the Council meet one of its key corporate objectives and ensuring that "everyone across the district to access housing that meets their needs and that they can afford."

Respondent	Policy	Comment
Sean Lewis	Policy DS1: Development Strategy	The Government's position in the December 2023 NPPF states that the Standard Method represents an "advisory starting point for establishing a housing requirement" (paragraph 61). It is only advisory in as much that an understanding of housing needs is the starting point for determining the appropriate housing requirement. The reference to advisory starting point does not indicate that there is any greater degree of latitude than was previously the case for an authority to determine its own starting point. This is made clear by the third sentence in paragraph 61 which advises that only in 'exceptional circumstances' should local authorities depart from the Standard Method in determining the housing requirement for a local plan. 43. An example of an 'exceptional circumstance' has helpfully been inserted into footnote 25 of the Framework. This suggests that an exception could be made where: "Such particular demographic characteristics could, for example, include areas that are islands with no land bridge thaIt is clear from this example that the circumstances do indeed need to be truly exceptional and there is good reason for that. As such, it is clear that the standard method output remains the starting point for determining a minimum housing requirement and the basis for a sound local plan. 45. Indeed, it is also of note that the PPG identifies that the standard method calculates housing need, representing the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply (Paragraph 002, Reference ID 2a-002-20190220). 46. Upon review of the amendments to Policy DS1 (Development Strategy) and its supporting text, the LP updated sets out that the Council has chosen to retain its housing requirement of 8,400 dwellings rather than adopt the higher housing need figure of 9,094 dwellings.t have a significant proportion of elderly residents".

Respondent	Policy	Comment
RGP 259	Policy DS1: Development Strategy	The issue of the amount of housing development proposed within the Local Plan is clearly a matter of great importance, particularly as the Government clearly signals its intention for Local Planning Authorities to "significantly boosting the supply of homes" (para 60 NPPF, 2023) and use their evidence base to ensure that their plan is 'Positively Prepared' to "meet the area's objectively assessed needs" (para 35a NPPF, 2023). Paragraph 010 Reference ID: 2a-010-20201216 of the PPG states that "The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour." Low build-out rates are a significant risk to the delivery of homes in Cotswold District and effective and sustainable allocations that meet the needs of a diverse range of people. Therefore, a mix of sites, including smaller sites that are likely to be built out relatively quickly (paragraph 70 NPPF, 2023) alongside those strategic sites that will deliver large scale growth over a longer period of time. This algins with the 'stepped' requirement proposed in DS1 Development Strategy. Paragraph 68 of the NPPF (2023) states: "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan." (my emphasis)" The landholding has been submitted for consideration by the Council as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA). To date, the landholding's updated position has not been published in an updated SHELAA. We note that the NPPF defines 'Developable' as: "To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged" (my emphasis). Our clients maintain that the site meets these requirements and the site therefore should be able to form part of a trajectory of deliverable housing to meet the identified needs of the District over the plan period.

Respondent	Policy	Comment
Walsingham Planning 260	Policy DS1: Development Strategy	Emerging Local Plan 2026 – 2041 Development Needs The development needs envisioned by the Council are currently based upon the application of the standard method with a potential reduction of the requirement by 1,066 homes to account for previous over-delivery. It is noted that the Council will review how the past over-delivery is accounted for following clarification from central Government. The standard method figure of 7,396 dwellings must be viewed as a starting point when determining the housing requirement to 2041. The Vision, Objectives and Development Strategy Options Topic Paper does note that the standard method has been used to provide an indication of likely housing need. However, it is important to note that the Council must consider reasonable alternatives and be based on proportionate evidence in accordance with soundness test b) outlined in the NPPF (paragraph 35).

Respondent	Policy	Comment
Star Planning 269	Policy DS1: Development Strategy	As part of the update, the Development Strategy is not proposed to be amended and Richborough has made representations on this matter as part of the comments on the Cotswold District Local Plan Update Consultation - Vision, Objectives and Development Strategy Options Topic Paper. However, as has been identified, there is the potential for shortfall in the delivery of housing during the period up-to 2031 and contingency arrangements should be made in any updating of the Local Plan. If more housing sites are required, whether falling within C3 or C2 use classes, then the growth should be directed to the Principal Settlements, especially those where there has been inadequate housing to meet the needs of the local community such as at Stow-on-the-Wold The retail offer within Stow-on-the-Wold is significant comprising in excess of 140 shops and there is a wide range of local facilities and services. Over 1,100 people are employed by local businesses or are self-employed which highlights a strong employment role for Stow-on-the-Wold. Further, Stow-on-the-Wold is a location with good access to sustainable travel choices which is also a key differentiating attribute when compared to the other settlements. The only missing community facility of any note is a secondary school but there is such a facility available at near-by Bourton on the Water and is ready accessible to any pupils may live on the site by cycle or school bus. There is a need to encourage people to live, work and play locally. There is a need for housing and economic growth to occur at Principal Settlement, in particular Stow-on-the-Wold, otherwise they will decline, especially their local and community services. Keeping people living, working, playing and interacting with local facilities and services, people in their community, without the need to travel is a means of addressing the climate change emergency through strategic planning. This means directing growth to sustainable settlements (namely Stow-on-the-Wold) where people work and want to live rather than, in essence, requiring those looking for homes to move away from their community and support network.

Respondent	Policy	Comment
Liz Shield (SFPlanning) 246	Policy DS1: Development Strategy	Response to the Regulation 18 draft local plan policies Approach to development – policies DS1 – DS4 7.2 In accordance with the current local plan, as a site which is well related to a non-principal settlement, development for housing would potentially be in accordance with local plan policy DS3. However, the draft local plan proposes some key changes to the development strategy at policies DS1 – DS4. Our concerns with this, along with our concerns relating to the Council's approach to assessing housing need are set out in more detail below. Housing need 7.3.1 Meeting housing need does not have to jeopardise or work against a green agenda. It is part and parcel of a healthy community to have good quality affordable homes which are suitable for the needs of those living in them. As the Council has recognised, development should normally be located in areas where residents have reasonable access to everyday services, facilities and/or employment opportunities (see statement of reasons for policy DS3, note iv). We agree entirely with this aim. 7.3.2 In August 2023, on the five year anniversary of the adoption of the current local plan, the Council undertook a review of whether "their applicable local housing need figure has changed significantly". The NPPF also requires a five year review if the housing need figure is "expected to change significantly in the near future". 7.3.3 From this review, the Council concluded that, in their view, the figure had not changed significantly and therefore strategic policies did not require updating. As a result, the Council considered that they could continue to use the approach and the figures set out in the adopted local plan, rather than switching straight to the standard method for calculating housing need. 7.3.4 The Council had previously stated in their consultation document in 2022 that "The adopted Local Plan must be updated to ensure that the District continues to maintain a deliverable five year housing land supply and passes the Housing Delivery Test" however, as set out above, this approach has evidently changed. 7.3.5 Our view is that the approach of continuing with figures from a plan adopted in 2018 is not in line with the Government's objective of "significantly boosting the supply of homes" as set out in paragraph 60 of the NPPF. We consider that the Council should be using the standard method to establish housing land supply and looking for ways to ensure that homes are provided in line with projected population growth within Cotswold District. 7.3.6 Our reasons for reaching this conclusion are as follows; ›

Respondent	Policy	Comment
Star Planning 269	Policy DS1: Development Strategy	Richborough does not agree with the Council's claim about the current supply of housing within the District. Although more housing is now proposed at Fire Service College site in Moreton in Marsh (310 dwellings), this does not make-up the shortfall in the delivery of new homes at Chesterton by 2031 (i.e. circa 750 dwellings less than originally stated). There is a net difference of 440 dwellings which may well increase given the slower than forecast delivery rate at Chesterton (now known as The Steadings). 8. An increase in the windfall allowance is now being made in the Local Plan. The extant Local Plan was adopted on the basis of circa 85 dwellings per annum being delivered on windfall sites but this is now proposed to increase to 105 dwellings. This represents a further 160 dwellings over the 8-year period 2023 to 2031 for this unpredictable source of supply. 9. In addition, and although there remains some 7 years before the end of the plan period, a number of the housing allocations have yet to be brought forward for development. These total some 190 dwellings and there must remain some doubt whether they will all come forward for development. In the absence of a fuller assessment by the Council, there are questions about whether all these outstanding allocations remain deliverable. Richborough advocate a 50% discount is applied to these sites representing 95 dwellings. 10. Overall, the housing land supply assumption for the period up-to 2031 is circa 700 dwellings, if not more, than is being claimed. Failure to deliver new homes does have real life consequences in terms of people being able to live within their community, provision of affordable homes and, although the Council's analysis has been noted in the Topic Paper, the price of new homes due to a lack of supply.

Respondent	Policy	Comment
SFplanning 272	Policy DS1: Development Strategy	In accordance with the current local plan, as a site which is well related to a non-principal settlement, development for housing would be in accordance with local plan policy DS3, an historically pragmatic and logical policy which supports small scale growth to enhance the vitality and viability of smaller settlements and local services. The draft local plan however proposes some unwelcome key changes to the development strategy at policies DS1 – DS4. Our concerns with this, along with our concerns relating to the Council's approach to assessing housing need, are set out in more detail below. 7.3 Housing need 7.3.1 Meeting housing need does not have to jeopardise or work against a green agenda. It is part and parcel of a healthy community to have good quality affordable homes which are suitable for the needs of those living in them. As the Council has recognised, development should normally be located in areas where residents have reasonable access to everyday services, facilities and/or employment opportunities (see statement of reasons for policy DS3, note iv). We agree entirely with this aim. 7.3.2 In August 2023, on the five year anniversary of the adoption of the current local plan, the Council undertook a review of whether "their applicable local housing need figure has changed significantly". The NPPF also requires a five year review if the housing need figure is "expected to change significantly in the near future". 7.3.3 From this review, the Council concluded that, in their view, the figure had not changed significantly and therefore strategic policies did not require updating. As a result, the Council considered it could continue to use the approach and figures set out in the adopted local plan, rather than switching immediately to the standard method for calculating housing need. 7.3.4 The Council had previously stated in their consultation document in 2022 that "The adopted Local Plan must be updated to ensure that the District continues to maintain a deliverable five year housing land supply and passes the Housing Delivery Test". As explained above however, this approach has evidently changed. 7 7.3.5 We have concerns with the Council's newly stated approach and consider that housing need has changed sufficiently, or will change sufficiently in the near future, such that the overall housing figure in the local plan should also be updated. 7.3.6 Our view is that the approach of continuing with housing figures from a plan adopted in 2018 (and the associated evidence base derived from the years prior to that) is not in line with the Government's objective of "significantly boosting the supply of homes" at paragraph 60 of the NPPF. We consider that the Council should be using the standard method to establish housing need and supply, and to look for ways to ensure that sufficient homes of the right type are provided in appropriate locations to suit local communities in line with the projected population growth for the District. 7.3.7

Respondent	Policy	Comment
Howard Cole Ltd 357	Policy DS1: Development Strategy	Call for sites: It is vital for the Council to make a full and proper assessment on whether sufficient sites have been identified to deliver the district's housing requirement over the plan period. It is also essential the Council can robustly demonstrate a strong and enduring housing land supply is secured to achieve the delivery of new homes by the end of the plan period. In this context 'delivery' means the completion of new homes suitable and available for occupation. We are pleased to see the Council is seeking to steer the emerging Local Plan Update to meet its housing requirement of at least 8,400 dwellings, as defined by the Standard Method. In responding to the 2022 Issues & Options consultation we urged against the then suggested approach to use an alternative approach to calculate the local housing need. At Issues & Options stage, on behalf of Newland Homes, we made detailed representations setting out that it is inappropriate to make a tilted balance away from meeting the economic or social needs. We highlighted that such an approach would bring about far too many unintended negative social and economic consequences. We are pleased to now see the Standard Method is being deployed as the 'starting point' as required by the NPPF. Table DS1-A of the emerging Local Plan Update sets out assumptions on the component elements proposed to make up the Council's land supply between 2011-2031. The table presents an unduly over optimistic figure for 'Windfalls'. The suggested windfall figure of 843 dwellings represents around 10% of the total housing requirement. That, windfall figure is to be delivered over the very narrow 7-year period, representing a delivery rate of 120 dwellings per year. In contrast, the adopted local plan set a windfall figure of 1,191 dwellings to be delivered over a 14-year period, at a rate of 85 dwellings pa. The increased reliance on windfalls to deliver much required new homes is considered to present a significant weakness in the emerging plan's development strategy. The proposed increased of the annual windfall allowance by around 141% is wrong and misguided. It is considered that approach fails to meet the soundness tests for the following reasons: • While the Council has benefited from strong levels of housing delivery from the windfall supply side since the adoption of the operative local plan, it needs to be emphasised this source of supply is a finite resource and a diminishing one, not a self-replenishing element. Moving through the plan period the windfall numbers, as a finite resource, will reduce. • The high-levels of housing windfalls has largely been a product of appeal permissions granted in the early years of the plan period resulting from the lack of an identified 5-yr supply of housing land. It is wrong to base future windfall housing rates on those appeal permissions. • Cotswold District faces an undisputed affordable housing crisis. Windfalls, by their very nature, are small-scale housing sites that yield little, if any, affordable housing. It is, therefore, wrong to plan the delivery of new homes whereby 10% of the housing supply side does nothing to address the district's affordable housing need.

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy DS1: Development Strategy	Policy DS1 – Development Strategy Housing Need 3.38. Policy DS1 sets out the housing target for the district, which is proposed to remain unchanged at 8,400 dwellings between 2011 and 2031, which equates to 420 dpa. It is important to note that this figure does not take into account the need for communal establishments, with Use Class C2 being monitored separately and requiring 217 additional dwellings, 11 dpa. This housing need figure was originally derived from the Updated Estimate of the Objectively Assessed Housing Needs of Cotswold District report, dated March 2016. Given the age of this study, and the fact that policies must be underpinned by up-to-date evidence in accordance with Paragraph 31 of the NPPF, the Council have assessed whether the target should be updated as part of the partial review. The Standard Method 3.39. As it has now been more than five years since the plan was adopted, the district's local housing need should be calculated using the Standard Method, in line with national Planning Practice Guidance (PPG: 68-005). Whilst Paragraph 61 of the NPPF sets out that there may be exceptional circumstances which justify an alternative approach, no such circumstances or demographic characteristics exist in Cotswold to justify this. Indeed, the Council themselves, in their Vision, Objectives and Development Strategy Options Topic Paper (January 2024) do not identify any specific exceptional circumstances which apply in the district. Therefore, in line with national policy, the Standard Method must be used here to determine the district's housing requirements. 3.40. This results in an uplifted need of 493 dpa, i.e. 9,094 dwellings over the twenty-year plan period, with these figures now including the need for communal accommodation. This is set out at Paragraph 7.7 of the Review of the Cotswold District Local Plan 2011 – 2031 Housing Requirement (August 2023). This is the latest available figure for housing need in the district and it aligns with the findings of the independent Gloucestershire Local Housing Needs Assessment 2019, which identified a need of 490 dpa in the district (see Figure 14 of the report). This represents an increase of 4.3% in the overall need and 14.38% in terms of the number of dwellings needing to be delivered per annum. 3.41. However, the paper produced by Opinion Research Services in July 2023 titled Reviewing Whether the Housing Need Figure for Cotswold has changed significantly and the Council's Review of the Cotswold District Local Plan 2011 – 2031 Housing Requirement both conclude, at Paragraphs 41 and 7.17 respectively, that whilst housing need has increased, the original 8,400 dwelling target does not need to be updated, as this is not a significant change when assessed in the context of Paragraph 77 and Footnote 43 of the NPPF, since it is below the 15% threshold which the Framework would consider to be significant in terms of under-delivery. 3.42. Notwithstanding, there is still a clear demonstration within the evidence base (e.g. Gloucestershire Local Housing Needs Assessment 2019) and the Standard Method calculation that housing need has increased within the district, which is, in fact, acknowledged within the supporting text of the policy (paragraph 6.1.13). The Council should be using this opportunity to revise the housing target itself, rather than the supporting text, to base it on the latest evidence which will ensure a positively prepared plan. This is also required in order for the plan to be consistent with national policy, as Paragraph 61 of the NPPF states that the Standard Method figure should be the starting point for establishing the minimum number of homes needed, to inform strategic policies. Delivery 3.43. Paragraph 6.1.13 in the supporting text, along with the Review of the Cotswold District Local Plan 2011 – 2031 Housing Requirement (August 2023), suggests that based on current delivery rates over the plan period, the 9,094 figure will be "comfortably exceeded". Whilst the district's future housing supply is discussed in more [illegible]

Respondent	Policy	Comment
Morgan Elliot Planning	Policy DS1: Development Strategy	Call for sites: Policy DS1 states that sufficient land will be allocated, which together with commitments and dwellings completed since 2011, will deliver at least 8,400 dwellings over the Plan period 2011-2031 in the principle settlements, including Tetbury.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy DS1: Development Strategy	Policy DS1 – Development Strategy Housing Need 3.38. Policy DS1 sets out the housing target for the district, which is proposed to remain unchanged at 8,400 dwellings between 2011 and 2031, which equates to 420 dpa. It is important to note that this figure does not take into account the need for communal establishments, with Use Class C2 being monitored separately and requiring 217 additional dwellings, 11 dpa. This housing need figure was originally derived from the Updated Estimate of the Objectively Assessed Housing Needs of Cotswold District report, dated March 2016. Given the age of this study, and the fact that policies must be underpinned by up-to-date evidence in accordance with Paragraph 31 of the NPPF, the Council have assessed whether the target should be updated as part of the partial review. The Standard Method 3.39. As it has now been more than five years since the plan was adopted, the district's local housing need should be calculated using the Standard Method, in line with national Planning Practice Guidance (PPG: 68-005). Whilst Paragraph 61 of the NPPF sets out that there may be exceptional circumstances which justify an alternative approach, no such circumstances or demographic characteristics exist in Cotswold to justify this. Indeed, the Council themselves, in their Vision, Objectives and Development Strategy Options Topic Paper (January 2024) do not identify any specific exceptional circumstances which apply in the district. Therefore, in line with national policy, the Standard Method must be used here to determine the district's housing requirements. 3.40. This results in an uplifted need of 493 dpa, i.e. 9,094 dwellings over the twenty-year plan period, with these figures now including the need for communal accommodation. This is set out at Paragraph 7.7 of the Review of the Cotswold District Local Plan 2011 – 2031 Housing Requirement (August 2023). This is the latest available figure for housing need in the district and it aligns with the findings of the independent Gloucestershire Local Housing Needs Assessment 2019, which identified a need of 490 dpa in the district (see Figure 14 of the report). This represents an increase of 4.3% in the overall need and 14.38% in terms of the number of dwellings needing to be delivered per annum. 3.41. However, the paper produced by Opinion Research Services in July 2023 titled Reviewing [illegible]

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Respondent	Policy	Comment
Graham Whitwell 113	Policy DS1: Development Strategy	Dear CDC and Local Plan Consultation, I'm writing to provide feedback from experience in Tetbury regarding over 12 months of campaigning to save Worwell Farmland AONB from destruction and development to build a Healthcare Centre. Please find my numbered learning points below: 1. Firstly, this beautiful field off the Cirencester Road was formally assessed and reported as unsuitable for development by CDC. The 'risks to the land outweighed the benefits of a Healthcare Centre. However, in the Application for Planning Process, this assessment was eventually overridden by an NHS Commissioning letter providing evidence that human need outweighed the harm to the land. 2. We have learnt from this devastating process that the Planning Process is 'Market Led'. A term quoted back to me by a CDC Planning Officer professionally supporting the decisions of Councillors. 3. The nonsense of a 'Market Led' Planning Process' in the above situation arose from a situation where there were literally no clear values or stipulations regarding Town and Country Planning within the Local Plan that meant anything of any use. This beautiful field is still being destroyed because the 'Market' had no framework through which it could be protected. 250 yards away from the Worwell Farmland there is a huge Industrial brownfield site and a further 200 yards away there is an over developed site for older people's apartments with unused brownfield land for sale!!! The juxtaposition of this situation underlines the madness and failure of both the 'Market', Town and Country Planning and CDC Climate Emergency Policy. 4. In constructing the next Local Plan this case example needs to be analysed and learnt from. Why is that? Well, as campaigners we warned that if Worwell Farmland was approved it would set a precedent for two adjacent fields. And so it was announced at the very last Planning Meeting on Worwell Farmland that an application two adjacent fields for 88 further houses on the AONB would be processed. This is happening when still the brownfield sites mentioned above are vacant. For some of us this was a very painful outcome. In your next Local Plan some clear injunctions are required to insist on brownfield sites being developed first before destroying greenfield and AONB sites which are so often suitable for rewilding!! If the next Local Plan fails to put a framework around Biodiversity, AONB and greenfield protection at the CORE of the Plan, others will find themselves in the miserable position us campaigners in Tetbury find ourselves now.

Respondent	Policy	Comment
Rosemary Nailer 413	Policy DS1: Development Strategy	Having invested a lot of time in trying to reduce the numbers on the steadings - 2,300 homes. I realised that any comments, suggestions and ideas are a complete waste of time as any decision for the future have already been made. Sadly I thought that this would be the case. I was be more prepared to spend time studying the draft
Nicholas Dummett 186 (CPRE)	Policy DS1: Development Strategy	Policy DS1. This sets out the housing numbers. The total need for 2011 to 2031 is raised from 8400 to 9094. This is mostly because the number now includes nursing and residential care home bed space and student accommodation (C2 use category). The two categories (C2 and C3) need to be kept separate in terms of site allocation and planning application approval as the C2 category uses far less space per head than a normal housing provision and has rather different locational requirements and arises from a quite different type of need. A fall off in C2 demand should not allow an increase in C3 housing supply. The table giving housing demand and land supply show that a total of circa 9700 dwellings will have been delivered by 2031. Substantially exceeding the target. The table however is confusing as it appears to add up to 10700. The explanation may be double counting of the Chesterton site. The implications of this over supply are that there should be restraint on approving further windfall sites and delay of development on approved sites to later years.
Moyra McGhie	Policy DS1: Development Strategy	Response to Cotswold District Local Plan via the template of the LGA response to the Government's 2023 NPPF Consultation.
MARTIN BARNETT 429	Policy DS1: Development Strategy	2.2 Development Strategy The need for village clusters and the planning village clusters has not be appropriately effectively and fully investigating the planning team as in my view potential decisions by the council have already agreed to Moreton to be come a garden village. Investigate other sections on the district for construction of the required number of homes, with the - the AONB and request the acquired building land in Mickleton, Willersey and south carney.

Respondent	Policy	Comment
Kelly Prosser (Zesta Planning) 146	Policy DS1: Development Strategy	Policy DS1 and the Five Year Housing Land Supply (5YHLS) 1.26. The proposed changes to Policy DS1 are somewhat confused. Amended paragraph 6.1.1 states that the need for the period 1 August 2023 to 31 March 2031 is based on the standard method for calculating housing need, but then the plan makes no update to the housing requirement at Policy DS1 and Tables DS1A – both still state 8,400 dwellings. Furthermore, the annualised requirements at Table DS1B show that the standard method Local Housing Need is not proposed to be applied until 2031/32 (i.e. after the end of the current plan period). 1.27. It is CO's position for the reasons set out at paragraphs 1.13 to 1.31 above, that the standard method Local Housing Need must be applied now. Thus, if the Council is seeking to demonstrate a 5 year supply through the partial update (notwithstanding our objections to the Council's approach in this regard), this should be based on the Local Housing Need of 493 dwellings per annum. 1.28. Instead, the Council are seeking to persist with the adopted Local Plan requirement, but with a significant reduction to factor in previous over delivery during the plan period. A reduced annualised requirement of 265 dwellings per annum is used which is some 228 dwellings/annum lower than the standard method requirement. 1.29. The Housing and Economic Needs Assessment PPG makes it clear that the standard method identifies a minimum annual housing need figure. Basing a five year housing land requirement on a figure that is below the minimum annual requirement (multiplied by five) is therefore clearly inconsistent with the Government's intended approach. Moreover, having regard to paragraph 77 of the NPPF and the expectation at paragraph 33 for strategic policies to be updated at least once every five years if their applicable local housing need figure has changed significantly, including past delivery against a now out of date housing requirement is not considered to be a sound approach. This approach has recently been endorsed at a number of appeal decisions at Malvern and Wychavon Districts including Land at Leigh Sinton Farms (APP/J1860/W/21/3289643) and Land off Morris Road, Broadway (APP/H1840/W/21/3289569) amongst others. 1.30. Thus, it is considered that first, the higher figure of 493 dwellings/year should be used [illegible]

Respondent	Policy	Comment
Boyer Planning 273 Call for sites	Policy DS1: Development Strategy	Policy DS1 as proposed to be amended, indicates that development will be direct to the Principal Settlements and will deliver at least 8,400 (C3 use class dwellings over the Plan period to 2031. This figure excludes a proportion of the C2 use class requirement, as set out in the evidence base documents but not reflected in the revised Policy wording. 3.2 The draft text also seeks to introduce a new part to the policy, indicating that the housing requirement will be monitored against a stepped (residual) requirement for the remaining years of the plan period as set out in the newly proposed housing trajectory. 3.3 The supporting text set out in relation to Policy DS1 has also been significantly updated and notes that the District's OAN is 9,094, based on the standard method for calculating need for the period 1 August 2023 to 31 March 2023. 3.4 The basis for these amendments are set out in a number of Topic Papers and other evidence based documents, although it is very unclear as to what documents are actually form part of the evidence base on the Council's website and no list is provided. Greater clarity would ensure that consultees are not disadvantaged by not being able to locate the relevant information. 3.5 In principle, Newlands of Stow considers that the Council's current 'Development Strategy' is likely to be found unsound at an Examination in Public. The reasons that have informed this view are discussed below in turn. 3.6 Newlands of Stow supports the majority of CDC's criteria set out to inform the Development Strategy, which seeks to deliver sustainable development. However, Newlands of Stow considers that there are several flaws and omissions within the Development Strategy and its evidence base, including the housing requirement and application of the Standard Method, past over-delivery, the use of a stepped trajectory, the plan period, the spatial strategy and site allocation methodology, which the Council are strongly encouraged to reconsider before progressing the plan any further. Reviewing the Housing Requirement 3.7 Draft Policy DS1 identifies a Housing Requirement for the District comprising 8,400 dwellings over the Plan period, which relates to an average of 420 dwellings per annum ('dpa'). This is the same requirement as that calculated in the adopted Cotswold District Local Plan (2011 – 2031). 3.8 Following the Plans adoption in 2018, a Review under Regulation 10A was undertaken in 2020, which identified a number of policies which required updating. However, following the Review, the Council paused the implementation of the changes required and eventually determined not to update the housing requirement in line with the Governments Standard Method

Respondent	Policy	Comment
Andrew Brian Crump	Policy DS1	Whilst Mickleton is still included in the list of Principal Settlements, since it was classified as such, it has lost the amenity of a Post Office, and so has a reduced infrastructure. In addition to that, it has been subjected to significant additional development since 2011, with 257 dwellings having been constructed. It is concerning to note that the zero housing projection for the village has been crossed out of the village specific police section, on the apparent basis that this had caused confusion. I cannot see how that would be the case, if the clear rationale was because the village had experienced such development. This should have ringfenced it from any further buildings until 2031 at the very least. Another aspect to consider, is that should a new Local Plan be in place for adoption in 2026, past experience shows that most of the additional development tends to occur in the first few years and so this concentrates it over a short intense period, as opposed to spreading it more organically over 15 to 20 years. With this in mind, it is vital that full credit is given for all newly built dwellings since 2011 to be offset against projected requirements within the current Local Plan period, and also in relation to determining how CDC has fulfilled the 5 year housing land supply stipulations. If there are currently 6.9 years worth of HLS then these should stave off any arguments that additional dwellings, beyond those already earmarked, should need progressing.
Richard Noble	Policy DS1	Moreton-in-Marsh has already seen significant development in recent years and already suffers from heavy traffic congestion and is starting to suffer from a lack of adequate facilities to support the hundreds of new homes that have already been built in recent years. I don't think this makes Moreton a viable area for large numbers of new homes. There needs to be significant improvements to infrastructure and local facilities in Moreton as it is, just to support the homes already built.

Respondent	Policy	Comment
EVENLODE PARISH COUNCIL	Policy DS1	EVENLODE PARISH COUNCIL represents the village of Evenlode. It submits all of the following points - both generally, and also specifically under each in relation to each of the aspects of the Plan identified below; 1. FLOOD RISK AND MANAGEMENT I. CDC own definition1 of a SLA is that it is "an area of COMPARABLE QUALITY to the CNL"; □ II. The Cotswold District Special Landscapes Final Report 2017 Chapter 6 Moreton in Marsh & Surrounds at paragraph 6.7 and 6.8 (among other observations) reinforces the fact that the area - including the village of Evenlode – is poorly drained; and has a remote rural character especially away from the A429, and the area is generally tranquil and feels remote short distances away from the A429 and the Fosseway. All of these observations in reports commissioned by CDC point to the fact that development is unwarranted if it is in an area so contiguous to the CNL. III. The specifications of CDC's POLICY EN4 and paragraph 10.4.12 & 13 (in the Cotswold District Local Plan Update Consultation Accepted) demonstrate the high standard of the evidential test required to show that there is no significant detrimental impact if development is allowed. IV. Evenlode PC submits that the adverse impact of CDC's proposals for the South of the proposed development area would be significant: V. The centre of the village itself occupies land classified as Flood Risk 1. VI. However the area on and around the road from Evenlode to Moreton, one quarter mile from the boundaries of the civil parish of Evenlode and Moreton in Marsh has, according to the Level 1 SFRA (a) a High Risk of Flooding from surface Water (RoFSW); (b) a risk of flooding to both surface assets and may emerge at significant rates, and (c) that this Southern area of proposed development is in a functional Flood Zone 3b. VII. These three Flood data from CDC's own Level 1 SFRA clearly show of picture which contra-indicates development in this area. VIII. The River Evenlode and its tributaries in this area have historically and regularly resulted in flooding which effectively cuts the village off from Moreton in Marsh. IX. To develop the area for residential use would aggravate this level of flooding; further overwhelm the capacity of the River Evenlode and its Tributaries, and have a significant detrimental impact on the area. This is further considered under the heading SEWAGE AND WASTE MANAGEMENT next in this submission. X. Throughout Policy CC5, CDC seeks to rely upon the evidence base outlined in paragraph 5b.6.3. This is the very Level 1 SFRA which identifies the issues at paragraph VI above and the significant impacts on the village of Evenlode. XI. In Policy CC5 at paragraph 5b.6.12 (regarding Flood Storage Area long term future proposals vis-a-vis Cirencester) it states " ...much of this area is functional floodplain and therefore2 is unlikely to be developed …". If the parts of Cirencester are in a functional Flood Plain, how then can the southern part of Moreton in Marsh close to the functional flood plain around Evenlode be justified as suitable for development? The same considerations apply. XII. Paragraph 1. of Policy CC5 places a duty on CDC to "...avoid areas at risk of flooding…" and specifies that "surface water flood risk will be considered as equal importance as fluvial risk". In fact, the Level 1 SFRA illustrates that all three flood maps (RoFSW & Flood Zones & Groundwater Flooding) demonstrate that of the potential development sites cross-hatched red and situated to the South of the SFRA diagram ALL fall within the avoidance prohibition on development. Why does CDC [illegible]

Respondent	Policy	Comment
gina stephens	Policy DS1	Based on DS1 it appears that MIM has been allocated the lions share of residential development because of the land potentially available. The points made by CDC that this development is: a thriving town centre with a wide range of services, a popular weekly market (only 23 stall in February) ranking it the 4th retail centre in the district with a good bus service is not a reflection of our beautiful small town centre and its amenities. The town centre alone, cannot support the proposed strategic development, as it cannot even support the current residential population who have to commute by car to shop at other local towns with better, more varied shops such as Stow on the Wold, Stratford on Avon, Evesham etc.
Timothy Phillips	Policy DS1	The more I look at the 17 chosen development areas the more I believe that there is an urgent need to reconsider a number of them. The data used in a number of cases is historic to the point of not being useful. The council appear to be trying to slide a change through when it needs to be a thorough overhaul. Land availability is bound to appeal to developers and be in opposition to residents. Need should be clarified. I believe that the affordable housing need is not being clearly identified and shown in the plans. There is too much that is unclear or hidden away. There is a lack of transparency hidden by the availability of information being in alternative parts of the council planning website. This requires huge amounts of time in searching and reading. This does not make, in my opinion, for a fair assessment by residents who no doubt after this exercise will be told they were consulted.
Lisa Spivey	Policy DS1	Down Ampney should be removed as a principal settlement. It never truly met the criteria and yet has seen huge development since the last local plan was made in 2018. It cannot sustain further development and should no longer be considered as a principal settlement.
Richard Noble	Policy DS1	Moreton-in-Marsh has already seen significant development in recent years and already suffers from heavy traffic congestion and is starting to suffer from a lack of adequate facilities to support the hundreds of new homes that have already been built in recent years. I don't think this makes Moreton a viable area for large numbers of new homes. There needs to be significant improvements to infrastructure and local facilities in Moreton as it is, just to support the homes already built.

Respondent	Policy	Comment
Richard Grant	Policy DS1	Housing Requirement 2.23 Policy DS1 sets out the Development Strategy to be followed by the Local Plan, and therefore sets the housing requirement. The policy sees some minor changes made to wording, but notably the housing requirement remains unchanged from the 8,400 new homes set out in the adopted Local Plan. 2.24 The fact that no change is made to the housing requirement is puzzling, given that it is not disputed that the local housing need figure has increased. The result is that in terms of the Local Plan targets, the plan is not aiming to meet its housing needs in full. 2.25 The reasons for the Local Plan not aiming to meet housing need in full by translating the local housing need figure directly into the housing requirement are summarised in paragraph 1.4 of the "Review of the Cotswold District Local Plan 2011- 2031 Housing Requirement August 2023", which includes 18 separate points. These can be summarised as follows: a. The new housing need is only 4.95% higher than that set out in the adopted Local Plan. We have shown that the assessment of local housing need is flawed, and even without any adjustments made to the new figure applying to August 2023 – April 2031, the correct figure represents an increase of 10% on the housing requirement set out in the adopted Local Plan. We would suggest that this is a significantly increased. b. That the housing requirement is expressed as a minimum which means that the plan can deliver the new local housing need figure without needing to adjust the requirement. Clearly, both the local housing need and the housing requirement are expressed as minimum figures. However, the NPPF (Dec 2023) paragraph 67 clearly requires that "Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period." This statement implies that the housing requirement should be an expression of the number of homes that can be provided over the plan period. A requirement that is lower than the need implies that the local housing need cannot be met over the plan period, and relying upon the minimum nature of the figure creates uncertainty over whether the authority intends to meet its needs. In particular, a lower housing requirement means that the local authority cannot effectively monitor whether local housing need will be met through the housing trajectory or the five year land supply, and therefore cannot be held accountable. c. The Council's housing land supply (set out in Table DS1A of the Local Plan Partial Update) suggests that there is a land supply over the whole plan period (ie taking account of completions since 2011) of 9,671 homes. This supply is far in excess of the local plan housing requirement and therefore shows that needs will be met regardless of the housing requirement. However, we have shown that the local housing need figure is higher than that suggested by the Council, and therefore that the flexibility shown by this land supply position may not be as high as suggested. The land supply suggests a surplus of just 432 homes, or 4.6% of the local housing need. The land supply includes an assessment that there are 2,348 homes expected to be delivered on extant planning permissions by 2031, that there will be 203 completions on allocated sites and that there will be

Respondent	Policy	Comment
Richard Grant	Policy DS1	Five Year Land Supply 2.27 The points above regarding monitoring are reflected in the approach taken to the calculation of the Five Year Land Supply. Policy DS1 includes a new clause which states "The delivery of the housing requirement will be monitored against a stepped (residual) requirement for the remaining years of the plan period, as shown in the housing trajectory." 2.28 It is unclear from the policy how a stepped requirement might work, as no further detail is presented. However, the approach is then explained in paragraphs 6.1.15 to 6.1.22, which set out the Local Plan approach to a five year land supply. 2.29 These paragraphs confirm that rather than setting out in policy a stepped housing requirement, the five year land supply will be based on a residual requirement, which measures land supply against the remainder of the housing requirement post 2023 once net completions from 2011 have been deducted. On this basis, the Local Plan Partial Update proposes that the five year land supply housing requirement should be 235 homes per year for the remainder if the plan period between 2023 and 2031. On this basis, the Local Plan assesses that there is a 7.2 year housing land supply. 2.30 We question this approach for the following reasons: a. Paragraph 77 of the NPPF (Dec 2023) is clear in setting out how a five year land supply should be calculated: "…local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old". From this, it is clear that the five year land supply should be calculated against the housing requirement which is set out in adopted strategic policies. b. The NPPG does make allowance for local authorities having a stepped housing requirement: "How is 5 year housing land supply measured where authorities have stepped rather than annual average requirements? Five year land supply is measured across the plan period against the specific stepped requirements for the particular 5 year period." Paragraph: 026 Reference ID: 68-026-20190722 Revision date: 22 July 2019 However, this provision still refers to a requirement, suggesting that the stepped requirement should therefore be set out in adopted strategic policies. In fact, the Local Plan Partial Update does not set out a stepped housing requirement; it presents a case for assessing Cotswold District's five year land supply using a residual requirement based on a calculation of net completions, rather than on a housing requirement related to the need for new homes. We do not believe that this is a valid approach. c. As is set out in paragraph 6.1.15 to 6.1.17, to calculate the residual requirement the net completions from 2011 have been deducted from the housing requirement, to create a residual figure as a new five year land supply requirement. In principle, this approach seems flawed as rather than measuring whether the land supply is sufficient to meet average housing need expressed as homes per year, it builds in an assessment of delivery of homes as well. The five year land supply assessment therefore resembles a housing trajectory which measures whether the Local Plan strategy is likely to deliver sufficient homes over the plan period to meet the

Respondent	Policy	Comment
David Hindle	Policy DS1	Within the text, close to the calculation of projected delivery, the underlying rationale of calculating potential capacity should be explained. I understand it to be a base assumption of 35 units per hectare. But with the site area adjusted to the over size of the site. Those %s should be stated. Then a further adjustment may be made relevant to site circumstances. For example an edge of village location, may well be adjusted downwards, in order to reflect the transition between the more dense central part, and the Countryside beyond the site. Conversely, the units per hectare may be adjusted upwards where a site is an integral part of an existing Town, where higher density may raise no issues.
Natalie and Geoff Robinson	Policy DS1	Moreton is already at capacity re sewerage - see the most recent Thames Water reports. Traffic congestion is a permanent feature and issue. Loss of green space Loss of tree cover, hedgerows and the animals who inhabit these spaces. 1500 new homes needs an infrastructure plan - schools, services, GP, dental, roads Road safety needs to be considered Water supply + sewage disposal plans Which other towns are being considered?

Respondent	Policy	Comment
Blue Fox Planning (representing Redrow Homes)	Policy DS1	In the context of this partial review, the focus of further growth and development is the strategic allocation of Chesterton, delivering circa 400 homes for the remainder of the plan period. The strategic allocation at Cirencester, has been slow in its delivery due to its sheer size. Due to persistent failures, it is a distinct possibility that further delays in subsequent, associated permissions and build out delays, will have a knock on effect for housing delivery forecasts and housing land supply. The LPPU includes an additional allocation through Policy S18: Moreton-in-Marsh, Site M72 - Fire Service College, net 310 dwellings, neighbourhood centre and associated facilities'. This includes 2ha of land for a primary school, and 12.5ha of employment uses. At the current time of writing the site (as allocated in the LPPU) is not the subject of any planning application on CDC's records, thus calling into question the delivery of this development site within the remaining plan period. It is considered that the LPPU places an overreliance on these two large allocations of land to bring forward the residual supply for the remainder of the plan period. A core element of addressing the climate and ecological emergencies is to establish a sustainable spatial strategy; that is to say, locating development where it has good access to services and facilities including public transport. The reliance on these two sites for housing delivery in the period to 2031, may impact delivery forecasts moving forward. There are significant benefits to delivering multiple smaller sites across through allocations at sustainable locations in CDC to ensure that the housing land supply targets are maintained. Sites at Principal Settlements, such as the full 9.5ha site at Hampton Street, Tetbury, will help to achieve this and ensure that delivery targets are maintained, with a particular focus on the delivery of much needed affordable housing, on which market led sites, such as this, are able to deliver.

Respondent	Policy	Comment
Bloor Homes Western (Ridge and Partners)	Policy DS1	In terms of the principal settlements identified, Bloor Homes is in agreement that Moreton-in-Marsh should be identified as a principal settlement. As set out in policy S18 "Moreton-in-Marsh is widely regarded as the main service centre for the north Cotswolds. Benefiting from a wide range of services, retailing, a popular weekly market, banking, and employment opportunities, it also has one of only two railway stations in the District. This, together with good bus services, makes Moreton-in-Marsh one of the District's most accessible settlements." There is clearly a need to locate development in the most sustainable settlements in the district, particularly those such as Moreton-in-Marsh, which are less constrained by the Cotswold National Landscape, a nationally important landscape designation. More specific comments on Moreton-in-Marsh are provided in the response to policy S18. There are concerns however with the approach taken within the Local Plan update to include over-supply within the calculation and taking a stepped approach for the remainder of the plan period which consequently only requires 265 homes to be delivered per year. The NPPF is clear at paragraph 61 that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance" (our emphasis). These issues are addressed in more detail in the note prepared by Emery Planning attached to this response. Ultimately, however it must be noted that the housing figure on which the original Local Plan was prepared was based on the guidance available at the time. This is now outdated following the Local Plan preparation in 2016 and does not necessarily reflect current housing needs. The Local Plan update must be in accordance with the current NPPF and PPG. Whilst the PPG does allow for additional supply to be used to offset any shortfalls against requirements from previous years (ref ID: Ref ID: 68-032-20190722), it must also be acknowledged that the Standard Method now being applied by the Council already takes into account past delivery. Since the Local Plan was adopted, local housing need has increased because affordability has worsened over the plan period since 2011. This was reflected in the recent consultation on the "Cotswold Housing Strategy 2024-2029." This document set out the Council has declared an affordability crisis with a key aim of the Corporate Plan being to tackle this. This report goes on to state that there are approximately 2,500 households who are unable to afford market rented housing in Cotswold District and 1,460 people are currently on the Housing Waiting List. Priority 2 of that document further acknowledges that "The Local Plan is one of the most powerful tools at the Council's disposal, which can be used to boost the delivery of affordable housing. We are currently undertaking a partial update of our adopted Local Plan. One of the principal objectives is to boost the delivery of genuinely affordable housing, particularly social rented housing." Over the remainder of the plan period to 2031, the local housing need using the standard method is therefore 3,944 dwellings (i.e. 493 X 8 years = 3,944). This is significantly greater (i.e. by 1,821 dwellings) than the proposed residual requirement of 2,123 dwellings. Since the Local Plan Update was released for consultation, further affordability ratios have been released which demonstrates that they are worsening and the Local Housing Need is actually 504dpa, rather than 493. The proposed stepped (residual) requirement would not therefore address the identified need and therefore the plan update has not been "positively prepared" in accordance with paragraph 35a) of the Framework and is not sound. The Local Plan update currently only proposes one additional allocation. With the majority of affordable housing across the District being delivered as part of the larger allocations, it would be sensible to allocate additional sites (in the most sustainable settlements) as part of this Local Plan Update to help the Council meet one of its key corporate objectives and ensuring that "everyone across the district to access housing that meets their needs and that they can afford." [illegible]

Respondent	Policy	Comment
CR Ayers 223	Policy DS1	Many of your detailed amendments seek to close developer loopholes in the current operation of planning in the Cotswold District against the background of severe restraints in land use for environmental and historic reasons. These amendments in the main are to be commended as it is apparent as a long time resident that development is twisted by dint of the quest for maximum profit by developers and landowners which does not necessarily meet the needs of the people. In Stow on the Wold we have seen limited land suitable for development being diverted into unnecessary grandiose schemes for leasehold retirement enclaves or larger housing aimed at wealthy new owners generally incoming from outside of the District rather than more modest sizing to accommodate local needs. Large developers exert undue pressure by dint of their financial power to fund well resourced legal appeals that are rarely challenged by CDC. Meanwhile, basic infrastructure, especially roads is inadequate and poorly maintained. The "who controls what" conundrum between district and county breeds a split and inadequate result. GCC will rarely fund any road improvements outside of the main Gloucester & Cheltenham conurbations on the basis of the low levels of resident population not warranting it, notwithstanding most of the road usage is transitory, generated from outside of the district by third parties. Medical cover is diluted by the presence of a disproportionate number of elderly people imported to live the "Cotswold Dream". Hospitals are some distance away and do not readily communicate with local surgeries.

Respondent	Policy	Comment
Newland Homes 241	Policy DS1	In terms of the principal settlements identified, Newland Homes is in agreement that Willersey should be identified as a principal settlement. There is clearly a need to locate development in the most sustainable settlements in the district and it is acknowledged within policy S19 that "Willersey is part of a cluster of settlements that serve the northernmost part of the district. Collectively, these settlements have the necessary services, facilities and employment opportunities to provide for the local population". More specific comments are made in relation to Willersey within the response on policy S19. It is agreed that the Local Plan update should use the Standard Method for calculating the number of homes needed and note that no exceptional circumstances have been put forward that suggest otherwise. The NPPF is clear at paragraph 61 that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance" (our emphasis). The Standard Method for the district suggests that actually 493 homes need to be delivered per annum. However, Local Plan update looks to include over-supply within the calculation and taking a stepped approach for the remainder of the plan period which consequently only requires 265 homes to be delivered per year. It is noted that this is also based on a housing need figure calculated back in 2016 and it should therefore be seen as out of date. The Local Plan update must be in accordance with the current NPPF and PPG. Whilst the PPG does allow for additional supply to be used to offset any shortfalls against requirements from previous years (ref ID: Ref ID: 68-032-20190722), it must also be acknowledged that the Standard Method now being applied by the Council already takes into account past delivery. Since the Local Plan was adopted, local housing need has increased because affordability has worsened over the plan period since 2011. This was reflected in the recent consultation on the "Cotswold Housing Strategy 2024-2029." This document set out the Council has declared an affordability crisis with a key aim of the Corporate Plan being to tackle this. This report goes on to state that there are approximately 2,500 households who are unable to afford market rented housing in Cotswold District and 1,460 people are currently on the Housing Waiting List. Priority 2 of this Report further acknowledges that "The Local Plan is one of the most powerful tools at the Council's disposal, which can be used to boost the delivery of affordable housing. We are currently undertaking a partial update of our adopted Local Plan. One of the principal objectives is to boost the delivery of genuinely affordable housing, particularly social rented housing." Furthermore, the affordability ratios released on the 25th March 2024 show that the affordability situation in the district is continuing to worsen. The Local Plan update currently only proposes one additional allocation, which is not considered sufficient to meet the Councils housing need when calculated via the Standard Method. With the majority of affordable housing across the District being delivered as part of the larger allocations, it would be sensible to allocate additional sites (in the most sustainable settlements such as Willersey) as part of this Local Plan Update to help the Council meet one of its key corporate objectives and ensuring that "everyone across the district to access housing that meets their needs and that they can afford." The housing figures identified should be updated to exclude past over-delivery from the future supply, and equally to ensure that the Plan can meet the housing requirement set out in the Standard Method must allocate additional sites for development.

Respondent	Policy	Comment

Sean Lewis	Policy DS1	It is understood that through this consultation CDC is exploring whether to update its existing LP policies running up to 2031 or to update its housing requirement to 2041, delivered through a full review of a new Local Plan.
		24. An update to the current CDC LP meets the aspirations set out in national planning guidance, although we would advocate a full review to ensure that other assumptions in regard to housing and employment needs for the district are robust over the plan period.
		25. The NPPF requires that plans should provide a 'positive vision' for the future of the district. Given that there are now just seven years remaining until the adopted plan period ends (2031), due to lead times in housing delivery we would encourage at this stage to begin formulating a development strategy that looks towards 2041. Planning for development needs up to 2041 would result in a LP being positively prepared in accordance with the NPPF's 'Tests of Soundness'.
		26. The NPPF requires evidence underpinning a Development Plan to be "proportionate" and "up-to-date". Should the Council choose to proceed with updating its development strategy to 2041, it will encompass a more comprehensive exercise that updates its evidence base relating to a range of topics, including housing need. For example, CDC will need to update its eight year old Strategic Housing Market Assessment (SHMA).
		Development Strategy Options
		27. In respect of identifying growth at Principle and Non-Principle Settlements, CDC proposes eight 'Development Strategy Options' to accommodate additional development up to 2041, comprising:
		a. Scenario 1: Additional non-strategic site allocations;
		b. Scenario 2: Main service centre focus;
		c. Scenario 3: Dispersed Growth;
		d. Scenario 4: Village Clusters;
		e. Scenario 5: New settlement(s);
		f. Scenario 6: New strategic site(s);
		g. Scenario 7: Focus growth around transport nodes;
		h. Scenario 8: Request neighbouring activity to deliver some of the housing need.
		Each of the eight options were reviewed by the 'Integrated Impact Assessment' supporting the LP Update and conclude that Scenarios 1, 2, 6 and 7 are the most appropriate options to accommodate additional development needs up to 2041.
		29. Given that our client's site at Hampton Street proposes up to 180 units adjacent to a principle settlement, it is considered to address a combination of Options 1 and 2. Considering CDC propose to take forward both growth options, the allocation of our client's site accords with the emerging spatial strategy for the district.

Respondent	Policy	Comment
Kelly Prosser	Policy DS1	The proposed changes to Policy DS1 are somewhat confused. Amended paragraph 6.1.1 states that the need for the period 1 August 2023 to 31 March 2031 is based on the standard method for calculating housing need, but then the plan makes no update to the housing requirement at Policy DS1 and Tables DS1A – both still state 8,400 dwellings. Furthermore, the annualised requirements at Table DS1B show that the standard method Local Housing Need is not proposed to be applied until 2031/32 (i.e. after the end of the current plan period). 1.27. It is CO's position for the reasons set out at paragraphs 1.13 to 1.31 above, that the standard method Local Housing Need must be applied now. Thus, if the Council is seeking to demonstrate a 5 year supply through the partial update (notwithstanding our objections to the Council's approach in this regard), this should be based on the Local Housing Need of 493 dwellings per annum. 1.28. Instead, the Council are seeking to persist with the adopted Local Plan requirement, but with a significant reduction to factor in previous over delivery during the plan period. A reduced annualised requirement of 265 dwellings per annum is used which is some 228 dwellings/annum lower than the standard method requirement. 1.29. The Housing and Economic Needs Assessment PPG makes it clear that the standard method identifies a minimum annual housing need figure. Basing a five year housing land requirement on a figure that is below the minimum annual requirement (multiplied by five) is therefore clearly inconsistent with the Government's intended approach. Moreover, having regard to paragraph 77 of the NPPF and the expectation at paragraph 33 for strategic policies to be updated at least once every five years if their applicable local housing need figure has changed significantly, including past delivery against a now out of date housing requirement is not considered to be a sound approach. This approach has recently been endorsed at a number of appeal decisions at Malvern and Wychavon Districts including Land at Leigh Sinton Farms (APP/J1860/W/21/3289643) and Land off Morris Road, Broadway (APP/H1840/W/21/3289569) amongst others. 1.30. Thus, it is considered that first, the higher figure of 493 dwellings/year should be used as the basis for calculating 5 year supply, and, second, the Council's previous over

Respondent	Policy	Comment
Chipping Campden School	Policy DS2: Development within Development Boundaries	We were surprised to learn recently that the School Campus is not included within the development boundary of Chipping Campden, and we believe it should be. We have already developed the Cidermill Theatre for School and Community use and have an ambition to build a new sports and leisure facility, also for School and Community use, to replace the existing outmoded facilities. This would also facilitate the provision of a new larger school hall and essential new and larger teaching accommodation, ancillary accommodation and more comfortable circulation spaces and corridors. We have also identified a site on the school frontage which could accommodate up to 6 small residential dwellings that would complement the adjacent new housing fronting Cidermill Lane.
Chipping Campden School	Policy DS2: Development within Development Boundaries	A further reason for requesting that the School campus be included with the development boundary of Chipping Campden is that it is a commitment of the School to permit public parking on the existing car park once the proposed new car park is provided on the norther side of the School.
Fairford Town Council	Policy DS2: Development within Development Boundaries	DS2 – 6.2.6 should also refer to amenity value of smaller open spaces such as play areas (whether equipped or informal)

Respondent	Policy	Comment
Sean Lewis	Policy DS2: Development within Development Boundaries	Whilst it is noted that no changes are proposed to this policy, it is respectfully requested that the development boundary for Tetbury is expanded to include the Land South of Hampton Street, promoted by our client. Initial discussions with the Town and Parish Councils indicated a willingness to consider Veizey's Quarry as a natural boundary to the town.
Plan A Planning Development Ltd 240	Policy DS2: Development within Development Boundaries	Call for sites. The Development Boundary to Fairford should be extended to include the land bounded by Totterdown Lane, Horcott Road and New Road, as this forms part of the existing built-up area. Paragraph 6.2.2 of the Reg 18 Consultation Draft Plan confirms that the "Development Boundaries essentially define the built-up areas of Principal Settlements". It is therefore an anomaly for the above area to have been excluded.

Respondent	Policy	Comment
Plan A Planning Development Ltd 240	Policy DS2: Development within Development Boundaries	Call for sites Consultation Draft Local Plan Policy DS2 Paragraph 6.2.2 of the current Reg 18 Consultation Draft Plan confirms that:- "The Development Boundaries essentially define the existing built-up areas of Principal Settlements including sites that: • are under construction; and • have been granted permission." Policy DS2 then confirms that proposals for development within the Development Boundaries will be regarded as acceptable in principle, whilst para 6.4.5 of the Reg 18 Consultation Draft Plan confirms that all land which falls outside of the Development Boundaries and Non-Principal Settlements will be regarded as countryside where new-build market housing will normally be precluded. Paragraph 6.4.2 of the Consultation Draft Plan confirms that the objective of this development strategy is to promote sustainability by focusing most growth within the Principal Settlements whilst allowing for small-scale residential development in the District's non-Principal Settlements. Proposed Revision to Development Boundary to Fairford Based on the premise that existing built-up areas should fall within the Development Boundaries of the Principal Settlements, it is clear that the Development Boundary to Fairford should be extended to include existing built development within the parcel of land between Totterdown Lane, Horcott Road and New Road. However, in order to ensure the revised Development Boundary is robustly defensible over the longer term, it should also be extended to include the adjoining land up to New Road. Whilst this includes a small area of currently undeveloped land, this provides the opportunity for some limited additional growth (of up to 3 no. residential units) within a relatively sustainable location. 2.5 Whilst it is acknowledged that a recent application for the development of a single residential unit on part of this undeveloped area was refused permission in October 2023 (CDC Ref. 23/00675/FUL refers), it is relevant to note that the [illegible]
Andrew Brian Crump	Policy DS2	This seems to be a somewhat fluid concept. The Shepherd's Fold/Furrow Way development at Mickleton, for example, was actually constructed on land outside the development boundary and has had the effect of extending residential development into the countryside. It is a bolt on to the very edge of the settlement and will necessarily form an extension to the built environment/settlement boundary. Open spaces, whether within or outside development boundaries, need to be protected for the enjoyment and recreation amenity of both present and future generations of residents and visitors to this area.

Respondent	Policy	Comment
Andrew Brian Crump	Policy DS2	Furthermore, CDC should give very careful consideration to the need to preserve the historic environment of Mickleton by ensuring the there are no incongruous and disproportionate adjuncts that are out of scale and that could cause irreparable damage to it, such as by the infilling of visually important spaces overlooking Meon Hill that make a positive contribution to the the character of the settlement.
Geoff Tappern	Policy DS2	Fully Support
David Hindle	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	Changes are a logical consequence of reducing travel by car, and some are helpful clarification of how the Policy will be operated. My only issue is that for the 20 minute choice of services a convenience shop selling fresh food should be made one of the 6. This is as somewhere I recall the importance of such being highlighted.
Ramon Gater	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	This plan seems to oblige existing rural residents to travel to principal settlements and consign many hamlets to further decline. Do CDC expect people providing services to travel for an hour or more for eg a plumber to fix a tap or a nurse to change a dressing? Some hotels in Lake District now have to bus cleaners in from Barrow where they can afford housing. Railway stations at principal settlements are mainly of use to city-dwellers coming into the area with few CDC residents using them regularly to travel out (although a better link to Stratford would be appreciated by many here). Development needs to be sustainable for local population if Cotswolds not to become a desert surrounded by principal settlements. Habitable and prospering villages provide life for locals and destinations for tourists. This overall plan appears too quick to presume all development must take place in "principal settlements". Development in principal settlements should prioritize opportunities for higher education and employment etc.

Respondent	Policy	Comment
Zesta Planning	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	CO recognise the important contribution of open spaces and gaps to the distinctive character of the District's smaller settlements and believe this added wording is useful within the supporting text to Policy DS3. However, it is considered the proposed updates to Policy DS3 – Small-scale Residential Development in Non-Principal Settlements are more restrictive and appear to contradict the Council's objective to address the issue of affordability, particularly in regard to the under-delivery of homes in the Local Plan as explained above. 1.34. A new set of accessibility standards have been proposed to Policy DS3. The standards set out in DS3(e) requires sites for new residential development to be within specified journey times between 20 – 40 minutes by foot or public transport to at least six services and facilities. The purpose of the standards is to, supposedly, help new housing developments to have reasonable access to services, facilities and employment and to reduce social isolation vehicle dependence/cost of living issues and transport emissions. 1.35. Whilst it is understood that residents of non-principal settlements should have reasonable access to some services and facilities, the proposed standards are unnecessarily complex for potential applicants and planning case officers to navigate. 1.36. Furthermore, CO consider that they disregard the rural nature that makes the Cotswolds distinctive. The prevalence of small, intimate villages across the Cotswolds makes the district nationally distinctive. These standards will be unachievable for new development in many hamlets and villages and will result in the exclusion of appropriately scaled new residential development from small villages. 1.37. Excluding residential development from the smaller non-principal settlements goes against national policy objectives to support the vitality of rural communities. Paragraph 83 of the NPPF states that "Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." The accessibility standards proposed will not be achievable for many smaller villages and will halt the sustainable development of these settlements. Without new residential development, these smaller settlements will [illegible]

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy DS3: Small-Scale Residential Development in Non-Principal	With regard to DS3 – Small-Scale Residential Development in Non-Principal Settlements – GCC welcomes the new accessibility standards in principle.
Bathurst Estate 175	Policy DS3: Small-Scale Residential Development in Non-Principal	Comment. We support the recognition that residential development within non-principal settlements is permitted, however the implications of not being able to exceed 5% of the existing settlement needs clarification. Is the policy referring to 5% existing number of houses, or building foot print, or population? Siddington is an example of a non-principal settlement which can accommodate development due to its location next to Cirencester and its existing facilities and services. Policy DS3 restricts the development opportunities in suitable locations for sustainable development.

Respondent	Policy	Comment
David Burson 185	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	Policy DS3 sits as part of a spatial strategy which has been established as sound through examination; as part of this the accessibility of services and facilities from nonprincipal settlements was considered and found to be acceptable, including in the context of national planning policy. It must also be noted the policy also exists to maintain the vitality of existing rural communities through modest development. The proposed addition of a new criteria without a complete policy review could undermine this and condemn less connected communities to stagnation and decline. This being the case, we believe the change to be unsound. In addition to our concern at the introduction of criterion (e) in principle, we also question the effectiveness of the detailed requirement. The criterion identifies that facilities must be within a maximum travel time by "foot and/or public transport" from certain services/facilities. The option to travel by bicycle should also be included in this assessment, it is a sustainable option and should be equally supported. It is unclear how travel times will be assessed; we cannot therefore have confidence the policy will be effectively and consistently applied. Consequently, we believe the change will hinder the delivery of new homes in non-principal settlements and so prevent soundness of the Local Plan.

Respondent	Policy	Comment
SPF Planning 250	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	In accordance with the current local plan, development at the site would potentially be considered to comply with policy DS3 being in a non-principal settlement, proportionate to the settlement size and helping to enhance the vitality and viability of the village and its services. 7.2 Historically, we have seen policy DS3 as a successful and pragmatic policy which enables proportionate growth to support existing small businesses and services within smaller villages. The current policy recognises the predominantly rural character of the District, where some housing can be in locations which are not necessarily readily accessible by a frequent public transport service and have a smaller level of services reflective of the size of the village. 7.3 However, in the draft local plan, the Council has proposed some amendments to policy DS3 (and the development strategy in general). These are likely to make it harder to deliver homes which will enable businesses and services in smaller settlements to grow and thrive. In the event that the Council wishes to proceed with changes to DS3, we have provided some comments on the changes below as follows; 7.3.1 Criteria b) of amended policy DS3 requires the development to be proportionate to the scale of the settlement, no larger than 1ha in size and no more than 5% of the size of the existing settlement. In our view, the 5% limit alone sets clear guidelines and would ensure that developments over 1ha but very small compared to a larger settlement could still be seen as appropriate and proportionate. 7.3.2 In respect of criteria c) we consider that infilling can be appropriate in certain circumstances so the policy wording should perhaps be reconsidered to ensure that it does not rule out acceptable infilling. Also, green wedges/corridors is not defined in the glossary. 7.3.3 In respect of criteria e), we raise the following points; i. Access to services by bicycle should be considered as well as walking and public transport albeit with a caveat relating to safety. ii. Access to the public footpath network should be added to the list of services and facilities which can be considered. Many people will choose this recreational activity over using public open spaces and sports fields and it provides valuable benefits to health and wellbeing. iii. 'Community hall' should potentially be expanded to refer to events spaces more generally. iv. A requirement to have 6 of the listed services/facilities may be considered disproportionate. People living in rural areas have

Respondent	Policy	Comment
SPF Planning 250	Policy DS3: Small-Scale Residential Development in Non-Principal	Going beyond the development strategy approach discussed above, the proposed change in policy H2 from 6 – 9 homes in rural areas needing to provide an affordable housing contribution to 3 - 9 homes being required to do so, may impact significantly on viability on small sites (particularly for smaller developers).

Respondent	Policy	Comment
Liz Shield (SFPlanning) 246	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	7.4 An alternative to settlement boundaries 7.4.1 We find the approach taken by the Council in its proposed changes to policy DS3 interesting. Whilst we understand the rationale for the proposals, we have suggested some important changes to DS3 as set out at paragraph 7.5 below in order to ensure that the right number of homes are delivered in the remainder of the plan period. 7.4.2 Critically, we feel that, provided the suggested changes below are made, policy DS3 could be an effective approach for development in any settlement in Cotswold District (whether principal or non-principal). At present, only permitting development in principal settlements where it falls within the development boundary is overly restrictive and fails to consider the fact that there are numerous edge of settlement locations which are appropriate for development and close to services and facilities but fall outside the development boundary. 7.4.3 A policy requirement could be introduced so that dwellings are always within the built up area of a settlement (similar to the proposed DS3 wording but of course applying to all settlements not just non-principal ones). 7.4.4 DS3 (as redrafted) seeks to ensure that housing is located so that residents will have access to the services and facilities they need on their doorstep rather than having to rely on a private car to access them. This in turn would reduce harmful emissions. 7.4.5 This approach means that as settlements grow and evolve, and services/facilities start up and shut down, the policy can still be applicable rather than becoming out of date. This means that a similar policy can apply consistently across the district to any location which perhaps does not have a long list of services in the immediate vicinity, but which has a good regular public transport service to a location which does. 7.4.6 In the event that settlement boundaries are retained, a policy permitting new dwellings adjacent to settlement boundaries should be explored. This would ensure that edge of settlement locations are appropriately designed and landscaped to take account of their setting.

Respondent	Policy	Comment
Liz Shield (SFPlanning) 249	Policy DS3: Small-Scale Residential Development in Non-Principal	The Council could adopt a similar approach [see reply to DS4] to the proposed amended version of policy DS3 in relation all settlements. Rather than relying on settlement boundaries, this approach would simply require development to be located within a specified distance of services and facilities, and of a proportionate size to the settlement.
Liz Shield (SFPlanning) 249	Policy DS3: Small-Scale Residential Development in Non-Principal	In accordance with the above, [suggested amendments to DS3] if the settlement boundary is to be retained for South Cerney, we consider that it should be more widely drawn than at present.

Respondent	Policy	Comment
Edgars Ltd 338	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	Call for sites. The adopted Cotswold Local Plan identifies Bledington as a Non-Principal Settlement. Whilst the settlement is not a major town, it is a sustainable location for a small scale of new development, and such developments would contribute well in terms of upkeeping local viability and vitality. Around 40% of the District's population live in rural settlements, and the emerging Local Plan, including Policy DS3 promotes 'small-scale residential development' in these locations subject to design criteria. The railway station of Kingham is around 1.3km from the site, and the nearest bus stop is located on Main Street, just 150m away, with services to Kingham, Witney and Chipping Norton, Bourton-onthe-Water and Stow-on-the-Wold. The site therefore is accessible by public transport. The settlement features a number of local facilities and services too, including the church, a public house, community shop and café, primary school and village hall. All are within a 400m walk. Therefore, Bledington is a sustainable location for residential development, and within this the land north of Main Street is in a sustainable location for development within the village. Development on the site will also contribute to maintaining and enhancing the long-term sustainability of Bledington, by helping to maintain the vitality of the local services. In terms of vitality, the NPPF makes clear that new rural housing gives benefit to the vitality of communities. Paragraph 83 of the NPPF encourages sustainable development in rural areas, where housing should be located for it to 'enhance or maintain the vitality of rural communities'. 'Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.
Morgan Elliot Planning	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	Call for sites: 339 Policy DS3 states that, in non-principle settlements, small-scale residential development will be permitted so long as the following criteria is met: a) "demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally; b) is of proportionate scale and maintains and enhances sustainable patterns of development; c) complements the form and character of the settlement; and d) does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the Local Plan period."

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	Policy DS3 states that, in non-principle settlements, small-scale residential development will be permitted so long as the following criteria is met: a) "demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally; b) is of proportionate scale and maintains and enhances sustainable patterns of development; c) complements the form and character of the settlement; and d) does not have an adverse cumulative impact on the settlement having regard to other developments permitted during the Local Plan period."
Morgan Elliot Planning 340	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	Call for sites. Policy DS3 includes proposed amends that adds to the scale of development, the form and character and adds part e) which refers to development being within a certain journey time by foot or public transport.

Respondent	Policy	Comment
Claudia Jones	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	Response to amendments to Policy DS3 Firstly, the Estate continues to support the purpose of Policy DS3 which has proven successful over the years in allowing small-scale, incremental and sustainable growth to be achieved at Non-Principal Settlements. However, the amendments proposed to this policy are recognised as comprising a more stringent criterion. These can be summarised as follows: The policy then lists a number of services. Statement of reasons for these changes are then set out on pages 91 and 92. The Estate only wishes to respond to amendments to criteria b). We have no objection to including the '%' requirement in criteria b) as it is recognised that this will allow for proportionate growth commensurate to the size of the settlement. In light of this, it is contended that the addition of restricting the development of sites to 1 ha is overly restrictive. The size of development should be based on the size of the settlement itself and the services and facilities that lie within it but close by, notwithstanding any sustainable transport connections and environmental designations. Moreover, given the requirement to now deliver 10% biodiversity net gain on both major and minor developments and the opportunity to deliver landscape enhancements may be restricted if an upper limit on the size of the site is adopted. Finally, this restriction could further restrict the ability for residential developments to give back to the community, such as deliver Criteria b) attaches an exact size limit to development under this policy, proposing sites to be no larger than one hectare and to not exceed 5% of the size of the existing settlement. Criteria c) adds that the proposed development should complement the existing pattern of development and should not negatively affect the contribution that open spaces and breaks in development, such as gardens, green wedges and green corridors, make to the built environment. Criteria e) is new, requiring that development "has a journey time by foot and/or public transport from the centre of the site to six of the following core or primary services that is no longer than the following: 40 minutes to employment area(s) offering 500+ jobs; 30 minutes to a secondary school; 20 minutes to any of the following:…" public open space, play spaces and allotments. We therefore respectively request this amendment is removed.

Respondent	Policy	Comment
Grant Baylis	Policy DS3: Small-Scale Residential Development in Non-Principal	Firstly, TGE continues to support the purpose of Policy DS3 which has proven successful over the years in allowing small-scale, incremental and sustainable growth to be achieved at Non-Principal Settlements. 2.3 However, the amendments proposed to this policy are recognised as comprising a more stringent criteria. These can be summarised as follows: - Criteria b) attaches an exact size limit to development under this policy, proposing sites to be no larger than one hectare and to not exceed 5% of the size of the existing settlement. - Criteria c) adds that the proposed development should complement the existing pattern of development and should not negatively affect the contribution that open spaces and breaks in development, such as gardens, green wedges and green corridors, make to the built environment. - Criteria e) is new, requiring that development "has a journey time by foot and/or public transport from the centre of the site to six of the following core or primary services that is no longer than the following: 1. 40 minutes to employment area(s) offering 500+ jobs; 2. 30 minutes to a secondary school; 3. 20 minutes to any of the following:" The policy then lists a number of services. 2.4 The reasons for these changes are then set out on pages 91 and 92. TGE wishes to respond to amendments to criterion b) and criterion e). 2.5 We have no objection to including the '%' requirement in criterion b) as it is recognised that this will allow for proportionate growth commensurate to the size of the settlement. However, it is contended that the addition of restricting the development of sites to 1 ha is overly restrictive. The size of development should be based on the size of the settlement itself and the services and facilities that lie within it but close by, notwithstanding any sustainable transport connections and environmental designations. 2.6 Moreover, given the requirement to now deliver 10% biodiversity net gain on both major and minor developments and the opportunity to deliver landscape

Respondent	Policy	Comment
Grant Baylis	Policy DS3: Small-Scale Residential Development in Non-Principal	Firstly, MMH continues to support the purpose of Policy DS3 which has proven successful over the years in allowing small-scale, incremental and sustainable growth to be achieved at Non-Principal Settlements. 2.48 However, the amendments proposed to this policy are recognised as comprising a more stringent criterion. These can be summarised as follows: Criteria b) attaches an exact size limit to development under this policy, proposing sites to be no larger than one hectare and to not exceed 5% of the size of the existing settlement. Criteria c) adds that the proposed development should complement the existing pattern of development and should not negatively affect the contribution that open spaces and breaks in development, such as gardens, green wedges and green corridors, make to the built environment. □ □ —. Criteria e) is new, requiring that development "has a journey time by foot and/or public transport from the centre of the site to six of the following core or primary services that is no longer than the following: 40 minutes to employment area(s) offering 500+ jobs; —. 30 minutes to a secondary school; —. 20 minutes to any of the following:" The policy then lists a number of services. —. □ —. □ —. 2.49 The reasons for these changes are then set out on pages 91 and 92. MMH wishes to respond to amendments to criterion b) and criterion e). —. 2.50 We have no objection to including the '%' requirement in criterion b) as it is recognised that this will allow for proportionate growth commensurate to the size of the settlement. —. 2.51 However, it is contended that the addition of restricting the development of sites to 1 ha is overly restrictive. The size of development should be based on the size of the settlement itself and the services and not the facilities that lie within it but close by, notwithstanding any sustainable transport connections and environmental designations. —. 2.52 Moreover, given the requirement to now deliver 10% biodiversity net gain on both major and minor developments and the opportunity to deliver landscape enhancements may be restricted if an upper limit on the size of the site is adopted. Finally, this restriction could further restrict the ability for residential developments to give back to the community, such as deliver public open space, play spaces and allotments. We therefore respectfully request this amendment be removed. —. 2.53 With regards to Criterion e) – this looks to introduce time-limited restrictions by foot and/or public transport. It's not yet understood what evidence has been utilised to support the prescribed journey times. It is not clear why a 20-minute journey time to 6 has been decided upon; yet the access to employment areas is 40-minutes. It's unclear why the two prescribed benchmarks have been selected and why one is considered less sustainable than the other. We would welcome further

Respondent	Policy	Comment
Kelly Prosser (Zesta Planning) 146	Policy DS3: Small-Scale Residential Developme nt in Non-Principal	Further Restriction of Small-Scale Residential Development at Non-Principal Settlements – Policy DS3 1.33. CO recognise the important contribution of open spaces and gaps to the distinctive character of the District's smaller settlements and believe this added wording is useful within the supporting text to Policy DS3. However, it is considered the proposed updates to Policy DS3 – Small-scale Residential Development in Non-Principal Settlements are more restrictive and appear to contradict the Council's objective to address the issue of affordability, particularly in regard to the under-delivery of homes in the Local Plan as explained above. 1.34. A new set of accessibility standards have been proposed to Policy DS3. The standards set out in DS3(e) requires sites for new residential development to be within specified journey times between 20 – 40 minutes by foot or public transport to at least six services and facilities. The purpose of the standards is to, supposedly, help new housing developments to have reasonable access to services, facilities and employment and to reduce social isolation vehicle dependence/cost of living issues and transport emissions. 1.35. Whilst it is understood that residents of non-principal settlements should have reasonable access to some services and facilities, the proposed standards are unnecessarily complex for potential applicants and planning case officers to navigate. 1.36. Furthermore, CO consider that they disregard the rural nature that makes the Cotswolds distinctive. The prevalence of small, intimate villages across the Cotswolds makes the district nationally distinctive. These standards will be unachievable for new development in many hamlets and villages and will result in the exclusion of appropriately scaled new residential development from small villages. 1.37. Excluding residential development from the smaller non-principal settlements goes against national policy objectives to support the vitality of rural communities. Paragraph 83 of the NPPF states that "Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." The accessibility standards proposed will not be
colin south	Policy DS3	With regard to small scale development in DS3 I would like to see that priority will be given to brownfield sites rather than agricultural land where the build is for more than two/three infill houses. Also that it excludes any sites within agricultural fields even if they are within the settlement, unless they are considered long term scrubland that has not been farmed for many years. Too many developers want to build on established farm land that should be used for the growing of crops to support british farming.

Respondent	Policy	Comment
colin south	Policy DS3	DS3 1e. Should have principle facilities such as Shop and Robust Transport links plus access to GP and Banks as an absolute requirement, almost all villages in the Cotswolds can meet six of the requirements listed in that we all have Allotments, Community Hall, Church, Primary School, Pub and Public Open Space but that these alone do not make us sustainable.
yvonne o'callaghan	Policy DS3	Policy DS3 (e) does not reflect the change in employment practices over the last 4 years and is an unreasonable 'ask'. Would propose a reduction to the 500+ jobs.

Respondent	Policy	Comment
Fuller Long Planning Consultants	Policy DS3	The reference to 'small-scale' within the policy title is superfluous. Should a proposal comply with the policy criteria, then it should be permissible. Accordingly, the title should simply read 'Residential Development in Non-Principal Settlements'. Criterion b The requirements relating to a site being no larger than 1 hectare or not exceeding 5 % of the existing settlement should be deleted. We understand this stems from the National Planning Policy Frameworks (NPPF's) guidance regarding exception sites (i.e greenfield land adjacent to settlements (see para 73b) for which there is a separate policy. We firmly submit that 'Previously developed sites' within settlements should not be treated in the same manner. In our view this entirely contrary to the advice contained within the NPPF particularly relating to making efficient use of previously developed land which applies to both urban and rural areas and to the guidance under the heading 'Rural Housing' that "Planning policies should identify opportunities for villages to grow and thrive"'(Paragraph 83 NPPF). In addition, in determining whether a development is proportionate in scale, what cannot be ignored is the characteristics of the individual application site (in particular the level of existing development), for which there is no mechanism within the Policy. Under the proposed policy wording, a development which results in a significant reduction in built form from the existing could be refused for not being 'small scale', which would seem illogical. We agree that part ii) of Criteria b should be deleted with the introduction of criteria e. Indeed, the presence of criteria e) further supports our view that the policy should promote the effective use of previously developed land (rather than limit it) in accordance with both Section 11 and paragraph 83 of the NPPF referred to above. In this regard for a development to be allowed Criteria e) ensures there must be reasonable access (other than by the private car) to everyday facilities. In light of the above we recommend criteria b is amended to say: "Is of a proportionate scale to the settlement, having regard not only to the scale and character of the settlement but also to the characteristics of the subject site." Criteria e) We consider that cycle times should be included as this is a form of travelling which does not rely on the private car. The Council anticipates the use of cycling as a means of transport through their requirements for cycle parking to be provided in new residential developments, accordingly we consider it right that journey times for this form of transport should be considered in terms of access to the listed facilities. Finally, footnotes 1 and 2 should not apply to travelling to school as there is no requirement for year-round services or services within normal working hours.
Bob Sharples	Policy DS3	Spor England welcomes the inclusions of sports field, leisure centres and community halls in Policy DS3: small-scale residential development in non-principal settlements. However would suggest that changing pavilions are also included in this list.

Respondent	Policy	Comment
Lisa Spivey	Policy DS3	Small scale development in non principal settlement should follow a natural development grain thus small scale (less than 5 units) should be considered on the edge of settlements in agricultural fields so long as they are not separate to the developed part of the settlement. This would allow small villages to increase in size proportionately to the settlement. Without this, then small villages will never be able to see development and will become "moth balled"
Tom Howard	Policy DS3	We understand where the update to DS3 has come from and welcome the general intent, however the prescriptive way that it is written could make it almost impossible to build any housing in smaller settlements, thus preventing villages from maintaining vitality and adapting gently to changing needs. The way DS3 1c) is written can be read to suggest that all open spaces in these settlements are 'valuable' and so should not be built upon. The wording is very restrictive and should be more permissible, but relying upon site by site judgement. EG. "...complements the form and character of the settlement, and respects the contribution that valuable open spaces and breaks in development make to the built Environment." An exercise can then be weighed on a normal harms v benefits basis. There may be, for example, an extremely good local case for providing some independent living homes for local old people, wishing to stay in their community and free up larger housing stock. The benefit of this (social, health, reducing burden on NHS, less travelling to visit relatives now housed a long way away ... .etc.) should be able to outweigh some relatively low value open/ green space, so a value judgement needs to be included in the policy. Paragraph 6.3.5 is simply too prescriptive, to the point that the policy seems unlikely to be able to deliver any housing. Again, the policy needs to allow for judgement on a site by site basis. A phrase like 'well-related to' provides more flexibility, and then landscape and other analysis can be done to build a harms v benefits judgement. To exclude any agricultural fields or farmyards also seems overly prescriptive, as there may be cases where these provide logical and sensible opportunities for targeted local housing to maintain the rural vitality.

Respondent	Policy	Comment
McLoughlin Planning	Policy DS3	On behalf of Partridge Homes, McLoughlin Planning has been instructed to raise the following objections to the policy. This submission is set out along the following tests in the Policy. Proportionate Size of development The proposed changes to the Policy seek to place a 5% limit on new developments in non-principle settlements, justifying it on the basis of footnote 35 of the 2023 NPPF. Whilst the December 2023 NPPF changes this to footnote 37, the approach adopted by the Plan is an incorrect interpretation of the footnote and the paragraph to which it relates. The 5% limit relates to "exception sites for community-led development". This limitation does not apply to other forms of residential development in rural villages. In addition, there is no understanding of what the measure is for which the 5% is calculated against. Is it village or Parish? If the former, how does the policy assess what constitutes the village. Complements the form and character of the settlement This has been a well-understood principle of DS3 since it was adopted. However, the proposed changes introduce additional arbitrary values against which proposals must be assessed. These features have to be protected by a specific policy destination such as Local Green Space or conservation area. The risk is that it introduces arbitrary factors against which proposals must be assessed and runs counter to many of the sites which have been granted planning permission through the DS3 route. Proximity to services Criterion E is poorly worded and in need of refinement. Is it the case that: The site has to be within 40 minutes of an employment centre by bus? And 30 minutes by bus from a Secondary School? And 30 minutes from 6 of the identified services and facilities?

Respondent	Policy	Comment
Siddington Neighbourhood Plan Steering Group	Policy DS3	This submission is made on behalf of the Siddington Neighbourhood Development Plan Steering Group. We fully support your proposed Policy DS3 and in particular paragraphs 6.3.6 and 6.3.7 and the comments in those paragraphs regarding the importance of gaps that make a positive contribution to the character of a village. Specifically, we think it is important that green gaps between Cirencester and adjoining settlements should be maintained. We think the Policy would be helpfully strengthened if a plan showing those gaps is included. In relation to Siddington, we would expect these to include the areas identified as SID2 and SID3 in the Integrated Impact Assessment for the Cotswold Local Plan Update – Points of the Compass Appraisal. We consider that this would provide assurance that the Local Plan will be in conformity with the strategic objective that "coalescence of settlements, particularly around Cirencester" should be protected (Objective 1(d)).
Coates Parish Council	Policy DS3	Policy DS3 We support the wording of 1.c. which recognises the importance of open spaces. We doubt whether 1.e is helpful in deciding where small scale development is permitted. For it to be truly sustainable, we suggest reducing the stated journey times. We support 6.3.5/6 & 7 in excluding agricultural fields from development and protecting open spaces, which are are part of the Cotswold character, particularly within the Cotswold National Landscape. In such areas development should be limited to brownfield sites.

Respondent	Policy	Comment
Iain Summerwood	Policy DS3	The emerging Local Plan update introduces a number of new criteria to policy DS3. Policy DS3 relates to allowing the provision of 'small-scale residential development' in non-Principal settlements. The proposed new wording therefore seeks to further restrict opportunities for new development in non-Principal settlement locations. These locations can be sustainable places, with a wide range of existing services and facilities, where there may be a specific local housing need, or where new development could contribute to the vitality and viability of services in the settlement. On behalf of our client, we object to the increased restrictions for new small scale development. Specifically on account of item (b) above, in our view a site can be proportionate to the scale of the settlement if it is larger than one hectare and where it may exceed 5% of the size of the existing settlement. This is an arbitrary criteria as to whether land is suitable, and we consider that this should be removed from the criteria. It would be better to assess the matter of proportionality on a case-by-case basis. Specifically on account of item (c) we support the notion of complementing the pattern of development. This is a good assessment tool and ensures that new development appropriately assimilates into the context of a place. However, we do consider that more careful wording should be made in relation to 'the contribution of open spaces and breaks in development' – in our view there is risk that the policy will be interpreted that 'all' breaks in development should not be developed. This would be overly restrictive. In our view not all open spaces and breaks in development are important to the setting of a village, and care should be taken with the wording to allow for the development of open areas which do not contribute to the character of a settlement, or to allow for development where provision is made in the design which protects the key parts of openness on a particular site (for example through sensitive development layout, inclusion of new public open space etc). Specifically on account of the supporting text comments regarding exclusion of agricultural land, in our view not all agricultural land should be protected from development. There will be scenarios where sites an in agricultural use, but which are sufficiently within the context of the village built form that development should be supported. For example, where a site may be in agricultural use, but where it may be surrounded by existing development on three out of four sides.

Respondent	Policy	Comment
Oddington Parish Council	Policy DS3	'a)demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally;' The Council questions whether CDC should have a policy regarding the construction of houses that will be used as second homes or holiday lets. We are of the view that such properties do not enhance the vitality of the Community. 'b. is of a proportionate scale to the settlement, is no larger than one hectare in size and does not exceed 5% of the size of the existing settlement. The Council questions why 'maintains and enhances sustainable patterns of development;' has been deleted.

Respondent	Policy	Comment
McLoughlin Planning	Policy DS3	On behalf of Partridge Homes, McLoughlin Planning has been instructed to raise the following objections to the policy. This submission is set out along the following tests in the Policy. Proportionate Size of development The proposed changes to the Policy seek to place a 5% limit on new developments in nonprinciple settlements, justifying it on the basis of footnote 35 of the 2023 NPPF. Whilst the December 2023 NPPF changes this to footnote 37, the approach adopted by the Plan is an incorrect interpretation of the footnote and the paragraph to which it relates. The 5% limit relates to "exception sites for community-led development". This limitation does not apply to other forms of residential development in rural villages. In addition, there is no understanding of what the measure is for which the 5% is calculated against. Is it village or Parish? If the former, how does the policy assess what constitutes the village. Complements the form and character of the settlement This has been a well-understood principle of DS3 since it was adopted. However, the proposed changes introduce additional arbitrary values against which proposals must be assessed. These features have to be protected by a specific policy destination such as Local Green Space or conservation area. The risk is that it introduces arbitrary factors against which proposals must be assessed and runs counter to many of the sites which have been granted planning permission through the DS3 route. Proximity to services Criterion E is poorly worded and in need of refinement. Is it the case that: The site has to be within 40 minutes of an employment centre by bus? And 30 minutes by bus from a Secondary School? And 20 minutes from 6 of the identified services and facilities? If the answer to the above is yes then the proposed strategy is failing in meeting the requirements of the NPPF to support rural settlements. In the District's case, there are only 5 secondary schools in the following locations: - Tadcaster

Respondent	Policy	Comment
David Burson 185	Policy DS3	DS3 - Small-Scale Residential Development in Non-Principal Settlements Current Local Plan policy DS3 has been effective in sustainably delivering new homes for rural communities and allowing the authority to resist harmful developments. We are cautious of changes to this well used policy which seem likely to undermine its effectiveness. The proposed change to criterion (b) introduces arbitrary limitations reducing the flexibility, and with-it effectiveness of the policy. The existing policy already includes provision (need for development to be proportionate to a settlement) through which Development Management officers can (and do) resist proposals harmful to settlements through their site size, or number of dwellings The proposed introduction of arbitrary limits reduces scope for officers to exercise professional judgement. It does not increase protection from harmful developments but reduces opportunity for beneficial schemes. The proposed limitation on larger sites (over 1Ha) is undesirable as it discourages the inclusion of additional land in residential schemes to offer benefits for the wider area such as extra open space, landscaping, or habitats. Similarly, we see no benefit to the proposed change to criterion (c). The current policy clearly and concisely sets a requirement for developments to complement the form and character of their settlement. This includes maintaining important green spaces. The proposed additional wording does not add to the policy, it simply lengthens it at the expense of clarity. Finally, we are concerned the introduction of criterion (e) will reduce the effectiveness of the policy and through this make the policy unsound.

Respondent	Policy	Comment
Liz Shield (SF Planning)	Policy DS3	In accordance with the current local plan, development at the site would potentially be considered to comply with policy DS3 being in a non-principal settlement, proportionate to the settlement size and helping to enhance the vitality and viability of the village and its services. 7.2 Historically, we have seen policy DS3 as a successful and pragmatic policy which enables proportionate growth to support existing small businesses and services within smaller villages. The current policy recognises the predominantly rural character of the District, where some housing can be in locations which are not necessarily readily accessible by a frequent public transport service and have a smaller level of services reflective of the size of the village. 7.3 However, in the draft local plan, the Council has proposed some amendments to policy DS3 (and the development strategy in general). These are likely to make it harder to deliver homes which will enable businesses and services in smaller settlements to grow and thrive. In the event that the Council wishes to proceed with changes to DS3, we have provided some comments on the changes below as follows; 7.3.1 Criteria b) of amended policy DS3 requires the development to be proportionate to the scale of the settlement, no larger than 1ha in size and no more than 5% of the size of the existing settlement. In our view, the 5% limit alone sets clear guidelines and would ensure that developments over 1ha but very small compared to a larger settlement could still be seen as appropriate and proportionate. 7.3.2 In respect of criteria c) we consider that infilling can be appropriate in certain circumstances so the policy wording should perhaps be reconsidered to ensure that it does not rule out acceptable infilling. Also, green wedges/corridors is not defined in the glossary. 7.3.3 In respect of criteria e), we raise the following points; i. Access to services by bicycle should be considered as well as walking and public transport albeit with a caveat relating to safety. ii. Access to the public footpath network should be added to the list of services and facilities which can be considered. Many people will choose this recreational activity over using public open spaces and sports fields and it provides valuable benefits to health and wellbeing. iii. 'Community hall' should potentially be expanded to refer to events spaces more generally. iv. A requirement to have 6 of the listed services/facilities may be considered disproportionate. People living in rural areas have different expectations about the level of

Respondent	Policy	Comment
Liz Shield (SFPlanning) 246	Policy DS3	Proposed changes to policy DS3 7.5.1 Criteria b) of amended policy DS3 requires the development to be proportionate to the scale of the settlement, no larger than 1ha in size and no more than 5% of the size of the existing settlement. In our view, the 1ha size limit is unnecessary and introduces a hurdle which will not go any further towards achieving the Council's aim of a proportionately sized development. The 5% limit would suffice in this regard and would ensure that developments over 1ha but very small compared to a larger settlement could still be seen as appropriate and proportionate (applying DS3 to both principal and non-principal settlements). 7.5.2 Whilst we accept that the NPPF does refer to both 5% and 1ha size limits, these relate specifically to community led development exception sites and not to development in general. Therefore, rigid adherence to these requirements is not the best way to achieve genuinely proportionate development. 7.5.3 Inclusion of the size limit policy generally would do enough to prevent sprawl and unchecked growth of settlements. This should provide reassurance that removal of development boundaries would not cause harm. 7.5.4 In respect of criteria c) the statement of reasons does not make sense given that policy DS2 does not include the wording proposed. Also, this has the potential to be applied very stringently to prevent infilling even though this could be appropriate in certain circumstances. Also, green wedges/corridors is not defined in the glossary. 7.5.5 In respect of criteria e), we raise the following points; i. Access to services by bicycle should be considered as well as walking and public transport albeit with a caveat relating to safety. ii. Access to the public footpath network should be added to the list of services and facilities which can be considered. Many people will choose this recreational activity over using public open spaces and sports fields and it provides valuable benefits to health and wellbeing. iii. 'Community hall' should potentially be expanded to refer to events spaces more generally. iv. We consider that a requirement to have 6 of the listed services/facilities is excessive. People living in rural areas have different expectations about the level of services they will be near. to, and indeed how many they actually want to be near to. Some people deliberately choose to live in rural villages to avoid crowds and this forms part of their health and wellbeing. Therefore, we feel that the policy should require a

Respondent	Policy	Comment
Liz Shield (SFPlanning) 249	Policy DS3	Policy DS3 as it is worded in the draft local plan could be used [see comment on supporting text to DS3], subject to the following amendments and considerations; i) Criteria b) of amended policy DS3 requires the development to be proportionate to the scale of the settlement, no larger than 1ha in size and no more than 5% of the size of the existing settlement. In our view, the 5% limit alone sets clear guidelines and would ensure that developments over 1ha but very small compared to a larger settlement could still be seen as appropriate and proportionate. ii) In respect of criteria c) we consider that infilling can be appropriate in certain circumstances so the policy wording should perhaps be reconsidered to ensure that it does not rule out acceptable infilling. Also, green wedges/corridors is not defined in the glossary. iii) In respect of criteria e), we raise the following points; a) Access to services by bicycle should be considered as well as walking and public transport albeit with a caveat relating to safety. b) Access to the public footpath network should be added to the list of services and facilities which can be considered. Many people will choose this recreational activity over using public open spaces and sports fields and it provides valuable benefits to health and wellbeing. c) 'Community hall' should potentially be expanded to refer to events spaces more generally. d) A requirement to have 6 of the listed services/facilities may be considered disproportionate. People living in rural areas have different expectations about the level of services they will be near to, and indeed how many they actually want to be near to. Some people deliberately choose to live in rural villages to avoid crowds and this forms part of their health and wellbeing. Therefore, we feel that the policy should require a new dwelling to have access to 4 of the identified services and facilities rather than 6. iv) As the local plan is driving towards being 'green to the core' – a provision could be inserted into this policy or elsewhere to incentivise providing a climate change resilient/low carbon development which goes beyond the policy requirements identified elsewhere in the plan. Providing such development could then override some of the other requirements of the policy. This would drive up the green credentials of housing in rural settlements; delivering a benefit which would offset the fact that less services may be available.

Respondent	Policy	Comment
Nicholas Dummett 186 (CPRE)	Policy DS3	Policy DS3. Small Scale Residential Development in Non-Principal Settlements. We support the substantial modifications to the policy to be more specific in some respects. In particular that small scale development is defined as not more than 5%. However it should be clear that this covers both a single development and the total cumulative development over the plan period. Otherwise multiple applications for 5% would be possible. The policy also requires that development is no further by foot/public transport than defined times from a list of facilities. We are concerned that this list is so all-encompassing that it will be easy for proposals to meet at least 6 of them and result in many of the smaller villages becoming targets for development. We suggest the list be truly that of essential services namely; employment, primary and secondary schools, banking and/or post office, a GP surgery/pharmacy, and food shops and that all are required to be within a reasonable distance in terms of time by foot, bicycle or regular (say 3 times a week) public transport.

Respondent	Policy	Comment
Kelly Prosser	Policy DS3	CO recognise the important contribution of open spaces and gaps to the distinctive character of the District's smaller settlements and believe this added wording is useful within the supporting text to Policy DS3. However, it is considered the proposed updates to Policy DS3 – Small-scale Residential Development in Non-Principal Settlements are more restrictive and appear to contradict the Council's objective to address the issue of affordability, particularly in regard to the under-delivery of homes in the Local Plan as explained above. 1.34. A new set of accessibility standards have been proposed to Policy DS3. The standards set out in DS3(e) requires sites for new residential development to be within specified journey times between 20 – 40 minutes by foot or public transport to at least six services and facilities. The purpose of the standards is to, supposedly, help new housing developments to have reasonable access to services, facilities and employment and to reduce social isolation vehicle dependence/cost of living issues and transport emissions. 1.35. Whilst it is understood that residents of non-principal settlements should have reasonable access to some services and facilities, the proposed standards are unnecessarily complex for potential applicants and planning case officers to navigate. 1.36. Furthermore, CO consider that they disregard the rural nature that makes the Cotswolds distinctive. The prevalence of small, intimate villages across the Cotswolds makes the district nationally distinctive. These standards will be unachievable for new development in many hamlets and villages and will result in the exclusion of appropriately scaled new residential development from small villages. 1.37. Excluding residential development from the smaller non-principal settlements goes against national policy objectives to support the vitality of rural communities. Paragraph 83 of the NPPF states that "Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." The accessibility standards proposed will not be achievable for many smaller villages and will halt the sustainable development of these settlements. Without new residential development, these smaller settlements will [illegible]

Respondent	Policy	Comment
Tom Howard	Policy DS3	We understand where the update to DS3 has come from and welcome the general intent, however the prescriptive way that it is written could make it almost impossible to build any housing in smaller settlements, thus preventing villages from maintaining vitality and adapting gently to changing needs. The way DS3 1c) is written can be read to suggest that all open spaces in these settlements are 'valuable' and so should not be built upon. The wording is very restrictive and should be more permissible, but relying upon site by site judgement. EG. "...complements the form and character of the settlement, and respects the contribution that valuable open spaces and breaks in development make to the built Environment." An exercise can then be weighed on a normal harms v benefits basis. There may be, for example, an extremely good local case for providing some independent living homes for local old people, wishing to stay in their community and free up larger housing stock. The benefit of this (social, health, reducing burden on NHS, less travelling to visit relatives now housed a long way away ... .etc.) should be able to outweigh some relatively low value open/ green space, so a value judgement needs to be included in the policy. Paragraph 6.3.5 is simply too prescriptive, to the point that the policy seems unlikely to be able to deliver any housing. Again, the policy needs to allow for judgement on a site by site basis. A phrase like 'well-related to' provides more flexibility, and then landscape and other analysis can be done to build a harms v benefits judgement. To exclude any agricultural fields or farmyards also seems overly prescriptive, as there may be cases where these provide logical and sensible opportunities for targeted local housing to maintain the rural vitality.
David Hindle	Policy proposalUpdate Policy DS4 as follows:	Policy has worked well.
David Hindle	Policy proposalUpdate Policy DS4 as follows:	The exceptional circumstances final variation to normal DS4 should be a totally separate Policy under H.. that will make it possible to make it clear what it is interned to mean and the requirements. I also thing that the use of the word ;development could be misunderstood,as it in reality only relates to a new building, and that needs to on the same site. I Will provide some suggested wording in a separate email This exception could remain but refer to a building not development. The Policy would then be in brackets.

Respondent	Policy	Comment
Matthew Dent	Policy proposalUpdate Policy DS4 as follows:	6.4.3 final bullet should be worded with extreme caution. The recent approval of a doctors surgery in Tetbury being the example. Here the developer and landowner forced through 27 houses with no viability assessment and a flawed biodiversity net gain assessment. The developer could have delivered the surgery with 3-5 houses and significantly reduced the impact. The council needs to be strong on this, if outside the development boundary only what is viable, based on independent evidence, should be built.
Amartya Deb (Gloucestershire County Council)	Policy proposalUpdate Policy DS4 as follows:	With regard to DS4 – Market Housing Outside Principle and Non-Principal Settlements – housing development in the open countryside will always be near impossible to make sustainable from a transport perspective. This will also put pressure on the highway network with impacts which will be difficult to mitigate.

Respondent	Policy	Comment
Rukaiya Umaru 164	Policy proposalUpdate Policy DS4 as follows:	Hallam supports the proposed update to Paragraph 6.4.3, which provides additional clarification regarding circumstances where certain types of housing development can be appropriate in the countryside. The updated text would accommodate housing development: "…in exceptional circumstances and adjoining a Principal Settlement, [where] a need is demonstrated to deliver an urgently required strategic infrastructure item identified by Policies SA1 – SA3 and the new housing provides enabling development." While Hallam supports this addition, it is noted that this circumstance is not supported by a standalone Local Plan policy. In contrast, other circumstances referred to in Paragraph 6.4.3 benefit from specific policy provisions (e.g. Policy H3 for affordable housing on rural exception sites and Policy H5 for housing for rural workers). The Local Plan Update should include a specific policy detailing the policy requirements for qualifying development, capturing the provisions of Footnote 1. This would be consistent with the approach for the other identified exceptions (Policies H3, H5 and H7). Notwithstanding the above, Footnote 1 states that in this identified exceptional circumstance, "the infrastructure item must be provided within the site boundary". This approach is unjustified and ignores the reality that strategic infrastructure may, in some instances, be more appropriate off-site. To demonstrate this point, Policy SA1/SA2/SA3 (now INF 1) which identifies strategic infrastructure requirements in Cotswold includes highways improvement and flood management schemes. These schemes are typically delivered off-site for the benefit of the wider community. As currently drafted, Footnote 1 is too restrictive and does not align with Policy SA1/SA2/SA3 despite the cross-reference made to this policy in Paragraph 6.4.3. The wording unnecessarily narrows the strategic infrastructure that could be delivered through this exceptional circumstance, which could in turn affect the deliverability of key infrastructure schemes. Indeed, the Local Plan should facilitate the delivery of urgently required strategic infrastructure to meet the needs of those living in the area. Suggested changes: • Introduce a new standalone policy to capture the policy requirements of the exceptional circumstance set out in Paragraph 6.4.3. • In Footnote 1, delete "the infrastructure item must be provided within the site boundary".

Respondent	Policy	Comment
Liz Shield (SF Planning)	Policy proposalUpdate Policy DS4 as follows:	In accordance with the current local plan, development at the site would be assessed against policy DS4. Historically Policy DS4 has been restrictive, preventing development outside settlement boundaries even where the site has good access to services and facilities. 7.2 There are several strategies the Council could adopt which would be less restrictive but still secure well managed growth; 7.2.1 The Council could have a policy which permits development adjacent to settlement boundaries perhaps with criteria relating to how it contributes to the character of the settlement or any other matters the Council considers might be appropriate for an edge of settlement location. Such a policy should be positively rather than negatively worded. 7.2.2 The Council could introduce more flexibly drawn boundary, which include within it some undeveloped or vacant land at the edges of the settlement which the Council has identified as being suitable for expansion but has not allocated because the land in question may not have been identified as suitable, available, and achievable at present. This way, the Council can still ensure that development is located close to services and facilities in principal settlements. This would align with the Council's climate change goals too, by permitting more housing within walking distance of services and facilities. 7.2.3 The Council could adopt a similar approach to the proposed amended version of policy DS3 in relation all settlements. Rather than relying on settlement boundaries, this approach would simply require development to be located within a specified distance of services and facilities, and of a proportionate size to the settlement. Policy DS3 as it is worded in the draft local plan could be used, subject to the following amendments and considerations; i) Criteria b) of amended policy DS3 requires the development to be proportionate to the scale of the settlement, no larger than 1ha in size and no more than 5% of the size of the existing settlement. In our view, the 5% limit alone sets clear guidelines and would ensure that developments over 1ha but very small compared to a larger settlement could still be seen as appropriate and proportionate. ii) In respect of criteria c) we consider that infilling can be appropriate in certain circumstances so the policy wording should perhaps be reconsidered to ensure that it does not rule out acceptable infilling. Also, green wedges/corridors is not defined in the glossary. iii) In respect of criteria e), we raise the following points; a) Access to services by bicycle should be considered as well as walking and public transport albeit with a caveat relating to safety. b) [illegible]

Respondent	Policy	Comment
Liz Shield (SFPlanning) 249	Policy proposalUpdate Policy DS4 as follows:	Response to the Regulation 18 draft local plan policies 7.1 In accordance with the current local plan, development at the site [call for site submission] would be assessed against policy DS4. Historically Policy DS4 has been restrictive, preventing development outside settlement boundaries even where the site has good access to services and facilities. 7.2 There are several strategies the Council could adopt which would be less restrictive but still secure well managed growth; 7.2.1 The Council could have a policy which permits development adjacent to settlement boundaries perhaps with criteria relating to how it contributes to the character of the settlement or any other matters the Council considers might be appropriate for an edge of settlement location. Such a policy should be positively rather than negatively worded. 7.2.2 The Council could introduce more flexibly drawn boundary, which include within it some undeveloped or vacant land at the edges of the settlement which the Council has identified as being suitable for expansion but has not allocated because the land in question may not have been identified as suitable, available, and achievable at present. This way, the Council can still ensure that development is located close to services and facilities in principal settlements. This would align with the Council's climate change goals too, by permitting more housing within walking distance of services and facilities.
David Hindle	Policy DS4	The exceptional circumstances, relating to Strategic Infrastructure should be a totally separate H Policy that needs to be added in an appropriate place. It should also relate to buildings only, as this is what it will in reality relate too, not Highways works, new Playing recreation grounds SUDS etc.
Andrew Brian Crump	Policy DS4	In 2001 previously undeveloped land was built on at Hill View in Mickleton for the ostensible purpose of providing affordable housing in Mickleton . It turned out that only two local families actually occupied the newly built properties and others came from further afield. A similar position arose when further housing development was constructed around the village post 2011. This shows the importance of establishing real local need before moving towards considering applications outside settlements where encroachment into the adjacent countryside would be inevitable

Respondent	Policy	Comment
Rob Jones-Davies	Policy DS4	The removal of the 'conversion of rural buildings' as a certain type of housing development allowable in the countryside from the guidance text to Policy DS4 at 6.4.3, in association with the changes to the policy EC6, and indeed the statement within the SoR's that 'the conversion of rural buildings to market dwellings in the open countryside is no longer needed or supported by the Council' is in direct conflict with current policy/ guidance contained within the following documentation; -National Planning Policy Framework - NPPF -National Planning Practice Guidance - NPPG -Historic England Advice note 9: 'The Adaptive Reuse of Traditional Farm Buildings' -CLA Guidance: 'The conversion of heritage and other farm buildings to new uses' The CLA have identified that approximately half a million traditional farm buildings have been lost since 1919 (the equivalent of 15 a day) and consequently, of those that remain, most are important as heritage and significant features within the rural landscape. Historic England (HE), goes further to state; 'Traditional farmsteads are an irreplaceable source of character in the English countryside. However, without appropriate uses to fund their long-term maintenance and repair, they will disappear from the landscape.' It is therefore not unsurprising to learn of HE's explicit support of residential conversion stating that proposals for residential conversion which 'enhance their historic character and significance are to be encouraged'. This is of course echoed within the NPPF at para 84 which offers support for the development of isolated homes where 'development would re-use redundant or disused buildings and enhance its immediate setting'. Regarding Rural Housing current NPPG states 'People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities.' The guidance previously identified 'A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.' Indeed, the Cotswold District's acute housing affordability issue is identified and reiterated on numerous occasions within the Local Plan. To starve the District of a sustainable supply of new homes by restricting the conversion of rural buildings is entirely counterintuitive to the aims of addressing this stated issue. To stymie this avenue of development will not only contribute to pushing the existing rural housing stock beyond that attainable by those who have been born, brought up, live, work and love the countryside but it will have a significant impact on the already fragile rural economy. CDC's extant policies and associated planning decisions relating to the 'conversion of rural buildings' (in addition to 'replacement dwellings' and 'extensions and alterations

Respondent	Policy	Comment
David Burson 185	Policy DS4	Policy DS4: Open Market Housing outside Principle and Non-Principal Settlements We object to the proposed modification to the wording of DS4. The opening reference to 'new build' dwellings being resisted (proposed to be deleted) makes it clear conversion proposals are subject of a separate policy. This clarity is helpful, particularly to parties unfamiliar with the Local Plan (or planning documents in general). The proposed change is detrimental to the policy and should not be made
Stephen Andrews (Kempsford Parish Council)	Policy DS4	o Since the 1970's, Kempsford has periodically grown by 20-30 houses. This has contributed to the continued vibrancy of the village and the retention of key aspects of village life, such as the Primary School. o Noting that Policy DS3 may allow exceptions that would allow this to continue, should/can specific reference be made either as part of DS3 or H3 to the need for a current evidence based Housing Needs Assessment (rather than Survey) to support the case for any further development.
Preston Parish Council	Policy S1 Cirencester Town	Footway and Cycleway on Kingshill Lane The Parish Council has lobbied for many years for a safe pedestrian and cycle route along Kingshill Lane mainly for children in the village to be able to access the Primary and Secondary Schools at Kingshill. The number of young families moving into the village is increasing giving rise to greater concern for safety. Currently the safe route recommended by Gloucestershire County Council takes young children across the Cirencester Road (A419) at times of day when traffic is heaviest and travelling very fast, along the road toward Tesco which is impassable due to flooding for several months of the year and then over the bridge into Kingshill Meadow Estate and through the old Beeches Estate. This is a ridiculously long journey and merely encourages people to risk the shorter route along Kingshill Lane which is very dangerous. Even with the 40mph speed limit near to the Schools, traffic actually travels at dangerously high speeds with no monitoring or means of prevention in place. Green Buffer Zone The Parish Council further wishes to see the retention of the green buffer zone between Kingshill Lane and Kingshill Meadow Estate. This will ensure that the distinctive character of the village of Preston is maintained as separate from the town of Cirencester. The current Local Plan sought to retain the integrity of small villages surrounding town and the Parish Council wishes to support this.

Respondent	Policy	Comment
Mr Hindle 401	Policy S1 Cirencester Town	Plan 2026 - 2041. I only identify a few matters, as I am not a landowner, or developer. Cirencester 1. The allocations I have identified above to be ref erred to. 2. In addition double check what the implied density agreed was on Chesterton, compared to the sought for unit size mix. As residential densities are generally encouraged to increase in Towns and Cities, it may be that more that my suggested, up to 2400 cap, can be further added to. 3. As the main Town, in addition to the Completions of Chesterton, a positive approach should be taken to Town Centre residential as part off fresh allocations. But I recognise that only an indicative figure could be given in relation to 'expected' residential in the Town Centre up to 2041. With the changes in planning Law there will also be an increase. without the need for planning permission. 4. Other existing site allocations should be carried forward in Cirencester, and appropriate sites considered on the fringes of the built up area, to appropriate criteria. This would be contestant, with scenarios 1,2 and 7, and overall also by focusing on Cirencester, after Morton the overall Cirencester proposals will reinforce the previous Strategic allocation via Chesterton development
Bob Sharples	Policy S1	Policy S1 – Cirencester Town: What is the justification for the open air swimming pool receiving contributions? There needs to be robust justification for this.
Mr Hindle 401	Policy S1	Related to Chesterton & Call for sites Town Centre Healthcare provision 1. A separate allocation in the centre of Cirencester should be included that would be to combine needs of the existing two premises of Cirencester Health Group, that are in the Town Centre. A possible funding mechanism could facilitated, as it would be part of a compressive redevelopment, and also assisted by CDC owning the site (Waterloo car park), where a possible location is indicated. At this stage only a Town centre allocation needs to be stated for the need, with the Cirencester Masterplan identifying the broad location.

Respondent	Policy	Comment
David Hindle	Policy S2: Strategic Site, south of Chesterton, Cirencester	In simple terms raise the 2350 by up to 50 units. (approx 2% - easy to accommodate - Allocate more free land for a Healthcare Centre, to accommodate both the existing Phoenix Surgery relocation needs, and the need generated by the site (at least 3 GPs and ancillary staff - landowners borrow the money and build Healthcare Centre, with The ICB paying rent and rates, for as long as needed to cover cost. - Then unlike the Tetbury 'model' the Healthcare Centre gets given free to the ICB. - The other Healthcare Centre for Cirencester I deal with under Strategic Infrastructure.
Bathurst Estate 175	Policy S2: Strategic Site, south of Chesterton, Cirencester	Support of the policy and retained site allocation. Following the amendments to the Use Classes order in 2020, the references to employment use B1, should be amended to Use Class E (g) (i, ii, iii). The reference to use Class B9 should be B8.

Respondent	Policy	Comment
Mr Hindle 401	Policy S2: Strategic Site, south of Chesterton, Cirencester	Local Plan call for sites - Feb 2024 (Call for Sites) As I am not a landowner, nor a developer with land purchase options. I am not therefore making 'call for sites' suggestions via the normally required form, but instead identify areas where I consider new allocations could primarily be considered, within areas I know best. This would be of relevance, primarily to site allocations for 2026 - 2041, as sufficient supply has been identified for up until 2031. I am looking at things from a planning perspective, having already submitted comments on all the current consultations, Plan ending 2031 I note that from the 2023 paper on residential availability, the expectation is that sufficient residential allocations, plus likely 'windfall' already exists for up to 2031. Notwithstanding that projection towards the end of the period may make it difficult to prove that a 5 year supply will then be maintained. My suggestion on an allocation is: Residential 1. On the Chesterton site up to an additional 50 residential units (only being 2%) are added, It would be made clear that this would be on the sole basis that it enables the following. Peripheral Healthcare allocation 1. Primary Care site allocation for a new Healthcare Centre to meet the combined needs of both Phoenix Surgery (Chesterton Lane), plus the minimum 3 Doctor premises (plus associated staff) provision already identified for Chesterton . The site would be enlarged safeguarded land given on the Chesterton site, given by Lord Bathurst (or new owners). A small site of around 0.2 hectares is safeguarded in the exiting Section 106 Agreement, relating to the need generated by Chesterton, (free is implied in the Section 106 agreement). The area identified in the Masterplan, identifies the location, but as a combined provision, to include the needs of Phoenix, significantly more free Healthcare land would be needed. The increased allocation of up to 50 more residential units would also need to cover: 1. Increased free land.
Bob Sharples	Policy S2	Policy S2 - Strategic site south of Chesterton, Cirencester Sport England is supportive in principle for contributions going towards sport and recreation, but this will need to be robustly justified through a robust assessment such as a playing pitch strategy and a built facility strategy.

Respondent	Policy	Comment
David Hindle	Policy S3: Cirencester Central Area Strategy	Somewhere in the text, the need for a new Healthcare Centre replacing the existing 2 existing centrally located premises for Cirencester Health Group, should have a mention
David Hindle	Policy S3: Cirencester Central Area Strategy	No issues, except suggest the deletion of 'out of centre' from I vi It would put cirencester at a disadvantage over other Towns, that are lager. Also I doubt that such sites could be found. Other proposals in following sections of the Central Area Plan look ok, but appropriate locations for visitors by car do need to be found.
Coates Parish Council	Policy S3: Cirencester Central Area Strategy	Policy S3 - 7.4.8, 7.4.11, 7.4.12 We disagree with the emphasis on discouraging use of the private car; reduction in public car parking capacity; redevelopment of car parks & the provision of a park & stride facility outside the centre. Cirencester & surrounding villages are dependent on each other for business & healthcare, which depends on accessing facilities by car.
Bathurst Estate 175	Policy S3: Cirencester Central Area Strategy	The focus away from retail uses to improving sustainability, diversity and integration within the Centre is welcomed. The reference to Masterplan Framework ensures that the new local plan aligns with the strategy within the Cirencester Town Centre Masterplan as the more detailed sub-policies which relate to the character areas are identified in the Masterplan.
Coates Parish Council	Policy S3	Policy S3 - 1.v, 1.vi, 1.xviii As we represent one of the town's surrounding villages, which largely relies on the private car for access to town, we do not support the modal shift in transport & movement, discouraging motor vehicles from the centre & instead providing parking outside the town. In fact, this will discourage large sectors of the local community from coming to town. Whilst we support other aspects of the Strategy, such as more evening activity, again this will depend on people travelling into the centre by car. For these reasons we do not support development in the car parks & are sceptical about the proposed public transport hub.
David Hindle	Policy S4: Down Ampney	revision to 7.5.2 as only one site remains.

Respondent	Policy	Comment
Andrew Scarth	Policy S4: Down Ampney	I fully support the change to the development boundary shown on Policy DS2 Map 7
Andrew Scarth	Policy S4: Down Ampney	I would point out that the land in question (DS2 Map 7) is not south of Charlham Way, it is south of the main street through Down Ampney. Charlham Way refers to five houses to the north of the main street between 4 Down Ampney and the bungalow New Grass just before Charlham Lane (numbers 1 to 5 Charlham Way postcode GL7 5RB, no other house has this postcode or Charlham Way in its address). The error seems to have been promulgated by Google who has merely picked up the street sign and assumed it refers to the whole of the main street through Down Ampney.
Geoff Tappern	Policy S4: Down Ampney	A list of non strategic infrastructure projects is proposed. This list is being modified now by the Parish Council
Bathurst Estate 175	Policy S4: Down Ampney	No comment

Respondent	Policy	Comment
Andrew Scarth	Policy S4	1. Down Ampney is still noted as a Principal Settlement although there have been changes since it was so designated. Paragraph 6.1.9 "The Principal Settlements listed in Policy DS1 have been identified as the most sustainable locations to deliver future growth, with Cirencester being the District's main centre by a very considerable margin. These settlements were selected on the basis of their social and economic sustainability, including accessibility to services and facilities. The availability of suitable land capable of delivering sustainable development during the Plan period also helped determine which settlements to include in the Development Strategy." In addition several of the paragraphs mention Principal Settlements when discussing Non-principal Settlements. For example, Paragraph 6.2.3 "● protect smaller settlements (and the open countryside) from larger scale development, which is more appropriately located in the Principal Settlements where there is better access to services, facilities, employment opportunities, and transport links." and Paragraph 6.3.3 "Due to the generally low levels of service provision, job opportunities and public transport availability beyond the Principal Settlements, many of the 160+ villages and hamlets (rural settlements) are not sustainable locations for residential development." A new assessment should be made. Down Ampney is no more sustainable than many non-principal settlements and should be re-designated. a. It has no employer or employment within the village; anyone employed who cannot work from home has to travel by private transport to his or her place of work. This necessitates mainly car travel as there is no public transport to any main centre of work (e.g. Cirencester, Swindon, Fairford, etc.) that would enable the individual to get to and from work in a working day. In fact, it is impossible to travel eastwards to Fairford and beyond and return the same day by public transport. b. Its facilities do include a village hall, a school, and a community-run shop, but no pub. c. The availability of land for development is neither more nor less that any other settlement, Principal of Non-principal, in Cotswold District. 2. In policy S4 there are a number of non-strategic (local) infrastructure projects proposed. These need updating. Referring to the Down Ampney Neighbourhood Plan would be a good starting point; there are a number of recommendations given in the various sections (for example IR1, IR2 and CR1). a. The level of through-traffic has increased considerably since the Local Plan was produced. Traffic safety improvements should be made including traffic calming at the entries and exits to and from the village and a pedestrian crossing near the school. The weight limit through the village should be reduced as stated in 5.6.2 on page 33 of the Neighbourhood Plan. b. The reference to links to the Folley and Down Ampney Pits should be removed: The Folley (the spelling should be The Folly) is an area of woodland outside the parish boundary. Down Ampney Pits are at the far south of the parish. Both areas are on private land, the latter very close to the proposed gravel abstraction on the old airfield. More realistic options for access to the countryside would be the examples given in Appendix 2 and recommendation CR1 in the Down Ampney Neighbourhood Plan.

Respondent	Policy	Comment
David Eglise	Policy S4	Down Ampney Policy S4 – the following extracts from the policy require further explanation (particularly the where abouts) of The Folley and Down Ampney Pits. A new natural open space is welcome. e.Improvements in links to The Folley and Down Ampney Pits, and existing pocket parks; and f. Provision of, or contributions to, a new natural open space or pocket park.
Sarah Basley	Policy S5: Fairford	No account taken of Fairford Neighbourhood Plan FNP9, Protecting the Fairford/Horcott Neighbourhood Gap. Paragraph 7.6.1 here implies that there is no need for this protected gap. Wording should be changed accordingly - Horcott is thus for the purposes of this policy NOT an integral part of Fairford.
Fairford Town Council	Policy S5: Fairford	We request re-wording of 7.6.1 "Fairford is one of the largest settlements in the District. Horcott lies a very short distance to the south-west of Fairford's built up area, separated by a Local Gap (designated by policy in the Fairford Neighbourhood Plan). Horcott is now part of Fairford parish although it used to be part of Kempsford.
Fairford Town Council	Policy S5: Fairford	Fairford Town Council is aware of potential schemes at Jones' Field and Horcott Lakes offering significant community benefits, which we would support in principle subject to appropriate specific conditions being attached to any Local Plan allocations.
Mr A. Pywell Plan-A Planning 240	Policy S5: Fairford	The Development Boundary to Fairford should be extended to include the land bounded by Totterdown Lane, Horcott Road and New Road, as this forms part of the existing built-up area. Paragraph 6.2.2 of the Reg 18 Consultation Draft Plan confirms that the "Development Boundaries essentially define the built-up areas of Principal Settlements". It is therefore an anomaly for the above area to have been excluded.
Plan A Planning Development Ltd 240	Policy S5: Fairford	Call for sites. The Development Boundary to Fairford should be extended to include the land bounded by Totterdown Lane, Horcott Road and New Road, as this forms part of the existing built-up area. Paragraph 6.2.2 of the Reg 18 Consultation Draft Plan confirms that the "Development Boundaries essentially define the built-up areas of Principal Settlements". It is therefore an anomaly for the above area to have been excluded.
Fairford Town Council	Policy S5	FTC requests amendment of the wording of a. to "Multi-Use Path between Fairford and Lechlade (route(s) to be finalised)"
Bathurst Estate 175	Policy S5	No comment
David Hindle	Policy S6: Kemble	7.7.4 'improved' should be 'decreased 7.7.3 refereeing to employment add 'Cotswold Airport'.

Respondent	Policy	Comment
Mike McKeown	Policy S6: Kemble	Increasing sustainable and public transport from Kemble station to locations with strong transport flows would make sense, such as cycle paths to Cirencester, including RAU and the Steadings, Cotswold Airport and Cotswold Water Park / Cotswold Lakes.
Bathurst Estate 175	Policy S6: Kemble	No comment.
Graham Hatfield	Policy S6: Kemble	Flooding and pollution. As an angler, dumping sewage into the Evenlode stream, will make all the fish and wildlife lifeless. Tell me why the rainwater and sewage are mixed together If our population has increased by 43% in 13 years why cant we have new houses in Kemble. It has less than 1000 population and a train station
Gallagher Developments 268	Policy S7: Lechlade-on-Thames	At this stage the Council acknowledge that the proposed updates to this policy "does not take into consideration of additional site allocations that may be required to delivers the updated requirements". We note the proposed removal of the strategic allocation L18B (land west of Orchard Close, Downington) for 9 net dwellings as it has been found to no longer be available for housing development. Gallagher Developments would like to take the opportunity to reiterate Lechlade's position within the settlement hierarchy can be directly achieved through the allocation of the Site at Land South Ferrers Park.
Keith Salway 428	Policy S7: Lechlade-on-Thames	Carpark: I am strongly opposed to any car park at LEC 3 which will not be used. It will despair the previous views the town and church as a[[reached from the east and must be cherished. (It is also very wet) I am not convinced that Lechlade has a parking problem. 1 before the 2 hour limited ford trades parking at memorial hall 2 parking in riverside - park for general areas 3 - riverside park over the bridge 4 formalise the mudding parking which are '-' on the Farringdon road.
Keith Salway letter rep 428	Policy S7: Lechlade-on-Thames	Lechlade Carpark: I am strongly opposed to any car park at LEC 3 which will not be used. It will despair the previous views the town and church as a[[reached from the east and must be cherished. (It is also very wet) I am not convinced that Lechlade has a parking problem. 1 before the 2 hour limited ford trades parking at memorial hall 2 parking in riverside - park for general areas 3 - riverside park over the bridge 4 formalise the mudding parking which are '-' on the Farringdon road.

Respondent	Policy	Comment
Lechlade Town Council 135	Policy S7: Lechlade-on-Thames	Response from Lechlade Town Council to CDC Local Plan Update Consultation with a focus on responding to Scenario 1 of the Vision, Objectives and Development Strategy Options Paper 1 The CDC Local Plan Update Consultation comprises a number of documents published for consultation, as follows: 2 Executive Summary, Consultation Instructions and Questions 3 Local Plan Reg. 18 Consultation Draft Policies Tracked Changes (and a version with changes accepted) 4 Vision, Objectives and Development Strategy Options Topic Paper 5 Towards a Framework Masterplan SPD for Cirencester Town Centre (Draft) 6 Integrated Impact Assessment (IIA) Cotswold LPU Interim IIA Report 2024 7 Integrated Impact Assessment (IIA) Points of Compass Appraisal 8 Strategic Flood Risk Assessment Level 1 Draft Report 2023 with updated mapping (2023 update) 9 Lechlade Town Council previously responded to consultation on CDC SHELAA Lechlade Site Assessments in January 2022. Its response made clear that the Lechlade Neighbourhood Plan was fully supportive of existing local plan allocations to 2031. It sought the opportunity to more fully consider the sustainability of making significant allocations for the period beyond in relation to an update to the Local Plan. 10 This response focuses on the opportunity to start to review the position of Lechlade as a Principal Settlement, within the context of Scenario 1 of the Vision, Objectives and Development Strategy Options Topic Paper, which considers meeting future housing needs through allocations in Principal Settlements. Review of the position of Lechlade as a Principal Settlement 1. A key point needs to be recognised at the outset, which is that for the most part, notions of sustainability in relation to the Principal Settlements of the Cotswolds are mostly relative to the development strategy of the Cotswolds, in common with many other rural districts, was more about making the best of a poor situation – dispersed development, too few employment opportunities, poor public transport. This is not a criticism but reflects reality. 1 Lechlade is an excellent case in point. It was made a Principal Settlement in the adopted Local Plan and attracted some housing site and employment site allocations to support housing delivery. At the time, it was one of the nine largest settlements in the district with over 2,000 population (based on the broader area covered by the two LSOA which make it up) – the built-up area of the settlement itself now has around 2,200 people (2021). 2 The CDC Role and Function of Settlements Study (2012) used information from 2001 and 2011 Census, and other survey data, to assess the role and functions of the larger settlements. This supported the designation of Principal Settlements. Some of this data shows how, at the time, the sustainability of Lechlade as a location for significant development was questionable. 3 The study examined settlements from the perspective of employment and people, retail and community facilities, and in terms of travel relationships. The sections below examine in more detail and provide updated information. Employment and People

Respondent	Policy	Comment
Rosemary Hahcke 416	Policy S8: South Cerney	1. Too much traffic in Broadway Lane and the Leaze. 2. No public transport runs in Broadway Lane and nearest bus stop too far to walk to for the elderly or infirm. 3. Condition of roads very poor. 4. Amount of traffic in the Leaze since new estates built. Further building planned. Road needs to be opened again to achieve two entrances. 5. Look at car parking in High Street on shopping areas. 6. I have been informed that building will continue for another 3 years. The Leaze can not cope.
Juliet Layton	Policy S8	New development in South Cerney will have to be sensitively placed and great consideration taken with regard to flooding, both pluvial and fluvial and the very high water table, Recent development has caused issues of flooding from the Churn up to and beyond the Spine Road. Lakeside Business park is successful but the parking is totally insufficient and no bus passes this way to alleviate the traffic.
David Hindle	Policy S9: Tetbury	!0.7.7 A flat safe route for pedestrians accessing the continuation of the Bridleway would need to be provided,, as a footpath will not be deliverable alongside the new vehicle access , as the width is insufficient for a pavement, and pedestrians use the part of the Bridleway that would be affected, as a flat and safe route. ----------This is additional to my request that reference is also made to also including the protection of safety for pupils using the Secondary School, and safe, and unobstructed access to vehicles needing to access the school, including buses.._____I looked at the site today and it is obvious that the Bridleway is too narrow for a pavement. In addition its narrowness does appear me to make access via it questionable. With regards to the footpath it is not clear if it is through the trees, or is part of the Bridleway. Whatever the situation pedestrians currently use the Bridleway. Therefore this is an additional area of conflict in changing the Bridleway into a pedestrian access. I predict opposition to this, unless a flat and safe way to access the remaining part of the Bridleway, that is.also used as a footpath is included, as part of development proposals.
David Hindle	Policy S9: Tetbury	7.10.7 having revisited the site, I note that the best solution may be a one way system, with access from re-designated part of Blind Lane. Then exit via a road opposite the vehicle exit to the school. As this will be a matter for later decision, it is still fine to note that: Change in status of part of Blind Lane, would need to be accompanied by a safe pedestrian route to the remaining By-way. And the safety of Pupils, and appropriate traffic measures would need to be included. adjoining, and for Lowfield Road.

Respondent	Policy	Comment
Ruth Hall 155	Policy S9: Tetbury	Thank you for consulting Wessex Water on the Cotswold District Council Local Plan Update. Wessex Water serve a limited area of the Cotswold District with wastewater services (principally Tetbury and surroundings). We note the proposed updates to Policy S9: Tetbury. No additional allocations are proposed.
TETBURY TOWN COUNCIL	Policy S9: Tetbury	Tetbury Town Council Response to consultation on CDC's Local Plan Firstly, we should like to congratulate CDC on producing such a detailed update on its local plan. The amendments are comprehensive and fully supportive of "green to the core". We are fully supportive of the need for good infrastructure which includes effective public transport that meets the needs of the local community as well as facilitating cycling and walking. Loneliness is an increasing problem in many communities. We are supportive of the development of neighbourhoods designed as communities with infrastructure such as pubs, cafes and shops to reduce loneliness. We are also supportive of the focus on renewable energy. However, this needs to be put in place with sensitivity so as not to compromise Areas of Outstanding Natural Beauty. In relation to the management of green spaces, responsibility needs to be clear and if this is in the hands of town and parish councils, realistic funding must be set aside by the developers to support this work. In relation to the short section on Tetbury, there are inaccuracies in the text which must be corrected: 1. Tetbury does not have any banking services and has now lost its mobile bank. We would welcome support for setting up a banking hub in the town. 2. Tetbury has a poor public transport system. There is no local transport to enable residents get from the outskirts of the town into the centre. The need for this is exacerbated by a significant lack of car parking in the town so residents with cars cannot park if they drive into the centre. Public transport to other towns in the Cotswolds is inadequate in frequency and hence is not used sufficiently. 3. Currently, there is no longer a need to increase local education facilities. However, any significant increase in housing would lead to a demand for more primary school places. 4. There remains a need, as identified in the consultation of Tetbury and Tetbury Upton's Neighbourhood Plan, for bungalows as well as more social housing and properties to rent. The council would be fully supportive of measures to reduce the number of AirBnBs in and around the town through a significant increase in council tax for second

Respondent	Policy	Comment
Blue Fox Planning (representing Redrow Homes)	Policy S9: Tetbury	The site at Hampton Street benefits from an allocation in the LPPU under Policy S9:Tetbury, and is noted as 'T31B Land adjacent to Blind Lane (indicative capacity of 43 dwellings net)'. The allocation of this site is supported by this representation and remains deliverable and achievable, both as a standalone site, or part of the wider site development of 120 dwellings. It is considered that the comprehensive, wider allocation of the site, would achieve a sustainable growth opportunity for Tetbury. The delivery of the wider Redrow site, including the phase 2 development alongside the existing allocation, would provide the opportunity to deliver a wider range of benefits and opportunities. Both the allocated portion of the site and the Phase 2 development area are suitable, deliverable and achievable within the remaining plan period to 2031, either as a phased development programme, or as a full site delivery strategy. A call for sites form has been submitted to CDC as part of this wider consultation exercise. This confirms the availability of the phase 1 site, subject of the current and emerging allocation, and promotes the wider landholding for allocation through the local plan process.

Respondent	Policy	Comment
Mr Hindle 401	Policy S9: Tetbury	Plan 2026 - 2041. I only identify a few matters, as I am not a landowner, or developer. Tetbury (where I live) Site A. The best area for growth would be the large 2 fields, that run alongside London Road, and adjoin. the large grassed area in front of Highfields Farm. The housing would need to be set away from this boundary, and set back from London Road. It must also be set back beyond the existing path that crosses the first field, and links to the grass area in front of Highfield Farm. The left over area in the first field already has trees and shrubs within it, and the remainder adjoining the footpath the would be an excellent wildflower or meadow area, not to be part of the residential. The residential would also need to be set back from the tree line that would form the rear boundary. That would be in order to minimise the visual impact from the rural area beyond. The other boundary would end before the third field adjoining Cherington Lane, which would be appropriate to retain as a visual buffer, logically with wild flowers or meadow area. I suggest this land as it is flat, rather gently rolling. It would also broadly align with the residential on Cirencester Road, and the new Rugby Pitch on the other side of London Road (although that is not easily visible). It would also be very close to the new Healthcare Centre, and is on the Tetbury side where the large TESCO store is. In terms of Landscape Sensitivity, that is present, but to a much lesser extent than other peripheral areas of Tetbury. The key would be careful design, layout, and setting in. I would expect the density to be on low, as I would anticipate it including the necessary wildlife/wild grass areas; setting back; and shared amenity space, and in real terms including all 3 fields, but with substantial visual, and wild flower and meadow grass areas. I think that the land is owned by the Duchy (now William as the heir). As the Duchy do own a lot of land within CDC, the Duchy should be notified of the consultations, if that has not already been done. It is possible that they may not know. Site B. A second area, that I do not know who it is owned by, is part of the field(s) adjoining Tetbury Hospital, and adjoining part of Monarchs Way. Looking at this from Tetbury itself, it looks that it would be largely not visible. Or it would look just as 'natural', as Tetbury looks from the Tetbury Trail, or Tetbury looks from the high ground. Setting back from the 'edge' would be needed, as would be the case from the Listed Tithe barn, and its associated buildings (some I think include residential) that adjoin the Monarchs way, that at this point runs down to Tetbury Hospital, after it has turned a right angle, adjoining the buildings that adjoin the Tithe Barn. Care would be needed regarding long views of St Mary's Church.

Respondent	Policy	Comment
David Hindle	Policy S9	In the pre-amble before the Policy starts,, note that the Settlement Boundary will need to be changed to include the Healthcare Centre and Residential - Suggests it runs tightly along the back gardens, and along the side of the Healthcare Centre. It would then miss the landscaped areas, trees, path and Worwell Farmhouse access. - 7.10.7 add in something about the access to the Blind Lane development also not conflicting with the safety of pupils to the adjacent school, and not resulting, and vehicles accessing or exiting it. - non strategic infrastructure add - A new burial ground by 2031, as the existing one is approaching capacity. - Support for community transport.
Liz Farnham	Policy S9	Recent development within the town has placed additional pressures on burial provision for residents of Tetbury and Tetbury Upton. The graveyard at Saint Saviours is approaching capacity. Developers of significant scale developments should be asked to contribute land for a new burial ground within the area covered by the Neighbourhood Development Plan and smaller developments should contribute funding towards testing and commissioning the land or creating additional.capacity within Saint Saviours. More public transport is required to connect Tetbury to transport hubs such as the railway station at Kemble and National Coaches at Cirencester. Also, we want to do more to connect to local cycling networks. The Dolphins Recreation Centre Trust requires support for a "village hall" befitting the second largest settlement in the District. Investment in sports clubs is required for the health and wellbeing of residents of all ages and abilities.

Respondent	Policy	Comment
Nikki Ind	Policy S9	Tetbury has changed a lot in recent years with an increase in population and not enough associated infrastructure. 7.10.1 - there are no longer banking facilities in the town - although we do have a post office. In addition, there are limited employment opportunities, particularly for young people, who may wish to undertake an apprenticeship and find they have to travel for work with limited access to regular, connected, public transport. Transport services, including accessible transport, within the town is also an issue for many residents too. Lowfield Road 7.10.7 - if Lowfield Road is to be the access for any housing allocation on land adjacent to Blind Lane, mitigation is vital, as this residential road was never built for the volume of traffic being seen, particularly at school drop off/pick up time and at weekends when the sports hall and sports pitches are busy. 7.10.9 - Dolphins Hall - with phase 1 nearing completion the town now needs phase 2 to be delivered - providing the community facility that the second largest town in the District deserves to serve it's residents. There is no mention of burial land, however, with St Saviours churchyard nearing capacity - allocation of land for this purpose should be considered.
Bob Sharples	Policy S9	Policy S9 Tetbury Sport England is supportive in principle to improving the community hub at the Dolphin Hall and improving leisure provision within Tetbury.
Prue Leith	Policy S9	If there are to be any more housing in Moreton, there will need to be a by-pass, but a by-pass just around Moreton won't stop the contstant blockages between Stow and Moreton. It would need to circumnavigate both towns.

Respondent	Policy	Comment
Sean Lewis	Policy S9	The amendments to the supporting text to this policy highlight that Tetbury has a thriving town centre, which is supported by the Tesco supermarket to the north of the town. Tetbury has a wide range of key amenities and has further potential to accommodate housing needs that will strengthen the vitality of the town, and according to the Town Council has a need for housing for the local community. 49. It is requested that Policy S9 is updated to include the allocation of the Site for the provision of up to 180 dwellings. A draft policy wording for inclusion in the LP Update is set out at Figure 1 below. 50. Discussions with Tetbury Town and Parish Councils highlighted that an extension to the Dolphin Hall remain on the local list of infrastructure requirements. The proposals have the potential to contribute towards funding this extension. 51. It also became clear during the discussions that Chavenage Lane is a popular walking/cycling route for local residents. The loss of a local convenience van serving teas and coffees, known as the Wild Carrot, no longer serves food and drink products to pedestrians/cyclists in this area. The Site has the opportunity to accommodate the Wild Carrot or a similar facility in its southernmost parcel, providing an opportunity for integration and community enhancement. Policy S9 TETBURY Allocated housing development sites • T31B Land adjacent to Blind Lane (indicative capacity of 43 dwellings net) • T51 Northfield Garage (18 dwellings net) • Land South of Hampton Street, Tetbury (up to 180 dwellings) Established employment sites: • Tetbury Industrial Estate (EES38) • Hampton Street Industrial Estate (EES39) • Priory Industrial Estate (EES40) The following non-strategic (local) infrastructure projects are proposed: a) Renovation of the Good Shed for community space / workshops; b) Improve community hub at the Dolphins Hall c) Improve leisure provision d) Improvements to local education facilities
Bathurst Estate 175	Policy S11: Bourton-on-the-Water	No comment.

Respondent	Policy	Comment
Guy Wakefield, Ridge (on behalf John Hackling Holdings) 243	Policy S11: Bourton-on-the-Water	Bourton-on-the-Water is a Principal Settlement with good transport connections. It has access to key transport routes. The A429 runs along the western boundary of Bourton-on-the-Water and provides access to nearby settlements of Stow-on-the-Wold (9-minute drive along the A429 to the northeast), Moreton-in-Marsh (18-minute drive along the A429 to the northeast) and Northleach (10-minute drive along the A429 to the southwest). Moreover, Cheltenham and Cirencester are both under a half an hour drive away. The accompanying text for the policy at 7.13.3 acknowledges that "Although Bourton-on-the-Water is heavily reliant on tourism, the village does have other significant employment opportunities, notably at the substantial industrial estate, which is well-used and helps to diversify the local economy". The importance of Bourton Industrial Park should not be underestimated both in the local and district wide economy. Over the current plan period there has been a significant amount of new residential development in Bourton-on-the-Water, comprising almost 500 homes. Extensive residential development should be supported by an appropriate scale of infrastructure to support the increased number of residents. Further, employment development should be allocated and developed at a similar rate to residential, to support new residents access to jobs in their locality. The policy explains that Bourton-on-the-Water heavily reliant on tourism. However, it is important to consider the need for additional employment opportunities. Diversifying the settlements employment offering reduces the area's economic vulnerability. Hacklings are a key employer within Bourton on the Water. They are currently considering their medium-term ambitions (the next 8-15 years) for the businesses looking forward. It is imperative that businesses have certainty that they will be able to expand their operations in their current location. If businesses do not have this level of certainty then the only alternative is to relocate their business, which would have a detrimental impact on the local economy. Hacklings are very keen to stay within Bourton-on-the-Water, as they believe their connection with the area and employment of local employees is integral to their success. As such, they are actively promoting land to the north of Bourton Industrial Estate. The subject sites allocation for future employment growth will provide Hacklings with the necessary security to continue is residency in Bourton-on-the-Water. It will provide the company with some security for additional employment provision in a planned way beyond the Plan period. This is supported by national policy. Paragraph 85 of the National Planning Policy Framework states that "planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." The site being promoted by Hacklings is directly adjacent to the proposed settlement boundary of Bourton-on-the-Water and the existing Industrial Estate. It is therefore a suitable and sustainable location for employment development being located within a principal settlement. Whilst it is acknowledged that there will be a subsequent Local Plan Review, very little information is provided within it on how the need for additional employment land will be met. An extension to Bourton Business Park as proposed by Hacklings would be a logical addition. It is adjacent to the existing Bourton Industrial Park to the south. In fact, the new proposed Industrial Park boundary has been amended to extend so that it sits adjacent to the subject site. The northern border of the subject site comprises hedgerow, which would create a strong and distinctive defensible boundary. This boundary would distinguish between employment land and open countryside, legibly rounding off of the northern edge of Bourton-on-the-Water, with the site being viewed in the context of existing built form. [illegible]

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy S11: Bourton-on-the-Water	Policy S11 - Bourton on the Water 3.53. This policy is mostly proposed to remain unchanged, with the exception of the removal of the allocated employment site at land north of Bourton Industrial Estate, and a multi-purpose community centre. The rest of the policy has already been found sound as part of the examination of the Local Plan. 3.54. Notwithstanding, as a Principal Settlement, allocations should be made for additional residential development to meet the pressing need for housing within the district. Land north of Moor Lane is considered to be an optimal and highly sustainable location for residential development. The merits of the site are discussed in Section 5 of this report. [call for sites submission].
Fransica Sankson 422	Policy S11: Bourton-on-the-Water	Development - Moreton, Stow or Bourton do NOT have the infrastructure for the homes, Doctors, Schools, roads, SEWAGE etc. The houses are not for the people that want/need to work in the areas too expensive for basic salaries. We do not need more executive homes at nearly £400,000. Doctors - already long need times School - already full and any new build would be an important school playing grounds. Sewage - already beyond breaking point. Roads - Fosseway cannot cope. Housing - NOT for young/ or most jobs available in the area that have a lower salary. BNG should be in the areas not sat somewhere totally different. Houses should be affordable to those earning 25k a year. They should be fully sustainable with solar panels / re-use water / sustainable heating. Big sites should have the infrastructure to support the numbers of people and cars. Houses should be built on brown sites – not - farmland.

Respondent	Policy	Comment
Stow on the Wold Town Council	Policy S13: Stow-on-the-Wold	This email forms part of Stow on the Wold Town Council's response to the current consultation on CDC's Local Plan and its Update exercise. It covers concerns that cannot be adequately addressed by responses to the preset questions in Cotswold District Local Plan Update Consultation Executive Summary and Consultation Instructions and Questions. Answers to those preset questions have been submitted separately via the participation platform. The existing Local Plan shows little understanding of the exceptional problems Stow faces. For years and years Stow has suffered from the unintended consequences of well meant but repressive policies aimed at preserving Stow's beauty and that of the surrounding countryside. Those consequences have been bleak leaving Stow with a starkly aging and declining population and crises in housing and parking. Against this all the Existing Plan offers is platitudes and support in principle for a Town Museum and a new community facility without any indication as to how they might be created. We might have hoped that the drafts now before us might have taken on board the evidence and policies of our Neighbourhood Plan. Far from it. The draft policies section of the update does nothing substantive to address Stow's needs and confines S13 policy to a simple regurgitation of the wording of the Existing Local Plan's support in principle for a Town Museum and a new community facility. If this is all CDC can offer Stow then we face a further sixteen years of benign neglect and further decline in our community's sustainability. CDC needs to rethink and accept that our town is more than a piece of cultural heritage set in a National Landscape and develop positive policies that address the needs of our population. CDC also needs to recognise that the proposition that small rural exemption sites would cater for Stow's needs is fallacious. There is an acute scarcity of such sites and little reason to assume that any further ones will come forward. Stow badly needs a significant provision of socially rented accommodation to counteract the declining numbers of children, young people, working families and key workers who cannot afford to live here given the present housing market. The spoilation of one of the finest market squares in the country used as a giant parking lot must be addressed by the provision of substantial off-street parking as must the need for a community building that caters for modern requirements. These needs get no more than lip service in CDC's Strategic Options paper which also proposes an even more restrictive planning approach to the National Landscape and the further grotesque overdevelopment of Moreton in Marsh. Stow should be treated as an exception to the former, and we oppose the latter which would further blight Moreton and add to the already heavy congestion on the Fosse as it passes through Stow. The 1500 dwellings proposed for Moreton on top of the substantial developments already agreed would put unbearable strain on local infrastructure. CDC's [illegible]

Respondent	Policy	Comment
Bloor Homes Western 244	Policy S13: Stow-on-the-Wold	There is clearly a need to locate development in the most sustainable settlements, of which Stow is one of these. However, the current Local Plan does not allocate any sites for housing within Stow, which means there has been no real affordable housing delivered within town for a significant period of time. Indeed, Stow on the Wold has not benefited from a material increase in the number of affordable dwellings in the current Local Plan period. The emerging Neighbourhood Development Plan (NDP), which is at Examination at the time of preparing these representations, has recognised this problem and seeks to positively address this situation by proposing a mixed-use allocation on 'Land North East of Stow' including 170 dwellings of which 40% would be affordable. There is, however, an opportunity for the Local Plan Update to extend this NDP Draft site allocation to incorporate adjoining land (to the North East) in neighbouring Broadwell Parish to create a truly comprehensive development to the north of Stow, which would help to further meet the wider affordability crisis within the district. Please set out any alternatives or changes you are seeking, using a continuation sheet if necessary. Additional residential sites should be allocated within Stow including an extension to the proposed allocation on Land to the North East of Stow within the submission Neighbourhood Development Plan.
Fransica Sankson 422	Policy S13: Stow-on-the-Wold	Development - Moreton, Stow or Bourton do NOT have the infrastructure for the homes, Doctors, Schools, roads, SEWAGE etc. The houses are not for the people that want/need to work in the areas too expensive for basic salaries. We do not need more executive homes at nearly £400,000. Doctors - already long need times School - already full and any new build would be an important school playing grounds. Sewage - already beyond breaking point. Roads - Fosseway cannot cope. Housing - NOT for young/ or most jobs available in the area that have a lower salary. BNG should be in the areas not sat somewhere totally different. Houses should be affordable to those earning 25k a year. They should be fully sustainable with solar panels / re-use water / sustainable heating. Big sites should have the infrastructure to support the numbers of people and cars. Houses should be built on brown sites – not - farmland.
Blockley Parish Council	Policy S15: Blockley	7.18.1 GP services no longer available (surgery building not returned to full use post-covid and has recently received consent to change of use to residential accommodation (24/00139/FUL).
Blockley Parish Council	Policy S15	Upper Rissington Business Park incorrectly mentioned here.

Respondent	Policy	Comment
Blockley Parish Council	Policy S15	An allotment has site has already been secured by Blockley and District Allotment Association (registered charity) on a 999-year lease basis. The Parish is in need of additional space for a burial ground. Improvements to footpaths and cycle paths are still sought, particularly to improve access between villages in the parish and access to the employment sites and o services offered at the business parks in Draycott and Northwick (nr Blockley). The re-instatement of a bus-stop that serves Northwick Business park (and enhancements to the safety of the stop location) are currently being pursued with GCC highways, by local councillors. Facilities for youth continue to be lacking and should be considered when any significant development takes place. In the meantime, this group may be better served with improvements to public transport and access to existing local facilities.
Chipping Campden School	Policy S16: Chipping Campden	The School, as a major employer in the town, would support a stronger supply of mid-market and affordable housing that younger people and younger families could afford. This would help balance the existing aging population and widen the choice of housing. Much of the existing stock is upper market larger dwellings or sought after historic and listed buildings, which when coming to market attract similar purchasers to those who have departed. There should be a limitation on new homes being bought as second homes or as holiday letting properties. As commented elsewhere in our responses we support the provision of traffic solutions for the benefit of the town generally as well as the School. We believe our new Cidermill Theatre supports the tourism industry in the town with such nationally recognised annual events at the Music and Literary Festivals. Our proposal for our existing car park would also support the tourism industry.

Respondent	Policy	Comment
Keyna Doran	Policy S16: Chipping Campden	Point 7.19.3 (as follows) is confusing: It talks about protecting Campden's landscape, etc. and states 'This will enable young people to take-up local employment opportunities and help to provide sufficient accommodation for an economically active population that supports the local economy. The additional housing will also help to sustain existing services and facilities', this statement doesn't have the necessary context to explain how the former will lead to the latter. Having identified that Chipping Campden has an aging population and saying 'Furthermore, the proportion of people in senior management positions is high, which is perhaps a reflection of the high average house prices in Chipping Campden.' there are no suggestions as to how we redress the balance. The obvious answer is to provide more social and/or affordable housing to allow younger/working people to live here, but this is out of our hands, particularly when planning permission is granted on Green Belt land and brownfield sites are being land-banked by developers, in order to gain planning on more desirable sites. There does sometimes seem to be a disconnect between the planning committee and the needs of local communities, meaning the local voice can be dismissed/unheard, despite the fact we live here and are more aware of our needs. Finally, in respect of Social Housing - Housing Associations are routinely ignoring Covenants on houses, some of which state they are for working people with local connections and working. In future Housing Associations should be made to register any Covenants with the Land Registry, to ensure this practice stops. This should be a legal requirement, prior to the appointment of any Housing Association, as it will help to maintain the economic viability of our towns.

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Keyna Doran	Policy S16: Chipping Campden	Point 7.19.3 (as follows) is confusing: It talks about protecting Campden's landscape, etc. and states 'This will enable young people to take-up local employment opportunities and help to provide sufficient accommodation for an economically active population that supports the local economy. The additional housing will also help to sustain existing services and facilities', this statement doesn't have the necessary context to explain how the former will lead to the latter. Having identified that Chipping Campden has an aging population and saying 'Furthermore, the proportion of people in senior management positions is high, which is perhaps a reflection of the high average house prices in Chipping Campden.' there are no suggestions as to how we redress the balance. The obvious answer is to provide more social and/or affordable housing to allow younger/working people to live here, but this is out of our hands, particularly when planning permission is granted on Green Belt land and brownfield sites are being land-banked by developers, in order to gain planning on more desirable sites. There does sometimes seem to be a disconnect between the planning committee and the needs of local communities, meaning the local voice can be dismissed/unheard, despite the fact we live here and are more aware of our needs and difficulties. Finally, in respect of Social Housing - Housing Associations are routinely ignoring Covenants on houses, some of which state they are for working people with local connections. In future Housing Associations should be made to register any Covenants with the Land Registry, to ensure this practice stops. This should be a legal requirement, prior to the appointment of any Housing Association, as it will help to maintain the economic viability of our towns.
Arthur Cunynghame	Policy S16: Chipping Campden	17.19.3 In my opinion the building of more houses doesn't "enable young people to take up local employment opportunities" because local jobs are by-and-large low paid and houses in Campden are generally expensive. Social housing at 80% of market price is often still out of the reach of lower paid workers. At the Moreton event I was told that this 80% is fixed by central government, so a discussion needs to be had between local councils and the government to review this. CPRE have suggested that "affordable" be redefined in line with local incomes not market rates and it seems to me that this has merit. 17.19.8 Such a review of HGVs is vital and indeed a paper has been submitted by Campden Town Council outlining concerns and solutions regarding both HGVs and road signage. 17.19.9 A railway station at Campden would serve little purpose as the site is some distance from the town. Residents would therefore drive to the station, in which case they might as well drive to Moreton or Honeybourne. An additional station on the line would slow train times.

Respondent	Policy	Comment
Highways England 133	Policy S16: Chipping Campden	Policy S16: Chipping Campden Reference to a potential new railway station opening at Chipping Campden has been removed from the Regulation 18 consultation draft. We understand that this reflects its removal from a potential major infrastructure schemes list as part of the Local Transport Plan. National Highways seeks clarification regarding the potential impact on the surrounding highway network as the opportunity for modal shift by rail at this location will be reduced.
Bathurst Estate 175	Policy S16: Chipping Campden	No comment

Respondent	Policy	Comment
Cotswold Charm 210	Policy S16: Chipping Campden	2. Chipping Campden: a. Chipping Campden School – education comments above already apply – the traffic chaos caused by buses to the school and traffic from BRi (this and the school are the major employers in the town). b. Employment - Evesham and Stratford upon Avon are major sources of employment for many Chipping Campden residents. There is a need to extend sustainable employment opportunities in Chipping Campden and the local area. i. Public Transport services – 1. Bus timetable between Stratford upon Avon and Moreton in Marsh a. Needs improvements during the week. b. Currently no service whatsoever provided on Sundays when many visitors want to catch a train back to London from Moreton in Marsh. 2. Bus timetable to Evesham is essentially non-existent. ii. Campden Rd/B4632 to Stratford upon Avon road – 1. This is the route used by the majority of people from Chipping Campden to get to Stratford upon Avon and cross the River Avon at Clopton Bridge. 2. It is also the major HGV Route 3. Existing residential development at Quinton and Long Marston Airfield (let alone future proposed expansion) have all been carried out without any improvement/increased capacity to this road itself and its main restriction at Clopton Bridge. It is now not uncommon to take one to an hour (or a lot more) get to Stratford upon Avon. 4. There appears to be an ever increasing number of accidents between Mickleton and the Waitrose roundabout at Stratford. c. Re-opening of Railway Station at Chipping Campden in conjunction with the old Honeybourne to Stratford railway link. i. This would provide much better – 1. Employment access to both Evesham and Stratford, etc. 2. Visitor access to Chipping Campden from both Birmingham and London and thus help support/develop/sustain the local economy. 3. Reduce the number of buses taking children to Chipping Campden School. 4. Reduce the traffic using Campden Rd/B4632 to Stratford. 5. Reduce the impact of traffic affecting the historic buildings in Church Street. d. Housing – there is a need for - i. Housing that local people and local wages can afford, be-it “Affordable”, “Social”, shared equity/rental. ii. Housing that enables older and medically challenged residents to move from (release) their current housing into more suitable accommodation e.g. bungalows, adapted units. iii. Planning Permission - reduce the impact of second homes/holiday cottages (e.g. ABNB) on the housing market.

Respondent	Policy	Comment
Arthur Cunynghame	Policy S16: Chipping Campden	17.19.3 In my opinion the building of more houses doesn't "enable young people to take up local employment opportunities" because local jobs are by-and-large low paid and houses in Campden are generally expensive. Social housing at 80% of market price is often still out of the reach of lower paid workers. At the Moreton event I was told that this 80% is fixed by central government, so a discussion needs to be had between local councils and the government to review this. CPRE have suggested that "affordable" be redefined in line with local incomes not market rates and it seems to me that this has merit. 17.19.8 Such a review of HGVs is vital and indeed a paper has been submitted by Campden Town Council outlining concerns and solutions regarding both HGVs and road signage. 17.19.9 A railway station at Campden would serve little purpose as the site is some distance from the town. Residents would therefore drive to the station, in which case they might as well drive to Moreton or Honeybourne. An additional station on the line would slow train times.
Arthur Cunynghame	Policy S16	I believe that significantly more than 36 dwellings are proposed on land at Aston Road. An alternative site for new houses within Chipping Campden parish is the old Polish Camp on the A44. A sizeable new village could be accommodated here complete with a convenience store and some social amenities. This would avoid the detrimental effect of significant new housing within Campden itself which does not have the road infrastructure to accommodate many additional dwellings and most sites would add to the drainage and flooding problems experienced by the town.
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Timothy Phillips	Policy S17: Mickleton	S17 Mickleton has lost the post office. The roads have become increasingly busy with the effects of the developments at Meon Vale (Stratford District) and now nearby further housing for Wychaven DC. There has also been approval given for more volume at the recycling area just outside the village by Worcestershire County Council which has created more commercial vehicle traffic use in the area. The new housing built has seen an increase in vehicle movements not just by residents but delivery vehicles as well. The development of the new housing has created some new open spaces that are greatly valued. The upkeep cost of these born by the residents for the benefit of all. New building does not create a society just by allocating a set percentage of housing types. It can help in a balance of need bt not in how people behave. Employment opportunities are negligible in the village so transport, private or public is necessary. No improvement of the infrastructure will not help if it not designed in.

Respondent	Policy	Comment
Andrew Brian Crump	Policy S17: Mickleton	This is out of date, There is no longer a Post Office in Mickleton and the bank in Chipping Campden has now closed, meaning that many elderly people, and others who do not use online banking will have to travel at least 7 miles to get to a bank. The infrastructure has shrunk in recent years. Why has paragraph 7.20.04 been ruled through? What possible confusion could be caused from the simple statement that zero development was prefaced on the basis of the development constructed during the plan period? The Preferred Options Paper from 2013, which preceded the adoption of the Local Plan in 2018, stated that 80 was the figure of dwellings suitable for Mickleton, yet 257 were then constructed. The confusing aspect , in my view, is why CDC have struck through this very clear paragraph. It is odd that CDC should argue that residents of Campden Vale Ward will qualify for Social Housing at Meon Vale, yet this will have no bearing on proposals of Mickleton. The settlements are just over 2 miles apart, and clearly any objectively assessed affordable housing need that can be met by Meon Vale should have a direct bearing on Campden Vale figures.
Clare Charlton	Policy S17: Mickleton	I think there needs to be improved bus services to Stratford and Evesham (there is no service to Evesham currently) as these are more valuable employment locations than Campden.
Clare Charlton	Policy S17: Mickleton	7.20.5; I think the Meon Vale and Long Marson airfield developments DO have a bearing on Mickleton in terms to transport/traffic in the village AND access to Stratford UA for local hospital services, shopping etc.
Clare Charlton	Policy S17: Mickleton	A significant number of children access Mickleton school from Meon Vale adding to traffic issues in the village. There needs to be consideration of a decent active travel route from Meon Vale to the school to reduce traffic congestion.
G C BAYLEY	Policy S17: Mickleton	The allotments in Mickleton are a much loved community resource and have been for centuries. The land is owned and managed by an ancient charity and it would be entirely inappropriate for it to be used for housing development. Despite a lot of development already in the village there are still other sites which are far more suitable for development if necessary.
Caroline Byrne	Policy S17: Mickleton	Removal of 7:20:4 causes concern, since the adpoted plans of 2011-2031, there was a SHELA in 2021, which identified large blocks of land and potentially over 200 properties with cars flowing on the very narrow lanes (MK12,MK13,MK18,MK20 ON TO Broad Marsden Rd (with school traffic) and Chapel lane in to the village. Similarly MK11 of about 150 on the existing allotments surely is against community/mental health/green space/low carbon activity policies - moving the allotments further out of the settlement will create car usage. Mickleton does not have the infastructure for further development. It has lost a shop and Post office, so only has one shop. Has no health facilities. The roads are very narrow within the settlement. Your plan is confusing as to if these parcels of land per 2021 SHELA are still under consideration for development or have been shelved.
Timothy Phillips	Policy S17: Mickleton	Mickleton justification for increases is not validated by up todate specific information of need that can be found or demonstrated in the District Council submission. In fact this is comment that could be addressed across the board. Where is the up to date specific need shown? Who are the segments of society per area? No information of this nature has been made readily available.

Respondent	Policy	Comment
D Elton	Policy S17: Mickleton	I think that the allotments should be left alone. They have been there for a very long time and worked on by many people who have invested time and money in developing crops and fruit trees, setting up greenhouses and community huts which have been very important in encouraging families, especially the children. to take an interest in nature and growing their own fruit and vegetables. In fact there is an allotment kept especially for local children that they would miss. I should also like to add that, for the adults, there is a vineyard! Allotments that have been established for a long time produce more fertile soil which enables better growing outcomes. This cannot be achieved by new soil that has not previously been cultivated. So providing allotments elsewhere would mean starting over from scratch and would take a long time to get good results.
D Elton	Policy S17: Mickleton	Regarding the allotments again - Since the 1970s there has been a 13% decline in overall wildlife numbers in the UK. Some species have shown a 41% decline. Moths and many other insects have virtually disappeared partly due to urbanisation. What we must realise is that these insects are critical in the fertilisation of food plants.
christina oscroft	Policy S17: Mickleton	In the recent past 3 substantial housing developments have significantly expanded the population of Mickleton without any consideration to the village infrastructure. The infrastructure of Mickleton cannot support further expansion of the population. The village does not have a Doctors surgery or dentist and no expansion has ocurred to the village primary schoool. Thus requiring villagers to travel as far as Moreton in Marsh (for GP) and Shipston on stour (dentist) . Also Mickleton no longer has a general post office - it closed ~1.5-2 years ago. Currently the village shop allows a mobile service; however, this is limited to purchase of stamps and posting of parcels and, due to the restricted hours (2 afternoons - Monday and Friday 3-5pm) the majority of residents cannot avail of this service. The village shop has recently been sold so there may be some question over whether this service will continue in the future. The last 3 housing developments in the village and the significant, ongoing housing developments at Meon Vale and the former Long Marston airfield has impacted on the volume of traffic that goes through the village. Further expansion of the village will exaserbate this and will make 3 current "traffic pinch points" in the village worse (by butchers shop/houses opposite (where cars have have to park on the road), outside the village shop, and road outside the Kings Arms).

Respondent	Policy	Comment
christina oscroft	Policy S17: Mickleton	I wish to make the following comments relating to the assessment of sites in Mickleton in the IIA, in particualr the assessment of the proposals affecting the Allottment and Community vineyard: i.The assessment does not consider aspects such as community facilities. The allotments are vital to Mickletons community spirit, and provides a unique environment where young and old come together. There is a large plot on the site specifically where local children interact with nature and learn first-hand how to grow vegetables, flowers and fruit. Furthermore, the allotments provide benefits to the well-being and mental health of residents as well as a source of sustainable food. ii. The assessment does not consider aspects such as biodiversity, ecology. For example the SHELAA, that provided evidence for the 2022 consultation, identified allotments are likely to have higher ecological value and diversity with insects, birds and potentially reptiles. There are ponds within allotments that provide natural habitats for a number of animals, such as frogs and newts. iii. In the last 2 years the Mickleton Allotment site has been expanded to introduce a number of new plots and there is a currently a waiting list for new plots. Demand for allotments will continue to grow as houses are built on small plots that cannot support a productive vegetable garden. iv. Mickleton allotment is ideally situated within the village, making it easily accessible for the majority of residents. The use of the allotment site for development would involve the relocation of the allotment plots. The proposal to relocate the allotments to a field in the north east of the site is problematic because the allotments would become less accessible to people living in Mickleton, as well as there being potential habitat disturbance issues due to increased use of cars. Additionally, the SHELAA identified that the use of the allotment site for development "would be a significant northwards extension to Mickleton…It would urbanise the northern approach into the village…the development of this site does not appear to be the next logical extension to the village". v. The allotment is well established. Considerable work has gone into improving the clay/heavy soil to make it productive. The proposal to relocate the allotments would require substantial investment from Allotment holders to improve the soil quality to make the land workable for cultivation. Relocation of equipment (greenhouses/sheds/polytunnels) would be problematic and costly. vi. The assessment has not taken into account the community vineyard, which shares the allotment site. The vineyard was established 13 years ago. It has over 300 vines, adopted by over 130 people that actively support the vineyard. The vineyard has a clubhouse on the site from which it organises many social events throughout the year. It also provides an outdoor space that other Mickleton Societies are able to benefit from. The vineyard produces over 500 bottles of wine each year and is understood to be the only vineyard in the country that produces its own wine which is shared between the vine adopters.

Respondent	Policy	Comment
Olly Breakwell	Policy S17: Mickleton	In response to the further update of the Local Plan 2021-31 we would wish to remind CDC that Mickleton has already experienced much larger new developments in the 2021 plan than had been expected and that CDC originally said that there would be no need for further development in Mickleton in the 2021/31 period. The current consultation refers to many sites surrounding the village that could be built on as early as 2026/31. CDC recently observed that some of these sites should be withdrawn pending more research into surface water flooding due to the high water table. We would wish to update CDC on this surface water problem and suggest that in updating the Local Plan the Planning Authority should not approve housing development on previous site MK18 (now included as part of the updated site reference MK7) given the effect this would have on the water table in this part of Mickleton. We attach evidence of the surface water flooding on the previous site MK18 which is now within the combined site MK7 (see attached photo of the MK18 field) In addition CDC should not approve further development in the vicinity of the MK18 field which results in the traffic generated entering the Broadmaston Road either directly or via Cotswold Edge, which if allowed would have an adverse effect on traffic at the entrance to the primary school. In addition any additional traffic on Broadmaston Road would have to enter Mickleton via Back Lane, Chapel Lane or Mill Lane all of which are in the Mickleton Conservation Area and are narrow roads with traffic pinch points on narrow bends with blind spots creating hazards for both pedestrians and vehicular traffic. Finally The Local Plan Consultation document (policy S17 Mickleton gives an overview of the suitability of sustainable development in the village. This is incorrect in that there is no provision for Nursery and Early Years education in the village, previous proposals for a GP surgery have been withdrawn and residents have to travel over 5 miles for GP and dentistry services with little or no public transport. Also, it should be noted that the Post Office in Mickleton closed a few years ago and there are no longer any banking or PO facilities in the village.

Respondent	Policy	Comment
Peter Sallabank	Policy S17: Mickleton	As a member of the vineyard club in Mickleton I have been made aware of the allotments plus the vineyards being considered for future housing developments, and I need to comment on this folly for Mickleton as a whole. I'm all in favour of more house building, as the country as a whole is doing a poor job of constructing sufficient affordable homes for a growing population. BUT my knowledge of the village is such that it's very obvious that there are many developable sites suitable for infill, also lots suitable for larger development. If you would like me to describe them geographically please reply to my email and I will get on it. Reasons to leave the allotments and vineyards as they are. 1- produce grown there is used and shared locally. For some people living on a pension growing their own food is vital. 2- produce grown there (a lot of food is grown there) cuts down on food needing to be shipped and trucked from all over Europe. Remember we are all tasked with reducing carbon emissions. 3- If you are aware of the blue zones around the world (if not please research them) people involved in agrarian pursuits live longer healthier lives. Therefore do not require the services of our creaking NHS. 4- The sense of community is what a village is all about, do not mess with it. To make other land available further away from Mickleton for allotments would not be of any use if people cannot walk there. Many people do not have a vehicle. I hope my comments will be given consideration when deciding on the future of Mickleton. Please approve of developments anywhere and everywhere, without disrupting what is already working for the community
Chris Marsh (Pegasus Group) 334	Policy S17: Mickleton	Policy S17 - Mickleton 3.53. The amendments proposed to this policy are minimal. Despite its role as a Principal Settlement, there are no housing allocations identified within the village at this stage. Land west of Stratford Road Lane is considered to be an optimal and highly sustainable location for residential development. The merits of the site are discussed in Section 5 of this report. [call for sites submission].
William Hall	Policy S17	para 7.20.4 There is no evidence this para has caused confusion to local people as stated, and it is wrong to state that it adds nothing to the Plan. It is in fact the only reasoned justification for the decision to not allocate any more housing sites in Mickleton before 2031, a policy made explicit by the Mickleton inset proposals map. The sound reasoning offered in the adopted Plan in 2018 related to the recent substantial growth of the village and the existing environmental contraints against further development. That reasoning remains sound. There is no evidence that the environmental contraints have been addressed since 2018. The fact that six years have elapsed since it was stated that no development should be allowed within the next 13 years does not in any sense weaken the strength of that very souund point. There are still 7 years to go, and the agrument for not allowing development before 2031 is as valid now as it was in 2018. The statement that the paragraph adds nothing is easily disproved by considering the implication of it's removal: namely, that new housing development could be allocated for development ahead of 2031, a fundmental change from the Adopted Local Plan contrary to the sound reasoning of that Plan. No material change in relevant planning considerations has occurred in the interim, so there is no legitimate case for its removal The paragraph should be retained and continue to be reflected on the proposals map..

Respondent	Policy	Comment
Graham Jones	Policy S17	7.20.4 and 7.20.5 should be deleted in their entirety. Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. They should address the needs and opportunities in relation to: housing, the local economy, community facilities and infrastructure. In addition they should provide for the protection of the environment, enable adaptation to climate change and help secure high quality accessible design. Mickleton is a "Principal' settlement along with others stated within the documentation and there appears to be development opportunities which are available, developable and deliverable. There is an overriding presumption in favour of sustainable development.(NPPF December 2023) A positive step is the proposed inclusion of the Sustainability Checklist in order to assess the attractiveness of housing sites.
Caroline Byrne	Policy S17	Removal of 7:20:4 causes concern, since the adpoted plans of 2011-2031, there was a SHELA in 2021, which identified large blocks of land and potentially over 200 properties with cars flowing on the very narrow lanes (MK12,MK13,MK18,MK20 ON TO Broad Marsden Rd (with school traffic) and Chapel lane in to the village. Similarly MK11 of about 150 on the existing allotments surely is against community/mental health/green space/low carbon activity policies - moving the allotments further out of the settlement will create car usage. Mickleton does not have the infastructure for further development. It has lost a shop and Post office, so only has one shop. Has no health facilities. The roads are very narrow within the settlement. Your plan is confusing as to if these parcels of land per 2021 SHELA are still under consideration for development or have been shelved.
Joanne Mcgrath	Policy S17	We agree paragraph 7.20.4 should be removed. Mickleton has a strong demand for new homes, especially affordable housing. There is developable and deliverable land available and housing allocations should be made. Sites offering the highest levels of sustainability should be prioritised, i.e. footpath and cycle links in closest proximity to existing settlement.
Steve McKinty	Policy S18: Moreton-in-Marsh	I would strongly support the re-opening of a Moreton to Stratford rail link. A road so that HGVs going to Oxford (A44) could bypass the town is also essential.
yvonne o'callaghan	Policy S18: Moreton-in-Marsh	It's slightly odd to be talking at 7.21.7 about a site allocation for 310 homes when the consultation in town is preparing the town for 1500 to 2000 new homes! Such a number would result in the loss of the Fire Service College which would be national / international loss of fire training facilities. The infrastructure locally would implode unless infrastructure preceded housing/commercial development.
Janet Irene Ryland	Policy S18: Moreton-in-Marsh	It is important to be clear in advance what employment opportunities Moreton offers, given that it is often the case that the railway links Moreton has support many people commuting to Oxford or London to work.
Janet Ryland	Policy S18: Moreton-in-Marsh	The consultation needs to be clear and transparent on what is proposed for Moreton by way of housing, 7.21.7 indicates around 300 housing but the notion of Moreton becoming a garden village suggests significantly more new stock. The risk of developing the Fire College site is to split Moreton and lose a sense of community. In addition, transparency is also needed on the benefits that the Fire Service College (under private ownership since 2013) will gain.

Respondent	Policy	Comment
John Holmes	Policy S18: Moreton-in-Marsh	The Moreton plans take too little account of the town's lack of infrastructure - sewage, parking, medical facilities etc. Extra housing will only exacerbate these problems with no account taken of the fact that CDC cannot control whether the infrastructure will actually be upgraded. Moreton is being selected for more housing largely because it is not in the National Landscape Area, but it is right next to the SLA on both sides, and the SLA is also environmentally important and at risk. Moreover the flooding risk seems to be being significantly underplayed both for the housing and the planned road. The bypass road itself will not solve many problems because it takes no account of east-west traffic, will do nothing to reduce congestion on the Fosse Way between Moreton and Stowe, and will cut across areas of significant natural beauty eg close to the village of Evenlode. Contrary to the CDC green ambitions, new houses will inevitably mean more cars and more pollution - the presence of a station to London does nothing to help this, and if there are not more jobs created in Moreton (and where are they going to come from?), the buyers of the houses will be commuting in and out of the town. Altogether these ideas seem ill thought out, and likely to spoil a small market town and its attractive and environmentally important surrounding villages. If more houses are needed, spreading them round the CDC area more evenly would in my view be less damaging.
Darren Curry	Policy S18: Moreton-in-Marsh	7.21.1 - how have you determined that Moreton in Marsh has a wide range of services - what does this mean? There are no public leisure facilities. We have one large supermarket. What assessment have you carried out of the composition of businesses on the high street?
Darren Curry	Policy S18: Moreton-in-Marsh	What is your definition of 'good' bus services - Policy S18 7.21.1 - Moreton has fewer than 20 buses a day and running to Stratford and Cheltenham, that are nor practical for commuting for most people
Darren Curry	Policy S18: Moreton-in-Marsh	Policy S18 7.21.5 - Moreton cannot handle further housing growth considering the fact that several years ago, the two roundabouts in the town centre were already determined to be over capacity at peak hours. The situation is now immeasurably worse, more housing means more traffic, pollution and an ever deteriorating air quality in and around the high street
Darren Curry	Policy S18: Moreton-in-Marsh	Policy S18 7.21.7 - there are significant concerns related to 'forever chemicals' on the FSC site and the potential environmental impact of excavation on this site
Darren Curry	Policy S18: Moreton-in-Marsh	Policy S18 7.21.9 - CDC is aware that only 50 houses on the Dunstall Farm Spitfire estate may be occupied without planning permission being breached. It is disingenuous to state that there is an 'indication' the sewage and wastewater treatment works will need to be upgraded, this is almost a categorical fact. These facilities are already overwhelmed and require upgrading even before there is any new development added.
Darren Curry	Policy S18: Moreton-in-Marsh	Policy S18 7.21.12 - this proposed road route will have a limited effect on traffic congestion through Moreton. There is no provision for traffic coming from Chipping Norton passing through town to go to Evesham, and in the other direction. Traffic flow evidence further shows that much traffic approaching from the south subsequently travel up through Bourton on the Hill again to Evesham.
Peter Mansfield	Policy S18: Moreton-in-Marsh	The flood prevention system installed after 2007 floods works well with what we have in Moreton now. However, any increase in building will negate that system. We need additional flood prevention measures to cope with any new build. Preferably before any new building takes place.

Respondent	Policy	Comment
Peter Mansfield	Policy S18: Moreton-in-Marsh	Don't forget that there were controlled explosions carried out at the FSC site when the first phase of land was sold off for building. Buried ammunition was unearthed and had to be dealt with safely. It was military way before it was the FSC
Peter Mansfield	Policy S18: Moreton-in-Marsh	I doubt if there are the 2,000 jobs in Moreton that CDC seem to think, The biggest employer is the FSC and certainly they are not all local by any means. Plus the FSC are laying people off, not just in the FSC, but in other areas as well. They have a very poor track record. They only got the FSC because they have a finger in many government pies (TV licences, Local Authority pensions, Police pensions, Fire Pensions, Military Recruitment< the list goes on and on). There were much better qualified training companies that bid higher than Capita for the FSC. Yet Capita were selected.
A Barnard	Policy S18: Moreton-in-Marsh	S18 the local development scheme doesn't take into account the lack of the town's infrastructure and amenities, schools, sewage, parking, doctors etc. Extra housing will only exacerbate these problems taken into account that CDC cannot guarantee whether the infrastructure will actually be upgraded….. Moreton is being selected for more housing largely because it is not in the National Landscape Area, but it is right next to the SLA (special landscape area) on both sides which need to be protected. Also the flooding risk seems to be significantly underplayed both for the housing and the planned road. In 2007 Residents of Moreton will remember clearly the devastations when Moreton high street and surrounding areas flooded.
William Barr	Policy S18: Moreton-in-Marsh	Policy S18 is completely flawed and is a easy way out by CDC in lumping the majority of the housing allocation onto Moreton-in Marsh. The scale of the proposed housing 1500+ is out of proportion to the existing size of Moreton and will completely change the character and well being of the town. Despite the promises of greater infrastructure there is a great risk and evidence of developers getting away with minimal infrastructure provision due to weak enforcement and regularity regimes. The community of Moreton will be left therefore with over capacity infrastructure and services. The pressure on existing sewerage and drainage provision, which is already at breaking point, will be immense. NHS services(GPs and dentist) are already resticted or non existent and this proposal will only exarcebate the situation. Highways are are at capacity at peak times and despite public transport links the vast majority of journeys connected with this proposal will be by car. The rail link is exceptionally expensive to use and does not easily connect with Cheltenham, Cirencester or the West Midlands. 1500 houses will not support a great deal of infrastructure based on the current planning levy. This proposal will put pressure on surrounding agricultural land and is innappropiate for the Special Landscape Area. The policy appears to be centred around the Fire Service College which in recent years has been owned by Capita. How much of this policy is therefore driven by Capita wishing to re-develop the majority if not all of the site for housing and relocate elsewhere. This is in contradiction to your other policies on the local economy. Finally consideration should be given to distributing the housing allocation throughout the distict with much less impact.
jamie ball	Policy S18: Moreton-in-Marsh	Policy S18 for Moreton In Marsh fails to take sufficient account of the flood plains that Moreton In Marsh sits on. In the SFRA 1 mapping and Gov.uk flood mapping much of the land surrounding the town is floodplain and acts as a natural barrier. The Local Plan wants to continue to build on this land, and build in a way that will overwhelm the current number of houses in this market town is irresponsible in light of known climate change. Equally there is no evidence of consultation and agreement from Thames Water to build in any new infrastructure to cope with the sewage and waste water build up that will be a necessary part of extensive new building. How can this Plan call itself 'Green to the Core' without addressing these critical environmental issues?

Respondent	Policy	Comment
jamie ball	Policy S18: Moreton-in-Marsh	S18 raises the possibility of a Bypass to run North to South of Moreton In Marsh, along the eastern side of the Fire College. However no clear definition of where this road might run is given in the Plan. The congestion in Moreton In Marsh is not just north to south but also east to west along the A44. The Bypass as currently mentioned would do nothing to alleviate this. Equally if traffic congestion is being realistically considered for the future, there is no point Bypass-ing Moreton without extending a Bypass to cover Stow on the Wold as well. So where does such a Bypass go? Does it pass through 'protected areas' of SLA and possibly AONB (depending on its final design)? How can such a road be authorised without serious justification that such protected areas in planning law should be breached? Has anyone considered the extensive flooding that takes place (see SFRA 1 & UK.Gov maps) to the south of the A44 where the Evenlode River and its tributaries routinely spill over the Evenlode Road making it impassable, and back up against the Railway line? And to bring a Bypass back to the A429 a substantial bridge will need to be built over the Great Western Railway train line. There is nothing in this plan to suggest Great Western Railway have been made aware of this plan. Does GCC, the builder of roads, agree to this project? Do they have sufficient funds to undertake the extensive civil engineering required to pass through known floodplains? And build a new bridge over the railway? Is there documentary evidence anywhere is this plan to support the Bypass?
Brad Hooker	Policy S18: Moreton-in-Marsh	Moreton is now an attractive market town. The ideas under consideration will obliterate the town's historic character and rural feel. There aren't the local services that the CDC says there are. There aren't the jobs here that the CDC says there are. The idea that lots of people in their 20s and 30s would be able to afford to buy houses here and then pay over £11,000 per year to commute 105 minutes each way to London via train seems ludicrous. Moreton is beyond the commuter belt for London. Yes, some hearty souls do the commute, but there just aren't that many people willing to travel so far at such a high cost. And the by-pass could be far shorter if it went to the west of Moreton rather than to the east.
Jerome Cook	Policy S18: Moreton-in-Marsh	The reference to "1,500+" should be changed to "around 1,500" as that has been the terminology used by CDC councillors and officials (including at the Q&A on 21 March), so should reflect this given "around" and "over/+" have different meanings.
Sheila Thomas	Policy S18: Moreton-in-Marsh	7.21.1 states “Moreton-in-Marsh is widely regarded as the main service centre for the north Cotswolds” Yet 7.19.1 states “Chipping Campden is the main service centre in the far north of the District” and 7.20.3 states “along with Chipping Campden and Willersey, Mickleton is part of a cluster of settlements that serve the northern most part of the District. Collectively, these settlements have the necessary services and facilities to provide for the local population”. The arbitrary division in this local plan of the towns and villages that fell historically under the North Cotswold Rural Council, into Mid Cotswolds (SA2) and North Cotswolds (SA3) is confusing. North Cotswolds also has a geographic meaning (includes towns and villages in adjoining counties) and a political meaning now with a North Cotswold parliamentary constituency including wards from Stroud and Tewkesbury.

Respondent	Policy	Comment
Richard Noble	Policy S18: Moreton-in-Marsh	Moreton-in-Marsh has already seen significant development in recent years and already suffers from heavy traffic congestion and is starting to suffer from a lack of adequate facilities to support the hundreds of new homes that have already been built in recent years. I don't think this makes Moreton a viable area for large numbers of new homes. There needs to be significant improvements to infrastructure and local facilities in Moreton as it is, just to support the homes already built.
Richard Noble	Policy S18: Moreton-in-Marsh	The policy concedes that Moreton-in-Marsh is already suffering from major traffic congestion. This problem is already crippling to the town and its nearby residents and even if a new road is proposed along with new housing development, the benefits will be cancelled out by the extra demand from hundreds of new homes in the local area, increasing demand on the same major route through Moreton High Street. Not to mention the extra demand on parking provision. Even if a bypass road is built this will not stop local people from driving into the main service centre to access the local shops and amenities, therefore increasing the traffic congestion on the high street, despite an extra bypass being built.
Jerome Cook	Policy S18: Moreton-in-Marsh	Paragraph 7.21.2 mentions that Moreton-in-Marsh (MiM) provides job opportunities for 2,000. Does CDC also have data about how many of those are filled with MiM residents; and how many MiM residents work elsewhere? Will enough job opportunities be available in MiM to support the residents of c.1,500 new homes? A sample survey of residents suggested most people used private vehicles to get to their employment. Without suitable job opportunities in the town, residents will continue to have to seek employment elsewhere, with the knock on effect of increased private vehicle usage and congestion.
Jerome Cook	Policy S18: Moreton-in-Marsh	Given the rural nature and that most employment and services/facilities are dispersed across the District, addressing congestion through Moreton-in-Marsh is necessary given the potential for increased congestion from further development in the town. Paragraph 7.21.12 says that space should be kept aside for a potential by-pass road to manage congestion through the town. Does Gloucester County Council support this (as the authority responsible for transport)? Would the proposed route run entirely through the District or would it need to pass through West Oxfordshire District Council and do they support? Would it run through Stratford-upon-Avon District and do they support? How close would it pass to Wolford Wood SSSI (Sites of Special Scientific Interest) and what would the environmental impact be?
Miss Laura Baskeyfield	Policy S18: Moreton-in-Marsh	7.21.12 - Congestion in Moreton is already a significant problem, making it difficult for other road users such as pedestrians and cyclists to use the town's facilities safely. Local club cycle routes are now planned to avoid Moreton center, as it has become dangerous to cycle through there given the volume of traffic. This is now only anticipated to get worse. Without adequate infastructure in place, the issues will remain. How relevant will the "transport hub" be if it can only be accessed safely by vehicles.
Janet Heady	Policy S18: Moreton-in-Marsh	Moreton in Marsh's mini roundabouts are already at capacity, creating daily congestion; building more houses will generate more traffic that the roads won't be able to absorb, as well as increasing air pollution.
Janet Heady	Policy S18: Moreton-in-Marsh	Flooding is a major issue in the area and more houses can only aggravate the issue; additionally, Thames Water's system is archaic and not able to cope with the effluent from existing houses.

Respondent	Policy	Comment
Lesley Langley	Policy S18: Moreton-in-Marsh	310 extra houses will cause unbearable congestion in a town that is already suffering from this problem. It has already become unsafe to walk or cycle in Moreton making the local community unhealthy. The local authority has a duty to enable the people in its care to be as healthy as possible and will be in breach of this duty if this plan goes ahead.
Lesley Langley	Policy S18: Moreton-in-Marsh	Moreton was recently flooded causing damage to people's homes, lives and well being. This development destroys the natural habitat around the town - fields that are a natural soakaway for excess rainwater. The very fear of flooding prompted by this development will destroy the mental wellbeing of many who live here. It would be irresponsible and damaging to the community to go ahead.
Janet Heady	Policy S18: Moreton-in-Marsh	Since 2011, approximately 1000 houses have been built / are being built in Moreton, but there has been no substantial increase in employment opportunities in the town; why and how would more houses generate employment issues?
Lesley Langley	Policy S18: Moreton-in-Marsh	Moreton is a traditional and historic market town and has always grown organically with a strong sense of community. Such a 'volume-build' of new homes will damage the sense of community Moreton has always enjoyed. There is little employment in this town and it cannot cope with an excess of homes. For the sake of the well-being of residents, a sense of community needs to be preserved. This development will lead to a substantial loss of tourism and damage the economy of this small town.
William Langley	Policy S18: Moreton-in-Marsh	I have lived in Moreton for 25 years, and witnessed the enormous amount of development, particularly of housing that has taken place during that time. The Fire College site alone has taken several hundred new homes, and the proposal to build hundreds more will render this once peaceful area of town unrecognisable. It will create even more congestion in a town where the roads are already saturated for much of the day, and the High Street almost impossible to cross except at the one crossing. It will further strain, if not overwhelm, the town's infrastructure, particularly in terms of access to health services, school places etc. It will greatly increase the risk of flooding, and degrade the overall environmental quality of area.
Janet Heady	Policy S18: Moreton-in-Marsh	Is a primary school on land affected by forever chemicals a good idea?
Jerome Cook	Policy S18: Moreton-in-Marsh	The comment provided by Juliet Layton (CDC Councillor for South Cerney) about sensitive and considerate placement of housing in South Cerney (see policy S8 page 119) is also relevant to Moreton-in-Marsh (MiM). New development in MiM will have to be sensitively placed and great consideration taken with regard to flooding, particularly pluvial given the current wastewater and sewage infrastructure is currently inadequate given the development that has already occurred in MiM. As a result of heavy and persistent rain recently a public right of way behind the care home development (itself behind the newish Aldi) has become flooded and difficult for residents to access; apparently no more than 50 houses on Spitfire's Ellenbrook development site can be occupied until the necessary infrastructure has been provided to cope with the additional homes.

Respondent	Policy	Comment
Sheila Thomas	Policy S18: Moreton-in-Marsh	7.2.1 Bus services are mainly used by those that do not drive (the elderly, young teenagers, visiting tourists and the financially disadvantaged etc). Many local places of interest such as National Trust properties cannot be reached by public transport. The central position of Moreton-in-Marsh means it is within 50 miles to over 20 large employment centres including places in the West Midlands (Coventry-32 miles; Solihull-38 miles); Gloucestershire (Cheltenham-24 miles, Gloucester-37 miles) Worcestershire (Kidderminster-45 miles, Worcester-32 miles); Oxfordshire (Oxford-31 miles, Banbury 22 miles); Buckinghamshire (Aylesbury- 46 miles, Milton Keynes-49 miles); Warwickshire (Warwick 24 miles, Rugby 38 miles) and Wiltshire (Swindon 38 miles). The new development by Spitfire now called Ellenbrook explains on its website why Moreton-in-Marsh is "AN IDEAL LOCATION" "Moreton-in-Marsh is positioned at the crossroads of the A429 and A44, which together provide excellent road access to surrounding towns and also link to major routes such as the M40 and M5 motorways. For international travel, Birmingham Airport is within an hour's drive and operates direct flights to over 150 destinations worldwide." The door-to-door service provided by car ownership is by far the most convenient, comfortable and quickest way to get around in rural areas such as ours and more houses will just mean more cars and more congestion. More congestion also means slower bus times.
Angus Jenkinson	Policy S18: Moreton-in-Marsh	It is claimed that Moreton's retail centre ranks fourth in the District. This data may be true on some parameters, but it is context free, and as such needs qualification. When compared with the many small villages, it is clearly a more structured and developed commercial centre. Indeed this was an element in my own choice with my wife to live here. However, in proposing to add in excess of 1500 additional houses, the strength of the retail centre needs examination. Another data element is that, in my inquiries in the High Street and amongst residents, there is a strong and widespread perception that retail has declined. One element is the lack of diversity. It is considered inferior to other locations. Clearly it is not in the same league as Cirencester and has limitations with respect to Stow, Tetbury, and even Bourton. That Moreton is declining might make this proposal an opportunity, but the means to regenerate the town would need to be developed to include a centre commensurate with the population as an active centre. While it will be a fact of contemporary lifestyles that many will live in relatively rural centres while commuting at least some of the time to cities, the town should not be hollowed out. Tourist cafe, pub, and hotel resource is should be balanced by a richer mix that also supports the local population. That will need not just a development plan but a regeneration masterplan.

Respondent	Policy	Comment
Angus Jenkinson	Policy S18: Moreton-in-Marsh	This comment relates specifically to the proposal for a primary school. It advocates the necessity for further modelling and research in relation to the likely outcome of the area plan and Moreton consultation processes. The Local Plan 'draft policies' consultation includes a specific development proposal at the Fire Service College for a new primary school, as well as 'enabling developments' of 310 homes, a neighbourhood centre and employment development. The proceeds from the enabling development would be reinvested into regenerating the Fire Service College, helping to secure its long-term future in Moreton. I am in favour of supporting the development of the FSC as a major local business and employer. I agree the absolute necessity for the business to replace and improve many of its facilities. I understand the logic whereby it aims to give up some of its land in favour of such development, although I would like to see the group making a significant further contribution and I hope it will protect its own future and growth. I note that prominent members of the town council have previously, in objecting to the Dunstall Farm development, claimed the prior necessity for a further primary school. I understand that the county is forecasting a growth and that the logic of further houses would mean further children. However, I am also advised by informed senior members of the existing primary school that the profile of incoming children over recent years has led to a decline in the number of primary school children not an increase. This may be because there is insufficient affordable housing for younger parents. Therefore, the need for a primary school needs to be specifically modelled in relation to the demographic profile contingent on the development strategy. There is also a case for saying that we should be considering older pupils, possibly at basic secondary school level, but alternatively as a 'technical college' As an apprenticeship centre and alternative to sixth form for the North Cotswolds.
A Barnard	Policy S18: Moreton-in-Marsh	Policy S18: Moreton in Marsh is plagued with traffic congestion and a lack of parking at this current moment in time. The idea of adding 1,500 more houses will exacerbate the situation already facing the local community. The influx of vehicle from this and the imprudent idea of a ring road will pollute an area of outstanding natural beauty with smog and fumes. These proposal do not offer a solution to the current issues facing residents instead wasting money on a pointless fad. The demand on the roads on Moreton Street will only grow with these houses respectable of a ring road as larger volumes of people journey into town for the local shops, amenities and commuting ease. The CDC need to improve and invest in the current infrastructure significantly before even suggesting increasing the burden on this small Cotswolds town.
Jerome Cook	Policy S18: Moreton-in-Marsh	Paragraph 7.21.2 mentions publicly available leisure facilities, which presumably mean the sports/leisure facilities at the Fire Service College. This access is dependant on an arrangement with a private company (Capita) and is vulnerable to decision making by the company (or decision by future owners) and maintenance of the site (note: the FCS seems to be the most logical - brownfield - site for "over 1,500" houses that the CDC propose for Moreton-in-Marsh. To ensure local access to leisure facilities CDC needs to include provision of permanent access in MiM otherwise there is a risk that residents will need to go elsewhere (e.g. Bourton-on-the-Water or Chipping Campden) and therefore increase congestion and private vehicle use.

Respondent	Policy	Comment
Lisa Davies	Policy S18: Moreton-in-Marsh	Policy S18 Para 7.21.7 I am opposed to the additional 310 houses as part of enabling development. The additional pressures these would place on existing overstretched services such as GP surgeries, and the already inadequate infrastructure (sewage, traffic flow) would put an unacceptable burden on the town with no guarantees of any upgrades . The site also borders a protected area for newts. And the town as a whole is at increasing risk of flooding, made worse by warmer , wetter winters as a result of climate change. Additional housing will add more concrete, more cars, more pressures, and will change the nature of the historic market town. Show us what the other options look like, including distributing the 1500 houses across the district
Lisa Davies	Policy S18: Moreton-in-Marsh	Policy S18 7.21.12 The roundabouts in Moreton have already been stated as being over capacity. Where will the funding come from for this relief road? The 310 houses, or even the 1500 houses will not generate anywhere near enough funding to pay for a road. The government cannot pay to complete its flagship HS2 project, more and more local councils going bust, it is a false promise to dangle a relief road as a possibility. And it would be irresponsible to add to known problems by building significant amounts of new houses BEFORE the current known issues are addressed,
Nick Loat	Policy S18: Moreton-in-Marsh	CDC's own CEO acknowledeged that Moreton-in-Marsh had seen more than its fair share of development and had reached its developemtn allocation for the 2031 plan. Therefore there is no requirement for the proposed 310 houses on the fire college (before 2031). There is evidence that a new primary school (suggested as a reason for allowing the development) isn't required as there is a falling birth rate.
Nick Loat	Policy S18: Moreton-in-Marsh	GCC have already stated that the A429 is at near capacity and that weas before the Dunstall Farm and Evenlode developments were approved. Another 310, plus 1,550 suggested and the far greateer number of homes that will actually be built (Dunstall Farms allocation was 119 homes 250+ are to be built). Moreton will be gridlocked. At the recent consultation meeting at the fire college, CDC's strategic planner said that it was important to plan for 1,550 homes as that way there was "a chance" that we would get the infastructure required (i.e. a new road). GCC's councillor has suggested that would cost in the region of £60million so either there is "no chance" of the road or the number of homes is likely to be much higher… in the region of 10,000 the size of a "garden village".
Prue Leith	Policy S18: Moreton-in-Marsh	It would be positvely immoral to build any more houses without infrastructure. Moreton schools, health and leisure facilities are already stretched. I am sorry to be brutal but if the CDC and the town council between them cannot fix the town clock in 5 years, how can we possibly imagine they are capable of any of their plans.

Respondent	Policy	Comment
Matthew Beresford	Policy S18: Moreton-in-Marsh	Moreton's High Street is far from thriving - may retail units have been permitted to be converted to residential. This process must be halted, and a more favourable conditions for independent retailers, if Moreton is to have the High Street to sustain the number of new homes the CDC is suggesting for the town. The rationale for putting such a disproportionate number of dwellings in Moreton seems to be primarily based on the emissions from private vehicles and a belief that by placing houses in Moreton the environmental impact (in terms of emissions) can be reduced. No analysis has been done of where those who live in Moreton actually work and no consideration has been made of the switch to electrical vehicles that will take place over the next fifteen years. Moreton faces ongoing problems with water and wastewater that needs addressing before more houses are built. This winter and spring has been incredibly wet - whilst Moreton has not flooded the building of many more houses, and the concreting over of much more of Moreton's neighbouring farmlands threatens to increase the likelihood of flooding in the future. Here is an assumption that because Moreton has local retail and employment that people who live in Moreton will, (a) work/shop in these locations and (b), travel to them using public or sustainable transport. This has no basis in evidence. Many of Moreton's residents work elsewhere and drive to these locations and those who use the town's facilities or who work here drive to the centre of town and the supermarkets as the provision for cycling is so poor - this is especially so for those on the Eastern edge of Moreton which is already some distance from the town centre and medical/retail facilities. The suggested relief roads have no evidence backing for actual transport movement and do nothing to impact East/West traffic. The A44/A429 interchange is already heavily congested and this will become far worse with the number of houses being proposed. Fundamentally the character of Moreton will be changed from a small market town to a larger, somewhat sprawling conurbation and in a way that is deeply unpopular with the residents of the town who have seen disproportionate and unpopular growth over the last ten years.
Prue Leith	Policy S18: Moreton-in-Marsh	I cannot understand why we do not have a master plan, comissioned from independant consultants for Moreton, given the ambition of CDC's approach. Cirencester had such a plan, properly debated with time for genuine consultation. I cannot suspecting that the enormous complication of this so-called consultation process is deliberate, designed to deter ordinary folk. The time allowed has been ridiculously short. Even Moreton town council were unaware of the plans until late December 2023.

Respondent	Policy	Comment
John Playfair	Policy S18: Moreton-in-Marsh	The proposal to safeguard land for a new road between the A429 and A44, is wrong. No route has been indentified for this road and no land for it been set aside. So far, the road mearly an asspiration. Surely full consultation is needed on the proposal first to establish if the road is necessary, and if its needed to identify its best course. It is premature and non-sensicle to include it in the local plan before this is done. If a road is provided it should closely follow the developed bounds of the existing town. Moreton will no doubt grow to meet a by-pass, therefore the belt should be fastened tightly. It should also have the character of a rural road, to suit the character in to which it will intrude rather than imposing uncharacteristic urban clatter, such as lighting and wide carriageways.
John Playfair	Policy S18: Moreton-in-Marsh	It is essential that a master plan is comissioned from independant consultants. To contimplate such enormous development without such a plan and proper consultation is irresponsible.
Carole Gandon	Policy S18: Moreton-in-Marsh	Are health services not relevant to planning? Moreton's existing surgeries are struggling now.

Respondent	Policy	Comment
Carole Gandon	Policy S18: Moreton-in-Marsh	There are a lot of sweeping statements about Moreton in 7.21.1 and 2 - it would be useful to get independent assessments of the 'wide range of services', 'employment opportunities' and the assertion that Moreton is 'one of the District's most accessible settlements' given the limited bus and train services and traffic congestion. 7.21.3 The Fire Service College seems to loom large in S18 - what is proposed looks more likely to benefit its current owners than Moreton (what is Capita's involvement in the consultation process?) - and what about the problems of Forever Chemicals at the site - one website declares it to be the epicentre of Forever Chemicals in the UK. Suggest the site is properly investigated by the Environment Agency if nothing else before any plans to build there are put in place (the EA is demonstrably not on top of the pollution there as things stand). There should be more consideration given to public leisure facilities in the plan - it is certainly not that easy for residents to use those at the Fire Service College. 7.21.5 Compared to other small market towns I have lived in, Moreton's retail offer is underwhelming and its range is shrinking - even over the 18 months since we moved here. The plan needs to help retailers and halt the trend whereby retail spaces become residential. More thought needs to be given to tourists' needs if tourism is to flourish - especially the lack of welcome (functioning ticket machines/information/taxis/cafe etc) at the rail station and where buses deposit them and at weekends (when they are left to their own devices at the point of arrival and in the absence of any open tourist information centre). 7.21.8 Given population trends, is there really a need for a second primary school - and why not a secondary school? 7.21.9 Surely any developer-funded study designed 'to ascertain whether the proposed development will lead to overloading of existing water infrastructure' is unlikely to be objective.... 7.21.12 The proposed new road needs much more thought - impossible to comment sensibly on such a vague proposition! And where is the vast amount of money needed for such a road going to come from? And surely it should involve Stow?

Respondent	Policy	Comment
Highways England 133	Policy S18: Moreton-in-Marsh	Policy S18: Moreton-in-Marsh The site MORE6 Fire Services College (opposite Cotswold Business Village) has now been expanded to include: - enabling development of an 18.3ha site allocation: - Market and Affordable Housing (indicative net capacity of 310 dwellings); - a new neighbourhood centre, including a convenience store, a replacement sports centre, a hotel and a public house; and - A 12.5ha employment site allocation comprising an enabling development of general industrial, storage and distribution, office, research and development and light industrial uses (B2, B8 and E(g) use classes). We seek further details as to the potential number of jobs and transport impacts associated with this development and if it was previously assessed as part of the Local Plan Examination transport evidence base.
Amartya Deb (Gloucestershire County Council)	Policy S18: Moreton-in-Marsh	"Policy S18: Moreton-in-Marsh" proposes to allocate land at the Fire Service College for a new primary school, as well as enabling developments of 310 homes, a neighbourhood centre and employment development. In addition, a route is proposed to be protected for a new road, which would futureproof the transport strategy for Moreton. In respect of the 310 homes at the Fire Service College, GCC Highways Development Management is aware of the constraints that currently exist on the High Street at Moreton. Any development in this location could significantly exacerbate conditions in this location, and any planning application coming forward would need to be fully supported by a robust Transport Assessment and comprehensive transport modelling. There is an aspiration for a relief road/bypass to the eastern side of Moreton, although there is no firm design for this, and the Local Plan refers to the route of this road needing further consideration. This site will safeguard land for a possible bypass, but without knowing the alignment of this it is difficult to say how much land would need to be protected for delivery of this route. This important issue needs to be explored further with GCC Transport Planning and Highways Development Management teams.
Grace Lewis 153	Policy S18: Moreton-in-Marsh	Within the Moreton-in Marsh area there are a number of development proposals that have come forward. Under current local plan policy S18 (allocated housing development sites) sites M_19A and M_19B on Land south east of Fosseway Avenue are allocated for a total of 119 dwellings. Development has also come forward at Dunstall Farm (Application Ref: 19/02248/FUL) that lies below these allocated sites. This was for 250 dwellings which Network Rail objected to in 2019 as a result of the impact development would have on the level crossings. Under the Draft Policies Document, paragraph 11.5.1 states that the Gloucestershire Local Transport Plan is prioritising improvements for Moreton in Marsh railway bridge including pedestrian and vehicle access. There are a number of level crossings within the vicinity of the bridge proposed for upgrade and a number of development allocations and proposals that will likely impact on the nearby level crossings. Should development come forward in this area, in order for Network Rail to support the proposals the level crossings affected would need to be stopped up and diverted over the new bridge structure. Network Rail have briefly discussed the proposed bridge upgrade with the council and look to work positively to ensure the level crossing affected are closed and the PROWs diverted, should the bridge be built. [See also linked comments to INF5]

Respondent	Policy	Comment
Bathurst Estate 175	Policy S18: Moreton-in-Marsh	No comment.
Christopher Kenney-Herbert	Policy S18: Moreton-in-Marsh	CDC has not confirmed any infrastructure improvements for the proposal for over 1500 new dwellings. No evidence of how any new road will be funded or a map of where it is likely to be located has been provided. The partial ring road being suggested, somewhere to the east of M-i-M, does not alleviate traffic going south through Stow or east/west. These proposed developments will just exacerbate the current traffic congestion. The WYG A429/A433 Corridor Study dated 2018, commissioned by GCC, concludes: - a. Para 2.14 Stow-on-the-Wold was one of the 5 collision hotspots on the A429 b. Para 3.2.10 assesses that the A429/A436/B4068 junction will be 109.7% of capacity by 2031 when the acceptable capacity thresholds for such junctions is a 90% Degree of Saturation. Subsequent to this report significant developments have been approved e.g. Dunstall Farm (19/002218/FUL) 250 dwellings and 67 dwellings on Evenlode Road (19/00086/OUT). Warwickshire's developments in Shipston-on-Stour also needs to be taken into account. In addition, between 2011 and 2021 the DVLA reported that the number of licenced vehicles within Moreton-in-Marsh increased by 20% against a national average of 11-12%. The NPPF (Dec 2023) Para108, Promoting sustainable transport, states:- d. the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; Paragraph114 of the NPPF, Considering development proposals, states:- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. CDC has shown no plans or evidence of how the effect of the additional traffic will be mitigated for the east/west traffic and surrounding villages and towns, particularly Stow. CDC's and GCC's failure to provide a footpath and pedestrian crossing, as per the decision notice conditions 12 & 13 of 16/05169/FUL for the Fosseway Garden Centre (FGC), raises concern as to the ability of these Councils to address such matters. Though this condition was subsequently removed, with the payment of £25,000 (19/01503/FUL), no improvements, after 4 years, have so far been made. These improvements were on the recommendation of GCC Highways, a statutory consultee. A ring road is required round both M-i-M and Stow-on-the-Wold (Stow). As there are currently no Government plans to upgrade the A429, CDC needs to evidence how

Respondent	Policy	Comment
Martin Grasby 200	Policy S18: Moreton-in-Marsh	We are not against development and particularly that of affordable and social housing, however, we are concerned at the totally disproportionate potential increase in house building and consequently population increase which Moreton has had to absorb more than a fair percentage of over recent years. 1. A main criteria for our concern is lack of adequate infrastructure including waste water and sewage management which has led to a significant increased risk and indeed incidences of flooding and pollution of the river Evenlode and its tributaries. A number of areas already experience flooding, sometimes combined with effluent waste, and the proposed expansion of Moreton will exacerbate this. The town lays in something of a flat bottom bowl so there is an obvious limit as to where additional water run-off can be directed to. Additional hard surfaces with new housing and road networks will, without doubt, compound an already precarious situation. Are you as a council prepared to underwrite insurance policies for those likely to be affected with difficulty in securing house insurance due to likelihood of flooding already shown to be a distinct possibility not limited a 100 year event? If you grant permission for yet more unwise planning applications you have a responsibility to recompense those adversely affected. 2. The proposal for substantial developments on the Fire Service College site will extend the town Eastwards way beyond a natural balance of the town centre. The proposal indicates a new school, shops, leisure centre and businesses meaning residents from the West will invariably drive to these facilities thereby creating more congestion and consequent pollution. The previous developments on the FSC site have already weighted the town significantly Eastward. 3. The inevitable environmental damage contradicts CDC's strapline 'Green to the Core.' The unsubstantiated need for the scale of development will undoubtedly affect the natural environment not least of which is the present on-going pollution from a totally inadequate water treatment plant. The river Evenlode is deteriorating in water quality, land being used as an 'overflow' is being polluted and these issues will worsen and will take years to rectify, if indeed it's possible. Whilst nature has proven to be resilient there is always a tipping point. 4. If an increase in housing stock takes place in Moreton, developers must be held accountable for any shortcomings on their original bids. We understand it is not uncommon for a developer to undertake improvements and provision of amenities but leaves the site without completion of these. There have to be clauses whereby they face strict, enforceable financial penalties should they not adhere to the original approval agreements. Thank you for considering these points and we trust you will take these and all factors into account when making decisions which have multiple consequences for the lives of residents and business owners and the surrounding environs of Moreton in Marsh.

Respondent	Policy	Comment
Cotswold Charm 210	Policy S18: Moreton-in-Marsh	1. Proposed housing allocation to Moreton in Marsh: a. Education i. New Junior school with be required to meet demand. ii. Secondary school – unless an alternative is proposed, we assume that the current provision at Chipping Campden School will continue: 1. This will require increasing the capacity at the school and associated additional development of its facilities. 2. Transport at the moment relies on buses: a. Without the development of an additional car/bus park and access, the current unacceptable Traffic chaos will only get worse. b. Rebuilding of the railway station at Chipping Campden and the provision of a shuttle service between the existing high speed trains would help to reduce the impact of school traffic. b. Infrastructure i. The Fosseway through Moreton is already clogged up and creates serious delays in Moreton itself as well as the knock on effects of backing up traffic to and from the sets of traffic lights at Stow on the Wold. ii. The roads are constrained by the bridges over the railway line and the adjacent road junctions – serious development work would be required to maintain a suitable traffic flow. c. Employment i. Major business development/expansion will be essential.
Mrs Louise Derrington 212	Policy S18: Moreton-in-Marsh	My comments, has I been able to actually input them , would have asked what if any consultation is being done to reflect the impact on local villages in the Moreton in Marsh area? The impact will be felt by us just as much as people in Moreton. It seems as if we are being ignored by the consultation process. The bridge into Moreton in Marsh is already a danger and the volume of traffic ,lack of parking, and pressure on local services by an already much increased housing stock means that Moreton is becoming inaccessible for those of us for whom Moreton has always been our local place to shop. I appreciate that Government Policy dictates the need for a plan but surely we need a plan which endeavours to provide affordable housing without actually destroying the reason people want to live here in the first place. Most people work in hospitality but if you make a house housing estate it won't do anything to enhance opportunities .

Respondent	Policy	Comment
Anita Adams 221	Policy S18: Moreton-in-Marsh	With no infrastructure in place to relieve traffic chaos, parking problems, caused by commuters parking in high street(where is the promised train station additional parking?) long waiting times to get face to face doctors appointments, a primary school over subscribed, no senior school for older students. Together with sewage problems and flooding. Once homes on new Spitfire site are occupied and new care home up to capacity the A 429 will be a nightmare, with 6 entry/exits on to it, all within a few hundred yards. (Fosseway Ave, Garage, Aldi/ Care Home, Health Centre/Hospital, Spitfire Homes and Garden Centre.) If located on Fire College land what's to say additional housing just keeps getting added and added. We also have problems with anti social behaviour, mainly by youngsters bored with nothing to occupy them, but to destroy or vandalise play equipment etc.

Respondent	Policy	Comment
Ms R A Mason 222	Policy S18: Moreton-in-Marsh	I attended the consultation event in the Redesdale Hall last week, and remain very concerned about several issues that have arisen. I asked 1 of the planners to clarify the village garden meaning / he was not able to do this. I am a committee member of the Moreton NDP / Neighbourhood Development Plan, and have been for several years. There has been no attempt to liaise with the committee to work together, as far as I'm aware. Having completed surveys & collected evidence over the years, it would make sense to have worked together? Issues including how the sewage is going to be dealt with, given the existing building being undertaken, and any future plans, is a real concern. There is ongoing sewage being dumped in the Evenlode River. & this is unacceptable from Thames Water - it needs to be stopped! The traffic through Moreton, is already a nightmare, particularly when traffic works are in place. This is just going to get worse, if the number of houses increase. The infrastructure of the town, is already at breaking point, especially with the local surgery, where it can now take nearly 3 weeks to get a GP appointment. Local schooling needs to be looked at again, given there is the equivalent of a whole class now available at the local primary school. The planners need to look at the short & long term impact of any future development in the area. Moreton has already seen a 43% increase in growth over recent years. It cannot sustain this in future years, without accurate forecasts of the effects this will all have on the town. With increased traffic, brings the risk of more accidents, & pollution, as well as the juggernauts helping to damage the road network. I would hope that efforts are being made to find more cost effective ways, of repairing our roads. This is so costly to motorists as well as the cause of accidents. Where are all the jobs going to come from, to employ all the new people anticipated to fill all the new housing? So many questions arose from the first consultation meeting, & I hope tomorrow nights meeting, helps to answer many of those queries. We have a clash with an NDP meeting, so unfortunately unable to attend. I hope we have some positive clarification after the meeting, and would ask you involve the town closely, with any new plan. Please do not ignore the views of Moreton's residents. This was always a lovely place to move to - don't ruin it!

Respondent	Policy	Comment
CR Ayers 223	Policy S18: Moreton-in-Marsh	Development of Moreton in Marsh. The Plan intention for the larger development of Moreton in Marsh to meet the Plan shortfall in Cotswold housing needs will place a greater travel load on the A429. However, unlike the development in Cirencester which is well served with good ring and other roads (A417 in particular) Moreton suffers from the 2 major traffic bearing roads, the north/ south A429, and the east / west A44 running through the centre of the town. This presents a major bottleneck in traffic flow especially in respect of inter county traffic. The narrow railway bridge on the A429 also throttles traffic flow and the pedestrian walkway is narrow and dangerous to walkers. As mentioned above these constraints need attention now to restore the Vale of Evesham traffic flow on the A44. The only way is for a bypass to the north and closing the existing through town road to transient traffic. Moreton is very close to the northern Gloucestershire border and a long way road journey wise to the rest of the Cotswold District making commuting to the rest of Gloucestershire a less attractive option. There is insufficient local employment available for all of those housed in the new estates so it will in practice become a commuter town. In has excellent rail links especially with the more recent development of the Worcester Parkway station that allows easy transfers to north / south trains and the doubling of the trackway to Oxford has improved scheduling. Thus, rail commuting to Worcester, Birmingham, Hereford, Oxford, Reading and London (including interchange to the new Elizabeth Line) is highly likely. This import of "outsider" commuters to Moreton to fill the new houses does not solve the problem of the indigenous Cotswold shortfall requirement? Is Moreton really the answer to the Cotswold numbers problem? The above notes are random musings, but there is a running thread of inadequacies in the road system, which not being the direct responsibility of CDC, needs addressing before any further housing development proceed along the A429 corridor and in particular at Moreton in the Marsh. □
Judith Montford The EA 207	Policy S18: Moreton-in-Marsh	Chapter 7: Delivering the Strategy We understand that in relation to allocated sites for developments in this local plan, only broad areas with high level assessment of potential for future development rather than sites have been put forward. Regarding specific site allocations Policy S18 – The Fire Service College, Moreton-in-Marsh is the main site proposed. This was confirmed to us in an email of 14 February 2024. Following a review of this site, S18 - Moreton-in-Marsh, we note that there appears to be two new allocations here, namely M72 and ME6 which are both fully in Flood Zone 1. In addition, a 'route for a new 'landscape-led' road is safeguarded to connect the A429 to the A44 from the north and south of the town' is proposed, however it is not clear where this would be.
Judith Montford The EA 207	Policy S18: Moreton-in-Marsh	There appear however to be new site allocations within Chapter 7. For example, we are concerned there may be new allocations proposed in areas at flood risk. Policy EC4 also appears to refer to changes to site allocations. We note many sites are shown in Appendix B of the SFRA Level 1, however it is not clear which ones are being put forward.

Respondent	Policy	Comment
Judith Montford The EA 207	Policy S18: Moreton-in-Marsh	We are also aware of significant development activity in and around Bibury, situated on the River Coln which has not been listed within Chapter 7. Despite enduring considerable historic modifications such as straightening, widening, and the installation of in channel obstructions, this river continues to support a variety of protected species. Consequently, any development in this vicinity must be highly considerate of the river's ecological sensitivity. Moreover, there is potential for substantial restoration work along this river corridor, driven by the area's catchment partnership. To ensure that the efforts of potential upcoming restoration projects are effective, let alone optimized, it is essential that all development initiatives align with and support the goals of the catchment partnership, prioritizing the preservation and restoration of the River Coln's delicate ecosystem. We are happy to have further discussions with the LPA concerning this. We have not reviewed these site allocations in any detail in relation to site constraints and matters within our remit. Please confirm if sites have been allocated for proposed development in Cotswold and if so, please can you provide shapefiles of your chosen/allocated sites so we can provide flood risk, water quality/water resources, biodiversity/ecology and groundwater protection advice on these?
Hugh A. V. Wainwright 226	Policy S18: Moreton-in-Marsh	The Fire Service College, owned since 2013 by Capita a company in a poor financial situation, only has a 12 year contract from the MOD. There is no guarantee this will be renewed or that the company will survive that long. Therefore, there could be the opportunity to develop a brownfield site in the 2030-41 period, rather than destroy and pave over current agricultural land. As housing requirements have been met for Moreton until 2030 wait until the future of the Fire College site has been determined and act accordingly.
Hugh A.V. Wainwright 227	Policy S18: Moreton-in-Marsh	POLICY S18 7.12.12 A bypass might alleviate the traffic problem in Moreton that has increased dramatically over the last twelve years. The problems with a bypass are taking over greenfield sites to build a bypass, infilling between the current borders if Moreton and the new bypass and would any proposed bypass solve the congestion and air pollution in Moreton.
Hugh A.V. Wainwright 228	Policy S18: Moreton-in-Marsh	There are currently no major employers in Moreton and many people commute to other more major towns for work. The parking in Moreton has long been a problem and the increase in housing will only worsen the situation as even more people will drive to the centre of Moreton and park for the day or even the week. The new cycle hub at the station is barely used. What is going to be done to tackle this problem and assist parking for current residents in Moreton? Many parking spaces are taken up all day by train commuters and on numerous occasions by weekly commuters leaving their vehicle all week. A well planned and positioned car park away from the centre of the town with time limited parking in the centre of town that is monitored, for people who want to do a quick shop, and a sensible residents' parking scheme. In addition, a pedestrianised area from behind the Redesdale Hall to the war Memorial to include the slip road would enhance the centre of the town.

Respondent	Policy	Comment
CR Ayers 223	Policy S18: Moreton-in-Marsh	Development of Moreton in Marsh. The Plan intention for the larger development of Moreton in Marsh to meet the Plan shortfall in Cotswold housing needs will place a greater travel load on the A429. However, unlike the development in Cirencester which is well served with good ring and other roads (A417 in particular) Moreton suffers from the 2 major traffic bearing roads, the north/ south A429, and the east / west A44 running through the centre of the town. This presents a major bottleneck in traffic flow especially in respect of inter county traffic. The narrow railway bridge on the A429 also throttles traffic flow and the pedestrian walkway is narrow and dangerous to walkers. As mentioned above these constraints need attention now to restore the Vale of Evesham traffic flow on the A44. The only way is for a bypass to the north and closing the existing through town road to transient traffic. Moreton is very close to the northern Gloucestershire border and a long way road journey wise to the rest of the Cotswold District making commuting to the rest of Gloucestershire a less attractive option. There is insufficient local employment available for all of those housed in the new estates so it will in practice become a commuter town. In has excellent rail links especially with the more recent development of the Worcester Parkway station that allows easy transfers to north / south trains and the doubling of the trackway to Oxford has improved scheduling. Thus, rail commuting to Worcester, Birmingham, Hereford, Oxford, Reading and London (including interchange to the new Elizabeth Line) is highly likely. This import of "outsider" commuters to Moreton to fill the new houses does not solve the problem of the indigenous Cotswold shortfall requirement? Is Moreton really the answer to the Cotswold numbers problem? The above notes are random musings, but there is a running thread of inadequacies in the road system, which not being the direct responsibility of CDC, needs addressing before any further housing development proceed along the A429 corridor and in particular at Moreton in the Marsh.

Respondent	Policy	Comment
Sworders 248	Policy S18: Moreton-in-Marsh	Policy S18: Moreton-in -Marsh The policy makes provision for development of the site at the Fire Services College, to the east of the town. It proposes: 'An enabling development including market and affordable housing (Indicative net capacity of 310 homes) and also includes a new neighbourhood centre containing a convenience store, a replacement sports centre, a hotel and a public house.' Two hectares of land are allocated for the delivery of a new primary school. A route for a new 'landscape led' road is safeguarded, to connect the A429 to the A44 from the north and south of the town. Paragraph 17.21.7 notes that the site allocation covers 18.4ha. A further 12.5ha site allocation comprising an enabling development of general industrial, storage and distribution, offices, research and development, and light industrial uses (B2, B8 and Eg use classes) is also proposed. We have a number of comments to make in response to the above. In our view, 310 new homes will not provide sufficient funding to deliver the list of community benefits and infrastructure proposed. We note that 310 units only comprise the first phase of planned development which in total could deliver 1,500 new homes by 2041. We suggest that even this scale of growth is unlikely to support a new school, pub, community centre, shop and sports centre. Experience elsewhere has found that several thousand new homes are required to produce the receipts required to fund such a list of community facilities. We fundamentally disagree with the use of the term 'enabling development'. The National Planning Policy framework makes two references to enabling development. These are both in the context of development supporting heritage assets, not a local employment facility. The term 'enabling development' has been used liberally to indicate that the proposed level of growth will somehow fund improvements to the Fire Service College, but there is no evidence of how the Fire Service will benefit, and after the other items listed above have been paid for, we would question whether there will be any funds left to contribute to the Fire Service College. The Council should make its calculations of the viability of the proposed development transparent and accessible for review. There is also inconsistency between the references to the size of site which would be used for a new primary school; in Policy S18 it is referred to as a 2 ha site, but in para 7.21.8, a reference is made to a 2.4ha site. 1,500 new homes would almost double the existing population of Moreton in Marsh. It would significantly affect the character of a town which has seen relatively small scale, incremental growth. The scale of development proposed would have a significant impact on the existing problem of congestion in Moreton in Marsh town centre. The entrance to the Fire Services College lies some 1.2 miles from the town centre, so many residents are unlikely to walk into the town, and will still use their cars for local journeys, adding to the existing congestion. We recognise that Cotswold District Council needs to find sites to deliver new housing and encourage it to do so in Moreton in Marsh. However, in the context that the Local Plan Review is purported to be a tool to enable the Council to respond to the climate crisis, and to include zero carbon developments, the proposed allocation at the Fire Services College is excessive to meet local housing need in Moreton. The Plan should look more comprehensively at alternative, smaller sites around Moreton, to deliver new homes in more sustainable locations. Our client's site, ref M74, has been discounted to date because it lies on the edge of the Cotswolds National Landscape (former AONB), adjacent to the Fosse Way, but it could deliver 100 new homes and a primary school site. The Cotswold Borough SHELAA Part 2 Assessment (2021) sets that

Respondent	Policy	Comment
David Wilson Thames Water 307	Policy S18: Moreton-in-Marsh	S18 Moreton in Marsh It is understood that Moreton in Marsh will be a focus for new development. Moreton in March Sewage Treatment Works (STW) is located to south east of the town. The STW will need to be upgraded to accommodate the growth proposed. Any new development in proximity to the STW should be assessed in line with the Agent of Change principle set out in the NPPF, paragraph 187 as set out above. Where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station. Policy S18 also sets out that "A route for a new 'landscape-led' road is safeguarded to connect the A429 to the A44 from the north and south of the town." Any such road will need to take account of Moreton in Marsh STW operational requirements and that it will need to be upgraded to accommodate growth.

Respondent	Policy	Comment
David Wilson Thames Water 307	Policy S18: Moreton-in-Marsh	Chapter 7 - Development Strategy The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure. The attached table provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements. Early engagement between the developers and Thames Water would be beneficial to understand: • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be. To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when. Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Proposed Change Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
Mr Hindle 401	Policy S18: Moreton-in-Marsh	Plan 2026 - 2041. I only identify a few matters, as I am not a landowner, or developer. Morton 1. The broad 1500 allocation figure identified must be realistic, as CDC must have done some initial site searching. If additional 'logical' likely allocations emerge then I would encourage further allocations, to be considered, beyond 1500.

Respondent	Policy	Comment
Sue Stapely 404	Policy S18: Moreton-in-Marsh	All Documents relating to development in Moreton-in-Marsh. Moreton Sections. Unanswered questions attached. Please respond by email or, if possible convene a proper meeting with more that one planning office, chaired by Cllr Laycock to take Q's and A's from residents and capture all answers. Please provide a concise summary of the update document for residents. I have lived near Moreton for 10 years and in its center for the past 2 years and I'm distressed by the sate of towns infrastructure which is inadequate for current resident and needs upgrading before more development. Many residents would like there to be a master plan for Moreton and again efforts to improve the crumbling infrastructure of the town before and more residents move in. The Moreton neighbourhood plan must be considered by CDC before any proposals are confirmed. Residents view must be taken into accounts. Please organised a more useful meeting that the one on 6.3.24 with just one planning office and many worried residents being told 'I don't know'! FOSSE BARN, HIGH STREET, Moreton-in-Marsh, GL56 0LL QUESTIONS FOR CDC PLANNERS AND COUNCILLORS CONSULTATIVE MEETING 6 MARCH 2024 1. What notice, if any, will CDC take of the Moreton Neighbourhood Development Plan which has been created over the past four years by successive Working Groups made up of residents of Moreton and some of the town councillors. This is based on the views of 450 Moreton residents in response to a survey which went to every household about a year ago and is nearing completion? 2. We accept that there must be more genuinely affordable homes, more social housing and more rentable property and that a Local Plan is needed but are concerned at the way it has been handled thus far without much transparency, with a rushed consultative period and with no promised reference to the Moreton Neighbourhood Development Plan which covers this very topic from the residents' point of view. 3. Why cannot Moreton have a Master Plan before the details of further developments are worked up by CDC planners, as Cirencester has been granted? 4. When must the Update to the CDC Local Plan be completed? 5. [illegible]

Respondent	Policy	Comment
D Hutch 407	Policy S18: Moreton-in-Marsh	HOUSING DEVELOPMENTS, Moreton-in-Marsh I am a resident of Moreton-in-Marsh and I am writing this document for the Public Consultation about proposed new housing in Moreton, on 6" March 2024. In Moreton, there is a serious shortage of housing, especially for local people on low incomes. As everyone knows, we have a housing crisis for young people across the UK. I am broadly in favour of the proposed development, if it is done well. Many years ago, I lived in Bournville, one of the first "garden villages". Bournville Village Trust continues to exercise an international influence on housing and town planning generally. Anyone visiting Bournville will be struck by the exceptionally wide range of housing provision (for some 20,000 people), the fine recreational facilities, and the beauty of the natural and built environment. Nowadays we need exemplary, sustainable housing, which can reduce bills for householders. I would like super-insulated houses, all with solar panels for cheap electricity, eco-friendly homes without a gas supply, all with secure bicycle sheds and charge points for electric vehicles. There should be safe spaces for children to play, with good maintenance guaranteed into the future. We need plenty of flats, without excessive fees. It hardly needs saying, the town's sewage system must be upgraded before any additional housing is built. There will be a public outcry if this does not happen. The Evenlode River is already seriously polluted because the existing sewers cannot cope with heavy rain. This flat town has a history of inundation, so flood protection will be crucial. We require better public transport across county boundaries, to Shipston-on-Stour and Chipping Norton. We will need accessible premises for doctors, dentists and allied health professionals. We may also need a multi¬ faith centre. We need a thoughtful approach to biodiversity. With a larger population, there will be a great opportunity to improve the town centre. To understand how cars have taken priority over people, try pushing a double buggy past Lloyds Bank, where the pavement is always obstructed by overhanging vehicles. We need wide pavements and plenty of additional parking elsewhere. Then Moreton will be an even more attractive town, for the people who live here, for people who choose to travel here from the neighbouring villages and for the tourists who come from all over the world. Our beautiful Cotswold town has serious problems with traffic noise and air pollution. A by-pass would divert lorries from the town, but buses and coaches could still enter and park. Better walking and cycling facilities would encourage local people to leave their cars at home.

Respondent	Policy	Comment
Suzanna Berry 408	Policy S18: Moreton-in-Marsh	I confirm that I have looked at the questions and possible responses in your consultation and am struggling to find somewhere to respond in the way that I would like, as the questions are leading. Please can you provide evidence that support your plans and will combat my concerns relating to development in this area. 1. Employment Opportunities I am a school business manager and have been for over 25 years. I see the impact of rural poverty on young people and communities. There are currently 269 pupils in the school, which has a capacity for 315. (Data from Get Information About Schools) Of those pupils 22. 7% are eligible for free school meals. This is likely to increase when 28 social houses are occupied later in the year. My belief, and please correct me if I am wrong, is that there is insufficient employment in this area. The nearest towns offering more employment opportunities are Cheltenham (40 mins), Gloucester (50 mins), Oxford (55 mins). Many of the families on low incomes struggle to afford to run a reliable car to access employment. As we boarder different counties bus transport is not as integrated as it could be. We can move to the south, within Gloucestershire but there are limitations moving East and North. We have very good train transport, but the cost is prohibitive for people working in minimum wage roles. Much of the work available in the town is connected to the hospitality industry, pay is low and hours variable, seasonal and inconsistent. We are blessed having access to 2 outstanding secondary schools. However, at post 16 they cater for more academic students. For those wanting to study more technical subjects they have to travel to Cirencester. There is one direct bus at 6.50am taking 1 hour 48 minutes. In the rural secondary schools I have worked in deprivation and poor academic attainment has been worst in white working class children, boys in particular. Not being able to access appropriate technical post 16 education does not help. Whilst I understand your proposed development will include some commercial opportunities, there is no guarantee they will be suitable for less academic residents. Please can you advise me on how you plan to protect any less academic families moving into this new housing from rural poverty, running for generations to come.

Respondent	Policy	Comment
Peter Blackburn 409	Policy S18: Moreton-in-Marsh	General suggestions to Local Plan The improvements would improve residents quality of life and provide sustainable environmental solutions. Comments for the Local Plan 2024 , regarding Moreton in Marsh specifically. High Street Look and feel The High Street needs to be made to look more attractive, by removing parking and volume of car traffic, to encourage development of more variety of retail businesses in the town. The many long term parked cars need to be relocated to a large car park, near the station, or on the northern show ground, or on the south side of the town near the Hospital. Free parking within these carparks should be offered to residents of the High Street. Parking needs to be within 5 minutes walk. There should be more traffic calming on the High Street and the removal of many parked cars, which seem to be there permanently. Perhaps the High Street could be pedestrianised if a new ring-road could be built, to reduce noise and pollution for residents and attract visitors to support an increased number of retail premises. Additional capacity at the Doctors' surgery may be appropriate; a new secondary school for the town; a broader variety of retail businesses on the High Street to support residents and visitors who could be encouraged to arrive via the railway station. Volume of taxi and bus provision is lacking from the station. Railway bridges The two bridges are dangerous for pedestrians to walk across because the pavements are very narrow and a large number of lorries and vehicles pass close-by pedestrians. Separate footbridges could be provided to separate pedestrians and traffic, over the trainline. This would encourage walking and cycling into the town to/from the eastern developments.

Respondent	Policy	Comment
Richard Vaughan Davies 418	Policy S18: Moreton-in-Marsh	P.139 (7.21.7) Totally inappropriate use of land without improving - and adequate sewage and drains The river Evenlode is already polluted by raw sewage. This is a serious health hazard. Build elsewhere, leave Moreton alone. Executive Summary P2 (1.9) The proposal for 1500 houses (in addition) to the 350 on the Fire Service College Site) will cause excessive traffic congestion and be a considerable safety hazard for drivers, cyclists and pedestrians You should be fully aware of the congestion and safety problems that such a massive residential will cause. Do not build these houses in Moreton. Glos has many other potential sites (brownfield) where such development would be less harmful and even beneficial. Executive Summary P2 (1.9) The proposal for 1500 new houses would totally change the character of the town and overload the existing infrastructure. Moreton has the character of a small market town, with personal services and friendly environment. This would be a totally loss if thousands of new house are built. Spread the load across Gloucestershire if you must and not all in one place. Brownfield sites are available.
Graham Trethewey 419	Policy S18: Moreton-in-Marsh	Page 138 Policy 518 Moreton-in-Marsh paragraph 7.21.7 (Page 139) contains the implicative 310 houses of the Fire Service College Site. My comment is that 310 more houses on the above site are too many due to the home event of upgrading the Moreton wastewater treatment works. The development should be suspended until the upgrading has been completed. When the development is allowed to commence the developer must be instructed to push the acceptable tree per building plot is 310 trees and no houses are to be passed for occupation until all trees are planted. All trees are to be planted at the developers expense and within 2 years of purchase. Even trees must be consistently maintained by watering every two weeks. Photographic evidence of the masterplan must be provided by the developer with time and date on all photo's. Each street must be on each photograph and the developer must sign a statutory declaration after each two weeks masterplan period started working has been carried out. If public comments are still being received by CDC then the developer of the Fire Station Site must state the name of the developers architect and planning and building regulations approval drawings must bee seen by the public before any approvals are given. An architectural aspects of the development must meet all criteria stated by the local Moreton-in-Marsh neighbourhood plan scheme to date.

Respondent	Policy	Comment
Josephine Anne Lane-Burford 420	Policy S18: Moreton-in-Marsh	Page 138 Policy S18 Moreton-in-Marsh Paragraph 7.21.7 (Page 139) DISAGREE We should put an end to the over development of Moreton area, the infrastructure cannot support more and more houses thus increasing the population and inevitable traffic congestion, which will also affect air pollution. 1. Retain valuable farm land. (Consider self sufficiency) 2. Consider nature conservation WTE rest therefore retain and plant more trees and hedgerows to improve air quality for humans and safeguard birds and wildlife's habitat 3. Planning Permission for any developments should not be granted without public approved signed and sealed infrastructure plans in place.
Fransica Sankson 422	Policy S18: Moreton-in-Marsh	Development - Moreton, Stow or Bourton do NOT have the infrastructure for the homes, Doctors, Schools, roads, SEWAGE etc. The houses are not for the people that want/need to work in the areas too expensive for basic salaries. We do not need more executive homes at nearly £400,000. Doctors - already long need times School - already full and any new build would be an important school playing grounds. Sewage - already beyond breaking point. Roads - Fosseway cannot cope. Housing - NOT for young/ or most jobs available in the area that have a lower salary. BNG should be in the areas not sat somewhere totally different. Houses should be affordable to those earning 25k a year. They should be fully sustainable with solar panels / re-use water / sustainable heating. Big sites should have the infrastructure to support the numbers of people and cars. Houses should be built on brown sites – not - farmland.

Respondent	Policy	Comment
Mark Stephens 423	Policy S18: Moreton-in-Marsh	S18 Moreton in Marsh Wider transport infrastructure - are not close to Moreton-in-Marsh e.g. M40, A34, M4, M5 with limited alternative transport of trains. Only N/S connection by GWR with the proposed Honeybourne Stafford link not on FWR's planned route expansion. Any development of land for employment will need - an interrogated transport, network of infrastructure and these are already developed in nearby centers such as Banbury, Evesham, Oxford and Stratford. Even with a proposed by-pass the current - the proposed transport infrastructure of support the number of proposed homes. Reduce the number of proposed dwellings which is disproportional to the towns location as employment and/or transport hub. Look for alternative locations with better transport infrastructure and/or proximity to major transport links e.g. Cirencester, Kemble, Fairford with the M4, A417, A419, M5 access (Birmingham NQ) to Bristol SW, Cheltenham, Swindon. On a flood plain - Flooding: Moreton-in-Marsh has experienced flooding in 2007 when the whole of the town center was under a meter of water and again in 2022 when east street was flooded. The proposed number of new dwellings resulting in hectares of current farmland that helps absorb the rainfall and maintain the already high water table (less than 0.5 in under GL56 0LA as per flood assessment) will exacerbate the potential for flooding either from Evenlode, it's tribulates (some of which are main roads in the specific development) and the high water table. The - of drawings from the projected number of dwellings cannot be coped with - A reduction in the disproportion number of dwellings proposed for Moreton-in-Marsh A full flood risk assessment - independent - to be undertaken A full appraisal by the Environment Agency as to their views (they provide regular alerts of potential floodings to the properties in the GL56 area) Public services are not just for purpose of the existing population of Moreton. - Sewage pumping station - over capacity of pumping raw sewage in the towns waterways including the Evenlode river. - Doctors surgeries - there are 2 and both are over subscribed - Dentists - there is no NHS dentist in the town to have to go to other towns. NC Hospital - does not cover most medical referrals which mean already we have to travel to Stow, Cirencester or Gloucester. A reduction in the number of proposed houses in the local plan for Moreton A new sewage pumping system for Moreton to stop ever increasing sewage release (Note Thames Water has approved a CSO for Moreton so eve more sewage can be realised and the new P.S has been put back again from 2026 to as least 2028.

Respondent	Policy	Comment
Danielle Stephens 424	Policy S18: Moreton-in-Marsh	I am commenting on the effects such over development will have on Moreton-in-Marsh, both for new residents and existing the town infrastructure (water, road, health services etc) but primarily the rural character of the town. The massive increase (310 on the FCS plus a further 1500+) will change the town, making it a commuter town devoid of community with 2 counties if the neighbourhood center hot public houses and primary schools goes ahead. Currently the town is struggling to incorporate the new developments in respect of shopping & leisure facilities, because people commuting by car to other nearby towns (e.g. Evesham, Stratford, Stow-on-the-Wold) for their daily needs. This influx of additional housing will densely populate areas that are rurally characterful, enabling the current residents to enjoy the countryside with numerous footpaths and fields that people and their dogs use and appreciate daily. These rural will no longer be there to enjoy by all through built up residential areas which is already the case in relation to the new developments in the Avenue for example which is not attractive, being a development of very similar looking houses, which could belong to any town, not a quaint market town like Moreton who's heritage and architect and community and rural aspect should be preserved by fewer houses (I am not against all new housing) and better designed layout and landscapes. Again I urge you to look at the backhouse and The Avenue developments to see how it shouldn't be done. Thank you for reading this & taking my views into account.
Anna - Gabriella Stephens 425	Policy S18: Moreton-in-Marsh	My objection is related to Highway's safety issues, particularly the current and proposed number of new houses which will directly impact on this. Already the roads in the town are gridlocked on a daily basis because of throughout traffic on the A419 and A44 and this problems also occurs at Stow-on-the-Wold. Our roads are dangerous because of the amount of traffic and in many cases narrow footpaths (Over the railway bridges x2) (or no footpaths up to Fosseway garden center) The amount of traffic also creates real pollution problems (air) The proposed increase in number of dwellings will make this problem also worse due to the disproportionate extra number of cars that will be driving in and through our town from and to the new proposed developments. Already it is too dangerous to cycle and as a runner it is dangerous running over the railway bridge on the A419 and down Todenham road to the new avenue estate and beyond. On the A44 there is no footpath beyond the fire station college so that is very dangerous to run, walk take a pushchair on the very narrow overgrown path. A proposed by pass for HGV's ad heavy traffic will not stop the extra number of cars from the new houses (2 cars per household = 3620 cars minimum extra) and parking which is already hazardous on our high street and town center car park would be even worse. Build some new houses but only those that highways infrastructure can support both current and future, I am seeking a reduction in the number of new houses proposed for Moreton-in-Marsh. Our town should have its fair share but not be expected to take the lions share just because it is views that we have the necessary infrastructure and because there is available land. The building of new houses should be proportional and Moreton has already has a disproportional amount built in the last 20 years with over 1800 built - even more than Cirencester.

Respondent	Policy	Comment
Martin Barnett 429	Policy S18: Moreton-in-Marsh	I am not a resident of Moreton-in-Marsh, but am local to the area, and wish to stand with the good people of the town to oppose the plans to turn Moreton-in-Marsh into a Garden Village. I have raised my family in the Cotswolds since leaving the British Military some thirty years ago, and I can appreciate the need for additional housing, as both my daughters are not in a financial position to buy their own homes locally, especially with the ludicrous prices of property in this part of the country, but not at the expense of Moreton-in-Marsh. I attended the Redesdale Hall drop-in, and the Fire Services College meeting in an attempt to learn more of the CDC's plans for Moreton, and have been struck by the level of inconsistency with the data provided by the . This has made the process extremely confusing, at a time when the CDC needs to provide us with clear and concise information. The main discrepancies include: 1) From a video posted by the CDC covering a recent meeting, it highlights a rather upset Cllr Harris discussing his annoyance at certain individuals who had indicating that Moreton may be assigned 10,000 dwellings as part of the plans for the town. It is my opinion that this comes directly from the rhetoric used by CDC indicating that Moreton could become a Garden Village. It was interesting to note that Mr Weaver (CEO CDC) stated that a Garden Village is 'technically smaller strategic developments up to around about 3 to 4,000 homes'. This does not relate to the UK Government website on this subject which states 'Garden Villages as being between 1,500 and 10,000 homes in size'. Garden Towns have a number of dwellings exceeding 10,000 homes. What may not be know, and what hasn't been described to those who attended the Fie College meeting, is that the 2016 Locally-Led Garden Village, Towns and Cities prospectus suggests that 'local authorities should decide themselves how to define what a Garden Village is'. 2) During the Redesdale Hall drop in Matthew Britton and James Brain both discussed the Government's standard methodology for calculating the number of houses for the District during this extended planning period to be around 7,400 dwellings. This is backed up by the leaflet I took away from the drop-in. During the meeting at the Fire College the number of 7,400 was never discussed, only a figure of 3,300, of which 1,500 would relate to Moreton. Are we being fed on a diet of contradictions? 3) Around 5,150 dwelling's worth of land supply for the extended planning period has already been identified however, this still requires land for a further 2,250 to bring us up to the 7,400 figure. If land for the vast majority of dwellings has already been identified, and that includes the segments of land listed in the 2026-2042 Plan for the development in Moreton, why would time be spent looking for additional land, or a plan for 'Village Clusters' to be considered. Politically, I feel that this is already a 'done deal', a factor that CDC have vociferously denied. It appears we have walked into a smoke¬ screen of misnomers and differences in data that has brought me to the decision that we are not being told the full story. Prior to joining the Military, I served as a Colonial Police Officer in Hong Kong. Today I work in a sector providing advice on crime within a specific arena. Recent data suggests that crime clear-up rates of the UK for each Force was between 5% to 18%, which cannot be viewed as healthy. In the US, 52.3% of homicides, 36.7% of violent crime, and 23.2% of robberies are successfully investigated. If the CDC propose to increase the number of residents in Moreton by 100% +, crime will inevitably increase. Moreton's Police Station was recently converted for housing, and the Stow-on-the-Wold Police Station is closed, and only used as a watering hole for Officers. Our nearest Police Station is almost twenty miles away in Cirencester. Moreton and Stow need a permanent Police Station, especially as statistics indicate that rural crime and [illegible] by 200%

Respondent	Policy	Comment
P Harvey	Policy S18: Moreton-in-Marsh	Enough is enough, we have had more than our quota here in Moreton-in-Marsh you have ruined this Cotswold town by your neglect and not listening to the local people and people of Moreton, who do not have the infrastructure for what you want. I am very elderly do not have a computer so this form was very different for me to answer it properly so I am using it to tell you how I feel and sincerely hope you will listen to the people Moreton who are working hard to try and explain that these future plans are not right.

Respondent	Policy	Comment
E Stevenson - letter rep 434	Policy S18: Moreton-in-Marsh	CDC Local Plan for Moreton-in-Marsh S18 7.21.6 7.21.7 18.3 ha site Affordable housing is needed by huge houses are built infrastructure and overdevelopment Huge houses no local person can afford - school planned on contaminated land on fire college land. Pollution on Fire College Site - Infrastructure, Over-development, Huge houses in Moreton. CDC mentions affordable housing in their plans for building 310 houses on fire college land - they mention the housing crisis in the Cotswolds in the CDC newsletter March 2024 - but - WHAT GETS BUILT? Enormous houses no local person can afford even the smaller ones on Evenlode road are £400,000 plus - impossible for a local person to buy. The huge houses that are built will be rented out as Air BNB or second homes that only people from London can afford to buy making lots of money for developers who gobble up greenfield provide no infrastructure - then take the money and walk away. The Fire Service College land is polluted - a school should not be built there - and sat David's primary school has not reached full capacity. CDC should find out how many houses are second homes or let out as Airbnb's instead of building enormous houses local people cant afford developers should be made to provide more infrastructure and the proportion of affordable houses should be greater than huge unaffordable ones! S18 5.5.1 7.21.8 Wastewater - overloading existing water infrastructure by over development More building more houses more concrete more hard services on what is a flood plain - sewage and drainage already cant cope houses will get flooded! Flooding - Drainage - Water supply - Moreton. Moreton-in-Marsh is prone to flooding (the clue is in the name MARSH!) CDC is allowing new houses to be build on a flood plain (spitfire development on stow road) etc.

Respondent	Policy	Comment
Martin Barnett 429	Policy S18: Moreton-in-Marsh	6.12 Impact Assessment Matthew Britton continues that assessment of crime ant safety would be carried out by the country and especially rural a communities in the police is at all time low (theft of rural farm machinery up to 300%) my view of this process in not one of faith and trust that fast a box ticking exercise. I attended the Redesdale Hall drop-in, and the Fire Services College meeting in an attempt to learn more of the CDC's plans for Moreton, and have been struck by the level of inconsistency with the data provided by the . This has made the process extremely confusing, at a time when the CDC needs to provide us with clear and concise information. The main discrepancies include: 1) From a video posted by the CDC covering a recent meeting, it highlights a rather upset Cllr Harris discussing his annoyance at certain individuals who had indicating that Moreton may be assigned 10,000 dwellings as part of the plans for the town. It is my opinion that this comes directly from the rhetoric used by CDC indicating that Moreton could become a Garden Village. It was interesting to note that Mr Weaver (CEO CDC) stated that a Garden Village is 'technically smaller strategic developments up to around about 3 to 4,000 homes'. This does not relate to the UK Government website on this subject which states 'Garden Villages as being between 1,500 and 10,000 homes in size'. Garden Towns have a number of dwellings exceeding 10,000 homes. What may not be know, and what hasn't been described to those who attended the Fie College meeting, is that the 2016 Locally-Led Garden Village, Towns and Cities prospectus suggests that 'local authorities should decide themselves how to define what a Garden Village is'. 2) During the Redesdale Hall drop in Matthew Britton and James Brain both discussed the Government's standard methodology for calculating the number of houses for the District during this extended planning period to be around 7,400 dwellings. This is backed up by the leaflet I took away from the drop-in. During the meeting at the Fire College the number of 7,400 was never discussed, only a figure of 3,300, of which 1,500 would relate to Moreton. Are we being fed on a diet of contradictions? 3) Around 5,150 dwelling's worth of land supply for the extended planning period has already been identified however, this still requires land for a further 2,250 to bring us up to the 7,400 figure. If land for the vast majority of dwellings has already been identified, and that includes the segments of land listed in the 2026-2042 Plan for the development in Moreton, why would time be spent looking for additional land, or a plan for 'Village Clusters' to be considered. Politically, I feel that this is already a 'done deal', a factor that CDC have vociferously denied. It appears we have walked into a smoke¬ screen of misnomers and differences in data that has brought me to the decision that we are not being told the full story.
JO Trice-Rolph	Policy S18	S18 says there is a protected route for a road connecting the A429 and A44 round one side of Moreton - but the plan doesn't appear to show this route - please could you confirm where this is planned to run.
John Holmes	Policy S18	The suggested road would not do much to relieve traffic, given the east-west problems, and would do nothing to help with the congestion on the Fosse Way. The new traffic arising from the new housing would be likely to try to avoid the Fosse Way by using the small roads through surrounding villages such as Evenlode. The result would be significant damage to the SLA, which is just as attractive as the National Landscape and only not included in it for illogical historical reasons.

Respondent	Policy	Comment
EVENLODE PARISH COUNCIL	Policy S18	EVENLODE PARISH COUNCIL represents the village of Evenlode. It submits all of the following points - both generally, and also specifically under each in relation to each of the aspects of the Plan identified below; 1. FLOOD RISK AND MANAGEMENT I. CDC own definition1 of a SLA is that it is "an area of COMPARABLE QUALITY to the CNL"; □ II. The Cotswold District Special Landscapes Final Report 2017 Chapter 6 Moreton in Marsh & Surrounds at paragraph 6.7 and 6.8 (among other observations) reinforces the fact that the area - including the village of Evenlode – is poorly drained; and has a remote rural character especially away from the A429, and the area is generally tranquil and feels remote short distances away from the A429 and the Fosseway. All of these observations in reports commissioned by CDC point to the fact that development is unwarranted if it is in an area so contiguous to the CNL. III. The specifications of CDC's POLICY EN4 and paragraph 10.4.12 & 13 (in the Cotswold District Local Plan Update Consultation Accepted) demonstrate the high standard of the evidential test required to show that there is no significant detrimental impact if development is allowed. IV. Evenlode PC submits that the adverse impact of CDC's proposals for the South of the proposed development area would be significant: V. The centre of the village itself occupies land classified as Flood Risk 1. VI. However the area on and around the road from Evenlode to Moreton, one quarter mile from the boundaries of the civil parish of Evenlode and Moreton in Marsh has, according to the Level 1 SFRA (a) a High Risk of Flooding from surface Water (RoFSW); (b) a risk of flooding to both surface assets and may emerge at significant rates, and (c) that this Southern area of proposed development is in a functional Flood Zone 3b. VII. These three Flood data from CDC's own Level 1 SFRA clearly show of picture which contra-indicates development in this area. VIII. The River Evenlode and its tributaries in this area have historically and regularly resulted in flooding which effectively cuts the village off from Moreton in Marsh. IX. To develop the area for residential use would aggravate this level of flooding; further overwhelm the capacity of the River Evenlode and its Tributaries, and have a significant detrimental impact on the area. This is further considered under the heading SEWAGE AND WASTE MANAGEMENT next in this submission. X. Throughout Policy CC5, CDC seeks to rely upon the evidence base outlined in paragraph 5b.6.3. This is the very Level 1 SFRA which identifies the issues at paragraph VI above and the significant impacts on the village of Evenlode. XI. In Policy CC5 at paragraph 5b.6.12 (regarding Flood Storage Area long term future proposals vis-a-vis Cirencester) it states " ...much of this area is functional floodplain and therefore2 is unlikely to be developed …". If the parts of Cirencester are in a functional Flood Plain, how then can the southern part of Moreton in Marsh close to the functional flood plain around Evenlode be justified as suitable for development? The same considerations apply. XII. Paragraph 1. of Policy CC5 places a duty on CDC to "...avoid areas at risk of flooding…" and specifies that "surface water flood risk will be considered as equal importance as fluvial risk". In fact, the Level 1 SFRA illustrates that all three flood maps (RoFSW & Flood Zones & Groundwater Flooding) demonstrate that of the potential development sites cross-hatched red and situated to the South of the SFRA diagram ALL fall within the avoidance prohibition on development. Why does CDC [illegible]

Respondent	Policy	Comment
Sue Luckett	Policy S18	Moreton and the local area cannot cope with more traffic. Every new home resident will need their own car, age 17+ children will need a car to get anywhere. Public transport dose not work round here, and the fossway is now so heavily congested at peak times it is not fit for purpose. I live in a local village, side roads are already rat runs for cars avoiding Moreton and stow. Consequently cycling and walking on country lanes is much less desirable choice of transport. There needs to be a main cycle route from moreton to bourton. Planners put a bit of cycle path round a development and get praised but it is not the solution. We need a designated cycle path from Moreton to Stow and on to Bourton at least.
Pam Bennett	Policy S18	A lot of issues Moreton has have not been considered. Flooding is an issue as well as the sewage and waste water. Now we need these systems upgraded without the consideration of any further housing in Moreton.
Pam Bennett	Policy S18	Moreton needs better sewage drainage and water supply now, without new houses.
Fiona Perry	Policy S18	Any new development in Moreton-in-Marsh should only be considered once an independent assessment has taken place to check on the existing infrastructure; with recommendations on how to improve the infrastructure to enable it to cope with the proposed additional housing. Infrastructure should come first. It is idealistic to think the new developments would not give rise to additional traffic which will cause serious highway safety issues. There are not enough safe routes planned for cyclists. The fire service college land is a significant walking distance from the town centre. The sewerage system in Moreton-in-Marsh needs to be improved now (2024) before any more building takes place. Will there be an assessment on the safety of the proposed development area of the Fire Service College land? The proposed route for a new 'Landscape-led' road to connect the A429 to the A44 will go through and area designated a Special Landscape Area with disastrous consequences on existing tree cover and hedgerows; which will have a knock on effect on the wildlife in this area.
jamie ball	Policy S18	Policy S18 for Moreton In Marsh proposes extensive building of new houses on 'allocated Housing development sites that are known to have areas that flood. Pls see all my comments made in earlier section 'Flood Risk Management'.
jamie ball	Policy S18	Policy S18 also makes vague reference to a north south Bypass to alleviate traffic through the centre of Moreton In Marsh. Where exactly will this bypass go? There is as much east west congestion caused by the A44 through Moreton In Marsh. Any bypass would need to overcome this as well or be pointless. Further the real issue of congestion extends to Stow on the Wold. If the expense of a Bypass is considered, it should move traffic away from both Moreton In Marsh and Stow on the Wold. CDC does not build roads. GCC does. Does GCC have sufficient funds to undertake the civil engineering required to build across SLA land south of the A44, which has known flooding issues, and then build a bridge over the railway line? Has GCC been consulted? Do they have a specific plan? Where will the funds come from? What is their timeframe? Does Great Western Railway also agree? Surely the train line would be severely disrupted if a new bridge is required to be built. Have GWR been consulted? Can it be demonstrated that both GCC and GWR are committed to this proposed bypass?

Respondent	Policy	Comment
jamie ball	Policy S18	Policy S18 where is Thames Water commitment to upgrading Moreton in Marsh's sewage and waste water infrastructure? CDC has not engaged with them in the Plan to insure the proposed building works can be supported. Current problems with sewage and water management in Moreton In Marsh must be dealt with before any additional housing development is undertaken. Equally new development should be proportionate to existing size of the town and all services. Increasing the town by 100% is environmental unsound given the known propensity for flooding.
john shelton	Policy S18	Policy S18...the massive scope of CDC's development Plans for Moreton require a full fledged independent Local/Master Plan. When asked whether a plan was being considered along the lines of Cirencester's in the number limited Q&A session with the Public the CDC CEO said that it was not CDC's intention to have one. Quite possibly CDC doesn't want one as it would expose that Moreton is not a suitable site for such large scale development...negatives include flooding/sewage problems, lack of realistic employment opportunities without considerable commuting, grid-locked roads both east-west and north-south, a weakened railway bridge unsuitable for the amount of HGV traffic even at current levels. inadequate parking even today, rising pollution levels. and a linear Railway line (not the Hub claimed by CDC)...the list is long and real. The only thing going for CDC's plans for Moreton is the Fire College/Capita's willingness to make land available to reduce their annual losses and the need to upgrade their tired buildings and that it is currently outside the AONB but is surrounded by the Moreton Special Landscape area making any development controversial. There is no information about the required by-pass other than it will have to go to the east of Moreton and no admission that any bypass will further increase traffic problems to the north south east and west of Moreton, most notably to Stow.which is ofter gridlocked even now.Any new road big enough to cope with HGV's will be expensive and require compulsory purchase of agricultural/greenbelt land. There will be fierce local opposition.
Richard Noble	Policy S18	The proposed safeguarded route for the new 'landscape led' road should be shown as part of the plans. It is not currently clear where this proposed route is and whether it is at all viable.
Miss Laura Baskeyfield	Policy S18	Small housing developments, such as 13 dwellings on Davies Road have caused a significant impact on the local infastructure and environment and with now an increased risk of flooding in the vicinity of the build. What will be the resulting impact of the proposed additional housing, which the overall number still remains unclear. Moreton has seen a number of small developments over several years, which has resulted in a large increase that has widely gone unnoticed. An independant plan is required here.

Respondent	Policy	Comment
Lucy White	Policy S18	1.1 These representations are prepared on behalf of Mr Robert Oughton in consultation with Spitfire Homes. 1.2 Mr Robert Oughton is the landowner of Dunstall Farm, which lies to the south of Moreton-in-Marsh. The northern section of the site benefits from planning permission for 250 homes (reference 19/02248/FUL) and Spitfire Homes are underway with the construction of the site, with first sales due to commence in April 2024. The site is allocated for residential development in the Adopted Local Plan under Policy S18 (Sites M19A/B). Mr Oughton owns further land to the south of the existing allocation (identified as MOR7 within the accompanying Integrated Impact Assessment) and south-east of the allocation, details of which are submitted through the concurrent call-for-sites exercise. Policy S18: Moreton-in-Marsh 1.3 Mr Oughton broadly supports the amendments to Policy S18 which recognise the town's potential to deliver further housing and employment to deliver additional housing, employment and facilities to improve the town's self-containment and sustainability, whilst making a significant contribution towards the district's housing supply. 1.4 However, Mr Oughton objects to the use of the terminology "enabling development" in respect of the proposed allocation of 18.3 hectares of land at the Fire Services College for market and affordable housing (circa 310 dwellings), a new neighbourhood centre including convenience store, replacement sports centre, hotel and public house and a further 12.5 hectare employment site allocation of "enabling development". Paragraph 7.21.7 as amended indicates that the enabling development would support the modernisation and upgrading of facilities at the Fire College. However, the associated amendments to Policy S18 do not place any obligation upon the Fire College to direct funds arising from the proposed development towards the improvement of its estate. Accordingly, the policy fails to provide any assurance that the proposed allocation would safeguard the prosperity of the Fire College as an important institution and employer in the local area. 1.5 Enabling development is normally attributed to proposals for the improvement of heritage assets which could not be achieved without additional development to fund such works. This is not a relevant consideration for the Fire College and therefore enabling development is not justified. The Local Plan provides no evidence that the scale and nature of development proposed is necessary and directly related to the funds necessary to ensure the ongoing prosperity of the Fire College. We do not object to the development providing it is justified on its own merits, as necessary and sustainable development which meets the objectively assessed needs of the District and Moreton. 1.6 In respect of paragraph 7.21.09 of the supporting text to Policy S18 (Accepted Changes Version of the Local Plan Update), we support the need for a review of the transport strategy for Moreton to support future growth. In accordance with the Local Plan's "Green to the Core" headline strategy, priority must be given to reducing journeys by car and achieving a modal shift to greater use of sustainable forms of transport. However, it is accepted that a new road building could be required to alleviate congestion and support future strategic-scale growth. 1.7 In this regard, we support the proposed opening of the Stratford-upon-Avon to Honeybourne railway line to improve the viability of services from Moreton-in-Marsh and enable greater use of public transport from Moreton (paragraph 7.21.10). 1.8 Mr Oughton supports the principle of safeguarding a route for a new road through the Update to the Adopted Local Plan where the need is demonstrated by: a) a thorough and comprehensive assessment of the options available to reduce vehicular movements through Moreton-in-Marsh, both in respect of existing and future trips associated with new development; b) [illegible]

Respondent	Policy	Comment
Brad Hooker	Policy S18	Moreton-in-Marsh is NOT suitable for substantial expansion. There is a train line, but Moreton-in-Marsh is too far from Oxford and Worcester for substantial numbers to commute to work in those places. This is doubly true for commuting to Reading and triply true for commuting daily to work in London. Traffic and flooding are already huge problems around Moreton. As for a by-pass, no route has clearly been identified. No land for a by-pass has been made available. Concerning a by-pass, a FULL separate Consultation should be held. Paving over land in ANOB or SLA cannot be classified as preserving the environment. The rural nature of this area would be obliterated by the scale of building envisioned in current proposals.
Elizabeth Royle	Policy S18	Policy S18 Moreton-in-Marsh I would be interested to see the evidence that suggests that an additional primary school is needed, as at present St David's School is not at capacity
Elizabeth Royle	Policy S18	Policy S18 Moreton-in-Marsh I would be interested to see the evidence that suggests that an additional primary school is needed, as at present St David's School is not at capacity
Elizabeth Royle	Policy S18	Policy S18 Moreton-in-Marsh CDC acknowledges the current problem of highway congestion, which can only get worse if/when the proposed houses are built. Already residents in the Fosseway housing system are having to add 5 minutes to each journey to allow for turning right at the junction of the A429 and Fosseway Avenue, due to the number of entrances and exits in that section. Similar problems are likely to appear or worsen across Moreton, if the proposed houses arre built.
Elizabeth Royle	Policy S18	Policy S18 Moreton-in-Marsh CDC acknowledges that improvements to facilities to treat sewerage and waste water are required to support new houses and businesses. These need to be in place before building commences; Thames Water are several years behind promised improvements at present, and, although CDC can request that they prioritise this work, Thames Water are not under their control, and have their own agenda and timelines. The pollution of our local waterways by sewerage is already well above the legally set limits, and should not be allowed to worsen.
Nick Loat	Policy S18	The current primary school isn't at capacity and I believe the birth rate is falling, where is the evidence of need?
Sheila Thomas	Policy S18	7.21.2. The 2,000 job figure needs to be updated especially to take into account the effect of the pandemic. Also more detail is required e.g. How many jobs are fulltime, how many part time, how many minimum wage jobs, how many apprenticeships, what employment sectors, how many work from home, how many self employed. What new businesses have come to the town and how many left. e.g. Matcon to Evesham, Four Anjels to Bishops Cleeve.
Ian Macpherson	Policy S18	S18 - I consider that this whole consultation process is inadequate as follows: 1. The time scales for comments has been too short 2. The methods for collecting comments (website and paper form) are confusing. 3. The whole process for collecting comments appears to be designed to deter / stop comments from the local population of Moreton in Marsh 4. I predict that my comments above will be deemed not relevant by CDC

Respondent	Policy	Comment
Christie Hill	Policy S18	I believe the “garden village” of circa 1500+ new homes will constitute overdevelopment of Moreton-in-Marsh due to the developments currently being built in Moreton, additional plans at the Fire Service College, as well as the substantial number of new homes built in the area over the last 10 years. A garden village would completely change the character, feel and look of Moreton as well as having a significant impact on infrastructure, which Moreton already struggles with. Even if a bypass road was built, there would still be a huge impact on Fosseway due to the additional homes. The bypass will cause traffic problems in other roads around Fosseway. The addition cars brought into Moreton with these new build homes will have an adverse affect on pollution and air quality in the area. The sewage and water are not sufficient, as we already struggle with sewage problems in the areas. There are not enough doctors, dentist, leisure and school places available in the area to meet the demand of these extra houses. In addition there is a flood risk in the area, by building so many houses on fields. Moreton cannot support the majority of the CDC’s new home targets for the whole of the Cotswolds. Other Cotswolds towns, although in AONB, want and need additional housing, so it shouldn’t be so heavily built in Moreton. There aren’t jobs locally to support these houses . I understand that Moreton has been selected for a proposed garden village due to its train and public transport links, but the trains are infrequent and do not stop in other Cotswold villages and the busses are slow and again infrequent. Developing on a farmland in Moreton rather the brownfield sites around the Cotswolds, where houses are actually needed, will increase the cars on the road and therefore pollution. Finally, these new homes, built on farmland will reduce the green spaces, trees, wildlife and views around Moreton, which are enjoying by residents, walkers, cyclists and other tourists.

Respondent	Policy	Comment
Oddington Parish Council	Policy S18	Oddington Parish Council objects strongly to the considerable additional housing at Moreton in Marsh until such time as an overall plan for the necessary infrastructure requirements is agreed and committed. We have already seen a disconnect between planning and the other agencies and statutory bodies which has resulted in flooding issues and a congested A429. Additional housing, affordable housing, appropriate employment and transport are inextricably linked. It would be an act of faith to believe that a fully integrated plan can be achieved. The proposals for Moreton in Marsh will have an impact on residents of Oddington. The issues of most concern are: •Traffic – the Fosse Way through Bourton to Moreton is already congested. Although Moreton has two A roads they are not ideally routed. A relief road is referenced in the material which could affect Oddington but even if considered with the additional 1,500 houses, would never meet the economic hurdle in the current climate. Traffic could become much worse. •Primary and Secondary school capacity – the secondary school is in Chipping Camden. •NHS Provision •Water and sewage. Attendees at the consultation were very concerned about existing pumping station capacity and Thames Water's plans and the impact on Evenlode. •Rail connection improvements
Amartya Deb (Gloucestershire County Council)	Policy S18	There also needs to be some realism about the pattern and frequency of proposed bus route enhancements. Moreton is quite some distance from major towns, and whilst there is a reasonably good bus service to Cheltenham which could be expanded with the assistance of developer funding, the end result would not be 'high frequency'. This is mainly due to the general absence of other main population centres along the route which would contribute patronage. The journey between Moreton and Cheltenham currently takes over 70 minutes, probably without much scope for reducing this. The train service to Oxford and Worcester may be more attractive to the new residents, which would reduce the actual patronage on the bus to Cheltenham. With current operating costs of £200,000 per bus per annum and rising, then the section 106 request for an enhancement to the existing service to operate every 30 minutes, with later evening services etc. would be considerable. A development of 1,500 dwellings is of 'moderate' size and there will be many other calls on the list for developer funding. Any thoughts of 'four buses per hour' for this location would be unaffordable and unsustainable in my view. An enhanced level of bus service needs to be commercially viable by the end of the s106 funding period. This brings into question the sustainability of this proposal.

Respondent	Policy	Comment
Susie Stephen (Stantec)	Policy S18	We welcome the recognition of the important role and contribution made by the FSC within the District. We also welcome the proposed changes to Policy S18 which provides in principle support for development on the Site in order to facilitate vital investment in the FSC's facilities (as noted at paragraph 7.21.6). As amended, Policy S18 allocates land within the Site for housing and a new neighbourhood centre including potential for a convenience store, replacement sports centre, hotel and public house uses (under Site Ref M721); and employment (Class B2, B8 and E(g) uses (under Site Ref ME62). Whilst the FSC are still in the relatively early stages of developing detailed proposals, these uses are consistent with current aspirations for the Site and against the context of enabling development required for the necessary investment in the wider FSC Site operations. The allocation of land within the Site for a new 2-form entry primary school is also supported. We have no comments or suggested amendments to the wording of the draft updates to Policy S18 which is supported, as drafted. It is noted that the specific route of the new 'landscape-led road' to be safeguarded to connect the A429 to the A44, requires further consideration. However, we would reiterate that land within the FSC Site does not present an option for consideration due to the critical (and secure) nature of on-going operations within the FSC Site which are to be maintained.

Respondent	Policy	Comment
Lucy White Planning	Policy S18	These representations are prepared on behalf of Mr Robert Oughton in consultation with Spitfire Homes. Mr Oughton welcomes the consultation on proposals for a new Local Plan to 2041. It is noted that, based on the standard methodology, the Council anticipates a housing requirement of around 7,400 new dwellings over the plan period, of which up to around 3,290 dwellings would need to be identified through the new Local Plan (subject to Government clarification on over-delivery). We support the Council's preferred strategy for meeting most of the housing requirement to 2041, namely through a combination of non-strategic site allocations, a focus on main service centres, new strategic sites and a focus on growth around transport nodes. Moreton-in-Marsh as a Principal Settlement, Main Service Centre and transport hub with capacity for significant development outside the Cotswold National Landscape, is ideally placed to support the Council in delivering its preferred strategy and we support the Council's acknowledgement of Moreton's role through this options paper to deliver over 1,500 new dwellings by 2041 and additional development to support infrastructure, including a possible secondary school, in the longer term. We support the ongoing classification of Moreton-in-Marsh as a Principal Settlement (paragraph 2.3). Land south of Moreton, identified as MOR7 in the Integrated Impact Assessment, is owned by Mr Oughton. The site lies outside the National Landscape and immediately adjoins M19A and M19B which are allocated for residential development through the adopted Local Plan and benefits from full planning permission for 250 dwellings. Site MOR7 (M19C) is ideally located to support further residential development at Moreton. With the exception of land at the southern boundary which lies in flood zone 3, there are no insurmountable constraints to development. The site is relatively flat, agricultural land, defined by mature hedgerows and tree planting which provides an enclosure to any future development. Vehicular access is already established from the A429 into the landholding. The recently approved scheme for 250 dwellings includes a new vehicular T junction access with a right hand turn filter lane. The internal road is designed to accommodate a bus route which could be extended to serve into MOR7. An additional access via the A429 into MOR7 would be capable of facilitating a connection to further new development and a future new road from the A429 to the east of the town, if deemed necessary. Although the site is understood to comprise grade 2 agricultural land, this is subject to further assessment and any loss of best and most versatile land should be balanced against the wider sustainability benefits of directing planned developed to Moreton-in-Marsh, outside the National Landscape and closely associated with the town's built up area and associated facilities and services.

Respondent	Policy	Comment
Bloor Homes Western (Ridge and Partners)	Policy S18	Firstly, it is acknowledged and accepted that at the current time, the policy is being developed. However, Moreton-in-Marsh is one of the key settlements in the district and the main service centre for the north of the Cotswolds. The town benefits a range of shops and services and one of only two train stations in the entire district and must therefore be considered as an appropriate location for growth moving forward, particularly as the Local Plan to date has focused on growth within the south of district with the strategic allocation at Chesterton, Cirencester. The proposed allocation at the Fire Service College indicates the proposed direction of travel for both the Local Plan partial update and the Local Plan Review. The Cotswold National Landscape is located to the west of the town, and it is therefore most logical to extend to the east. As you will be aware, Bloor Homes have been actively promoting Land to the South of London Road. These representations relate to Phase 1 which has been the subject of a previous pre-application submission (ref: 23/01915/PAYPRE), and Phase 2 which includes an extended site area. These have been submitted as part of the accompanying 'Call for Sites' and are supported by a Vision Document. These sites are directly to the south of the proposed Fire Service College site, which is proposed to be allocated (under policy S18) for an enabling development including market and Affordable Housing (indicative net capacity of 310 dwellings) and also including a new neighbourhood centre containing a convenience store, a replacement sports centre, a hotel and a public house). In addition to this, 2 hectares of land is allocated for a primary school (including early years or nursery provision) and 12.5 hectares for enabling development of B2, B8 and E(g) uses. Equally, it is acknowledged under policy S18 that there is a proposal to safeguard additional land for a road connecting the A429 and A44. The proposed safeguarded route is proposed to connect London Road (A44) to the A429 to the north and south of Moreton via the east of the Town (outside of the Cotswold National Landscape). No indication of the proposed route is provided within the supporting documentation. However, this presents an opportunity for Moreton as a whole to accommodate more strategic development moving forward around this key transport hub. As has been mentioned previously and as is detailed within the accompanying Call for Sites and submitted Vision Document, the amount of land Bloor Homes has under its control to the South of London Road has increased. Bloor Homes would welcome the opportunity to work with the Council and key stakeholders to prepare a comprehensive masterplan for Moreton Garden Village aspiring to meet the Councils aspirations to the east of the town and would be keen to enter into discussions as to the location of the proposed eastern relief road / link road and how this could facilitate a comprehensive mixed-used sustainable development for the town. The accompanying Topic Paper titled Vision, Objectives and Development Strategy Options Topic Paper sets out a number of development strategy options. Paragraph 1.9 of the Topic Paper suggests that "given that Moreton-in-Marsh is a transport hub, which has a railway station; good provision of services, facilities and employment; and has various sites outside the Cotswold National Landscape, the town would become a focus for strategic-scale growth of over 1,500 additional dwellings and additional land for employment development. A longer-term vision, including additional development, may be required to deliver some infrastructure items such as a secondary school". It is agreed and supported that there should be a long-term vision for Moreton as a whole to ensure that these ambitions can be met. The Development Strategy sets out a number of options and suggests that the preferred approach is a combination of scenarios 1(additional non-strategic site allocations), 2 (main service centre focus), 6 (new strategic sites) and 7 (focus around transport nodes). Whilst the accompanying Topic Paper identifies Moreton-in-Marsh as a future location for strategic development, further consideration should be given to identifying
Debbie Taylor (Rangeford Villages)	Policy S18	Concerns about effects on the area - infrastructure, density, overdevelopment. Need to safeguard farmland. Highway safety issues - means of access/road capacity. Flooding, drainage and public service concerns (see comments on CC6). Lack of school availability.

Respondent	Policy	Comment
Paul Holmes	Policy S18	I would like to submit my objection to the local plan and the proposed development of Moreton in Marsh. While I appreciate the need for extra housing, no plan should be considered without a full feasibility study. Moreton has been earmarked because of the employment opportunities. But there is no industry here. Yes, build new houses but create businesses, build a bypass and provide adequate infrastructure to support the proposed population influx BEFORE the proposed houses are built.
Lauren Macadie	Policy S18	I have massive concerns about the development of Moreton-in-marsh. I have been a resident for 8 years and have seen the town swell, to a stage where it is at bursting point, without the infrastructure to cope. All our services are still designed for a small town, parking, schools (lack of secondary), doctors (it's not possible to book an appointment), roads and sewerage. The current new development (spitfire homes) will put more pressure on these. I already worry about the flood risk as the site is currently covered in standing water. The idea of even more housing is unbelievable. Our sewerage system is inadequate, and is destroying not just our water ways, but those of everyone down river. Please take note, and save our town.

Respondent	Policy	Comment
Julia Cross (on behalf of Mr and Mrs Geoffrey Cridlan)	Policy S18	Page 138 Policy S18 Moreton-in-Marsh Paragraph 7.21.7 (page 139) – the site at the FSC is certainly very attractive to developers and already has many houses on the land. Do FSC intend to eventually close the Fire Collage and sell off all the land to housing? Will the intended 310 houses remain at that number or will the amount creep up as it has on the Stow Road development? All those properties, all that concrete, all those people, all those extra cars using the roads and Moreton High Street, all those people using the amenities – schools, doctors, nurseries, North Cotswold Hospital, railway station, library. Moreton will begin to buckle under the strain of it all. •Will there be another doctors? •Will there be another dentist? •Will there be further schools? •What sort of shops will spring up? – I very much doubt it will be traditional high street shops serving the community •Have the developers consulted with Great Western Railway so that they are aware of a further strain to the North Cotswold railway line ? When there are trains (?), the car park is getting increasingly full, the number of carriages that GWR run on commuter trains are too few and overcrowded already. •Where is the employment going to come from with the Moreton area? Does this mean that people from everyone of the new houses will be travelling elsewhere for work? •Presumably if there are these many more people, then our two supermarkets are not going to be sufficient. Where will be building stop? Page 138 Policy S18 Moreton-in-Marsh Paragraph 7.21.12 (page 139) The idea of a bypass sounds like an attractive idea and a very short fix for the traffic in Moreton high street. However not only will this slice into valuable, attractive and productive farmland, spoiling the landscape and our very special area disturbing the wildlife, woodland, flora and fauna, but it will cause the death of the town. Not in the next few years perhaps, but eventually the reason for Moreton-in-Marsh "being" will be smashed, trampled on and completely lost. The traffic will still be there, but the town will die a slow death. The by pass will be built around as the developers will think they have carte blanche and before we know it there will be huge out-of-town industrial and retail development along the by pass.
Julia Cross (on behalf of Mr and Mrs Geoffrey Cridlan)	Policy S18	In closing, I must object very strongly that clear plans have not been drawn up for us to debate and comment on. Everything seems VERY airy-fairly and up in the air. I hope that in the future, we may have a further chance to discuss these plans.
Bathurst Estate 175	Policy S19: Willersey	No comment.

Respondent	Policy	Comment
Newland Homes 241	Policy S19: Willersey	Willersey is identified as a principal settlement in policy DS1 and is therefore one of the key settlements where the current Local Plan seeks to direct development. The Local Plan review looks to delete one allocation because it cannot be developed due heritage constraints. It does however look to retain the other mixed-use allocation within the settlement. However, to date, there has been no application for the residential part of this site, and the trajectory in the most recent Housing Land Supply Report (dated August 2023) does not expect this site to deliver until the very end of the plan period at the earliest and questions must be raised as to whether it will deliver at all. Whilst it is acknowledged that Willersey is one of the smaller settlements in the district, it still has an important role to play with the local plan recognising that "Willersey is part of a cluster of settlements that serve the northernmost part of the District. Collectively, these settlements have the necessary services, facilities and employment opportunities to provide for the local population". As Cotswold District is a predominantly rural area, development in settlements such as Willersey should be supported and as noted by the NPPF at paragraph 83 "Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby". In order to ensure that the settlements in the northernmost part of the district can continue to be sustained, additional development should be considered within Willersey. Newland Homes have been actively promoting development on Land at Moore Lane for around 40 dwellings. Whilst this site has been previously been dismissed at appeal under reference APP/F1610/W/19/3229031, the Inspector did state at paragraph 21 that "I acknowledge that occupiers of the development would have sufficient access to everyday services and facilities and that the development would accord with other policies within the CDLP, including those relating to the built, natural and historic environment; biodiversity and geodiversity; highway safety; and the delivery of infrastructure. I also acknowledge that there are no particular constraints to the development of the site, as noted in the Strategic Housing Land Availability Assessment Review September 2017; a document produced to inform the allocations policies of the CDLP housing strategy." As such, the only matter preventing development on this site was the Councils Development Strategy at the time. Cotswold District Council have acknowledged that there is a housing affordability crisis in the Cotswolds and recently consulted on the 'Cotswold Housing Strategy 2024-2029'. As such, the Local Plan Review needs to allocate additional housing sites such as those at Moore Lane, Willersey which is both available and deliverable as set out in the accompanying Call for Sites submission to try and address this. Additional residential sites should be allocated within Willersey such as Land at Moore Lane, which will support the vitality and viability of the settlement such as Land at Moore Lane.

Respondent	Policy	Comment
David Hindle	Policy H1: Housing Mix and Tenure to Meet Local Needs	3. Retain 'expected' , as for example if no self build plot meant one more affordable housing , I would expect that the additional affordable housing unit would be given priority. Also, self build plots only needed to supply those who meet a criteria, and insufficient may exist. - 8.1.7 retain 'expected'
Matthew Dent	Policy H1: Housing Mix and Tenure to Meet Local Needs	No development should be solely affordable or social rent. All developments should have a mix or open market and affordable/social rent to ensure a mixed and balance community.
Matthew Dent	Policy H1: Housing Mix and Tenure to Meet Local Needs	Self build housing needs to be encouraged more, the houses are higher quality, better designed and more energy efficient than those deliver by developers.
Chipping Campden School	Policy H1: Housing Mix and Tenure to Meet Local Needs	As a major employer in the town the School supports Policy H1.

Respondent	Policy	Comment
Paul Hinton 161	Policy H1: Housing Mix and Tenure to Meet Local Needs	The Ministry of Defence has significant land interests within the area covered by Cotswold District with three operational establishments at RAF Fairford, RAF Little Rissington and Duke of Gloucester Barracks. Supporting these establishments are Service Family Accommodation (SFA) which is a housing type present across the district. As national defence needs change and need to be delivered at these establishments there can be requirements for additional SFA. Policy H1 and the supporting text is silent on this existing housing type and fails to recognise that during the plan period there could be a need for further SFA, contrary to paragraph 60 of the NPPF. We would therefore recommend that Policy H1 and the supporting text identify SFA as a housing type that is present within the District and that there maybe requirements for additional SFA as defence needs change in accordance with paragraph 101 of the NPPF.
Bathurst Estate 175	Policy H1: Housing Mix and Tenure to Meet Local Needs	We consider that the change to require 67% of homes to be M4(2) and 8% to be M4(3) is high. Clarity is needed around the reasoning and justification as to how the percentages have been determined.

Respondent	Policy	Comment
The Planning Bureau on behalf of McCarthy Stone 190	Policy H1: Housing Mix and Tenure to Meet Local Needs	We note that point 6 of Policy H1 requires '67% of both market and Affordable Housing will be accessible and adaptable by meeting requirement M4(2) Category 2 of the Building Regulations and 8% of both market and affordable housing should be to M4(3) Category 3 of the Building Regulations.' However, the Council should note that Paragraph: 009 Reference ID: 56-009-20150327'of the PPG on Housing optional technical standards states that 'Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling'. Therefore, the plan needs to make a distinction between the standards described within point 6 especially with respect to M4 (3) category housing and what sub category is relevant for affordable housing and market housing respectively. We also note that point 3 requires proposals for more than 20 dwellings to provide '5% of dwelling plots for sale as serviced self or custom-build plots unless demand identified on the Local Planning Authority's Self-Build and Custom Register'. Housing for older people, being specialist in nature, is often delivered on brownfield sites separate to housing allocations or other development sites and tend to be high-density flatted developments on small or medium sized sites of around 0.5 hectares located near town centres that have a minimum amount of around 35 to 40 units. There is therefore not room for self-build plots on site. Older person's housing schemes are already marginal with respect to viability and as it is impractical to deliver self-build plots on site the threshold is not suitable for schemes delivering specialist housing for older people. The threshold for the provision of self-build plots should therefore be reconsidered and the requirement applied to units over a certain area for example 1 hectare or 100 units.
CR Ayers 223	Policy H1: Housing Mix and Tenure to Meet Local Needs	Downsizing. Developers over hype downsizing as an excuse to build more open market housing. Whilst family members may leave vacant bedrooms, they do actually return with their families on visits especially if they have been forced by the high price of housing to move out of the area. They need accommodating. Owners put a lot of effort and capital into their houses and can be reluctant to move to a lesser property where they may not know or indeed like the area and neighbours or wish to experience the upheaval and associated costs.

Respondent	Policy	Comment
CR Ayers 223	Policy H1: Housing Mix and Tenure to Meet Local Needs	Occupation of Housing. There is not a shortage of housing in the Cotswold District if all of the present housing was occupied. The figures are distorted by housing being left empty for use at weekends, short term rentals and holiday lets. We should only permit building for occupation and not to satisfy the demand for 2nd home, holiday homes or casual use investment properties.
Chris Marsh (Pegasus Group) 334	Policy H1: Housing Mix and Tenure to Meet Local Needs	Policy H1 – Housing Mix and Tenure to Meet Local Needs 3.54. The revised policy adds a requirement for 67% of both market and affordable housing to meet M4(2) Category 2 standards, with 8% of both market and affordable housing meeting M4(3) Category 3. Specific evidence is required to justify imposing such requirements. NPPF footnote 49 allows for these optional technical standards for accessible and adaptable housing to be introduced through planning policy 'where this would address an identified need for such properties'. Planning Practice Guidance (ref. ID: 56-007-20150327) sets out the evidence that can be used by local planning authorities to demonstrate a requirement to set higher accessibility, adaptability, and wheelchair housing standards. Figure 78 of the Gloucestershire Local Housing Needs Assessment 2019 indicates that the need for adapted housing is 48,356 households, with paragraph 9.111 stating that, on this basis, 75% of housing should be adaptable. The assessment concludes that that this should consist of 67% M4(2) and 8% M4(3) housing, which aligns with the draft policy. Therefore, this new addition to the policy is justified and consistent with national policy (footnote 52 of the NPPF) since the inclusion of the technical standards will address an identified need within the evidence base for these properties.
Morgan Elliot Planning	Policy H1: Housing Mix and Tenure to Meet Local Needs	Call for sites: 339. Policy H1 is focused on achieving a housing mix and tenure to meet local needs.

Respondent	Policy	Comment
Chris Marsh (Pegasus) 335	Policy H1: Housing Mix and Tenure to Meet Local Needs	Policy H1 – Housing Mix and Tenure to Meet Local Needs 3.55. The revised policy adds a requirement for 67% of both market and affordable housing to meet M4(2) Category 2 standards, with 8% of both market and affordable housing meeting M4(3) Category 3. Specific evidence is required to justify imposing such requirements. NPPF footnote 49 allows for these optional technical standards for accessible and adaptable housing to be introduced through planning policy 'where this would address an identified need for such properties'. Planning Practice Guidance (ref. ID: 56-007-20150327) sets out the evidence that can be used by local planning authorities to demonstrate a requirement to set higher accessibility, adaptability, and wheelchair housing standards. 3.56. Figure 78 of the Gloucestershire Local Housing Needs Assessment 2019 indicates that the need for adapted housing is 48,356 households, with paragraph 9.111 stating that, on this basis, 75% of housing should be adaptable. The assessment concludes that that this should consist of 67% M4(2) and 8% M4(3) housing, which aligns with the draft policy. Therefore, this new addition to the policy is justified and consistent with national policy (footnote 52 of the NPPF) since the inclusion of the technical standards will address an identified need within the evidence base for these properties.
Morgan Elliot Planning 340	Policy H1: Housing Mix and Tenure to Meet Local Needs	Call for sites. Policy H1 is focussed on achieving a housing mix and tenure to meet local needs. Policy H2 aims to maximise the delivery of affordable homes to help meet identified needs. It outlines that developments providing 11 or more properties or over 1,000 sqm of combined gross floorspace will need to contribute towards affordable housing provision. On greenfield sites, subject to viability, the policy aims to achieve 40% of new dwellings to be affordable.
Nikki Ind	Policy H1	It is important that we support ageing residents, there are a lot of bungalows that have been extended and adapted to make family homes, leaving a shortage of suitable, affordable properties.
Andrew Brian Crump	Policy H1	Surely, by including second homes as a category for potential future development, this is likely to drive up the prices of open market housing, giving preferential treatment to those who already have a residence at the expense of those who are struggling to afford one. Furthermore, second home owners will need to commute to and from the Cotswold District and thus not assist in achieving a reduction in carbon emissions.

Respondent	Policy	Comment
Tom Howard	Policy H1	The proposed updates to this policy do not respond to the NPPF update from Dec 2023 to paragraph 70; especially 70b ".... To promote the development of a good mix of sites local planning authorities should: b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing." The policy as written suggests that custom and self building is restricted to being a % of larger sites. This not only runs in the face of the original intent of the 2015 Right to Build Act (one of the core aims of this was to diversify housing supply away from bigger housebuilders towards SME's on smaller sites), but also does not provide the sort of self-building opportunities that self-builder are looking for (most are looking to build on sites of 10 or less homes - evidenced in various NACSBA reports and in the councils own Self build report from 2016). We suggest that the introduction of a policy that allows Self Build specific allocations, or a small scale Edge of settlement exception policy, would help the plan to align with the self build legislation from government (2015, 2016 and LURA 2023), and the updated NPPF (2023). Currently the policies are arguably not in alignment and out of date.
David Hindle	Policy H1	The dwelling mix ill be set out out within the hosing SPG.
Sean Lewis	Policy H1	Our client is supportive of the retention of this policy, which encourages a suitable mix and range of housing in terms of size, type and tenure to reflect local housing need.
Arthur Cunynghame	Policy H1	An additional general comment is that new planning approvals for dwellings should include a condition that the dwellings are occupied full time and not used as second homes or holiday lets.
David Hindle	Policy H2: Affordable Housing	Maybe a good place to include a paragraph, about the particular need for social rent, and for the 'First Homes' , to have a sufficiently high discount to off-set the high residential property prices within the District.
David Hindle	Policy H2: Affordable Housing	Policy is a great improvement on the existing one, and is justified by need. My only query relates to the universal use of a 50% discount on market value. This should be looked at from the perspective of generally accepted % of income on housing costs, and also checked out against multiples of income for a mortgage. That is now regularly at least 4.5. For an interest rate I suggest that 5% is used, as that is a reasonable long term average. For First time Buyers up to 35 years mortgage period is often permissible. My own view is that it may be found that discounts may instead be 30% 1 bedroom; 40% 2 bedroom; 50% 3 and more bedrooms, although with the value cap 3 bedrooms will be the likely limit. - I would be very happy to be proved wrong, as First time buyers of First Homes need the maximum help that they can get.
David Hindle	Policy H2: Affordable Housing	Somewhere reference should be made to an Affordable Housing SPG being developed alongside the reviewed Plan. - also within the text I would suggest that reference is made to social rented, and affordable rent tenure to be expected to be predominantly, 2 and 3 bedroom units. Further details of mix for affordable to be within the affordable Housing SPG. - Officers will need to check what I am suggesting is said about 2 and 3 bedroom units.
Matthew Dent	Policy H2: Affordable Housing	Social rent should be replaced with affordable housing and starter homes, we need people to positively contribute to housing costs. This also allows them to move up the housing ladder rather than being staying in their council house for life.

Respondent	Policy	Comment
yvonne o'callagahn	Policy H2: Affordable Housing	Affordable housing needs to be provided where there is evidenced demand/need. We should not have location of affordable housing driven only by the availability of land. If Moreton in Marsh it to grow by 1500 - 2000 homes and 40-50% of that is affordable housing it will force people to move away from their communities, possibly employment, schools, etc. to access affordable housing.
Chipping Campden School	Policy H2: Affordable Housing	As a major employer the School supports Policy H2.
Geoff Tappern	Policy H2: Affordable Housing	Fully support affordable housing but to increase percentage to 50% is too high. I would like to see the justification for this including numbers. Also it should be strictly enforced who these houses are for. According to CDC policy it should be those with a local connection or within the CDC area. Not from outside.
David Eglise	Policy H2: Affordable Housing	Affordable housing:- CDC want to increase to 50% which is believed impractical plus this type of accommodation must be local use and CDC area only.
Timothy Phillips	Policy H2: Affordable Housing	The increase is it appears political rather than need driven. Such volumes are not organic growth. They are imposed without thought of the needs of the residents who may as result be put into accommodation that takes them away from friends family and work.
David Hindle	Policy H2: Affordable Housing	The high need for affordable housing justifies the raising of the 30% to 40%, and the 40% to 50%. For those who consider that this is excessive it should be remembered that up to half of the Affordable Housing, will often be affordable rent, that only includes a minimum 20% on market rent. Therefore, developments, will retain an overall mix, of type and tenure, as 40% or 5o% would remain market housing,
David Hindle	Policy H2: Affordable Housing	I meant to say 'discount on on market rent'
Blockley Parish Council	Policy H2: Affordable Housing	Blockley Parish Council supports the changes to policies H1 and H2. Social rented housing is the only truly affordable option for many people. BPC consider it important that the Local Plan is used to increase the amount of affordable housing within the district, albeit within the constraints of NPPF
Oddington Parish Council	Policy H2: Affordable Housing	The Parish Council believes that more clarity is required around social and affordable housing.

Respondent	Policy	Comment
Blue Fox Planning (representing Redrow Homes)	Policy H2: Affordable Housing	Policy H2: Affordable Housing, continues to set out CDC's approach to affordable. The delivery requirements for affordable housing have increased as follows: ☐ Up to 40% of new dwellings (gross) on previously developed (brownfield) sites; and ☐ Up to 50% of new dwellings (gross) on all other sites). This policy increase is the only methodology which CDC have introduced as part of the LPPU to increase the supply of affordable homes. This again represents a missed opportunity, as the most realistic way to increase delivery, is to allocate more sites overall thus ensuring the supply is maintained as part of market led schemes. This partial review is a missed opportunity as CDC has not put in place a strategic plan to deliver the forecast shortfall. The policy increase amounts to a 10% increase across all sites for new development. Redrow fully recognises the importance of delivering affordable housing as part of its market led housing schemes. Indeed, the provision of a proportion of affordable homes is considered to be a significant benefit that should be given great weight in the consideration of planning applications for new housing developments and given great weight in the "planning balance". The recognised acute housing affordability issue within Cotswold District makes this even more important. However, any adjustment to the type of affordable housing being sought, should be based on an up-to-date assessment of need and with consideration given to viability issues. The LPPU should recognise that most affordable housing is delivered as a result of it forming part of an open market housing scheme. Placing such stringent requirements and increase of a further 10% affordable housing, could seriously affect the deliverability of many schemes across the district. Turning to the 'Review of Cotswold District Local Plan 2011 – 2031 Housing Requirement' (August 2023), the delivery of affordable homes required by the Local Plan is 140 units per year (this is notably 30% higher than the Local Plan Inspectors consideration that 100 units would be an appropriate target). Over the plan period the overall number of homes delivered has exceeded the 420 per year average housing requirement, and thus as a proportion the amount of affordable housing delivered has increased. The requirement to deliver additional affordable housing for the remainder of the plan period is not questioned (particularly considering the media reported demand, but the increased demand for affordable housing considered in the viability and context of delivering market housing. The policy tracked changes now remove the policy text wording 'subject to viability'. There have been many instances where affordable housing provision has over the current plan period, with the agreement of the Planning Authority, been reduced below the policy requirement because of concerns as to the overall viability of schemes. As currently proposed, the policy text does not carry forward such flexibility. Some scope of viability considerations is included in the supporting text at paragraphs 8.2.11, 8.2.12 and 8.2.13 subject to a number of criteria, including: 'The Affordable Housing requirements have been set at a level that takes account of affordable Housing and infrastructure needs and allows for developments to be deliverable. Development proposals will be policy compliant in delivering the required Affordable Housing contribution and will not normally require a viability assessment. It will be expected that these policies will fully inform, and be reflected in, land valuation and purchase negotiations. Viability will only be considered in exceptional circumstances

Respondent	Policy	Comment
David Burson 185	Policy H2: Affordable Housing	H2: Affordable Housing We believe the proposed changes seeking affordable housing from smaller sites will stifle development in rural areas. While affordable homes are clearly needed this is in the context of a need for all types of housing. A policy that inhibits delivery of homes generally will do more harm than good in addressing issues of housing need. This is particularly the case in rural areas (non-principal settlements) where there is a need to provide modest numbers of new homes (of all kinds) to maintain existing populations The current threshold (6+) for affordable homes is considered a sensible balance that should be maintained. The proposed threshold of 3+ dwellings will disincentivise developments of smaller homes, instead encouraging fewer smaller units which will contribute less to the area. Whatever the threshold numerically, it must be based on net rather than gross development numbers. Use of a gross threshold discourages best use of land as (generally) it will be more advantageous for developers to retain existing dwellings (however poor their aesthetic or environmental credentials) rather than replace them to make better use of the site.
Bathurst Estate 175	Policy H2: Affordable Housing	No comment.

Respondent	Policy	Comment
The Planning Bureau on behalf of McCarthy Stone 190	Policy H2: Affordable Housing	Policy H2 seeks all housing delivering more than 10 dwellings to deliver 40% affordable housing on brownfield sites and 50% affordable housing on greenfield sites. We note however, that consultation has been published without the supporting evidence of an up-to-date viability study and it is therefore difficult to ascertain if any of the options put forward are realistic or deliverable. Although we appreciate this consultation is an early stage of plan production, we advise that by limiting scrutiny of the Local Plan Viability Assessment the Council is reducing the opportunities for comment on a crucial element of the evidence base that will inform policy and deliverability directly and the Local Plan would be less robust as a consequence. The Council will be aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council's policy requirements should therefore be robust and be used to form deliverable and realistic policies. In addition, the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that the older person's housing typologies should be robustly assessed separately in the forthcoming Local Plan Viability Assessment that still needs to be undertaken to inform the plan and affordable housing requirements. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that: "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this is not done, the delivery of much needed specialist housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need. The Council must therefore ensure that an up-to-date viability assessment is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision. We would direct the Councils towards the Retirement Housing Consortium paper entitled 'A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 ('RHG Briefing Note') available from https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viabiilty-appraisal-issues-

Respondent	Policy	Comment
Newland Homes 241	Policy H2: Affordable Housing	The proposals amend the affordable housing threshold from 11 to 10 dwellings. And increasing the affordable housing percentages. Part 3 of the proposed policy states: The Affordable Housing requirement on all sites requiring a contribution is (xvi): i. Up to 40% of new dwellings (gross) on previously developed (brownfield) (xvii) sites; and ii. Up to 50% of new dwellings (gross) on all other sites. (xviii) This is an increase of 10% across all sites from the current Local Plan. the footnotes for the policy suggest that "It is the Council's corporate objective to deliver more genuinely Affordable Housing. Increasing the Affordable Housing requirements by 10 percentage points would help to achieve this. Furthermore, the Cotswold District Local Plan 2001-2011 included an Affordable Housing requirement of 50% and this was achievable." There are significant concerns with this policy. Firstly, it has not been the subject of viability testing and there have been significant changes to the cost of development since the previous Local Plan was adopted. This includes the introduction of CIL, BNG becoming mandatory for all large and small sites. This coupled with more stringent sustainability requirements which make it more expensive to build new homes. Furthermore, the proposed requirements for at least 25% of affordable homes to be social rented together with the emerging requirements of policy H11 (homelessness housing provision) will all have further impact on viability. As a result, this policy in its current form cannot be supported. Secondly, the Cotswold Housing Strategy consultation document sets out that 1,460 people are currently on the Councils waiting list. This document also acknowledges that majority of affordable homes within the district are delivered through the development of large sites and the need for developers to provide on-site affordable housing. However, the Local Plan update only proposes one allocation. In order to meet the Councils key objectives of ensuring that "everyone across the district to access housing that meets their needs and that they can afford", additional larger housing allocations need to be made within the Local Plan period to ensure that the affordable housing crisis in the district can be addressed. It is requested that the affordable housing requirement remains as per the current Local Plan. The increase in affordable housing requirement by 10% has not had its viability adequately tested or been robustly justified.

Respondent	Policy	Comment
Bloor Homes Western 244	Policy H2: Affordable Housing	The proposals amend the affordable housing threshold from 11 to 10 dwellings. And increasing the affordable housing percentages. Part 3 of the proposed policy states: The Affordable Housing requirement on all sites requiring a contribution is (xvi): i. Up to 40% of new dwellings (gross) on previously developed (brownfield) (xvii) sites; and ii. Up to 50% of new dwellings (gross) on all other sites. (xviii) This is an increase of 10% across all sites from the current Local Plan. the footnotes for the policy suggest that "It is the Council's corporate objective to deliver more genuinely Affordable Housing. Increasing the Affordable Housing requirements by 10 percentage points would help to achieve this. Furthermore, the Cotswold District Local Plan 2001-2011 included an Affordable Housing requirement of 50% and this was achievable." First there are concerns that this policy has not been the subject of viability testing and it is not appropriate to simply assume that because it was part of a previous plan, it is still applicable now. There have been a number of other changes to policy since the time of the previous Local Plan such as the introduction of CIL, and BNG together with more stringent sustainability requirements making it more expensive to build new homes, together with the requirements of policy H11 (homelessness housing provision) which all have an impact on viability. Equally, it is proposed to ensure that at least 25% of affordable homes are social rented, which is an additional cost to the developer. It is therefore considered that an appropriate viability assessment needs to be carried out. At the current time and in its current form, this policy cannot be supported. Secondly, the Cotswold Housing Strategy consultation document sets out that 1,460 people are currently on the Councils waiting list. It is ultimately the larger sites which will deliver the majority of affordable housing in the district, and by only allocating one additional site as part of the Local Plan Review, the suggested change (if proven to be viable) will not have any real impact in generating new affordable homes and therefore addressing the affordable housing crises in the District. In order to meet the Councils key objectives of ensuring that "everyone across the district to access housing that meets their needs and that they can afford", additional larger housing allocations including at land to the North East of Stow, as being proposed as part of the Neighbourhood Development Plan, should be made. Please set out any alternatives or changes you are seeking, using a continuation sheet if necessary. It is requested that the affordable housing requirement remains as per the current Local Plan. The increase in affordable housing requirement by 10% has not had its viability adequately tested or been robustly justified.
Sean Lewis	Policy H2: Affordable Housing	Our client supports the principle of new residential development delivering an appropriate proportion of affordable housing within the WP proposals. 54. It is important to acknowledge that the scale of the provision required by policy needs to reflect what can be delivered having regard to commercial realities. It is noted that Policy H2 proposes an uplift in the affordable housing target from 40% to 50% on all sites other than previously developed land and there is a need to ensure that what is required by policy is deliverable and realistic, having particular regard to viability.

Respondent	Policy	Comment
Liz Shield (SF Planning)	Policy H2: Affordable Housing	Going beyond the development strategy approach discussed above, the proposed change in policy H2 from 6 – 9 homes in rural areas needing to provide an affordable housing contribution to 3 - 9 homes being required to do so, may impact significantly on viability on small sites (particularly for smaller developers). 7.4 In accordance with the above, if the settlement boundary is to be retained for Moreton-in-Marsh, we consider that it should be more widely drawn than at present.
Liz Shield (SF Planning)	Policy H2: Affordable Housing	Going beyond the development strategy approach discussed above, the proposed change in policy H2 from 6 – 9 homes in rural areas needing to provide an affordable housing contribution to 3 - 9 homes being required to do so, may impact significantly on viability on small sites (particularly for smaller developers).
Liz Shield (SFPlanning) 246	Policy H2: Affordable Housing	Policy H2 – Affordable Housing 7.6.3 The proposed change in policy from 6 – 9 homes in rural areas needing to provide an affordable housing contribution to 3 - 9 homes being required to do so, may impact significantly on viability for small or individual housebuilders. We ask that the Council reconsiders, noting that an overall more pragmatic and open approach to housing (as detailed above) [see responses to DS1 - DS3] should naturally deliver more affordable homes without changes to the requirements for rural sites. 7.6.4 Whilst many parts of the district are identified as being designated rural areas, the designation does not appear to cover the district in full.
SFplanning 272	Policy H2: Affordable Housing	Policy H2 – Affordable Housing The proposed change in policy from 6 – 9 homes in rural areas needing to provide an affordable housing contribution to 3 - 9 homes being required to do so, may impact significantly on viability for small or individual housebuilders; particularly so when the need to deliver biodiversity net gain is also taken into account. We ask the Council to reconsider; noting that an overall more pragmatic and open approach to housing (as detailed above) would naturally deliver more affordable homes without changes to the requirements for rural sites. Whilst many parts of the district are identified as being designated rural areas, the designation does not appear to cover the district in full. Clarity might be required in the policy wording.
Liz Shield (SFPlanning) 249	Policy H2: Affordable Housing	Going beyond the development strategy approach discussed above [see responses to DS3 and DS4], the proposed change in policy H2 from 6 – 9 homes in rural areas needing to provide an affordable housing contribution to 3 - 9 homes being required to do so, may impact significantly on viability on small sites (particularly for smaller developers).

Respondent	Policy	Comment
Edgars Ltd 338	Policy H2: Affordable Housing	Call for sites comments. The site has potential for around 14 new homes and can provide 7 new affordable homes to comply with the 50% affordable housing provision. This is a planning as the site can directly help those seeking affordable housing in the local and rural area. In 2023, the Council declared that identified 1453 households in the district were in need of affordable housing. Summary 5.10 The principle of residential development on the site is considered acceptable for the following reasons: ☐ Bledington is a sustainable location in the District for limited growth; ☐ The site is within a sustainable location within the village with good access to services, facilities and public transport; ☐ The allocation of the land would contribute to local vitality and viability. For example by introducing new occupiers to the village that will use the café, the shop and the local bus service. ☐ The feasibility layout (which accompanies this report) demonstrates the site can deliver 14 new homes including up to 50% affordable housing.
Edgars Ltd 338	Policy H2: Affordable Housing	Call for sites: Housing Mix and Affordable Housing The Feasibility Layout demonstrates that the site can accommodate around 14 dwellings comprising 13 new build homes and 1 conversion. This could, for example, comprise 7 market units and 7 affordable units. This is in accordance with emerging local planning policies which require 50% affordable housing provision. The Feasibility Layout demonstrates a mix of units can be accommodated on the site to address the submission site can provide for a mix of smaller dwellings and larger family dwellings in accordance with the up-to-date housing need data at the time of any application submission. housing needs of the area in accordance with national and local planning policies requirements. The submission site can provide for a mix of smaller dwellings and larger family dwellings in accordance with the up-to-date housing need data at the time of any application submission.

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy H2: Affordable Housing	Policy H2 – Affordable Housing 3.56. The policy has been updated to reflect the plan's revised objectives which place a greater emphasis on providing affordable housing within the district. The Gloucestershire Local Housing Needs Assessment 2019 identifies a total affordable housing need of 7,387 affordable homes between 2021-41, yet the district's planned affordable housing only totals 2,497 units (Figure 3). Meanwhile, Table 6 in the Council's Authority Monitoring Report (2023) states that 1,972 affordable dwellings have been delivered in the past decade, with this number declining to 92 per year from 2021/22. This is 67% less than in 2018/19, when 285 affordable dwellings were delivered. Therefore, with affordable provision on a downward trajectory and a growing unmet need based on the data in the Housing Needs Assessment, the Council's aspirations to deliver additional affordable homes in the district is supported. 3.57. Support is also offered with regards to the addition of Vacant Building Credit and First Homes to Policy H2. Their inclusion is consistent with national policy, since both are referenced within the NPPF, at Paragraphs 65 and Paragraph 6 respectively, with the latter directing the reader to the Affordable Homes Update (24 May 2021), which features the First Homes policy. The thresholds for First Homes identified in the policy comply with the Affordable Homes Update.
Morgan Elliot Planning	Policy H2: Affordable Housing	Call for sites: 339 Policy H2 aims to maximise the delivery of affordable homes to help meet identified needs. It outlines that developments providing 11 or more properties or over 1,000 sqm of combined gross floorspace will need to contribute towards affordable housing provision. On greenfield sites, subject to viability, the policy aims to achieve 40% of new dwellings to be affordable.
Chris Marsh (Pegasus) 335	Policy H2: Affordable Housing	Policy H2 – Affordable Housing 3.57. The policy has been updated to reflect the plan's revised objectives which place a greater emphasis on providing affordable housing within the district. The Gloucestershire Local Housing Needs Assessment 2019 identifies a total affordable housing need of 7,387 affordable homes between 2021-41, yet the district's planned affordable housing only totals 2,497 units (Figure 3). Meanwhile, Table 6 in the Council's Authority Monitoring Report (2023) states that 1,972 affordable dwellings have been delivered in the past decade, with this number declining to 92 per year from 2021/22. This is 67% less than in 2018/19, when 285 affordable dwellings were delivered. Therefore, with affordable provision on a downward trajectory and a growing unmet need based on the data in the Housing Needs Assessment, the Council's aspirations to deliver additional affordable homes in the district is supported. 3.58. Support is also offered with regards to the addition of Vacant Building Credit and First Homes to Policy H2. Their inclusion is consistent with national policy, since both are referenced within the NPPF, at Paragraphs 65 and Paragraph 6 respectively, with the latter directing the reader to the Affordable Homes Update (24 May 2021), which features the First Homes policy. The thresholds for First Homes identified in the policy comply with the Affordable Homes Update.

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy H2: Affordable Housing	Call for sites. Policy H2 amends the threshold for delivering affordable housing from 11 to 10 dwellings. For sites that do not constitute brownfield land, it increases the % of affordable housing from 40% to 50%.
Richard Tilbrook	Policy H2	The dire shortage of affordable housing in our area now demands drastic measures. I have two proposals: - all new housing developments of more than a single dwelling should include 50% affordable homes; - new ways should be found to free up properties which are currently used as second homes or holiday lets to provide long term accommodation for local people. I would strongly support (at least) quadrupling council tax for second home owners and owners of holiday lets. I also think the Council needs to consider ways of incentivising owners of second homes/holiday lets to rent their properties out to local people at an affordable rent on a long term basis.
David Eglise	Policy H2	H2.3 The affordable housing requirement uplift is excessive and considered inappropriate i.e. 40% and 50% respectively.
David Hindle	Policy H2	The Housing SPG, will set out the commuted Affordable Housing contributions. This will reflect the 25% to be Social rent, and 25% first Homes. The remaining will be a reflection of the Affordable rent, and Shared Ownership sought. The level of contribution would then be set based on the overall unit sizes sought to reflect CDC need..
Hannah Totham	Policy H2	Not sure the proportion of affordable homes on brownfield sites should be increased to 40%. There needs to be bigger incentives to developers to develop brownfield rather than green fields so increasing green sites to 50% whilst keeping brownfield at 30% may help do that

Respondent	Policy	Comment
Bloor Homes Western (Ridge and Partners)	Policy H2	The proposals amend the affordable housing threshold from 11 to 10 dwellings. And increasing the affordable housing percentages. Part 3 of the proposed policy states: The Affordable Housing requirement on all sites requiring a contribution is (xvi): i. Up to 40% of new dwellings (gross) on previously developed (brownfield) (xvii) sites; and ii. Up to 50% of new dwellings (gross) on all other sites. (xviii) This is an increase of 10% across all sites from the current Local Plan. the footnotes for the policy suggest that "It is the Council's corporate objective to deliver more genuinely Affordable Housing. Increasing the Affordable Housing requirements by 10 percentage points would help to achieve this. Furthermore, the Cotswold District Local Plan 2001-2011 included an Affordable Housing requirement of 50% and this was achievable." First there are concerns that this policy has not been the subject of viability testing and it is not appropriate to simply assume that because it was part of a previous plan, it is still applicable now. There have been a number of other changes to policy since the time of the previous Local Plan such as the introduction of CIL, and BNG together with more stringent sustainability requirements making it more expensive to build new homes, together with the requirements of policy H11 (homelessness housing provision) which all have an impact on viability. Equally, it is proposed to ensure that at least 25% of affordable homes are social rented, which is an additional cost to the developer. It is therefore considered that an appropriate viability assessment needs to be carried out. At the current time and in its current form, this policy cannot be supported. Secondly, the Cotswold Housing Strategy consultation document sets out that 1,460 people are currently on the Councils waiting list. It is ultimately the larger sites which will deliver the majority of affordable housing in the district, and by only allocating one additional site as part of the Local Plan Update, the suggested change (if proven to be viable) will not have any real impact in generating new affordable homes and therefore addressing the affordable housing crisis in the district. In order to meet the Councils key objectives of ensuring that "everyone across the district to access housing that meets their needs and that they can afford", additional larger housing allocations such as land to the south of London Road, Moreton in the Marsh should be made as part of the Local Plan review. It is requested that the affordable housing requirement remains as per the current Local Plan. The increase in affordable housing requirement by 10% has not had its viability adequately tested or been robustly justified.
David Hindle	Policy H3: Rural Exceptions Sites	H.3.3. I cannot understand the reference to 'no Public subsidy'. A grant from the Government is a subsidy, and no total rural exception development would take place without it. Does it in reality mean no public subsidy , other than Grant(s) provided under the Governments Funding Programme via Homes England (or successor body). ---8.3.4 There will be a new SPG, it states 2007

Respondent	Policy	Comment
Bathurst Estate 175	Policy H3: Rural Exceptions Sites	No comment.
Liz Shield (SFPlanning) 246	Policy H3: Rural Exceptions Sites	7.6.5 Policy H3 - Rural exception sites 7.6.6 As indicated above, exceptions should not just relate to the provision of affordable housing or indeed self-build (although both are welcomed). If a development does not comply fully with the development strategy (amended as set out above) then further exceptions should be included for housing which meets the needs of the elderly or disabled people, housing which has greater low carbon and climate change resilience than that required by policy and housing which has greater ecological credentials than that required by law or policy.
SFplanning 272	Policy H3: Rural Exceptions Sites	As indicated above, exceptions should not just relate to the provision of affordable housing or indeed self-build (although both are welcomed). If a development does not comply fully with the development strategy (amended as set out above) then further exceptions should be included for housing which meets the needs of the elderly or disabled people, housing which has greater low carbon and climate change resilience than that required by policy, and housing which has greater ecological credentials than that required by law or policy.
Chipping Campden School	Policy H3	The School supports Policy H3.
Andrew Brian Crump	Policy H3	However, local need should be assessed robustly and not result in a situation where development adjacent to a village boundary leads to its extension merely to accommodate persons who have no tangible connection to its locality.
David Hindle	Policy H4: Specialist Accommodation for Older People	Before this Policy there are missing Policies relating to ------Residential Hostels ------HMOs -------Residential conversion. I will have to send an email related to these, as the format does not allow for such additions to be easily made

Respondent	Policy	Comment
Chipping Campden School	Policy H4: Specialist Accommodation for Older People	The School supports Policy H4. A a major local employer we support this policy as it will help the rotation of family homes to younger people if it facilitates the moving of those older people who wish to downsize, to do so yet remain within their local community.
Bathurst Estate 175	Policy H4: Specialist Accommodation for Older People	No comment
The Planning Bureau on behalf of McCarthy Stone 190	Policy H4: Specialist Accommodation for Older People	Para 8.4.1 The SHMA Update (April 2016) anticipates a dramatic growth in the older population in Cotswold We note that the consultation is supported by a Gloucestershire Local Housing Needs Assessment, September 2002, ORS (LHNA). Figures 74 identifies the 'modelled demand for older persons housing in Gloucestershire based on Housing LIN toolkit and GCC modelling'. This identifies for Cotswold between 2021 to 2041 an overall need for 1,699 owned sheltered homes, 440 sheltered rented homes, 149 owned extra care homes, and 44 rented extra-care homes. This results in an overall need for 2,332 new older persons dwellings. Para 8.4.1 however uses the 2016 SHMA update when identifying older person housing need. This identifies a much lower need of 665 sheltered and extra care units between 2017 and 2031. It is not clear why the 2016 SHMA has been used instead of the more up to date 2020 Local Housing Needs Assessment. Maybe in order to show a lower older persons housing need for the district? However, it is advised that in order to the plan to be consistent with national policy, justified that and underpinned by relevant and up to date evidence in accordance with para 31 of the NPPF that the paragraph should be updated to use the more up to date 2020 LHNA/evidence rather than the 2016 study.

Respondent	Policy	Comment
The Planning Bureau on behalf of McCarthy Stone 190	Policy H4: Specialist Accommodation for Older People	Policy H4 permits specialist accommodation for older people subject to a number of requirements including that the proposal 'meets a proven need for that type of accommodation in both the District and the settlement', 'includes Affordable Housing that is occupied by people with a local connection, where Affordable Housing is provided;' and ' point f requires that 'where accommodation is provided on a freehold or leasehold basis, it should provide Affordable Housing in accordance with Policy H2.' National Policy Context Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads: "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 63 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people. This includes those who require retirement housing, housing-with-care and care homes. In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking" (emphasis added). Paragraph 003 Reference ID: 63-003-20190626 recognises that: "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support." Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out: "plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require." Therefore, the Local Plan should recognise that housing for older people has its own requirements and cannot be

Respondent	Policy	Comment
CR Ayers 223	Policy H4: Specialist Accommodation for Older People	Population - Demographic Distribution. Plan policy H4 in its statement of reasons note "X" states: "To ensure that new developments deliver local housing needs, rather than importing people who want to live in the Cotswolds from further afield, Cotswold District already has an aging population and importing people compounds this issue and is leading to a demographically imbalanced community. This imbalance puts a strain on local health services." This observation is at the core of the problems in the Cotswold District and needs to be applied across the whole of the District. Housing resources are finite, and unless the population has an even age spread future working age population will be located outside of the areas it is needed bringing with it unnecessary commuting ("Green penalty") or indeed shortage of workers to maintain services. Particular group classifications of persons such as the aged are counted on a district wide basis for quantification and should wherever possible be spread across that district and not bunched together. Stow has a very high demographic imbalance, limited accommodation which is further restricted in availability by price constraints, second home ownership, holiday lets and Airb&b. Parking is in short supply due to the need to accommodate daily workers commuting in, tourists, visitors to business and the indigenous residents.
RGP 259	Policy H4: Specialist Accommodation for Older People	NPPF (2023) Paragraph 128 point a) states: "Planning policies and decisions should support development that makes efficient use of land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it" (my emphasis) NPPF (2023) Paragraph 63 "Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but not limited to) those who require affordable housing, families with children, older people (including those who require retirement housing, housing-with-care and care homes), students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)." (my emphasis). Our clients propose that allocations to support specialist accommodation for older people should be supported, particularly where those allocations support active travel and access to services. At this stage, it is not evident that this is the case and should be explored further. Our clients maintain that a specific housing need should be identified to meet explicit housing requirements for older people. However, our clients support the inclusion within the policy wording of specific ability to meet 'proven' needs for types of accommodation on both a District and settlement level at planning application stage, to support delivery. With this in mind, clarification should be provided within the policy or supporting text to include how this 'need' will be measured, and whether locational criteria will be used to inform the locations of housing for older people.

Respondent	Policy	Comment
Boyer Planning 273 Call for sites	Policy H4: Specialist Accommodation for Older People	Site Allocations for 'Retirement Housing' and Specialist Accommodation for Older People 3.48 Newlands of Stow strongly encourages the Council to reconsider the unjustified decision to neglect consideration of allocating sites to deliver specialist housing to meet the identified needs of a specific group within the community, as required by the NPPF and PPG. In particular, Newlands of Stow recommends that the Council allocate specific sites to meet the identified need for retirement housing, housing with care, and care homes. 3.49 As a result of CDC seeking to minimise both the plan period and housing requirements, Draft Policy DS1 proposes to make no further site allocations to meet housing need. Of further concern, is that despite the NPPF being revised in December 2023 to promote housing needs assessments to identify a range of housing for strategic development, Draft Policy DS1 remains unchanged notwithstanding it now being clearly inconsistent national policy. As further detailed below in response to Draft Policy H4, The National Planning Policy Framework ('NPPF') at paragraph 63 is clear that (emphasis added): "Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes." 3.51 Newlands of Stow considers that the Draft LPU, as currently formulated, is unsound. The absence of site allocations to accommodate development specifically seeking to address the identified needs for specialist accommodation results, in our view, in a plan that is neither positively prepared nor effective in meeting the housing needs of different groups in the community. In addition, Draft Policy DS1 is inconsistent with national policy which includes the specific identification of the need to assess the needs of older persons 'including for retirement housing, housing-with-care and care homes' and reflect this within planning policies. National Policy clearly requires the specific consideration of need for 'retirement housing' and specialist older persons accommodation and the allocation of sites to meet this need. 3.52 There has been no justification from the Council with regard to the decision to neglect the allocation of sites to meet the needs of older persons. Indeed, it is noted that paragraph 3.11 of the 2023 Regulation 18 Draft Local Plan consultation document did not make it clear that such sites have been discounted from the SHELAA, simply on the basis they have been promoted for specialist accommodation. However, the 2022 Regulation 18 'Issues and Options' consultation summary report (page 57) confirms that sites for such a use will not be allocated, but no reason is given to justify the position. 3.53 In relation to the current Draft LPU Regulation 18 consultation, the concept of allocating or even considering alternative strategies to specifically meet the needs of specialist accommodation for older people, is neither assessed nor even presented as alternative development strategy in evidence base papers. The Integrated Impact Assessment (IIA) (February 2024) states itself at Section 3 in the context of assessing different development strategy options for the District, that:

Respondent	Policy	Comment
David Hindle	Policy H4	After this Policy, new Policies:_____ Residential conversion._____ Residential Hostels_____ HMOs_____ None currently exist, but can be a way of providing low cost residential. For HMOs there will be the issue of over-saturation in places for possible consideration._____ A lot of residential hostels, will come under C3, but not all, and they have a function of providing accommodation, for those having special needs, including those with mental health, those with Learning Difficulties. Disabilities, those with Alcohol or Drug issues., Women's refuge, and a Hostel for the Homeless._____ For residential conversion there will be issues, on total size when conversion is acceptable. Otherwise the main issues would be having one 1 broom or 2 bedroom unit (more likely affordable). Technical hosing Standards being met. and an appropriate level, of parking. Except in Town Centres this would not be considered a refuse-able issue. I will send an email with issues.
Nikki Ind	Policy H4	We must ensure that we have sufficient affordable accommodation for older residents, not just expensive 'retirement villages' - where local people are outpriced.
Lisa Spivey	Policy H4	there should be an equivalent policy for young people under the age of 35

Respondent	Policy	Comment
Boyer Planning 273 Call for sites	Policy H4	LPU Q35 POLICY H4 - SPECIALIST ACCOMMODATION FOR OLDER PEOPLE LPU Q35 - We have made various updates to policies H1 to H7 and have introduced policies H8 to H11. Are there any reasons why these updates and new polices shouldn't be included in the Local Plan? Draft Policy H4 - Specialist Accommodation for Older People 5.1 Draft Policy H4 details the requirements Specialist Accommodation for Older People developments must meet to secure planning permission. It also repeats the Districts housing requirements for such developments, using the same requirement as set out in the adopted Local Plan. Paragraph 8.4.1 Requirement 5.2 Paragraph 8.4.1, states that there is a requirement for '665 (C3 use class) sheltered and extracare housing units between 2017 and 2031'It is stated that the 665 figure is arrived from the SHMA Update (April 2016). The SHMA is an outdated data source and should not be relied upon for setting housing requirements. It is considered that the requirement figure should be updated and revised to reflect actual need and not just repeat the adopted Plan requirement. 5.3 As a minimum the requirement should be updated to reflect the Gloucestershire County Council (GCC) Local Housing Needs Assessment (LHNA) (2020) although an up to date assessment to support the LPU should be undertaken. This is a particularly critical issue given the changing demographics of Cotswold District. The GCC LHNA models the demand for 'Older Persons Housing', and at Figure 74, sets out an additional sheltered accommodation housing need of 1,699 owned and 440 rented homes up to 2041, totalling 2,139 homes. 5.4 It is further stated in paragraph 8.4.1 that the Council propose in future housing requirement figures should be based on Residential Land Monitoring Statistics Reports stating: "The requirement figures provides a snapshot in time and applicants must refer to the Council's latest monitoring evidence, provided by future updates to the Residential Land Monitoring Statistics report, when submitting planning applications, in order to determine the remaining requirement(s) and to help determine the need for the development proposal." 5.5 The proposed amendments to the policy wording, completely change the approach to addressing the need for specialist accommodation. The adopted Local Plan acknowledges that the SHMA provided a snapshot in time and that it would be necessary to refer to the latest evidence when submitting planning applications. The Council now appear to be dismissing the likely changes in need and are seeking to restrict the delivery of specialist accommodation to the levels of need identified in the 2016 SHMA, which is completely unjustified. CDC Local Plan Update/Partial Review Regulation 18 2024 Newlands of Stow Representation Page 40

Respondent	Policy	Comment
David Burson 185	Policy H5: Dwellings for Rural Workers Outside Principal and Non	Policy H5: Dwellings for Rural Workers Outside Principal and Non-Principal Settlements Noting proposed changes to policy H8 (discussed below) which preclude applications to replace temporary dwellings with permanent homes we believe addition is needed to H5 to make clear that in the case of a rural worker's dwellings development is supported. Without this there is a risk that the normal, and well established, path to providing essential homes for workers following a proving period (i.e. temporary home) is lost.
Bathurst Estate 175	Policy H5: Dwellings for Rural Workers Outside Principal and Non	No comment
Bathurst Estate 175	Policy H6: Removal of Occupancy Conditions	No comment
David Burson 185	Policy H6	Policy H6: Removal of Occupancy Conditions The proposed moratorium on the release of occupancy conditions on holiday lets H6(2) built or converted for that purpose is contrary to national policy. Clearly where a holiday let is genuinely no longer needed (and this is supported by suitable evidence) it is contrary to good planning for that building to be kept vacant rather than re-used. The proposed policy H6(2) is unsound and cannot be included in an updated plan. If a policy of this type is to be included it must outline circumstances in which an application can be supported in the same manner as for rural worker's dwellings.

Respondent	Policy	Comment
Geoff Tappern	Policy H7: Gypsy and Traveller Sites	Change to available sites noted. In 3d it states where a sufficient number of plots cannot be achieved at the above location new sites will be considered. Where are the new sites you are considering?
David Eglise	Policy H7	CDC indicate they may want more sites but don't give any indication where they are considering. Secondary & even tertiary site considerations should be included.
Judith Montford The EA 207	Policy H7	H7 - Gypsy and Traveller Sites Often gypsy and traveller policies refer to flood risk as these sites are 'highly vulnerable' and therefore not appropriate within Flood Zones 3a or 3b. We would support additional wording in this policy that ensures Gypsy and Traveller Sites are not located in areas a high flood risk/Flood Zone 3 considering the impacts of climate change. Without including these in the local plan we will find the plan unsound. It appears that two sites are preferred, namely Meadowview which is wholly in Flood Zone 1 and Four Acres which is partially in Flood Zones 2 and 3 (includes ordinary watercourse) but seems to already have planning permission.
David Hindle	Policy H8: Replacement Dwellings (i)	Having this Policy makes a lot of sense,
Matthew Dent	Policy H8: Replacement Dwellings (i)	I fundamentally disagree with this policy. Replacement dwellings replace outdated and poorly constructed homes. They are usually replaced with extremely high quality and energy efficient homes that benefit the local housing supply and provide work for local building firms. The statements in this policy are overly restrictive.
Geoff Tappern	Policy H8: Replacement Dwellings (i)	It is good to see numbers quoted so there is no ambiguity. Anything built in the front of the house should have planning permission. Numbers like 3 square metres is ok results in some unusual designs which don't help the village line or environment. Do not see why in para 5a permission would be given to meet genuine family needs of an occupier and considered as exceptional. Open to abuse. If there is a rule stick to it.
Oddington Parish Council	Policy H8: Replacement Dwellings (i)	The Council supports 8.8.1 to 8.8.4. Over the years, the village has seen small houses in large gardens replaced by much larger properties. This has reduced the land available for more affordable developments which would house permanent residents and thus increase the vitality of the village.

Respondent	Policy	Comment
Bathurst Estate 175	Policy H8: Replacement Dwellings (i)	No Comment.
David Burson 185	Policy H8: Replacement Dwellings (i)	It is important to stress planning permissions that allow residential use of a building (either through a planning application or permitted development) to residential use are not a loophole, they are legitimate consent to undertake development. Where permission is in place to convert a building, it is a material consideration in a subsequent application to redevelop the site (i.e. 'upgrade' from a conversion to newbuild scheme). The status of a 'fallback' planning permission is well established in caselaw. In such applications the Council is well within its rights to refuse a planning application if they believe a new-build proposal would cause greater harm than the conversion scheme permitted on the same site. In the example developments cited in the Statement of Reasons beneath H8 planning permission can only have been granted by the Council if the new-build proposal offered benefits, or at least caused no additional harm, over the conversion scheme already permitted. This being the case, these permissions do not offer any justification for the proposed restrictive policy. The proposed criterion (f) would only serve to obstruct developments that offered improvements over permitted conversions contrary to good planning, national policy, and good sense. The provision is clearly unsound and must be deleted. The proposal to remove permitted development rights from any replacement dwelling is contrary to national guidance which clearly states such restrictions should only be applied in exceptional circumstances. The proposed blanket policy is clearly not exceptional and cannot be sound. [See also comments on policy clauses]

Respondent	Policy	Comment
Dan Washington (BBA Architects/Stantonbury Building and Dev)	Policy H8: Replacement Dwellings (i)	Policy H8 states that proposals for replacement dwellings will be permitted subject to a number of criteria. This includes that "the development does not involve a building that has received planning permission for conversion to a dwelling, or a notification of conversion to a dwelling through Permitted Development rights, in the last 10 years". It is not clear why this is necessary and no obvious reason why there shouldbe any in principle objection to doing this. If the conversion of a building to a dwelling is acceptable then this will clearly establish the principle of housing in that location. If a replacement dwelling is then applied for, it will then be for the local authority to determine if the design of the new house is harmful, acknowledging that the principle of housing has already been established. The replacement of a building that has been converted to a dwelling will not always be harmful, so there is no justification for the inclusion of this criteria. The policy also states that "condition will be imposed to remove permitted development rights on future extensions or alterations to the replacement dwelling". Again, whilst in some cases this would need to be considered, this is not necessary on all replacement dwelling applications. This can be considered on a case by case basis and it should not be included with policy.
Robert Irving	Policy H8	This sentence does not make sense "the scale, form and footprint of the replacement dwelling is smaller than, or of a similar size and scale (no more than 10% in volume) to the existing dwelling (including any extensions)." Requires the word "extra" after 10%

Respondent	Policy	Comment
David Burson 185	Policy H8	The proposed policy H8 is not consistent with NPPF policy and unjustified, therefore it is considered unsound. Proposed criterion (b) is without obvious justification or support from national policy. The only instance in which the NPPF identifies replacement buildings should not be materially larger than those replaced is in the Green Belt. It does not offer support for such a restrictive approach across an entire District. Indeed, the purpose of the Development Management system is to allow refined judgements to be made on the impact of individual developments to avoid imposition of arbitrary limits. Introductory text to H8 refers to potentially harmful impacts on the character of the area from larger dwellings on the character of the area. Existing Development Management policies and those proposed for the updated Local Plan require developments to maintain the character of the area, therefore existing safeguards exist to prevent developments harmful to the character of an area, including overly large homes. Similarly, the issue of affordability appears to offer little justification. While affordability is an important issue a targeted policy is needed to address it, principally through ensuring a supply of suitable new homes, and if necessary, applying limits in areas of specific need. In the absence of proper justification the blunt policy cannot be sound. Proposed criterion (c) is also excessively prescriptive. There are a range of benefits that can come from relocating a new home in the residential curtilage not just those identified (flood management, landscape, biodiversity). For example, relocation could benefit the setting of a heritage asset, amenity of neighbours, or allow for better environmental performance. The policy should be modified to allow relocation of dwellings where it is shown to be beneficial, whatever that benefit may be. As earlier noted, criterion (e) requires modification to make clear this does not prevent replacement of a temporary dwelling for a rural worker with a permanent home, where the development is supported under policy H5. Criterion (f) must be deleted as it is unjustified, and so cannot be sound, and forfeits opportunity to improve the environment through positive development.
Judith Montford The EA 207	Policy H8	We suggest the following phrase is added to Part b of the policy to ensure any increase in built footprint does not lead to an increase in flood risk elsewhere: A minor enlargement of the replacement may be permitted, but only to allow the dwelling to achieve Nationally Described Space Standards or to deliver prevailing sustainable construction standards and where the proposed enlarged design does not detract from the character and appearance of the area and does not lead to an increase in flood risk; and … Without including these in the local plan we will find the plan unsound.

Respondent	Policy	Comment
David Hindle	Policy H9: Extensions and alterations to dwellings	Policy plugs an obvious gap, as otherwise the design guide has to be solely relied on. After 3 add -----the extension does not result in an unreasonable loss of daylight, sunlight nor is overbearing to nearby residents. Add text to tie in and cross refer to the Design guide, as that is also appropriate.
Matthew Dent	Policy H9: Extensions and alterations to dwellings	The statement of floorspace and size restrictions in policy s overly restricted, this should be left to the planning process to decide what is appropriate for a building and its context.
David Eglise	Policy H9: Extensions and alterations to dwellings	Permitted Development Rights - Front facing developments particularly Porches, etc should be controlled/restricted to preserve the street scene/character of established villages.

Respondent	Policy	Comment
Louise Follett	Policy H9: Extensions and alterations to dwellings	The Regulation 18 version of the Cotswold Local Plan proposes a new Policy H9: Extensions and Alterations to Existing Dwellings which seeks to limit the size of extensions that can be made to both small dwellings and dwellings outside of Principal Settlements. For dwellings outside Principal Settlements the size of the extension is restricted by Criteria 4 to no more than 30% of the floorspace of the existing dwelling. Criteria 5 states that larger extensions may be permitted in 'exceptional circumstances', citing genuine occupier need or design considerations such as heritage. Concern is raised over this policy as it restricts the extension of existing dwellings outside of principal settlements without providing evidence to support the requirements of the policy. Development in the open countryside or at other locations outside Principal Settlements in the District will be subject to the policies of the adopted development plan, these should include matters relating to design, heritage, landscape, flood risk, residential amenity and parking, and should assist a decision maker in identifying any potential harms of a proposed development, including residential extensions. Additional guidance can be found in the NPPF (Dec 2023), the National Design Guide, and the Council's own Supplementary Planning Documents, as well as in any made Neighbourhood Plans. Paragraph 139 of the NPPF (Dec 2023) refers further to this matter. With regard to plan making the NPPF (Dec 2023) states at Paragraph 16 (b) that Plans should; "be prepared positively, in a way that is aspirational but deliverable;" Paragraph 31 states that; "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals." (our emphasis) Paragraph 35 states that in order to be found 'sound' that plans should be (a) Positively prepared – consistent with achieving sustainable development (b) Justified - including being based on proportionate evidence (c) Effective (d) Consistent with national policy No evidence has been published as part of the Reg 18 consultation to demonstrate that dwellings greater than 80sq.m (i.e not small dwellings) outside of Principal Settlements should have extensions limited to 30% of their existing floorspace. The policy restricts applicants with how they may wish to develop or improve their property, the restriction on new floorspace may be even less than 30% given it is proposed that conservatories and outbuildings are not to be counted as part of the

Respondent	Policy	Comment
Bathurst Estate 175	Policy H9: Extensions and alterations to dwellings	No comment.
David Burson 185	Policy H9	Policy H9: Extensions And Alterations to Dwellings Similarly to policy H8 the proposed arbitrary limits to household extensions are not aligned with national policy which only supports such restriction in the Green Belt. The strict limits are unsound. The requirement under criterion (2) that extensions be 'mathematically subservient' is not defined. The absence of clarity undermines the effectiveness of the policy and soundness. The imposition of arbitrary proportional limits to extensions is without any basis in national policy (outside of the Green Belt) and should not be uniformly imposed across the District. There are adequate controls to ensure developments are in proportion with their surroundings (in design policies) to ensure the character of the area is maintained. The proposed blunt tool undermines an individual approach required for good design. The inclusion of policy for 'exceptional circumstances' allowing for larger extension is indicative of the inappropriateness of the proposed arbitrary limit on floor area. The restriction set out under H9(4) must be deleted. The suggested exemption for particular applicants (H9(5)) is contrary to basic principles underpinning planning whereby a proposal's merits should be determinative in an application, not the applicant. We understand the purpose the exemption is included; however it is a solution to a problem that should not exist. Provision H9(4) should be deleted, with this the uncomfortable provision of H9(5) can also be removed.
David Hindle	Policy H10: Community-Led Housing	The definition of CLH looks fine to me, but compare it to the later NPPF 2023 to see if any variation is worthwhile. In the accompanying text double check that the it makes it clear that CLH can be an important way to deliver a rural exception housing for affordable housing(cross reference to Policy). Also note that as CLH, will prioratise the local need, it can often be a key way to deliver a far larger proportion of social rent residential, than other rural exception affordable housing will deliver.

Respondent	Policy	Comment
Robert Irving	Policy H10: Community-Led Housing	As a member of Cirencester Cohousing, I'd like congratulate CDC on proposing this policy.
Nigel Moor	Policy H10: Community-Led Housing	This policy includes more exacting locational criteria than found in NPPF. The policy should be redrafted on the lines of para 73 of the NPPF. Para 8.10.5 again includes criteria not contained in the NPPF and this paragraph should be replaced by the definition of Community – led development as defined in Annex 2 of NPPF.
Bathurst Estate 175	Policy H10: Community-Led Housing	No comment.
David Hindle	Policy H10	New H Policy probably here or elsewhere, dealing with: _____ In exceptional circumstances, market housing, on the same site,, to enable needed identified Strategic Infrastructure Building , identified in the Local Plan. will be permitted. The affordable housing required under Policy H2 must be provided, and only the amount of market housing to enable the provision of the Strategic Infrastructure Building will be permitted. Viability Assessment evidence must be provided demonstrating this.
David Hindle	Policy H10	When I refereed to CLH, I of course meant CLTs. The point being that as the Government recognises these in NPPF 2023, broad compatibility of definition should be checked.out. The added point, about CLTs, is making the point, that they will be highly likely to fit the definition of rural exception development. In addition, they tend to emphasis the provision of a higher proportion of Social Rent. As they are local, they also respond far better to local need, in the specific communities where they are developed., as they are a community response to need.
David Hindle	Policy H11: Homelessness Housing Provision	On my first reading I had some doubts, but I am satisfied that this represents an appropriate new Policy basis.

Respondent	Policy	Comment
David Hindle	Policy H11: Homelessness Housing Provision	To 8.11.12 add------The Council will prepare a guidance to indicate to applicants how the fund will be used in order to assist in the alleviation of homelessness.
Bathurst Estate 175	Policy H11: Homelessness Housing Provision	No comment.

Respondent	Policy	Comment
Mark Chadwick 184	Policy H11: Homelessness Housing Provision	POLICY H11: HOMELESSNESS HOUSING PROVISION Emerging Policy H11 fails to meet the statutory tests as set out within Regulation 122 and the policy tests as set out within the NPPF. Planning obligations are intended to help assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. They must be: • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. Emerging Policy H11 seeks to raise a tax levy from housing developments. While the matter of addressing homelessness is a very serious matter, and a crisis issue that needs urgently addressing, it is wrong to do so by raising a revenue base from development schemes that in themselves aim to address our wider housing crisis. It cannot be reasonably argued the contributions required within emerging policy H11 are necessary to make a housing development acceptable in planning terms. It cannot be reasonably argued the contributions are directly related to housing development schemes. Neither can it be reasonably argued such financial contributions are fairly or reasonably related in scale or kind. Housing developments of 10 or more homes, in additional to helping to address the general housing crisis, also help to address the crisis of affordability by way of the policy requirement to deliver an appropriate proportion of affordable homes. Notwithstanding the matter of the statutory and policy tests noted above, it is simply wrong to further burden the delivery of new homes with what amounts to a homelessness levy. Fundamentally, the Council needs to be cognisance of the fact that the higher the levels of financial contributions required from a housing scheme, the higher the purchase price will be for the new homes shouldering those costs. QED, the more unaffordable the homes become, and the greater the pressure becomes on the need for yet more affordable housing ! Instead of adopting an approach that further burdens housing development, Council's objective of responding to the acute matter of general housing need, affordability and homelessness in the District is more likely to be better served by increasing the District's over-all housing requirement figure, allocating a greater number of non-strategic housing sites. Emerging Policy H11 is wrong at every level. It fails to meet the required statutory and policy tests and will fail to pass scrutiny at examination. It should be struck out.

Respondent	Policy	Comment
Newland Homes 241	Policy H11: Homelessness Housing Provision	This is a new policy, and it is not clear from the policy wording exactly how this will be delivered or what the main aims of the policy are. It is accepted that Local Authorities have a responsibility to prevent homelessness in their areas, however the Local Plan update is not necessarily the most appropriate policy document in which to address this. The policy suggests that complying with this policy would involve a financial contribution. As it stands any contributions would need to be secured by Section 106 contributions and it is not considered that this would meet the CIL tests. It is therefore considered that the provision of housing for the homeless should be incorporated into the policy on affordable housing. This policy should be deleted, and the matter of homelessness housing provision should be incorporated into the policy on affordable housing and the Councils wider Housing Strategy as a whole.
Bloor Homes Western 244	Policy H11: Homelessness Housing Provision	This is a new policy, and it is not clear from the policy wording exactly how this will be delivered or what the main aims of the policy are. It is accepted that Local Authorities have a responsibility to help prevent homelessness in their areas. However, these contributions should be incorporated within the requirements for affordable housing. As it stands any contributions would need to be secured by Section 106 contributions and it is not considered that this would meet the CIL tests. This policy should be deleted, and the matter of homelessness housing provision should be incorporated into the policy on affordable housing and the Councils wider Housing Strategy as a whole.

Respondent	Policy	Comment
Howard Cole Ltd 357	Policy H11: Homelessness Housing Provision	Call for sites: Emerging Policy H11 fails to meet the statutory tests as set out within Regulation 122 and the policy tests as set out within the NPPF. Planning obligations are intended to help assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. They must be: • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development. Emerging Policy H11 seeks to raise a tax levy from housing developments. While the matter of addressing homelessness is a very serious matter, and a crisis issue that needs urgently addressing, it is wrong to do so by raising a revenue base from development schemes that in themselves aim to address our wider housing crisis. It cannot be reasonably argued the contributions required within emerging policy H11 are necessary to make a housing development acceptable in planning terms. It cannot be reasonably argued the contributions are directly related to housing development schemes. Neither can it be reasonably argued such financial contributions are fairly or reasonably related in scale or kind. Housing developments of 10 or more homes, in additional to helping to address the general housing crisis, also help to address the crisis of affordability by way of the policy requirement to deliver an appropriate proportion of affordable homes. Notwithstanding the matter of the statutory and policy tests noted above, it is simply wrong to further burden the delivery of new homes with what amounts to a homelessness levy. Fundamentally, the Council needs to be cognisance of the fact that the higher the levels of financial contributions required from a housing scheme, the higher the purchase price will be for the new homes shouldering those costs. QED, the more unaffordable the homes become, and the greater the pressure becomes on the need for yet more affordable housing ! Instead of adopting an approach that further burdens housing development, Council's objective of responding to the acute matter of general housing need, affordability and homelessness in the District is more likely to be better served by increasing the District's over-all housing requirement figure, allocating a greater number of non-strategic housing sites. Emerging Policy H11 is wrong at every level. It fails to meet the required statutory and policy tests and will fail to pass scrutiny at examination. It should be struck out.
Blockley Parish Council	Policy H11	8.11.11. seems to be an incomplete sentence
Blockley Parish Council	Policy H11	Blockley Parish Council welcomes a policy setting out a requirement to contribute to homeless housing provision. We note that elsewhere in the draft document "the applicant" and not "the developer" is the wording used (paragraph 1 of policy H11).

Respondent	Policy	Comment
Bloor Homes Western (Ridge and Partners)	Policy H11	This is a new policy, and it is not clear from the policy wording exactly how this will be delivered or what the main aims of the policy are. It is accepted that Local Authorities have a responsibility to help prevent homelessness in their areas. However, these contributions should be incorporated within the requirements for affordable housing. As it stands any contributions would need to be secured by Section 106 contributions and it is not considered that this would meet the CIL tests.
Chipping Campden School	Policy EC1: Employment Development	The School supports Policy EC1. We enjoy good relationships with local businesses and seek to foster these. We would encourage and support the growth of new modern industry and commerce that will provide good local career opportunities for the students who graduate from our School.
Fairford Town Council	Policy EC1: Employment Development	9.1.3 – This highlights a major deficiency in GFirst's Strategic Economic Plan for the County, which doesn't really do anything for the Cotswolds despite its location between Gloucester/Cheltenham, Swindon and Oxford. Re the issues mentioned – ● is in a rural location within an Area of Outstanding Natural Beauty; - It is NOT ALL in the AONB/National Landscape ● is relatively removed from the motorway network and has poor transport links with the rest of Gloucestershire and the M5; - southern parts have closer links with the M4 corridor and ● is an area where the residual value of commercial development does not support broader private sector or institutional investment. – This could easily change, if there was a more positive Economic strategy for the District and a bit of targeted infrastructure investment 9.1.4 – It is also important to support opportunities for employment growth in Fairford, where there is the potential for this to take place in parallel with some additional housing development, helping to support the vitality of the District Centre. 9.1.5 – This is really weak protection for existing employment sites in communities where employment desperately needs to be maintained to keep them sustainable. What exactly is meant by "where they are still attractive to the market,"? Is this effectively a 'laissez faire' policy which can only help turn communities into 'dormitory' or 'retirement' towns?

Respondent	Policy	Comment
Guy Wakefield, Ridge (on behalf John Hackling Holdings) 243	Policy EC1: Employment Development	The policy sets the strategy for employment development in the Local Plan area. It is noted that this policy supports key opportunities for growth at Bourton-on-the-Water. Whilst the policy supports the creation of jobs, it is considered that it should be expanded to explicitly support the growth of local businesses in the local area. Hacklings are a significant employer within the district and have ambitious growth plans for the next 8-15 years. However, in order to be able to implement these they need to have certainty that they will be able to expand their business in Bourton-in-the-Water. Without this certainty, the company may be forced to relocate. The policy should explicitly reference the opportunity to local businesses to be able to expand.
Nikki Ind	Policy EC1	We need to ensure that towns with limited, connected public transport have employment opportunities, particularly for young people.
Blockley Parish Council	Policy EC1	Blockley Parish Council supports the addition of a reference to "transport other than private vehicles" in EC1 (b)
Clare Turner	Policy EC1	I would welcome a policy addition that supports development of employment sites that will generate opportunities for 1. young people to train and/or develop and 2. residents to upskill or re-train to address gaps in the green or circular economy e.g. repair and re-use, retrofitting etc
David Hindle	Policy EC2: Safeguarding Employment Sites	Agree the text that specifies the 5 year genuine marketing criteria.
Chipping Campden School	Policy EC2: Safeguarding Employment Sites	The School supports Policy EC2. Consideration should be given to provide sites for professional or high tech businesses within or adjacent to residential development sites where it can be shown that these businesses would not adversely affect the amenity of local residents.

Respondent	Policy	Comment
Fairford Town Council	Policy EC2: Safeguarding Employment Sites	9.2.3-9.2.4 - CDC needs to give more consideration to the use of Article 4 Directions to protect a limited resource of commercial/employment sites in certain constrained centres such as Fairford (as provided for in the NPPF – para 53). Otherwise, you are basically 'running up a white flag' for these centres. Part 5 of the policy needs to [be extended in scope to] clarify that all existing long-standing small employment sites, including/ especially those within market towns where these form an essential part of the character of these towns, are covered by this policy. The review (which doesn't seem to have covered all our sites) needs to be comprehensive to cover these. As you say in 9.2.7, "Cotswold District has many established and successful employment sites both within and outside towns and villages. The established employment sites make an important contribution to the employment stock of the District and Policy EC2 provides a strong steer on how planning applications will be considered to support their continued role and function. In an area with scattered settlements and sensitive environmental considerations, it is important that, wherever possible, established employment sites and premises, in towns and villages especially, should be retained. Maximising the use of these sites reduces the need for the development of new sites particularly on the edge of villages or within the countryside and seeks to maintain and enhance a strong economic community. Therefore Policy EC2 seeks to make better use of the District's established employment sites and safeguards them for employment uses." Along with this, we strongly support 9.2.11.
Bathurst Estate 175	Policy EC2: Safeguarding Employment Sites	General support for the policy as it allows for sites to be redeveloped where the proposal would contribute to meeting an unmet need for development. The policy should define or clarify what is meant by 'no reasonable prospect' as this is currently open to interpretation and could lead to complications when justifying some development types.

Respondent	Policy	Comment
Liz Shield (SF Planning)	Policy EC2: Safeguarding Employment Sites	4.1 The local plan review provides an opportunity to recognise the importance of the Springhill Industrial Estate as an employment site and safeguard it for future growth. 4.2 EC2 refers to the safeguarded sites listed at Appendix E. The explanatory wording for EC2 (at paragraph 9.2.5) states; "These sites are considered valuable employment locations and should be safeguarded for that purpose." Also, at paragraph 9.2.7, the explanatory wording states that "Policy EC2 seeks to make better use of the District's established employment sites and safeguards them for employment uses." 4.3 The site's long history of industrial use (in the same ownership and use since 1980) has been well established with approximately 60 people now working from the site. Its contribution to the local economy, and its potential for future employment growth make it a valuable asset that should be safeguarded. 4.4 Its location a few minutes from Chipping Campden but outside the settlement boundary should not prohibit its safeguarding. Paragraph 9.2.7 of the local plan notes that there are a mix of safeguarded employment sites both in and outside of settlements. 4.5 The retention and potential expansion of the Springhill Industrial Estate still aligns with the principles of sustainable development by providing employment opportunities for the area and supporting the vitality and viability of the local economy. 4.6 Therefore, the site meets the criteria set out in the explanatory wording and there appears to be no reason not to safeguard the site in the local plan. 4.7 Safeguarding the site and taking a pragmatic approach to its growth would be of a longer term benefit across the plan period. It would enable Cotswold District to provide for employment needs as the population grows. Paragraph 9.2.9 of the draft local plan confirms that; "there is an increased land requirement to enable the economic potential of the area to be achieved". Safeguarding the site would help to achieve this aim. 5. Comments on the draft local plan policies 5.1 Policy EC2 – Safeguarding Employment Sites 5.1.1 Our client finds the wording of policy EC2 broadly favourable to safeguarded sites and therefore, comments are relatively limited provided that the site is safeguarded. 5.1.2

Respondent	Policy	Comment
Guy Wakefield, Ridge (on behalf John Hackling Holdings) 243	Policy EC2: Safeguarding Employment Sites	This policy sets out how employment sites will be safeguarded. Within the preliminary information, the Local Plan stresses the importance of existing employment sites, and states: "Protection of such sites and support for their potential intensification, where appropriate, is critical in ensuring that existing businesses are retained and have the opportunity to grow." (Paragraph 9.2.1) Therefore, the policy allows for flexibility within existing employment sites and supports (in appropriate cases) intensification on those sites. However, the policy fails to recognise the importance of allowing sites to extend into adjacent land. This land, whether designated or not, can be imperative to facilitating growth of existing employment sites overtime. If companies have outgrown their employment site, and cannot extend onto adjacent land, they may be forced to relocate. This loss of an employment site would have negative consequences for the local area and economy. This is acknowledged in the Plan. Paragraph 9.2.4 states: "…it remains a reasonable planning objective to strive to safeguard established employment sites in the interests of sustainable development and the health and self-sufficiency of the district's economy and employment offer. Land values for housing are nearly always higher than for other land uses. In an area where there is both high demand for housing and accordingly high land values, and where a 5-year supply of developable land for housing is conscientiously being maintained, [bold text] "allowing the market to decide" is unnecessary in planning terms and very likely to see a rapid decline in employment sites." [Emphasis added]. Thus, if you lose employment sites which are important to the area, they will not necessarily be replaced. It is agreed that Bourton Business Park should continue to be safeguarded as a key employment site, and it is noted that it is proposed to extend the site to include the recently permitted land to the north, which is currently being developed. This development demonstrates the importance of Bourton Business Park to the area, and additional land should be allocated for future employment development ensuring that Bourton-on-the-Water as whole has a diverse local economy. The policy should be amended to allow for the extension of established employment sites such as allocating addition land to the north of Bourton Business Park.

Respondent	Policy	Comment
SF Planning on behalf of Springhill Industrial Estate	Policy EC2	Policy EC2 is broadly favourable to safeguarded sites and therefore comments are relatively limited provided that the site at Springhill Industrial Estate is safeguarded under this policy. Please see our submission letter emailed to the Council on 4 April 2024 (including to the call for sites) for more information. Paragraph 3 permits alternative uses where there is no reasonable prospect of the employment use coming forward where the proposed use "would contribute to meeting an unmet need for development in the area". However, it is not entirely clear what this is intended to mean nor how wide 'the area' is. For example, if a village did not have a shop and one was proposed on an allocated employment site which was not coming forward, would that be meeting an 'unmet need?'. At the other end of the scale, we would consider the acute need for housing generally as an unmet need, but it is not clear what the Council had in mind. Paragraph 4 confirms that permissions for employment use within established/allocated employment sites will have a condition restricting the use to Classes B2, B8 and/or E(g) as appropriate. We are unclear as to why the Council are proposing this as a blanket policy. There are many 'ancillary' uses for employment sites which could be beneficial, for example a café or shop for workers to use on a larger site (but one which would not be restricted to use by employees). This may be a way for new (viable) services or facilities to be provided in that area. The policy should allow for suitable co-existing uses where there is justification and where they will offer a wider benefit to the settlement. Finally, paragraph 5 refers to sites in Appendix E as requiring "prior approval". We assume that the Council simply mean some form of consent or permission rather than the general permitted development order sense, but it would be helpful if this could be made clearer
Clare Turner	Policy EC2	At 9.2.11. It would be helpful if the policy wording were expanded, so not only must evidence be submitted to demonstrate that the site has been "continually, actively and effectively marketed for at least five years and that the use is no longer of commercial interest" but that any possibility for a not-for-profit or community group or organisation to operate out of the site and deliver economic benefits or employment opportunities has also been ruled out, before other uses are considered.
Blockley Parish Council	Policy EC2	Blockley Parish Council supports proposed wording that strengthens the safeguarding of existing employment sites in Policy EC2
Stephen Andrews (Kempsford Parish Council)	Policy EC2	EES29 Map 12 – There would seem to be no justification for reducing this allocation. Kempsford Parish Council wishes to ensure the retention of local employment sites that are close to the Parish.

Respondent	Policy	Comment
Liz Shield (SF Planning)	Policy EC3: Proposals for all types of Employment-Generating	We note the following wording at paragraph 3 of this policy: "Proposals for large-scale employment development will not be permitted outside Development Boundaries, and outside established employment sites, unless it is in accordance with other policies that expressly deal with large-scale employment development in such locations." This means that development boundaries should be drawn so they are sufficiently flexible to allow for the creation of job opportunities and the growth of existing businesses. An inflexible development strategy will stifle economic growth in the area. 5.2.2 The proposed changes to development boundaries in the current draft continue the approach taken in the adopted local plan namely that they are drawn tight to existing development and do not, for the most part, allow for new, unanticipated sites to come forward within the settlement boundaries over the plan period. This is one key way in which economic growth is stifled by the presence of settlement boundaries. 5.2.3 To put it another way, boundaries which are deliberately drawn to allow expansion of a settlement will also ensure that businesses within settlements (particularly smaller settlements) can grow rather than experiencing stagnation in profits as prices rise and the economic climate becomes more challenging. Settlement boundaries being drawn noticeably tight to existing settlements does not allow for the additional customers these businesses and services need to remain viable.
Guy Wakefield, Ridge (on behalf John Hackling Holdings) 243	Policy EC3: Proposals for all types of Employment-Generating	This policy, and the language it uses, needs to be amended to increased flexibility for businesses in the Local Plan area. This is supported by Paragraph 86 part d) of the National Planning Policy Framework which states that planning policies: "should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances." There will be cases where employment generating uses, albeit not necessarily traditional employment uses, will look to locate within established employment sites and may bring uses which complement the existing employment uses on these sites. These should not be automatically seen as inappropriate. This policy needs to be amended to provide a greater level of flexibility, for a wider range of employment generating uses, including those within established employment areas.
Chipping Campden School	Policy EC3	The School supports Policy EC3. As well as encouraging our students to pursue academic studies in higher education we also seek to support and equip those students who wish to enter into employment, apprenticeships or other forms of training directly from School. Therefore w support the development of a diverse range of local potential employment opportunities.

Respondent	Policy	Comment
SF Planning on behalf of Springhill Industrial Estate	Policy EC3	We note the following wording at paragraph 3 of this policy: "Proposals for large-scale employment development will not be permitted outside Development Boundaries, and outside established employment sites, unless it is in accordance with other policies that expressly deal with large-scale employment development in such locations." This means that development boundaries should be drawn so they are sufficiently flexible to allow for the creation of job opportunities and the growth of existing businesses. An inflexible development strategy will stifle economic growth in the area. The proposed changes to development boundaries in the current draft continue the approach taken in the adopted local plan namely that they are drawn tight to existing development and do not, for the most part, allow for new, unanticipated sites to come forward within the settlement boundaries over the plan period. This is one key way in which economic growth is stifled by the presence of settlement boundaries. To put it another way, boundaries which are deliberately drawn to allow expansion of a settlement will also ensure that businesses within settlements (particularly smaller settlements) can grow rather than experiencing stagnation in profits as prices rise and the economic climate becomes more challenging. Settlement boundaries being drawn noticeably tight to existing settlements does not allow for the additional customers these businesses and services need to remain viable.
Blockley Parish Council	Policy EC3	Blockley Parish Council supports the addition of EC3 point 3 to protect areas outside of the development boundary that are not suitable for large-scale development (but notes that on occasion, locations outside of the development boundary may be well suited to small scale development that generates employment opportunities without negatively impacting the local area. Such development is accommodated in point 2 of the policy, which remains largely unchanged).
David Hindle	Policy EC4: Special Policy Areas	All makes sensible variations, and the development outlined on the 3 sites are all worthy of support, and being singled out to have Special Policy application.
Fairford Town Council	Policy EC4: Special Policy Areas	Policy EC4 – Please can we have a Special Policy Area policy for Fairford.

Respondent	Policy	Comment
Royal Agricultural University	Policy EC4: Special Policy Areas	Chapter 9 Policy EC4 sets out the overriding strategy for the RAU. It is noted in the supporting text to the policy that the LPA has updated policy EC4 following a request from the RAU which has made it more flexible to accommodate the RAU's growth plans and to improve the policy so that it is 'green to the core'. This is welcomed by the RAU. Policy EC4 drafted as follows: Royal Agricultural University, Cirencester. At this site, proposals for the expansion of the existing University campus, including associated development for educational, training, business and research development, student accommodation and other ancillary operational floorspace, will be permitted. Subject to landscape and heritage constraints, proposals for the expansion of the University campus will include purpose-built student accommodation commensurate to the increased accommodation needs of additional student population growth. Development proposals will be tied to the operations teaching and research of the Royal RAU. For completeness previous representations to the emerging local plan have suggest the following amendments to policy EC4 and its supporting text. 1. The Special Policy Areas (defined on the Policies Map) will be master-planned and development implemented on a comprehensive basis at the following locations: Royal Agricultural University, Cirencester. At this site, proposals for the expansion of the existing University campus, that includes the provision of an innovation village/agricultural technology park to support the growth of the university and agricultural research will be supported in order enhance the universities role as a nationally important centre for agricultural research and technology (Agri-Tech). The proposals will be primarily focused on the growth of agricultural technology, including associated research and innovation associated with the agricultural industry and the integration of associated uses that could include educational, training, student accommodation, business start-up and support spaces, business, conference and hospitality facilities, and other operational floorspace, will be permitted. A master plan will be produced in consultation with the local community and the Local Planning Authority, that will provide a framework for the delivery of future planning applications across the university campus and will establish a framework for determining any full or outline planning application(s). The development of the masterplan can be completed, where appropriate, in conjunction with the application for the innovation village to help facilitate its timely delivery. 3. With regard to the Royal Agricultural University, Cirencester, the Master Plan will: a. ensure that the character of the parkland setting is not compromised on this important gateway to Cirencester;

Respondent	Policy	Comment
Sworders 248	Policy EC4: Special Policy Areas	Policy EC 4 - 1c relates to the Fire Services College. It states that: 'At this site, proposals for development of operational fire, rescue and emergency responders' training facilities, ancillary development, and associated infrastructure, will be permitted. 2.4ha of land is allocated for a primary school (including early years or nursery provision). Further land is allocated for enabling development to support the regeneration and development of facilities at the Fire Services College. This includes a residential allocation (indicative net capacity of 310 dwellings) (market and Affordable Housing), a new neighbourhood centre and a 12.5ha employment allocation (B2, B8 and E(g) Use Classes). Development proposals will be tied to the operations of the Fire Service College.' Paragraphs 9.4.19 and 9.4.20 of the supporting text to Policy EC4 notes that: 'The Fire Services College is a leader in fire and emergency response training and one of the world's largest operational fire and rescue training facilities. It specialises in providing dedicated training for fire and rescue services, emergency responders and a wide spectrum of commercial and public sector clients globally' and that; 'In March 2013, the College moved from government to private ownership in order to help secure future investment to maintain the College as a pioneering facility for the fire and rescue services, both in the UK and overseas. Significant new and replacement infrastructure and supporting facilities are required to ensure that the College remains at the forefront of training provision.' While the Fire Services College is undoubtedly a leader in fire and emergency response training, and one of the world's largest operational fire and rescue training facilities, we question whether it is the role of Local Plan to allocate sites to provide enabling development which will provide financial support a privately owned organisation such as the College. The buildings may need to be updated and repaired to reduce their carbon emissions and to make them more efficient, but the cost to the environment of these upgrades is potentially the delivery of a new road and the development of more than 1,000 new homes. Please set out any alternatives or changes you are seeking, using a continuation sheet if necessary. We suggest that the LPA should re-assess the overall sustainability of their proposal for the Fire Services College, and look instead at other sites in Moreton which could provide more appropriate, smaller scale development in much more sustainable locations, which require significantly less infrastructure development, such as our client's site M74.
Chipping Campden School	Policy EC4	The School supports Policy EC4. We particularly support the development and expansion of the RAU and we notice increased interest in agriculture and related businesses from some of our students. We assume that there would also be some mutual support between RAU and our local major employer BRI which would be of interest to some of our students. Similarly the FSC has a range of technical career opportunities which would encourage and support.
Bob Sharples	Policy EC4	Policy EC5 – Special Policy Areas, Sport England is supportive of the principles of the protection of the leisure uses and playing fields at the Fire Services College at Moreton-in-Marsh

Respondent	Policy	Comment
Sheila Thomas	Policy EC4	I live in the East of Moreton in Marsh and object to the further development of the FSC. There is a risk that it will create a separate community and adversely effect community cohesion. No need for a pub, hotel etc. Just because private companies have a need for money is not a reason to overdevelop a town that has already seen a massive increase in house building.
Jerome Cook	Policy EC4	Policy EC4 section note that proceeds from the enabling development at the Fire Service College site will be used to regenerate the FSC's facilities. Given the development will lead to increased pressure on Moreton-in-Marsh's (MiM) current infrastructure such as roads and sewage/water, proceeds from development should be prioritised towards improving the town's infrastructure to cope with the growth, rather than to the private company that owns the FSC.
john shelton	Policy EC4	EC4.c the residents of Moreton and the general public have a right to know the specific terms of the deal that has been negotiated between CDC and Capita. Especially as it involves the regeneration/development of buildings. Freedom of information and transparency are vital to build public trust.
john shelton	Policy EC4	EC4 9.4.24...cars will have to taken into account because the Fire college is too far to access to shop by foot. Roads and parking in Morteton are already at 100%.
Richard Noble	Policy EC4	Moreton-in-Marsh has already seen significant development in recent years and already suffers from heavy traffic congestion and is starting to suffer from a lack of adequate facilities to support the hundreds of new homes that have already been built in recent years. I don't think this makes Moreton a viable area for large numbers of new homes. There needs to be significant improvements to infrastructure and local facilities in Moreton as it is, just to support the homes already built.
Clare Turner	Policy EC4	EC4 4c (deletion of). While the Local Transport Plan no longer proposes a railway station at Chipping Campden, should the Campden BRI masterplan still consider safety measures (associated with the railway line) in relation to the provision of active travel routes to access the site?
Coates Parish Council	Policy EC4	Policy EC4 - 1.a We support the proposals for the RAU.
Jason Seaward	Policy EC4	Ref EC4 1.c Development of Fire Service College. This site is only linked to Moreton-in-Marsh by the A44 which feeds the already congested town centre crossing of the North-South A429 Fosseway. The only other link is to come out of the site to the north and join the very small road that feeds into the north of the town onto the Fosseway which is regularly blocked by heavy trunk traffic going south to Swindon and the M4. There is no natural, organic link into town from the FSC that avoids adding to the two A road trunking traffic. Developing services, retail, school, housing and employment at the FSC is not extending the natural boundaries of Moreton-in-Marsh, it is creating a whole new settlement that will add a single, undistributed transport demand to the east of the town. Users at the FSC cannot reach any of the integrated transport services, or other (limited) facilities in Moreton-in-Marsh without going through either the existing East-West road bottleneck on the A44 crossing the railway or making a longer diversion north, the join the North-South A429 bottleneck over the railway.
Grace Lewis 153	Policy EC4	Policies Map It is noted on page 29 that Policy EC4 which safeguards land adjoining the railway to facilitate a new station in accordance with the local transport plan at chipping Campden is to be removed as this station is no longer proposed.

Respondent	Policy	Comment
Susie Stephen (Stantec)	Policy EC4	The draft updates to Policy EC4 acknowledge the need for a nuanced approach to support the District's larger institutions and employers. We welcome the FSC's continued inclusion within the Policy, noting the important role and contribution played by the FSC to the District and the implicit objective to retain and support the FSC's contribution in the long-term. In addition to supporting development within the Site for operational purposes (which is welcomed), the updates to Policy EC4 introduce in principle support for development within the Site which is necessary to facilitate the much-needed upgrading and enhancement of the FSC's facilities in order to ensure its long-term future and continued success. Whilst the FSC are still in the relatively early stages of developing a detailed proposals for the Site, the emerging proposals for 'enabling development' have been carefully considered and have been subject to a positive dialogue with Officers in response to the FSC's previous representations (included in Appendix 2). The proposed redrafting of Policy EC4 is therefore considered to have been positively prepared in this respect and as a consequence, we only have limited further comments to make on the policy wording itself at this stage. As a point of clarification, it is unclear what is meant by 'development proposals will be tied to the operations of the Fire Service College' within part 1. c. (which is also referenced again within paragraph 9.4.3 of the supporting text). It is accepted that the allocation of land for development within the FSC Site is necessary to facilitate investment in the wider FSC Site (including by reference to 'enabling development' within the Policy) but the development itself must be capable of operating independent of the FSC notwithstanding the potential for symbiosis between certain uses. We would therefore duly request an amendment to this part of Policy EC4 and paragraph 9.4.3 as shown below (changes shown in Bold). c. Fire Services College, Moreton-in-Marsh. At this site, proposals for development of operational fire, rescue and emergency responders' training facilities, ancillary development, and associated infrastructure, will be permitted. 2.4ha of land is allocated for a primary school (including early years or nursery provision). Further land is allocated for enabling development to support the regeneration and development of facilities at the Fire Services College. This includes a residential allocation (indicative net capacity of 310 dwellings) (market and Affordable Housing), a new neighbourhood centre and a 12.5ha employment
Susie Stephen (Stantec)	Policy EC4	Stantec PDF re FSC

Respondent	Policy	Comment
David Hindle	Policy EC5: Rural Diversification	9.6.4 The word agricultural is wrong in the context, as the Policy is dealing with rural diversification. It should instead say something like, 'new buildings for rural diversification are only built when they are needed' etc
Chipping Campden School	Policy EC5: Rural Diversification	The School supports Policy EC5. We would support any initiative to increase local employment opportunities and would welcome contact with business representatives for a dialogue over potential curriculum enhancements where these would enhance the employability of our graduating students.
Clare Turner	Policy EC5: Rural Diversification	EC5 9.6.4 and 9.6.5 are welcome additions to provide clarity on the importance of supporting diversification on farms while protecting biodiversity and closing a loophole that allows planning permission for housing that would not otherwise be granted. Would suggest "agricultural buildings" might be replaced by "rural buildings" in 9.6.4 however, as diversification may cover activities other than agriculture.
Bathurst Estate 175	Policy EC5: Rural Diversification	We support this as it aligns with the requirements in the General Permitted Development Order.
Blockley Parish Council	Policy EC5	4.EC5 f Blockley Parish Council supports rural diversification but welcomes the closing of the loophole that allows conversion of rural buildings to housing, shortly after development related to farm diversification has taken place. BPC would like to see the period of time extended beyond 10 years (unless a significant material change in circumstances has been demonstrated) however to ensure the policy acts as an effective deterrent.
Bathurst Estate 175	Policy EC6: Conversion of Rural Buildings	The new provision that the conversion of rural buildings to residential will not be allowed within ten years accords with the requirements of the General Permitted Development Order. We agree with this revision.

Respondent	Policy	Comment
Dan Washington (BBA Architects/Stantonbury Building and Dev)	Policy EC6: Conversion of Rural Buildings	The proposed amendments to Policy EC6 include that conversion of rural buildings will be permitted provided that: d. the development leads to an enhancement of the immediate setting f. the building is not converted to residential use within a period of 10 years dating from whichever is the latter of either: • the substantial completion of the building now proposed for conversion; the first use of the building; or • the substantial completion of any subsequent extensions to the original building, unless a significant material change in circumstances has been demonstrated. Firstly, the requirement of development to lead to enhancement of the immediate setting is difficult to define and would lead to unclear criteria for developers to follow. It is considered more appropriate that conversions of building have no detrimental impact on the immediate setting. There is no justification for the inclusion of a time limit of 10 years for conversion to residential from a previous use of the building. This is unnecessarily restrictive and could result in the long term vacancy of buildings.

Respondent	Policy	Comment
Rob Jones-Davies	Policy EC6	The removal of the 'conversion of rural buildings' as a certain type of housing development allowable in the countryside from the guidance text to Policy DS4 at 6.4.3, in association with the changes to the policy EC6, and indeed the statement within the SoR's that 'the conversion of rural buildings to market dwellings in the open countryside is no longer needed or supported by the Council' is in direct conflict with current policy/ guidance contained within the following documentation; -National Planning Policy Framework - NPPF -National Planning Practice Guidance - NPPG -Historic England Advice note 9: 'The Adaptive Reuse of Traditional Farm Buildings' -CLA Guidance: 'The conversion of heritage and other farm buildings to new uses' The CLA have identified that approximately half a million traditional farm buildings have been lost since 1919 (the equivalent of 15 a day) and consequently, of those that remain, most are important as heritage and significant features within the rural landscape. Historic England (HE), goes further to state; 'Traditional farmsteads are an irreplaceable source of character in the English countryside. However, without appropriate uses to fund their long-term maintenance and repair, they will disappear from the landscape.' It is therefore not unsurprising to learn of HE's explicit support of residential conversion stating that proposals for residential conversion which 'enhance their historic character and significance are to be encouraged'. This is of course echoed within the NPPF at para 84 which offers support for the development of isolated homes where 'development would re-use redundant or disused buildings and enhance its immediate setting'. Regarding Rural Housing current NPPG states 'People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities.' The guidance previously identified 'A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.' Indeed, the Cotswold District's acute housing affordability issue is identified and reiterated on numerous occasions within the Local Plan. To starve the District of a sustainable supply of new homes by restricting the conversion of rural buildings is entirely counterintuitive to the aims of addressing this stated issue. To stymie this avenue of development will not only contribute to pushing the existing rural housing stock beyond that attainable by those who have been born, brought up, live, work and love the countryside but it will have a significant impact on the already fragile rural economy. CDC's extant policies and associated planning decisions relating to the 'conversion of rural buildings' (in addition to 'replacement dwellings' and 'extensions and alterations
Blockley Parish Council	Policy EC6	5.EC6 f Blockley Parish Council supports the conversion of rural buildings to support diversification but welcomes the closing of the loophole that allows conversion of rural buildings to residential use, shortly after development related to diversification has taken place. BPC would like to see the period of time extended beyond 10 years (unless a significant material change in circumstances has been demonstrated) however to ensure the policy acts as an effective deterrent. The addition of wording in 9.6.3 is welcomed to ensure the appropriateness of any proposals are considered for a any given location.

Respondent	Policy	Comment
Clare Turner	Policy EC6	EC6 is there an opportunity to support conversion of rural buildings to create affordable homes (particularly social rented) if the location is suitable eg it has viable active travel routes to services or employment.
Claudia Jones (Morgan Elliot Planning)	Policy EC6	On behalf of my client, the following representation responds to the proposed amends to emerging Policy EC6 that relates to the 'Conversion of Rural Buildings'. Consequently, this representation responds to question LPU Q47 of the consultation survey. This response specifically draws on part f) of the emerging planning policy which states that the conversion of rural buildings to alternative uses will be permitted provided, inter alia, "the building is not converted to residential use within a period of 10 years dating from whichever is the latter of either: • the substantial completion of the building now proposed for conversion; the first use of the building; or • the substantial completion of any subsequent extensions to the original building, unless a significant material change in circumstances has been demonstrated." Footnote iv) attached to that part of the policy sets out reasoning for this inclusion, stating that "Annual monitoring of planning permissions has identified various cases where rural buildings are being converted, which are subsequently converted in quick succession into housing (sometimes without the initial development even being completed). This is being used as a loophole to build homes in the open countryside where they would otherwise be refused, leading to unsustainable developments." We agree with the Council insofar that we do not support the building of new dwellings in the open countryside that do not meet the exceptions listed within national planning policy as referenced at Paragraph 84 of the NPPF. However, my client wishes to propose an amendment to part f) of Policy EC6 (as drafted) that allows for conversions of rural buildings to residential use below the 10 year threshold in exceptional circumstances, such as where it can be demonstrated that the building is no longer required for farming, equestrian or business use and its loss does not cause detrimental harm to the relevant operation. Officers will need to consider the justification put forward by the Applicant on a case by case basis and make a judgement as to whether it would meet this test. Including this amend allows for greater flexibility in delivering sustainable homes within the open countryside that are commensurate to its rural character whilst meeting rural housing needs. It does not undermine the Council's suggestion that unsustainable homes are being delivered in rural areas through conversions as officers should also assess proposals against whether the site is in a sustainable location for development in accessibility terms. Indeed, this is what is proposed within emerging Policy CC8 part 2) "Development must provide and optimise walking, cycling and public transport connections to key off-site origin and destinations." Although we would add that when applying that policy in rural areas, decisions should be made in the context of Paragraph 109 of the NPPF given the rural nature of the district. Allowing for the delivery of homes through the conversion of rural buildings supports the purpose of Paragraph 83 of the NPPF which promotes sustainable development in rural areas where it will enhance or maintain the vitality of rural communities. The Government's continued support for such proposals is reflected in a consultation undertaken in July 2023 where proposed amendments to the conversion of rural buildings to other uses (residential and flexible commercial) under permitted development would expand the ability to deliver more dwellings and more floorspace within sensitive landscape areas such as the AONB. Therefore, pursuing the amendment to draft Policy EC6 subject of this representation clearly aligns with the Government's support for new uses to rural buildings. The below provides new draft wording to Policy EC6, amendments highlighted in red for ease. "The conversion of rural buildings to alternative uses will be permitted provided:

Respondent	Policy	Comment
David Hindle	Policy EC7: Agricultural and Forestry Buildings	9.7.7 after 'agricultural' add 'and forestry'
Clare Turner	Policy EC7: Agricultural and Forestry Buildings	EC7 While it is helpful to include a new policy that adds clarity to what constitutes acceptable development of new agricultural and forestry buildings, I note that there is no feedback from professional bodies representing these industries locally (on the online system). It would be reassuring to know that the opportunity to comment on the consultation had been shared with these organisations. I support the reference in 9.7.9 to mitigate the impacts on biodiversity and provide enhancements, but there is also a missed opportunity to address the impact of any new buildings on our waterways (e.g. nitrates from intensive farming practices). Similarly the impact of the new buildings in terms of associated greenhouse gas emissions when in use could also be considered in this policy, to support the overall objective of making the plan green to the core. Buildings that are associated with regenerative farming practices will typically reduce greenhouse gas emissions and may result in the capture of CO2 as well.
Bathurst Estate 175	Policy EC7: Agricultural and Forestry Buildings	No comment.
Mike McKeown	Policy EC7	To align with CDCs climate emergency agriculture and forestry policy should encourage practices that reduce GHG emissions and better still captures CO2. Therefore I suggest planning permission should consider the GHG emissions of the farming and forestry practices associated with the proposed development. For example industrial scale intensive animal farming buildings should be avoided as these create very significant GHG emissions. Conversely buildings that are associated with regenerative farming will at a minimum reduce GHG emissions and can often capture CO2.
Fairford Town Council	Policy EC7: Retail	Policy EC7 – This section seems to be incorrectly headed 'Policy EN7: Retail'

Respondent	Policy	Comment
Fairford Town Council	Policy EC8: Town Centres	9.8.3 – We believe the mix of uses needs to be 'carefully, planned, balanced and managed', particularly in smaller centres.
Bathurst Estate 175	Policy EC8: Town Centres	No comment

Respondent	Policy	Comment
Fairford Town Council	Policy EC8	There seem to be 2 clause 1's so that references to this are ambiguous. This clearly needs to be corrected. We strongly object to the deletion of the last sentence in part 5 of the policy, unless it is clarified that the corresponding provision in our Neighbourhood Plan policy is not affected by this. Given the inevitably higher value of property as residential in smaller centres, especially where the policy has not been properly applied previously, this is the only effective protection we have to ensure that a proper effort is made to market the property for the existing use. (This is a similar requirement to that in 9.2.11.) CDC also needs to give more consideration to the use of Article 4 Directions, as provided for by NPPF para 53, in centres where the availability of remaining commercial space is very limited. It would also be helpful if the policy could make provision to avoid the loss of town centre use frontages to entrance halls for residential use in the rest of the building, as in the Stow & Swells submission draft Neighbourhood Plan: Policy SSNP8: Stow Town Centre & Market Square C. Proposals in the Market Square to change the use of an active ground floor frontage to a residential use will not be supported. D. Proposals for new residential uses on upper floors will be supported, provided they: 1. are carefully designed to achieve a good quality of life for residents; 2. achieve well-designed development that creates a safe and comfortable living standard, and which positively addresses the townscape through good design that enhances the external appearance of buildings; 3. take account of existing ground floor uses and mitigate accordingly to minimise the scope for conflict with existing commercial operations and ensure that future residents have a good quality of life in amenity terms and that existing commercial operations are not unduly constrained; 4. so far as possible, avoid residential access via rear service yards in order to enhance natural surveillance and assist legibility. Where this is unavoidable, measures to enhance legibility such as lighting should be incorporated into design, and clear distinction should be made to delineate between residential access routes and areas required for commercial activity; and 5. minimise street clutter by directing supporting infrastructure such as bin stores and cycle facilities away from active frontages. E. Development proposals that require some loss of ground floor floorspace to facilitate access to upper floor residential will be supported where this can be achieved without undermining the integrity and viability of the existing unit(s); and provided it will not result in a proliferation of residential accesses that would undermine the vitality and viability of an individual shopping frontage.

Respondent	Policy	Comment
Susie Stephen (Stantec)	Policy EC8	The draft updates to Policy EC8 are generally supported albeit we question the purpose of retaining Clause 9 given the overlap (and repetition) within Policy EC9 (Retail and Leisure Impact Assessment). If Clause 9 is to be retained, it should refer to Clause 8 (as opposed to Clause 7) alongside associated updates within the supporting text. Clause 9 should also expressly exclude proposals which 'are in accordance with an up-to-date plan' in order to accord with the NPPF (paragraph 94).
Susie Stephen (Stantec)	Policy EC8	Policy EC9 repeats the requirement for proposals for retail and leisure development outside of defined centres to undertake an impact assessment set out within Policy EC8. We have no objection to the draft updates to Policy EC9, but consistent with our comments above, the policy should expressly exclude proposals which 'are in accordance with an up-to-date plan' in order to accord with the NPPF (paragraph 94).
David Hindle	Policy EC9: Retail and Leisure Impact Assessment	9.9.2 delete office in first line._____B1 office needs deleting later as now not relevant._____After retail should 'and leisure' be added. _____Where the next time retail is used, it could just say 'Impact Assessments' or add 'and leisure'.
David Hindle	Policy EC9: Retail and Leisure Impact Assessment	Footnote needed to indicate what a SWOT analysis is. I think that SWOT used in 9.9.3
Susie Stephen (Stantec)	Policy EC9	As noted above, Policy EC9 repeats the requirement for proposals for retail and leisure development outside of defined centres to undertake an impact assessment set out within Policy EC8. We have no objection to the draft updates to Policy EC9, but consistent with our comments above, the policy should expressly exclude proposals which 'are in accordance with an up-to-date plan' in order to accord with the NPPF (paragraph 94).

Respondent	Policy	Comment
Bathurst Estate 175	Policy EC10	No comment
David Hindle	Policy EC11: Tourist and Visitor Accommodation	Before 'hostels' in the underlined heading the word 'visitor' needs to be added. Within 1 the words 'and visitor hostels' needs to be added after 'serviced accommodation'. The subtext says nothing currently about visitor hostels, so a few words in an appropriate place. _____ I will be separately be suggesting a new Policy relating to residential hostels, which have a separate function.
David Hindle	Policy EC11: Tourist and Visitor Accommodation	I noted today the intention of the Government to put holiday let accommodation, that would have been C3, into a separate Use Class. It would seem that would be based on a persons home being let for more than 90 days. Unfortunately there is not also an intention to have second homes in a separate use Class. The discouragement there being that I understand that twice Council will be payable, There will obviously be implications for the Tourism accommodation Policy CII, and there would also be a missing Policy setting out criteria for considering changes of use from C3 into the new use class, that would also then have implications for C11. Given the need for residential, and to protect residential use, I would expect that the thrust of Policy would be a protectionist one to the residential, particularly when they are smaller units, 1,2 or 3 bedroom units, as those will be the more affordable ones, compared to large 4 or bedroom units, There is however a need to reconcile the need for residential, with the tourist benefit to the economy, and providing jobs. I think that the most difficult areas could relate to the Town Centres, where Tourism based accommodation is encouraged. Perhaps the greatest protection should be given to new build residential, where there is a reasonable expectation in granting permission is that it will be residential, not tourism accommodation. Perhaps given that Planning Legislation does change over time, restriction on the use, and a condition should always be added that only C3 use is being granted (I assume that Legislation would change the definition). And notwithstanding any future changes in Legislation only that use is permitted, and the property cannot be let for tourist accommodation for more than 90 days. My assumption is that between the Regulation 18 and 19 consultations, an additional consultation would be inserted regarding new Policies emerging as part of the Reg 18 consultation, or reflecting changes in Government Legislation changes. That is assuming an end date of 2031 is retained. If instead there is a new Plan for 2026 - 2041 my expectation is there would be 2 further consultations, prior the an Examination in Public of the Local Plan.

Respondent	Policy	Comment
Bathurst Estate 175	Policy EC11: Tourist and Visitor Accommodation	No comment
Dan Washington (BBA Architects/Stantonbury Building and Dev)	Policy EC11: Tourist and Visitor Accommodation	It is acknowledged that hotels are designated as Town Centre uses within the National Planning Policy Framework (NPPF). However, the NPPF does state that the sequential test should not be applied to small scale rural development (Paragraph 93). Small scale is not defined, but this paragraph suggests a degree of flexibility in applying the sequential test in relation to town centre uses and a recognition that there is a requirement to provide town centre uses in rural locations. Hotels serve different environments and particularly in Cotswold district with a large tourist draw and a largely rural area, the need for hotels in locations outside of town centres should be recognised. The sequential test should not be applied on all hotel schemes outside of town centres.
David Hindle	Policy EC12: Equestrian Related Development	Extra criteria needed? g. Similar wording as for other buildings related to a non-agricultural use _____Any buildings constructed for the use, would not be permitted change of use to residential for at least 10 years (use wording used elsewhere in Policies related to similar situations)._____Subtext justification would be needed.
Bathurst Estate 175	Policy EC12: Equestrian Related Development	No comment.
Bob Sharples	Policy EC12	Policy EC12 – Equestrian Related Development, Sport England is supportive of the principles of this policy and would support the requirement for robust justification in any new development in connection with equestrian use. This should be supported by the British Horse Federation and/or the specific national governing e.g. British Polo Association.
Blockley Parish Council	Policy EC12	BPC supports the inclusion of 9.12.8 relating to biodiversity in policy EC 12 and the corresponding paragraph in the other EC policies

Respondent	Policy	Comment
Nicholas Dummett 186 (CPRE)	Policy EC12	Policy EC12. Equestrian Related Development. This was previously a gap in the plan which needed addressing. However the provision allowing a dwelling for a staff member needs tightening. As drafted the provision to allow a dwelling for one staff close to the stables is very flexible (it for instance includes family) and "close" is subjective. This could lead to substantial isolated houses being built in the open countryside contrary to policy DS4.

Respondent	Policy	Comment
EVENLODE PARISH COUNCIL	Policy EN1: Built, Natural and Historic Environment	ENVIRONMENT I. EVENLODE village is in a SLA. The village is not within the Cotswolds National Landscape(CNL) but it is within the 'Moreton in Marsh and surrounds SLA' It is adjacent to the CNL on both sides of the village (as is Moreton itself) and the features of its land are just as green as the CNL, and the character of the village is indistinguishable from those villages within the CNL. The centre of the village is less than 3 miles from the site of proposed development at the South end of the Level 1 SFRA diagram. Development as outlined in the proposals in the Local Plan would inevitably do serious damage to the local environment. II. As stated above, The Cotswold District Special Landscapes Final Report 2017 Chapter 6 Moreton in Marsh & Surrounds at paragraph 6.7 and 6.8 (among other observations) reinforces the fact that the area - including the village of Evenlode – is poorly drained; and has a remote rural character especially away from the A429, and the area is generally tranquil and feels remote even short distances away from the A429 and the Fosseway. All of these observations in reports commissioned by CDC1 point to the fact that development is unwarranted if it is in an area so contiguous to the CNL if the character of the area is to be properly protected. In view of all the other points made in this submission by Evenlode PC, where is the high level of evidence that CDC needs to show justification for its plans? III. The specifications of CDC's POLICY EN4 and paragraph 10.4.12 & 13 (in the Cotswold District Local Plan Update Consultation Accepted) demonstrate the high standard of the evidential test required to show that there is no significant detrimental impact if development is allowed. IV. Evenlode PC submits that the adverse impact of CDC's proposals for the South of the proposed development area would be significant: V. The centre of the village itself occupies land classified as Flood Risk 1. VI. However the area on and around the road from Evenlode to Moreton, one quarter mile from the boundaries of the civil parish of Evenlode and Moreton in Marsh has, according to the Level 1 SFRA (a) a High Risk of Flooding from surface Water (RoFSW); (b) a risk of flooding to both surface assets and may emerge at significant rates, and (c) that this Southern area of proposed development is in a functional Flood Zone 3b. VII. These three Flood data from CDC's own Level 1 SFRA clearly show of picture which contra-indicates development in this area. VIII. The River Evenlode and its tributaries in this area have historically and regularly resulted in flooding which effectively cuts the village off from Moreton in Marsh. IX. To develop the area for residential use would aggravate this level of flooding; further overwhelm the capacity of the River Evenlode and its Tributaries which are already suffering from very high levels of pollution, and have a significant detrimental impact on the area. X. The Evenlode river is already so heavily polluted as to be effectively dead as it comes through our village, even before any new houses are proposed. Data2 from the Evenlode Catchment Partnership is readily available to CDC about the state of our rivers, and the Evenlode particularly, as it runs through Moreton in Marsh and on into Evenlode village. Data again from the Evenlode Catchment Partnership shows that more raw sewage has been dumped into the river by Thames Water than anywhere else locally in 2023. Environment and habitat and wildlife is already taking a heavy hit; any future proposal for development of houses and roads will damage it even more and more significantly. Taking together these data and the fact that Thames Water's financial situation just announced, demonstrates yet again that the repairs to the current state of TWUL infrastructure will not take place and that the new infrastructure sought by CDC to support its development proposals is even more remote. What realistic prospect of an and evidenced Statement of Common Ground is there now of the recommended liaison between developers, EA and TWUL? And

Respondent	Policy	Comment
john shelton	Policy EN1: Built, Natural and Historic Environment	Moreton SLA is an important designation should be protected from development
Blockley Parish Council	Policy EN1: Built, Natural and Historic Environment	10.1.1 AOB has not been updated to CNL
Blockley Parish Council	Policy EN1: Built, Natural and Historic Environment	2.10.1.2 AOB has not been updated to CNL
Blockley Parish Council	Policy EN1: Built, Natural and Historic Environment	10.1.3 AOB has not been updated to CNL

Respondent	Policy	Comment
Morgan Elliot Planning	Policy EN1: Built, Natural and Historic Environment	Call for sites: 339 Policy EN1 seeks to protect, conserve and enhance the historic environment by: a) Ensuring the protection and enhancement of existing natural and historic environmental assets and their settings in proportion with the significance of the asset; b) Contributing to the provision and enhancement of multi-functional green infrastructure; c) Addressing climate change, habitat loss and fragmentation through creating new habitats and the better management of existing habitats; d) Seek to improve air, soil and water where feasible; and e) Ensuring the design standards that complement the character of the area and the sustainable use of the development.
Morgan Elliot Planning 340	Policy EN1: Built, Natural and Historic Environment	Call for sites. Policy EN1 seeks to protect, conserve and enhance the historic environment by: a) Ensuring the protection and enhancement of existing natural and historic environmental assets and their settings in proportion with the significance of the asset; b) Contributing to the provision and enhancement of multi-functional green infrastructure; c) Addressing climate change, habitat loss and fragmentation through creating new habitats and the better management of existing habitats; d) Seek to improve air, soil and water where feasible; and e) Ensuring the design standards that complement the character of the area and the sustainable use of the development.
David Hindle	Policy EN1	After EN1 new Policy related to Advertisements. Cross refer to design guidelines (where there should be something), and Advertisement Consent being determined on the basis of residential amenity and highways safety. If possible make reference to no stand alone advertisements, advertisements being only related to the premises they are on, .and internally illuminated Advertisements not normally being permitted. Any illumination to be via external means
Andrew Brian Crump	Policy EN1	When considering the impact of residential development in close proximity to a heritage asset such as Meon Hill, for example, views to and from it, which signify the importance of its setting, should be given significant weight in terms of protecting the natural and historic environment. There are also correlated considerations in terms of how additional light, air and noise pollution can impact upon the heritage asset and its surroundings.

Respondent	Policy	Comment
Fergus Dignan 126	Policy EN3: Local Green Spaces	Local Green Spaces designation for areas in and around Tetbury town To provide green spaces for residents, protect and support wildlife and river quality (Chapter 10.3) and for funding to be allocated to protect and extend and join up these LGSs: •☐and around species-rich pockets identified by Gloucestershire Wildlife Trust •☐emaining fields adjacent to the Worwell site above the railway park
Nikki Ind	Policy EN3	There is no mention of the 7 Local Green Spaces listed in the Tetbury Neighbourhood Plan - Policy 8 - should they be included?
Bob Sharples	Policy EN3	Policy EN3 – Local Green Spaces, Sport England is puzzled why some playing fields are designated Local Green Spaces and others are not. This appears to be inconsistent and therefore not sound.
Jerome Cook	Policy EN3	Policy EN3 will require updating of designated Local Green Spaces once the Moreton-in-Marsh NDP (Neighbourhood Development Plan) has been completed, as this will include Local Green Spaces (such as allotments and parks).
Geoff Tappern	Policy EN3	In policy EN3 please add the recently designated green space in Down Ampney called Duke's Meadow
David Eglise	Policy EN3	EN3 - Local Spaces - Millennium Field(Dukes Meadow) - Down Ampney is not listed - recently designated and should be included.
Fairford Town Council	Policy EN3	Policy EN3: Local Green Spaces – See separate document (emailed separately) proposing additional green spaces, including smaller open and informal play spaces within residential estates which form part of their design, character and amenity.
Blockley Parish Council	Policy EN3	Blockley Parish Council supports the continued inclusion of LGS1 (Blockley Mill, aka waterboard site) and will be reviewing the potential designation of additional sites as Local Green Spaces.
Stephen Andrews (Kempsford Parish Council)	Policy EN3	The Kempsford Playing Field (centred upon SU 15483 97113) should be designated as Local Green Space
Judith Montford The EA 207	Policy EN3	Policy EN3: Local Green Spaces We recommend that an objective is raised here which encourages initiatives that provide ecological enhancements to these green spaces. We therefore encourage the inclusion of the following to point 2 of Policy EN3. [new in green text] Proposals for development or schemes that leverage opportunities to enhance the ecological value of these green spaces will be strongly encouraged and supported. [end green text] We advise that the above proposed wording is added for accuracy and clarity.

Respondent	Policy	Comment
Andrew Brian Crump	Policy EN4: The Wider Natural and Historic Landscape	If housing is built too close to a proximate AONB which is of visual significance to Mickleton, then this will have adverse consequences for sense of place, heritage and tranquillity. These factors are key drivers for tourism and which also affect the well-being of residents who benefit from the recreational. The vista across to Meon Hill from the Heart of England Way along Canada Lane is exceptionally beautiful and residents and Heart of England Way walkers and derive much pleasure from experiencing this environment and thus be encouraged to explore the locality on foot and to reduce their carbon footprint accordingly. Wide open spaces engender a feeling of freedom and an antidote to the pressures and stresses of everyday life. Visual quality and local distinctiveness should therefore be of key significance when considering proposals for future development. amenity they provide. Dark skies and tranquillity are also of particular importance in this location and any extension of residential development will necessarily have adverse consequences for both.
Clare Turner	Policy EN4: The Wider Natural and Historic Landscape	10.4.2 and 10.4.3 I welcome the new wording that acknowledges the wider benefits of our landscape (beyond aesthetics) in terms of habitat for wildlife/nature recovery, improving our resilience to climate change and opportunities for carbon sequestration.
Morgan Elliot Planning	Policy EN4: The Wider Natural and Historic Landscape	Call for sites: 349 Policy EN4 seeks to protect the wider natural and historic landscape by only permitting development where it does not have a significant detrimental impact on the natural and historic landscape, including the tranquillity of the countryside of the Cotswold District. It also seeks to enhance the, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, the setting of settlements, settlement patterns and heritage assets.
Morgan Elliot Planning 340	Policy EN4: The Wider Natural and Historic Landscape	Call for sites. Policy EN4 seeks to protect the wider natural and historic landscape by only permitting development where it does not have a significant detrimental impact on the natural and historic landscape, including the tranquillity of the countryside of the Cotswold District. It also seeks to enhance the, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, the setting of settlements, settlement patterns and heritage assets.

Respondent	Policy	Comment
Royal Agricultural University	Policy EN5: Cotswolds Area of Outstanding Natural Beauty	This policy sets out the conservation and enhancement of National Landscapes or its setting, which will be given great weight in any planning application. The second part of that policy states Major development will not be permitted within the AONB National Landscape unless it satisfies the exceptions set out in national Policy and Guidance. There hasn't been much change to this policy wording apart from replacing 'AONB' with 'National Landscape'. This is to keep it in line with the new terminology found in Paragraph 183 of the revised National Planning Policy Framework which outlines that permission in the AONB will only be allowed in 'Exceptional Circumstances'. Whilst there hasn't been much change to the main text, the supporting text has had a slight amendment which is found at paragraph 15.5.3 which states: "The NPPF requires great weight in to be given to the conservation of landscape and scenic beauty in these areas together with their wildlife and cultural heritage. In addition, the scale and extent of development within all these areas should be limited. " The entirety of the RAU's Cirencester campus sits within the Cotswold Area of Outstanding Natural Beauty (AONB), that is recognised and now referred to as a National Landscape. Under policy EC4, the RAU campus is designated as a 'special policy area'. The RAU will work together the AONB Partnership, National Landscapes and Cotswold District Council to ensure that the development of our estate is landscape-led, and complimentary to our surrounding environment as required by the Local Plan. The exception test of NPPF paragraph 183 will be justified and met as part of the application. In summary it is the RAU's view that there is a demonstrable national need for the development with land management a massively influential field central to addressing the climate, nature and health crises that threaten the foundations of our economy yet is currently underserved. Additionally, the site's allocation and previous permission demonstrate the council's recognition of the site as suitable for major development within the AONB. The RAU is supportive of this Policy changes which are consistent with the NPPF changes. The RAU will work with the AONB Partnership, National Landscapes and Cotswold District Council to ensure that the development of our estate is landscape-led to ensure it complies with the policy.

Respondent	Policy	Comment
Edgars Ltd 338	Policy EN5: Cotswolds Area of Outstanding Natural Beauty	Call for sites - Bledington. Policy EN5 of the adopted Local Plan seeks to protect the Cotswolds Area of Outstanding Natural Beauty (now referred to as a National Landscape). This protection is continued in the emerging EN5 policy text within the emerging Local Plan update. 5.14 The site is well screened, with existing development to approximately three of the four 'sides' of the site, and significant belts of existing vegetation. The most open area of the site is at the far northeastern corner. 5.15 The feasibility sketch layout follows a number of key principles: ☐ Focus development away from the north-east corner ☐ Protect and reinforce boundaries ☐ Provide open space for the village ☐ Plant new trees, and where existing trees are required to be removed these should be more than compensated for. Existing trees to be retained wherever possible. ☐ Retain a more open character to the north eastern corner of the site. ☐ Promote a low-density development that is in keeping with the surrounding development pattern 5.16 Having regard to the scale of development proposed, 14 dwellings, and associated landscape impact, Edgars do not consider that the development will represent a 'major development' for the purposes of AONB policy and consider the site is appropriate for development in its context.
Morgan Elliot Planning	Policy EN5: Cotswolds Area of Outstanding Natural Beauty	Call for sites: 349 Policy EN5 specifically relates to the Cotswold Area of Outstanding Natural Beauty and seeks to protect and enhance its natural beauty, character and special qualities. Further it posits that major development within the AONB must satisfy the exceptions set out in national policy and guidance.

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy EN5: Cotswolds Area of Outstanding Natural Beauty	Call for sites. Policy EN5 specifically relates to the Cotswold Area of Outstanding Natural Beauty and seeks to protect and enhance its natural beauty, character and special qualities. Further it posits that major development within the AONB must satisfy the exceptions set out in national policy and guidance
Morgan Elliot Planning 340	Policy EN5: Cotswolds Area of Outstanding Natural Beauty	Call for sites. The site sits central to the village comprising agricultural land and is bordered by existing residential development to the southern and western boundaries. The site also sits within the Cotswold AONB, where Policy EN5 seeks to protect and enhance its natural beauty, character and special qualities. The fact that Didmarton itself is wholly within the AONB demonstrates that built form, particularly residential development, is a key characteristic to the site's setting within the landscape and contributes towards the landscape character and special qualities of this part of the AONB. The accompanying Landscape Technical Note has considered the local landscape characteristics of the site and visual qualities in the context of delivering a residential use on site. Overall, it concludes that the site presents an opportunity to conserve and enhance the special landscape
Morgan Elliot Planning 340	Policy EN5: Cotswolds Area of Outstanding Natural Beauty	Call for sites. qualities of the site through high quality design and the use of appropriate materials and landscaping which is congruous to the village and surrounding properties. 4.12 Mitigation measures and where possible enhancements will be key drivers influencing any design proposals, ensuring that the residential development proposed integrates well into the wider landscape. It is therefore considered that the design of any such proposal would seek to conserve and enhance the special landscape qualities and characteristics of the AONB complying with Policies EN5 and Paragraphs 176 and 182 of the NPPF. Indeed, the accompanying Development Framework Plan is reflective of the detailed analysis within the Landscape Technical Note.
Andrew Brian Crump	Policy EN5	Meon Hill is an outlier of the Cotswold National Landscape escarpment and so its setting within the landscape and historic environment should be given very careful and sensitive consideration in the event of any future development proposals being advanced in its visual vicinity.

Respondent	Policy	Comment
Fergus Dignan 126	Policy EN6: Special Landscape Areas	Special Landscape Areas (10.6) The chalk stream Tetbury Avon valley and the fields above it to be granted SLA status and protected from development.
Elisabeth Davies	Policy EN6: Special Landscape Areas	EN6 - Moreton in Marsh surrounds. Hedge rows of landscape must be protected and managed. Hedgerow regulations. I agree that the sites should be protected and managed. However, the situation of the past three years concerning an agricultural heritage ridge and furrow field in Draycott has not been protected. It has been bought and sold several times over the past years. I believe at inflated prices simply as a profit concerning venture, prices beyond the reach of interested local farmers. This field was sold on yet again, but the whole field sub-divided into small plots. The consequence of which to the detriment of the villagers and homeowners of Draycott. Three years of stress, misery to get illegally living occupants on the agricultural land off. The ridge and furrows have been dug up and no proper maintenance for five years now. I hope you can bear this in mind when finalising the Local Plan in order to protect the beauty of this landscape to remain 'Green to the Core' and most importantly 'the well-being' of the residents and homeowners. I believe there should be proper scrutiny when agricultural lands are put up for sale and proper legislation in force to stop profiteering and abuse of heritage ridge and furrow fields.
john shelton	Policy EN6	Moreton and its surrounds are an SLA....CDC's plans will have a significant detrimental impact on the special character and key landscape qualities of the area including its tranquility
Fergus Dignan 126	Policy EN7: Trees, Hedgerows, Orchards and Woodlands	10.7.2 'compensatory planting' [now 10.7.7] There should be more detail of what is meant by 'compensatory planting'. Replacement plants must offer similar or superior wildlife benefits and must quickly account for the lost biodiversity and biomass.

Respondent	Policy	Comment
Rosie Walker	Policy EN7	At Policy EN7 please add the word 'only' to sentence number 1. The NPPF states that development should be refused where it will result in the loss of irreplaceable habitats such as ancient woodland and ancient and veteran trees. This policy should be strengthened to accommodate this clearly.
Clare Turner	Policy EN7	EN7, 3 Inclusion of "are in place" confuses the meaning of "Development that incorporates new trees, including street trees, trees for parks and orchards and the appropriate measures are in place to secure the long-term maintenance of them will be permitted." Suggest "Development that incorporates new trees, including street trees, trees for parks and orchards and the appropriate measures to secure the long-term maintenance of them, will be permitted".
Bathurst Estate 175	Policy EN7	No comment
Fergus Dignan 126	Policy EN8: Biodiversity and Geodiversity: Features Habitats and	Planning Applications Adequate funding needs to be allocated in order to police commitments made by developers in planning applications as regards eg. protection of features, habitats and species (10.8). Perhaps developers should be made to pay a further tariff to pay for this scrutiny.
Blue Fox Planning (representing Redrow Homes)	Policy EN8: Biodiversity and Geodiversity: Features Habitats and	Emerging Policy EN8: Biodiversity and Geodiversity: Features, Habitats and Species, requires proposals to deliver mandatory BNG of at least 10% which should be maintained for a minimum of 30 years. Redrow's corporate target is to demonstrate a minimum 10% net gain for biodiversity on every new planning application and thus support the aims of this policy. Whilst aiming to deliver BNG onsite, we acknowledge that this is not always possible due to site constraints and other requirements. We also support the policy wording noting that off-site BNG will be permitted where robust evidence is submitted, and that the mitigation hierarchy has been followed. A well-considered offsetting strategy can delivery important biodiversity objectives. The Phase 1 allocated site at Hampton Street will deliver a policy compliant percentage of BNG as illustrate on the concept plan included at Appendix 1. The inclusion of the wider Phase 2 site will also deliver a policy compliant amount of BNG, and will also deliver wider benefits such as green infrastructure including new woodland planting (circa 1.1 hectares) as part of the overall illustrative layout.

Respondent	Policy	Comment
Judith Montford The EA 207	Policy EN8: Biodiversity and Geodiversity: Features Habitats and	We are pleased to see conservation, enhancement, and Biodiversity Net Gain (BNG) as leading objectives of this policy, however, it's imperative to emphasize the urgent necessity for development plans to prioritize the protection, enhancement, and creation of river corridors. As such, the current draft does not provide a strong enough message of the ecological value of river corridors via the provision of wildlife habitat, natural flood management, and water quality. Therefore, we strongly encourage the inclusion of a stand-alone watercourse policy which requires and protects 'ecological' River Corridor and Buffer Zones. Without the inclusion of such a policy in the local plan, we will find the plan unsound. Watercourses are vital to biodiversity, serving as wildlife corridors and offering a diverse range of habitats that are integral to the Cotswold's ecological network. Consequently, land within and alongside these waterways holds exceptional value for wildlife, making its protection essential. The policy should include measures to protect and enhance the physical form of rivers, as well as their water quality and quantity. Inclusion of a policy specifically relating to the protection and enhancement of watercourses and their river corridors could help to achieve Water Framework Directive (WFD) objectives by committing developers to delivering the restoration/enhancement opportunities identified within their sites. It would also support the alignment of the local plan to other national legislation, including paragraph 180 of the NPPF which calls for developers to "help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans". Out of the 37 assessed waterbodies that fall within the Cotswolds river basin district, a staggering 35 are currently failing to achieve "good ecological status" (Classifications data for Cotswolds Management Catchment | Catchment Data Explorer) and it is essential that this is sufficiently addressed within the objectives of the local plan. The inclusion of the proposed watercourse policy would mandate the urgent necessity for developments to proactively protect, enhance and restore these irreplaceable ecological assets, that not only support a range of biodiversity, but define so much of the Cotswold's distinct landscape. To supplement the watercourse policy, the inclusion of a defined buffer zone would: 1. support the re-naturalization of Cotswold's watercourses via the natural processes of erosion, deposition and natural changes to the bank profile without necessitating intrusive and harmful bank protection works 2. provide space for the proliferation of aquatic, semi-aquatic and terrestrial habitats that support the an array of dependant species 3. create, protect and enhance wildlife corridors which can also be used as part of Green (and blue) Infrastructure networks 4. prevent permanent overshadowing of the water by buildings 5. reduce the risk of pollution caused by run-off 6. reduce incidences of flooding by allowing water storage and the natural drainage of rainwater. As such, networks of undeveloped buffer zones help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the River basin management plan for the Thames River Basin District HRA (publishing.service.gov.uk). This would also ensure the commitment of the Cotswolds District Council to DEFRA's 25-year plan and support the other policies within the local plan itself. This policy would address the declared climate and ecological emergencies of Policy SD2 and would promote the protection and enhancement of existing Green and Blue Infrastructure assets, links and networks required under Policy CC7. A clear and defined message to safeguard watercourses and their associated riparian corridors would

Respondent	Policy	Comment
Sean Lewis	Policy EN8: Biodiversity and Geodiversity: Features Habitats and	Our client has already begun technical work assessing landscape matters as part of the evidence base supporting the Site's promotion. These representations are supported by a Landscape Review, prepared by FPCR. The evidence recognises that the Cotswolds National Landscape is an important designation and provides an opportunity to guide the evolution of both the masterplan and the detailed approach to development. The Site provides good scope to deliver BNG and enhancing the amenity value of Chavenage Lane.
Sean Lewis	Policy EN8: Biodiversity and Geodiversity: Features Habitats and	Our client recognises the importance of conserving biodiversity and delivering 10% net gain in accordance with the requirements of the Environment Act 2021. As noted above, the Site and proposals have an opportunity to meet the requirements of the Act and Policy EN8.
Chris Marsh (Pegasus) 335	Policy EN8: Biodiversity and Geodiversity: Features Habitats and	Policy EN8 – Biodiversity and Geodiversity 3.59. The Policy has been amended to include reference to delivering a 10% biodiversity net gain. This is considered unnecessary and a duplication of national policy requirements, with 10% Biodiversity Net Gain now mandatory for all major developments (as of 12 February 2024) and all non-major developments (as of 2 April 2024) as required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Reference to BNG within Policy EN8 is therefore considered sufficient to address the requirements of BNG within the Local Plan with BNG tools and guidance available at a national level. Summary of the amendments required 3.60. Remove the duplication of national policy requirements within the policy. This will ensure a justified policy which is consistent with national guidance.

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy EN8: Biodiversity and Geodiversity: Features Habitats and	Call for sites. Policy EN8 has been amended to reflect the new requirement for proposals to deliver 10% biodiversity net gain.
Bob Sharples	Policy EN8	Policy EN8 - Biodiversity and Geodiversity: Features, Habitats And Species, Sport England is concerned that playing fields could be used for meeting BNG off-site which could negatively impact the primary use as a playing field. This should be resisted.
john shelton	Policy EN8	CDC should be required to have a full properly independent BNG and GNG analysis undertaken to assess any futher development in undertaken
Mr Michael Priaulx	Policy EN8	The requirement for three swift bricks per dwelling is very welcome as a universal nest brick for small bird species, in addition to providing homes to endangered red-listed species such as swifts. Please clarify that this includes extensions, and swift bricks should be installed in accordance with best practice guidance such as BS 42021 or CIEEM.
Mr Michael Priaulx	Policy EN8	Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in the district return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected. This is because building-dependent species such as swifts and house martins are overlooked by the DEFRA Biodiversity Net Gain metric so need their own clear policy.
Fergus Dignan 126	Policy EN8	10.8 (EN8) If development that conserves biodiversity will be permitted (clause 1), it stands to reason that development which doesn't conserve biodiversity will not be permitted. However, the inclusion of the word 'significant' in clause 2 [now clause 7] could enable development that does not conserve biodiversity. To avoid clause 1 being undermined, the word 'significant' should be removed.
Gloucestershire Wildlife Trust	Policy EN8	We strongly support the line that reads 'Off-site BNG should be delivered in locations that contribute to the Gloucestershire Nature Recovery Network and that are as close to the development site as possible' As above, we would like to see an additional line added to this policy to state that any development taking place within medium or high opportunity areas for nature recovery, as per the Nature Recovery Network, will be expected to demonstrate that it has maximised opportunities for BNG.

Respondent	Policy	Comment
Bathurst Estate 175	Policy EN8	Support. We support the emphasis on the importance of landscaping and green infrastructure for development and how ecological enhancement should be included into its design. The prioritisation of onsite biodiversity net gain before exploring alternatives is welcomed. The Council should confirm if this policy is required in light of the Environment Act requirements for BNG on all sites.
The Planning Bureau on behalf of McCarthy Stone 190	Policy EN8	Whilst we support that the Council is only seeking the mandatory minimum of 10% Biodiversity Net Gain, the Council should also reconsider the additional wording it proposes with regard to BNG in points 2 to 9 of the policy to ensure the policy is in line with the guidance and statutory instruments that the government have recently updated / published regarding statutory Biodiversity Net Gain. The Council should then amend the draft policy so that it is consistent with any updated guidance and regulations.

Respondent	Policy	Comment
Judith Montford The EA 207	Policy EN8	Policy EN8: Biodiversity and Geodiversity: Features, Habitats and Species There are key points that are missing from draft policy EN8 that we would expect to see in a policy which is about protecting and enhancing biodiversity and ecology. Without including these points which we have highlighted below, we will find the plan unsound. For point 8 of Policy EN8, to reflect the urgent need for developments to proactively contribute to the conservation of habitats, ecological networks and the dependant wildlife, we recommend strengthening this point with the following: Development plans will be expected to propose adequate strategies to reverse habitat fragmentation and promote creation, restoration. Beneficial management of ecological networks, habitats and features will be required, particularly in areas subject to landscape-scale biodiversity initiatives and that will support the delivery of the Gloucestershire Local Nature Recovery Strategy and the Gloucestershire Nature Recovery Network. For point 10, in order to clearly define the habitats of "principal importance" we would strongly encourage the inclusion of a priority habitats section, listing those listed as BAP priority habitats. This would highlight the priority habitats and it is essential for developers to be aware of. As per current BAP classification system, this list would include “River and streams” and “standing open waters and canals”. Within this section, we would also encourage including a paragraph outlining irreplaceable habitats, such as rivers or streams that have not been heavily modified. This should strongly discourage any work involving the realignment or infill of any existing, watercourse. While unlike rivers, ponds are not classified a priority habitat, they also support a range of biodiversity. They provide valuable habitat to aquatic invertebrates, amphibians, birds and fish, serving as breeding grounds, foraging areas, shelter, and nurseries for young. Therefore, their protection is essential and we would encourage the inclusion of the following point be raised in addition to those currently listed currently Policy EN8 . Example wording below: Development will also be expected to protect and enhance non-priority habitats such as ponds. Like rivers, they provide valuable habitat to aquatic invertebrates, amphibians, birds and fish, serving as breeding grounds, foraging areas, shelter, and nurseries for young, and as such, their preservation is essential. We also recommend including the legal requirement for developers to consider the presence of non-native species, and when required, take sufficient steps to ensure they're removal and eradication. Example wording for the supporting paragraphs of this policy found below. Invasive species pose a serious risk to ecosystems, outcompeting native species, disrupting ecological processes and transforming habitats. Development that facilitates or fails to adequately mitigate their introduction and spread, can cause detrimental impacts on native biodiversity and the functionality of ecosystems. Under schedule 9 of the Wildlife and Countryside Act 1981 (as amended), it is a legal offense to introduce or encourage the proliferation of any listed invasive species. Similarly, species classified as 'controlled waste' under the Environmental Protection Act 1990 must be handled in accordance with legal regulations. These species must be safely disposed of at a licensed landfill site to prevent further spread and environmental harm. Within the policy itself, we recommend the following: When present on the site of construction, developers are legally obliged to prevent the spread of invasive species. Developments should also seek to appropriately eradicate any identified non-native species in accordance with the legal regulations of the Environmental Protection Act 1990.
Blockley Parish Council	Policy EN9	Blockley Parish Council supports the changes to EN8 and EN9 to reflect BNG and strengthen these policies

Respondent	Policy	Comment
David Hindle	Policy EN10: Historic Environment: Designated Heritage Assets	10.10.6 Delete Tetbury Goods Shed as completed.
Rohan Torkildsen 158	Policy EN10: Historic Environment: Designated Heritage Assets	Chapter 10: Built, Natural and Historic Environment We [[Historic England] note that you consider the existing suite of heritage policy remains, by and large, robust and that heritage evidence including the Cotswold Historic Environment Strategy (CDC 2016) "continues to be relevant". Mindful of NPPF paragraph 31, are you confident it is up to date? Considering the relative effectiveness of the current plan's strategy for the historic environment, it may also be helpful to mention whether the referred to Conservation Area Appraisal Pilot Project has been successful, and if local lists of non-designated heritage assets have been compiled.
Amartya Deb (Gloucestershire County Council)	Policy EN10: Historic Environment: Designated Heritage Assets	GCC officers have no further comments to make. The protection and enhancement of the historic environment appears well covered.

Respondent	Policy	Comment
Elisabeth Davies	Policy EN10: Historic Environment: Designated Heritage Assets	EN10 – Historic Environment Designated Heritage Assets. Greater weight will be given to the assets and conservation 'Green to the Core'.
Morgan Elliot Planning	Policy EN10: Historic Environment: Designated Heritage Assets	Call for sites: 349. Policy EN10 relates specifically to conserving and enhancing a designated heritage asset's setting, character, appearance, significance within the historic environment.
Morgan Elliot Planning 340	Policy EN10: Historic Environment: Designated Heritage Assets	Call for sites. Policy EN10 relates specifically to conserving and enhancing a designated heritage asset's setting, character, appearance, significance within the historic environment.

Respondent	Policy	Comment
Morgan Elliot Planning 340	Policy EN10: Historic Environment: Designated Heritage Assets	Call for sites. The site sits within the Conservation Area of Didmarton where Policy EN10 seeks to conserve and enhance a designated heritage asset's setting, character, appearance and significance within the historic environment. It is also considered to sit within the setting of two Grade II listed buildings, including Didmarton's Chapel (Historic England Ref: 1089731) located approximately 100m to the north east of the site and 19 Chapel Walk (Historic England Ref: 1153274).
Andrew Brian Crump	Policy EN10	Meon Hill is an Iron Age hillfort and thus a heritage for which both its inherent protection and that of its setting are clearly significant planning considerations to which great weight should be given.
john shelton	Policy EN10	Chasleton House (grade1 listed) lies to the east of Moreton and should be considered in any analysis of the proposed Moreton bypass
David Hindle	Policy EN11: Historic Environment: Designated Heritage Assets	Either as part of EN11 or as a new Policy the circumstances in which a new Designation of a Conservation Area should be stated. -------In addition circumstances for an Article 4 Direction related to a Conservation Area. Indeed other than changes of use I note that the current Plan is silent on Article 4 Directions in general. Most appropriate places to add would be here, and in the Policy related to Design.

Respondent	Policy	Comment
Edgars Ltd 338	Policy EN11: Historic Environment: Designated Heritage Assets	Call for sites: Settlement Character / Heritage Policy EN11 of the adopted Local Plan 2031 seeks to preserve and where appropriate enhance the special character and appearance of the Conservation Area in terms of siting, scale, form, proportion, design, materials and the retention of positive features. The Local Plan update seeks to continue this protection, in line with the objectives of the National Planning Policy Framework. The village of Bledington does not have a Conservation Area Appraisal. Broadly speaking the settlement is arranged around a historic rectangle of streets, marked by the church, the Green, and by housing on Main Street and Chapel Lane. The site sits outside of the 'rectangle' (highlighted in Figure 3 below by green arrows) and sits mostly outside of the Conservation Area boundary that is in place today, with just the part directly fronting Main Street being within the Conservation Area boundary. This would infer that the field which comprises the main part of the site was not considered significant to the character of the Conservation Area when it was designated, Modern developments were then built in the 20th century on the edges of the village. This focused on areas such as Jackson Road, Old Burford Road, Old Forge Close and New Road (the latter of which adjoins the site). The site is capable to being developed in a manner that is sensitive to the verdant character of the area, and is sited outside of the historic rectangle street pattern. For example, in the proposed Feasibility Layout sketch provided, a development is shown that limits the degree of change to the site frontage. Here, the existing dwelling would be retained, and its associated outbuilding could be converted to form 1 new residential dwelling. A new access would be formed to facilitate access to the wider landholding that sits behind the main dwelling. In so doing all of the new-build dwellings would be sited outside of the Conservation Area boundary. The provision of a generous proportion of open space is included for the purpose of promoting local health and wellbeing, protecting the wider setting of the Conservation Area, and respecting the settlement edge character. However, it should be outlined that the site already is already of a separate character to Main Street and from the comparatively more open land to the far north east – this site is an opportunity for suitable new development which respects this transition of settlement character. Ultimately the existing site is now significantly surrounded by other developments, and this is an opportunity for the Local Plan to allocate an appropriate site which would be a logical complement to [illegible]

Respondent	Policy	Comment
Morgan Elliot Planning	Policy EN11: Historic Environment: Designated Heritage Assets	Call for sites: 349. It is acknowledged that Policy EN11 permits development within Conservation Areas providing that it: a) Preserves and where appropriate enhance the special character and appearance of the Conservation Area in terms of siting, scale, form, proportion, design, materials and the retention of positive features; b) Include hard and soft landscape proposals, where appropriate, that respect the character and appearance of the Conservation Area; c) Will not result in a loss of open spaces, including garden areas and village greens, which make a valuable contribution to the character and/or appearance, and/or allow important views into or out of the Conservation Area; and d) Have regard to the relevant Conservation Area appraisal (where available).
Morgan Elliot Planning 340	Policy EN11: Historic Environment: Designated Heritage Assets	Call for sites. It is acknowledged that Policy EN11 permits development within Conservation Areas providing that it: a) Preserves and where appropriate enhance the special character and appearance of the Conservation Area in terms of siting, scale, form, proportion, design, materials and the retention of positive features; b) Include hard and soft landscape proposals, where appropriate, that respect the character and appearance of the Conservation Area; c) Will not result in a loss of open spaces, including garden areas and village greens, which make a valuable contribution to the character and/or appearance, and/or allow important views into or out of the Conservation Area; and d) Have regard to the relevant Conservation Area appraisal (where available).
Morgan Elliot Planning 340	Policy EN11: Historic Environment: Designated Heritage Assets	Call for sites. In accordance with Policy EN11 and Paragraph 203 of the NPPF, the proposed allocation will seek to maintain the openness whilst presenting an opportunity to conserve and enhance the special historic features associated to the Conservation Area through considered siting of the dwellings, and their scale, form, proportion, design, materials and the retention of positive features. Further, there is opportunity to provide hard and soft landscaping that is reflective and respectful to this historic environment and its character and appearance.

Respondent	Policy	Comment
Bathurst Estate 175	Policy EN12: Historic Environment: Non-Designated Heritage	No comment
Fairford Town Council	Policy EN12	Policy EN12 – Could this be inadvertently undermining existing lists of NDHA e.g. in Neighbourhood Plans and from previous planning history? Does it need to be made clear that the LPA will be responsible for assessing this, not just applicants?
Bathurst Estate 175	Policy EN13: Historic Environment: The Conservation of Non	The policy includes the matter of weighing harm against the public benefits including the optimal viable use. We object to the current wording of the policy on the grounds that guidance on weighing harm against the public benefits (including optimal viable use) is not included within the NPPF. We propose that this part of the policy is removed and that the policy just focuses on the protection and where possible enactment of heritage assets.

Respondent	Policy	Comment
Judith Montford The EA 207	Policy EN15: Pollution and Contaminated Land	Policy EN15: Pollution and Contaminated Land We ask that paragraphs 10.15.1, 10.15.3, 10.15.7 and 10.15.9 are amended to read; 10.15.1 The NPPF states that local planning authorities should ensure new developments are appropriate for their locations, to prevent 'unacceptable risks' from pollution. Policy EN15 safeguards against development that is likely to result in unacceptable levels of pollution, such as light and noise, [new text] and any negative [strikethrough - the] effects on amenity, health and the natural environment, including soils and controlled waters. (i) The potential harmful effects of such disturbance from development on local residents, neighbouring land uses and premises, wildlife and its habitats, and should be considered. 10.15.3 [New] Controlled waters can be polluted by the discharge of [strikethrough - solid or liquid] pollutants [new] onto land, soakaways, direct into groundwater or [new] surface water courses, [new] or via other pathways. Good quality ground water and surface water is crucial for water-dependent [new] ecosystems and animals, and [strikethrough - for the use of groundwater] [new] can be used as a source of drinking water, [new] agriculture or industry. [Strikethrough] Development proposals located within the inner Source Protection Zone (SPZ1), where there is highest risk of potential pollution to groundwater, therefore need to be designed appropriately and in discussion with the Environment Agency. [new] Any proposed site activities and Sustainable Urban Drainage Systems (SuDS) must be appropriate for the site and designed in accordance with best-practice guidance. Early discussions with the Environment Agency and other appropriate regulators is advisable. 10.15.7 It is important that there are controls on developments which pose a risk to groundwater, to ensure an adequate and safe water supply. Groundwater feeds into both public and over 200 private water supplies. These supplies may be affected through pollution [new] (or polluting activities) and may be depleted through surface water and drainage systems which do not allow for natural infiltration of water through soils. The most vulnerable groundwater sources are designated as Groundwater Source Protection Zones (SPZ). [strikethrough] Further details are available from the Environment Agency website. [new] You can view the Environment Agency's groundwater SPZs on MagicMap https://magic.defra.gov.uk/MagicMap.aspx and further information here: Groundwater source protection zones (SPZs) - GOV.UK (www.gov.uk). https://www.gov.uk/guidance/groundwater-source-protection-zones-spzsDevelopment proposals located within an inner Source Protection Zone (SPZ1) or at sites where aquifers are sensitive and vulnerable, where there is a risk of potential pollution to groundwater, need to be designed appropriately and discussion with the Environment Agency and other appropriate regulators is advisable. 10.15.9 Particular care will be taken in relation to the redevelopment of contaminated land [new] or land that is suspected of being contaminated and in relation to [new] activities involving hazardous substances. Where a site is affected by contamination, responsibility for securing safe development lies with the developer and/or landowner. Developers will be required to show that appropriate measures have been taken to mitigate any adverse impact of [strikethrough - potential] contamination and/or hazardous substances on sensitive receptors such as groundwater or end-users of the development. [new] Developers will assess and manage the risks from land contamination following Land contamination risk management (LCRM) Guidance Land contamination risk management (LCRM) - GOV.UK (www.gov.uk). https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm We advise that the above proposed amendments to the supporting text of the policy are added for accuracy and clarity.

Respondent	Policy	Comment
Andrew Brian Crump	Policy EN15	The residents of Furrow Way in Mickleton, who live in properties closest to Meon Hill, will be only too aware of severe flooding issues that resulted in significant mitigation measures being required some three years after the buildings had been completed. A number of properties were flooded and a sequence of visits was required (as reported in the Stratford Herald) to remedy the position. The run off of water from Meon Hill had clearly not been fully addressed in the flood risk impact assessment commissioned by the developers. In relation to dark skies, there are no street lights between Furrow Way and Meon Hill and so any incursion of further development into this area will necessarily result in additional lighting being highly visible from the surrounding landscape.
john shelton	Policy EN15	The Fire Service College has contanmimated land and regularly burns noxious materials as part of its remit. Is it really sensible to continue to release noxious fumes alogside the proposed developments
Blockley Parish Council	Policy EN15	EN 15 Blockley Parish Council welcomes the inclusion of a reference to waste water and infrastructure capacity in 10.15.4.
David Hindle	Policy EN16: Dark Skies	Far too long ------as the basic principles are straight forward._____ Policy needs to be set within the other important consideration of safety, security and feeling safe._____The broad approach would be_____Safety, security, and feeling safe are material considerations. Within the area covered by the Council, dark skies are also a material consideration. The impact of development can have a significant effect on dark skies, when a development is isolated.----------By reference to the view from the sky included below, the areas where the dark skies are most pronounced can be seen._____ EN16_____1. The dark skies Policy to be followed, is linked to safety, security and feeling safe----------a) Principal or non principal settlements, or immediately adjacent to them __ In such areas dark skies will not be a material consideration for new development. Appropriate guidelines are in the Design Code, but of relevance to new major development, or development that is not on a Street, and only to ensure safety, security and feeling safe. _____b)_Development not within a Principle Settlement, nor adjacent to to them. - Particularly where the development is isolated. Dark Skies will be a material consideration, but not to the detriment of of safety, security, and feeling safe. The guiding principles, and guidelines will be included in the Design Code.----------__-Minimal need for subtext, as guidelines will be within the Design Code._____ The person updating yje Design code needs to cover two matters. 1. The basic Principles of secure by design.----------2. Lighting for new development. Breaking it down into the same two categories as the Policy. ----------Principle and non Principle Settlements and adjacent--------Guide for major development, or development not on a street frontage.___That has the guideline there for safety, security and feeling safe reasons.-only----------Guide for all development elsewhere, particularly isolated development--------Standards need to cover dark skies, but not compromising safety, security or feeling safe.

Respondent	Policy	Comment
Andrew Brian Crump	Policy EN16: Dark Skies	Please see my comments above. Dark skies between Furrow Way. Mickleton and and Meon Hill should be preserved to protect the natural environment and residential amenity from additional light pollution
john shelton	Policy EN16: Dark Skies	CDC's development plans for Moreton would categorically impact Dark Skies policy.
Prue Leith	Policy EN16: Dark Skies	The purpose of Policy EN16 is to ensure that development does not harm the quality of dark night skies. I quote "It also encourages the enhancement of the Cotswold District dark skies, as it has one of the darkest skies, compared to other parts of the country, for the benefit of people and wildlife. Retro fitting of inappropriate and old lighting schemes for new more energy efficient and less light polluting products is also encouraged." A properly lit by-pass suitable for HGV traffic is hardly compatible with this policy.
John Playfair	Policy EN16: Dark Skies	CDC's written polocies on dark skies, nature, the environment and wildlife all sound highly commendable, but I do not understand how a by-pass running slap through the land these policies are there to protect can make sense.
Coates Parish Council	Policy EN16: Dark Skies	Policy EN16: Dark Skies We support this policy.
Blockley Parish Council	Policy EN16: Dark Skies	EN16 Blockley Parish Council supports the creation of a dark skies policy
Arthur Cunynghame	Policy EN16: Dark Skies	I am pleased to see that the dark skies policy which hitherto has lacked enforcement is to be beefed up.

Respondent	Policy	Comment
Amanda Davis 209	Policy EN16: Dark Skies	I wish to make the following comments: 1. Fully support dark skies status policy 2. Essential to maintain green spaces between settlements, including satellite villages to a more central village or town, eg Bourton on the Water with Little Rissington and with Lower Slaughter. While equestrian, farming and other land based uses are fully in keeping within this green separator space, retail, buildings (other than agricultural), buildings associated with recreation, residential and other uses should not be located here. Dark skies policy will be reinforced by this approach.
Bathurst Estate 175	Policy EN16: Dark Skies	Support: General support of the policy as it is already considered by the LPA but now would be a formal policy which emphasises the need for technical assessment of dark skies in planning applications. We suggest that the policy includes a definition of 'dark sky' locations to establish when these technical assessments are required.
Judith Montford The EA 207	Policy EN16: Dark Skies	Policy EN16: Dark Skies We welcome the inclusion of this policy. However, it should be strengthened to ensure there is no light spill into adjacent natural terrestrial and aquatic habitats, including buffer zones. We would encourage the wording of this policy is expanded to ensure it applies to development around watercourses. This would also reinforce the objectives of the watercourse policy. Without including these points which we have highlighted below, we will find the plan unsound. Within the supportive text, we therefore recommend the inclusion of an additional paragraph with the following; [new text] Artificial lighting disrupts the natural diurnal rhythms of a range of wildlife using/inhabiting the river and its corridor habitat. River channels and waterbodies with their wider corridors should be considered Intrinsically Dark Areas and treated as recommended under the Institute of Lighting Engineers "Guidance Notes for the Reduction of Light Pollution.
gina stephens	Policy EN16	The proposed development of MIM with the required street lighting and lighting from the 1500+ properties will have a significant negative effect on the dark skies with increased light pollution. This does not support the CDC policy of Green to the Core.
Bob Sharples	Policy EN16	Policy EN16 – Dark Skies – Sport welcomes the caveat which can allow sports lighting which is in line with Policy DS4. The use of LED lights and smart controls can allow sports lighting to be used carefully and intelligently without harm to the dark Skies Policy.
Judith Montford The EA 207	Policy EN16	Within the policy itself, we would encourage explicitly including watercourses and associated riparian zones within the classification of "sensitive areas". We therefore would encourage the following wherever "sensitive areas" are mentioned: [new text] Sensitive areas (including rivers, ordinary watercourses, associated riparian zones/ marginal habitat and the area within the 10-meter development buffer zone). We also recommend expanding point 2. ii. of this policy and suggest the policy is amended to read; ii. If that is not achievable, then adverse impacts are mitigated [strikethrough] to the greatest reasonable extent [new text] using cowlings (or equivalent) to direct light away from areas of ecological sensitivity.

Respondent	Policy	Comment
Nicholas Dummett 186 (CPRE)	Policy EN16	Policy EN16. Dark Skies The supporting paragraphs 10.16.13 to 10.16.23 include many important requirements. As we understand it as they are notes they have only the force of guidance. We suggest they are sufficiently important for the implementation of the policy that they are referenced in the policy by adding " 2.c. Details of requirements to implement this hierarchy are given in the paragraphs following this policy ".
Arthur Cunynghame	Policy EN16	I am pleased to see that the dark skies policy which hitherto has lacked enforcement is to be beefed up
Fairford Town Council	Policy EN17: Management of Accessible Green Open Spaces in	Policy EN17 – This deals only with the management of accessible green spaces. Could it unintentionally lead to less good open spaces being provided?
Bathurst Estate 175	Policy EN17: Management of Accessible Green Open Spaces in	Support- No comment.

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy EN17: Management of Accessible Green Open Spaces in	Policy EN17 – Management of Accessible Green Open Spaces 3.60. This is a new policy which will require costings to be provided as part of proposals for the design and long-term management of open spaces. It also states that engagement with parish councils regarding the green space proposed and its accessibility will be needed, and a framework for transferring open space by agreement to a parish council, charity, or community trust is also provided. 3.61. Alternatively, if a developer is to retain ownership of the public space, the policy highlights that the means of long-term maintenance should be demonstrated at the planning application stage, or a maintenance company appointed. The requirements of this policy are onerous, with the matters covered equally able to be negotiated with the Council in a more informal manner post-application submission. It is considered that a detailed policy on this is unnecessary.
Chris Marsh (Pegasus) 335	Policy EN17: Management of Accessible Green Open Spaces in	Policy EN17 – Management of Accessible Green Open Spaces 3.61. This is a new policy which will require costings to be provided as part of proposals for the design and long-term management of open spaces. It also states that engagement with parish councils regarding the green space proposed and its accessibility will be needed, and a framework for transferring open space by agreement to a parish council, charity, or community trust is also provided. 3.62. Alternatively, if a developer is to retain ownership of the public space, the policy highlights that the means of long-term maintenance should be demonstrated at the planning application stage, or a maintenance company appointed. The requirements of this policy are onerous, with the matters covered equally able to be negotiated with the Council in a more informal manner post-application submission. It is considered that a detailed policy on this is unnecessary.
Fairford Town Council	Policy EN17	2 ii) – What is meant by 'the required agreement'? What happens after 20 years? 5 - Any management agreements negotiated by CDC should include an option for residents to go to tender for a new provider at renewal/contract review break points, so that they don't get locked in to progressively increasing charges. (This has been recognised as a National issue.)
Blockley Parish Council	Policy EN17	EN17 Blockley Parish Council welcomes early engagement (pre-application) regarding open green space and green infrastructure and the overall attempt to address the problems associated with poor management of these types of assets. The policy will only be impactful however if effective enforcement is in place to address instances where the open space is not offered in an "adoptable condition" (EN17 clause 3) for example.

Respondent	Policy	Comment
Duncan Ward	Policy EN18: Sherborne Park Estate Masterplan	I am concerned that there appears to be no detail, on how any off this will be achieved, for residents to determine which of the policy is good, and which is not. It states collaboration and partnership as an aim, but I am not aware of the NT entering into any discussions on any of this, and yet they appear to have submitted a plan the CDC will support - can we see the details, behind this plan. In fact on the Sherborne Brook Project, we have heard very little, other than by general newsletter, on the status of the work on this. It is nearly 2 years since they held an open house, which was very guarded, and we are aware that first computer modelling was not successful. What is the current status on this? If they can not communicate on this single project, then the implications on this plan are far more wide reaching. The prospect of Sherborne, being an option, as an overspill for Bourton on the Water, is alarming. On sunny days already when the shop is very busy, we have people sitting on our wall, and our front lawn, with no regard for us. Without correct facilities, this will be magnified, and we do not want to see Sherborne, become a Bibury. It also flies in the face of celebrating the history and landscape of Sherborne, which is unique. We need to have full disclosure on the plans to all residents, before they are submitted
Roger Davies	Policy EN18: Sherborne Park Estate Masterplan	A working party needs to be formed that allows the local community opportunity to actively influence the development of the Masterplan. A working party run by the masterplan owners, the National Trust, will not have sufficient authority, so it should be chaired by an independent person. There is no precedent for such a working party and therefore no reason why it should not be chaired by an independent figure able to pull together the CDC, NT and the local community. If it is left to the NT to chair, issue minutes, and hold meetings when they feel like it then the effort may fail. The voice of the community should be strengthened by a statement in EN18 that the CDC will view with disfavour a Masterplan submitted without a convincing mechanism for the community to express its view 9n future planning developments.
David Hindle	Policy EN18: Sherborne Park Estate Masterplan	I welcome this significant Policy initiative, as a collaboration between the NT, CDC, and with appropriate by those who would use the Park. It is inevitably kept at a 'high level, and have confidence in the NT. As many parts will not require planning permission, it is inevitable that the Policy is about setting broad objectives, that could only be in a Masterplan, that would be gradually carried out..

Respondent	Policy	Comment
Gillian Davies	Policy EN18: Sherborne Park Estate Masterplan	This is an exceptionally difficult document to review and comment on. I have had to scroll through literally hundreds of pages to the section affecting my village. I have spoken to neighbours who have strong views but have found the whole process too demanding and without exception they gave up. This system for requesting comment is not fit for purpose. As for the detail of EN18. This is an ambitious project assigned to the NT to create a master plan. But beyond the NT responsibility there are huge infrastructure challenges, in particular a very limited road infrastructure, next to no public transport and a sewage system that is unlikely to be able to cope with the build of public conveniences. There are also quite a few Schedule 1 bird species that will be impacted. I welcome recent moves to establish a working group with the local community, but I'm concerned that if this working group is "chaired" by the NT, the local residents, businesses and landowners will not have strong enough voice. I urge the CDC to find and appoint an independent chair, to ensure rigour and process to the working group. Such a person should be able to build a strong coalition, and ensure the community "buy in" to the challenges where they can, and act as a constraint on the NT rubber stamping their own home work.

Respondent	Policy	Comment
Andrew Woolley	Policy EN18: Sherborne Park Estate Masterplan	Although I agree that the promotion of biodiversity and the provision of accessible greenspace should form important objectives within the Local Plan, I do have some major concerns regarding Draft Policy EN18. This is a very unusual if not unprecedented policy which appears to give bias to the aspirations of one particular landowner (i.e. the National Trust). The policy is not in the best interests of the residents of Sherborne and other local stakeholders. Moreover, Local Plan policies should be founded on a very strong evidence base, but there appears to no significant evidence supporting this policy within the published consultation documents. The policy is ill conceived and poorly thought through, appearing to be hastily drafted on the back of the National Trust's 'Big Nature, Big Access' project and Cotswold District Council's obligations to the 'green agenda' and its response to climate change. But why does the National Trust's Masterplan need to be incorporated into planning policy? The extant Local Plan already contains robust policies in respect of biodiversity, heritage, Conservation Areas and the Cotswolds National Landscape (AONB) which all provide a strategic framework for development, development control and environmental protection. Surely a more appropriate vehicle for the advancement of specific policies would be the development of a Neighbourhood Plan which would serve the aspirations of the wider Sherborne community and not just the National Trust (albeit the National Trust would be a major player in the creation of such a plan). We should remember that the Sherborne Estate is not just the preserve of the National Trust, but it encompasses a living community which is passionate about its environment and its heritage. With regard to some of the specifics of Draft Policy EN18: 1) There is significant local concern regarding increased visitor numbers to the Estate having an adverse impact upon Sherborne village and the local environment. Specific concerns include increased traffic and car parking within the village and on local rural roads (many of which are single track lanes); negative impact upon local wildlife (particularly nesting and over-wintering birds on the Broadwaters and water meadows); littering and antisocial behaviour; and the general impact upon the quiet ambience and tranquillity of the village and well-being of village residents. 2) The provision of sustainable travel is not realistic. The Estate and local villages are not served by a viable public transport system. The Estate is remote from centres of population, and it is inevitable that most visitors will travel to Sherborne by car. This is not environmentally sustainable and flies in the face of one the primary objectives of the Local Plan Update to minimize CO^2 emissions and mitigate climate change. 3) On a positive note, I believe the Masterplan would gain significant local support if its principle aims include the following provisions: i. the retention and creation of existing and new habitats; ii. the delivery of strategic scale nature recovery; iii. the conservation and enhancement of all of the historic parkland across the Estate and the wealth of valued heritage assets (including the restoration of the iconic 18th century Broadwaters); iv. the generation of renewable energy by way of the restoration and recommissioning the old turbine house; v. the renovation and maintenance of the tenanted housing stock (making it fit for purpose); vi. the provision of new affordable housing to serve young people in the community; vii. and the promotion of an economically viable and sustainable agricultural industry across the Estate. 4) I [illegible]

Respondent	Policy	Comment
George and Elinor Crosbie Dawson	Policy EN18: Sherborne Park Estate Masterplan	Using the policy’s own numbering, our comments are as follows: 2c) The impact of increased travel to and through the estate (whether sustainable or not) will necessarily have a negative impact on the natural habitat here. An example of this is how nesting birds, some of which are already endangered, will be disturbed by the proposed new footpath routes. The increased traffic will also be a significant danger for the local residents (including children attending the village school) and animal population. 2d) Any “demonstration of how increased recreational access can be achieved without compromising the environmental characteristics of the Estate and adversely affecting the local community” would have to be very detailed in order to be convincing. All evidence so far suggests that the proposed increased access will adversely affect the natural habitat and local community. Furthermore, the comments elsewhere in EN18 regarding using Sherborne effectively as a second “honey pot” to relieve the pressure on Bourton is extremely concerning for the local community and entirely inappropriate for the size and character of this village which Lord Sherborne tried so hard to preserve. Indeed it directly contravenes the terms of his Will. 2f) The draft Policy’s expressed hope of “ensuring that the character of the parkland setting and the wider AONB are enhanced” would be welcomed. Although it is questionable how this can be achieved with increased footfall, traffic, etc over the land and village. 2g) We support the proposals for the creation of new habitats for nature recovery. However, they would need to be meticulously and sensitively planned in order not to be detrimental to the existing habitats. 2h) Similarly, the generation of renewable energy within the Estate would have to be considered very carefully in conjunction with point 2g above in relation to local habitats. Wildlife can be jeopardised by implementing renewable energy infrastructure. 2j) In respect of the Policy’s proposals regarding redundant buildings, we would comment that where a building has been allowed to deteriorate to such an extent as to become redundant (i.e. through lack of maintenance and repair), it does not follow that such a building can be repurposed in anyway desired. Not only do many of these “redundant buildings” hold listed Grade II status and are situated within the Listed Parkland, but they also form part of the original character and history of the estate. Again Lord Sherborne’s wish to maintain the continuity of the estate is paramount. 2k) Given the many unused houses in the village, opportunities to offer the existing cottages to staff and local residents should be maximised ahead of any new development.

Respondent	Policy	Comment
Stephen Challis	Policy EN18: Sherborne Park Estate Masterplan	Please find attached (email sent to James Brain & local.plan@cotswold.gov.uk) Sherborne Parish Council's feedback on proposed Local Plan Policy EN18. The document also consolidates feedback from Aldsworth, Barrington, Clapton, Farmington and Windrush Parish Councils, Sherborne Tenants' Association of the National Trust, and 28 individual Parishioners. As you know, the Proposed Policy, and the materials prepared by the National Trust (NT), have sparked considerable interest from the respective Communities. Sherborne Parish Council really welcomes the opportunity to provide feedback as part of the formal consultation process. At this early stage in the process, the focus is on ensuring the Criteria to be included within Policy EN18, are inclusive and robust. You will see some proposed changes to a couple of the criterion, and a new one. At the same time, it is perfectly reasonable that residents of Sherborne and neighbouring Parishes are showing their keen interest in what is being proposed by the NT. Having reviewed the various documents published by the NT, there are many positive aspects which should be encouraged to fruition. At the same time, there are many which are unclear and as written, would potentially threaten the character and the social well-being of Sherborne's Community, as well as our neighbours. We have endeavoured to maximise awareness of the proposed Policy throughout Sherborne and surrounding Parishes to ensure the respective Communities are informed and understand how they can engage with the consultation process. Many Parishioners report difficulty in using the online feedback portal, and are keen to have their thoughts included within the attached document. In the interests of privacy, full names and email addresses have been omitted. If further contact details are required, we can arrange introductions between CDC and individual contributors. Kind regards Stephen Challis Sherborne Parish Council stephen@sherborneparish.org

Respondent	Policy	Comment
Roger Davies 105	Policy EN18: Sherborne Park Estate Masterplan	1. On the online comment system EN18 doesn't appear other than in the contents page – there is nothing. Only by dint of scouring the CDC website do I find another version of the document with EN18 included. I'm a pretty savvy IT user, but it took me more than an hour to find, on page 197 of a 390 page document. 2. I have the following comments to make, as a Sherborne Resident, surrounded on three sides by the Sherborne Park estate. a. It troubles me that the National Trust have been able to apparently lobby the CDC to include this policy for a masterplan with no input from the local community. I acknowledge the NT will say that comes later – but when? The community have been aware of the phrase "big Nature Big access for years now and have no detail. It appears that the CDC are waving through the NT's plan on a nod. b. I note that the CDC say they support the NT's prospectus for their "Big Nature, Big Access" project, and yet the Parish Council and the local community have had no opportunity to read this prospectus. Why is this? I'd like to see it, please. c. It troubles me that Sherborne is seen by the CDC as in effect a "pressure relief valve" to tempt tourists away from Bourton. Has the CDC explained this to the local community? Have you plans to? I don't think you have, and I doubt the residents will take kindly to the concept especially as they will feel , rightly or wrongly, that this policy is being snuk past them. d. It troubles me that this policy document can get to this stage with only input from one local landowner, namely the National Trust. e. It troubles me that there can be a policy developed for Sherborne to bring in unknown numbers of tourists with no apparent thought or discussion yet given to parking, public conveniences and footfall through the village and on local roads. No apparent thought given to local businesses other than the NT. None of these matters are covered in any detail in the policy document. As such, including it on the CDC policy is premature. f. I'm troubled by the vague talk of small scale rural housing provision. There are quite a number of NT rental properties currently lying empty. The plan doesn't mention those. Is the CDC really content with a housing policy that seems to implicitly favour NT employees? There is an argument for that perhaps but it needs to be very carefully made. g. Last year the community produced a "Statement of Community Heritage" . There is no sign that this document has even been read by the CDC. I feel it should be considered as part of the DCD plans. Overall I feel the community is being disenfranchised by the development of this policy. It is exceptionally difficult to find the EN18 policy document, which will change the nature of the village more than any other development in the last 300 years. CDC, and the National Trust need to make a much better effort in engaging with the community – there is great potential for win-wins , but also the efforts so far have great potential to be a PR disaster. The community have been patient for many years now, waiting for a plan – this half-cocked policy development is not the way to engage with us.

Respondent	Policy	Comment
Alix Whiffen 107	Policy EN18: Sherborne Park Estate Masterplan	I was shocked to see this policy presented for Sherborne as part of CDC's wider plans. The overview presented gives very little detail of some very significant plans for this village, for which the community has not been consulted. I am very disappointed in this approach by the National Trust. I can't comment on the plans until I see more detail and supporting documentation. Detail of the plans missing. Next steps not clearly outlined.
P R D Paul 108	Policy EN18: Sherborne Park Estate Masterplan	As a neighbouring landowner to the Sherborne Estate, I am pleased that I will be consulted about the National Trust's policy for the Estate. However, I understand that policy has been in in development for some years and I have not yet been approached or consulted. It could be more impactful if we were to cooperate on the environmental aspects of their policy.
P R D Paul 108	Policy EN18: Sherborne Park Estate Masterplan	The local roads are used a lot by cyclists and walkers as an important part of their circuit routes. They are already considered dangerous for cyclists and increased traffic could that danger. Access to and from the Estate should be limited to direct access from the A40.
P R D Paul 108	Policy EN18: Sherborne Park Estate Masterplan	There is no mention in the policy of the importance of the heritage of the community of Sherborne and no indication of intention to preserve it. The Community Heritage Significance should be a core part of the policy.

Respondent	Policy	Comment
P R D Paul 108	Policy EN18: Sherborne Park Estate Masterplan	The village and it's residents are a integral part of the Sherborne Estate and the impact on the village and its residents. There has been no consultation on the draft policy. A meeting with the National Trust, CDC and the residents of Sherborne Village to discuss the draft National Trust policy is needed.
Karen Kelly 111	Policy EN18: Sherborne Park Estate Masterplan	I am horrified to hear about the plans which are laid out for the future of The Sherborne Estate. This is one of the few iconic estates left in the south of England. It is a peaceful, quiet, unpoluted, unexploited place, a diamond surrounded by over populated areas of tourism, leaving litter and human waste where ever one goes, but at Sherborne we have a precious GEM. We have here otters and water voles and kingfishers on our Brook, water which is crystal clear, which we drink. Please consider all the amazing wild life which would be distroyed by this horrendous plan, wildlife can only survive in quiet unpoluted, unpopulated areas, and these areas are now very few and far between. This one we must retain, and not be tempted by financial gain and greed which has caused so much destruction all over our small country.

Respondent	Policy	Comment
Caroline Leatham	Policy EN18: Sherborne Park Estate Masterplan	Dear Sir We have carefully examined the Proposals for the future of Sherborne as set out in the recent National Trust's Concept Paper , and we wish to make the following comments: 1. We welcome the concept of increasing bird and general wildlife on the Estate which has markedly decreased (particularly bird life) on the Sherborne Brook, due to the lack of control and therefore build up of the weed and silt in the water over the last ten years. We live at Sherborne Stables, thus overlooking the water and have noticed an enormous change since we have been here. 2. We are also concerned at the suggested increase in paid parking capacity at the Trust's car parks. Encouraging more people to come and charging for parking will inevitably mean a substantial increase in visitors using the free parking on the village road, and probably the church car park. Already at weekends many visitors park for free near the war memorial on the village road and on the road outside residents' houses. As things stand, the road through the village is hardly wide enough for passing cars, delivery vans and farm vehicles. Many of the village houses do not have off street parking and this will make parking for them even more difficult. 3. One of the principal circular walks includes walking down part of the village road from the war memorial to the village green at the East end of the village, along a very narrow pavement which is unsuitable for increased numbers of visitors. The above are some of our concerns.

Respondent	Policy	Comment
Rohan Torkildsen 158	Policy EN18: Sherborne Park Estate Masterplan	Historic England would value a meeting with the National Trust and CDC to more fully appreciate this welcome proactive conservation initiative and clarify matters such as the extent of the site to which the policy relates, the location for, and amount of development envisaged. Before endorsing the principal of new development within the estate, including "..construction, reuse or demolition of existing redundant buildings, new buildings and infrastructure… small scale rural affordable housing or low cost housing" it will be important to appreciate the likely impact, mindful of the national policy context to inform appropriate change within such important historic places. Policy EN18 should refer to need for the masterplan and any new subsequent development to have due regard to the need to be consistent with national policy and the desirability of managed change, conserving the character and appearance of the historic estate, and the significance of affected designated heritage assets and their settings. Any harm should be avoided, minimised or fully justified. Reference to the future masterplan being informed by a Conservation Management Plan is reassuring. However, whilst draft Policy EN18 indicates that a future masterplan will provide the framework for determining any relevant planning application(s), this should not override the need for development proposals to also accord with relevant legislation and national policy, particularly as we currently know little of the form of development and its likely impact
Karen Kelly	Policy EN18: Sherborne Park Estate Masterplan	I am horrified to hear about the plans which are laid out for the future of The Sherborne Estate. This is one of the few iconic estates left in the south of England. It is a peaceful, quiet, unpoluted, unexploited place, a diamond surrounded by over populated areas of tourism, leaving litter and human waste where ever one goes, but at Sherborne we have a precious GEM. We have here otters and water voles and kingfishers on our Brook, water which is crystal clear, which we drink. Please consider all the amazing wild life which would be distroyed by this horrendous plan, wildlife can only survive in quiet unpoluted, unpopulated areas, and these areas are now very few and far between. This one we must retain, and not be tempted by financial gain and greed which has caused so much destruction all over our small country.
Bathurst Estate 175	Policy EN18: Sherborne Park Estate Masterplan	No comment.

Respondent	Policy	Comment
Bruce Fletcher	Policy EN18: Sherborne Park Estate Masterplan	Bruce Fletcher representation attachment 1
Bruce Fletcher	Policy EN18: Sherborne Park Estate Masterplan	Bruce Fletcher representation attachment 2 https://drive.google.com/file/d/1FeIpWV5jFAuSUBGee8QPjdJJgha_ZQCD/view?usp=sharing_eil_m&invite=CKCNxt8G&ts=661298d1
Sherborne Parish Council 204	Policy EN18: Sherborne Park Estate Masterplan	Comments from The document also consolidates feedback from Aldsworth, Barrington, Clapton, Farmington and Windrush Parish Councils.

Respondent	Policy	Comment
Sherborne Parish Council 205	Policy EN18: Sherborne Park Estate Masterplan	Sherborne Park Residents Company, Ltd (SPRC) is the largest private landowner in Sherborne, as we represent 30 homeowners, with property and buildings valued at more than £40 million. We sit within the overall National Trust footprint in Sherborne, just West of the main village, overlooking the Sherborne Brook broadwaters. We believe that the proposals of the National Trust and the endorsement of this by the CDC, as evidenced in EN18, are premature and have the potential to negatively impact environmentally sensitive surroundings, our peaceful enjoyment of this historically significant village, as well as our property values. We recognise, however, that there may also be some benefits. But to realise benefits without detrimental impact to nature, the village and homeowners, there must be a recognition of the issues in the past between the National Trust and the people of Sherborne. This is necessary because it has impact on 1) what is contained in EN18, 2) how the CDC should approach the National Trust's (NT) proposal, and 3) the way that the CDC, NT, and Sherborne Parish Council, along with other key stakeholders, should work together over the coming years. 1) The issues in the past which are relevant to EN18 and the way forward include: - When Lord Sherborne bequeathed the bulk of his estate to the National Trust in 1982 so that 'safeguard the continuity of the Sherborne Estate which over the years has been fostered by my family'. The family acquired the estate in 1551. While the properties were not in perfect condition when granted, their condition has deteriorated drastically under NT ownership. - The historic and culturally significant Grade II listed Sheafhouse as well as the Northfield buildings have a large number of holes in the roofs that have been left unrepaired for many years. This has caused rotten wood, a partial collapse in one area, and an unsustainable situation. (separate document entitled 'Sherborne Park Estate – New photos documenting mismanagement' provided separately) - The Broadwaters, the pride of the village and a historic man-made feature of the Sherborne Brook is turning into a swamp of invasive species, and which is now largely overgrown in summer. Traditionally this was used as a sheep-wash in medieval and subsequent times, and even was able to sustain small boating. It was regularly weeded and dredged to keep it open. Instead of a sight to behold, it is an eye-sore. It has been dredged periodically for more than 400 years, but the last time the NT did this was many years ago (separation document entitled 'Evolution of the Broadwaters' provided) - The quality of the rental housing owned by the NT has consistently deteriorated. As of the writing of this note there are 9 vacant properties. A number of properties have issues with mould, and poor heating. This has been a constant issue which is well documented by the Sherborne Parish counsel. While some work is periodically done the NT has not commissioned an appropriate holistic engineering report to ensure that all issues are identified and remediated once and for all - In the lead up to EN18 there was no community engagement by the NT on what it might contain. In fact, even after EN18 was issued there was no proactive engagement by the NT to the village, and the village had to get a copy of the proposal through other means, and only obtained it after a few weeks. Consultations and communication has also been very poor in the past, and has left the village sceptical that this will change - Essentially, the NT is a poor landlord, and has provided inadequate investment in the needs of the property. Lord Sherborne's dying wish that the 'continuity of the estate' be assured is significantly at risk as the current situation is not sustainable. If the NT cannot manage what they have adequately, and provide appropriate investment to maintain the estate, how can we be sure they have the capabilities to manage the new developments they propose, and that they will change their approach and behaviour? 2) Given the [illegible]

Respondent	Policy	Comment
Sherborne Resident 208	Policy EN18: Sherborne Park Estate Masterplan	We have been resident in Sherborne for over 20 years. Both our children attended the preschool (now sadly closed) and the primary school. There are aspects of the policy EN18 we agree with i.e. Planting native trees New pond not accessible by the public to improve habitats for flora and fauna Work on the Boathouse and Turbine We have noticed a sharp increase in visitors since Springwatch first filmed in the village in 2018 and increase in cyclists as the sport has become so popular. Springwatch put Sherborne on the map. While the deer population has increased considerably, we no longer have visiting Canada geese and as the Broadwater has not been maintained by the National Trust, there has been a dramatic reduction in wildfowl. The wildlife has already suffered due to neglect of their habitats, so we welcome improvements for flora and fauna. More people in the village has led to more traffic on the single track lanes, congestion around the village shop and school. Pay and display car parks on the edge of the village will not prevent people driving into the village to park for free. Surely in time it would be necessary to introduce parking restrictions within the village centre and possibly even traffic calming measures to enforce the speed limit. Access to the village from Clapton on the Hill and Bourton on the Water will affect the structure of the two stone bridges which were not designed for the demands of heavy traffic. These lanes are in poor repair as is the lane running from the A40 past Cats Abbey. The junction on the A40 above Ewe Pen is extremely dangerous, with poor visibility and at times a queue to cross over towards Lodge Park. More people in the village will lead to more litter and the necessity for a greater number of litter bins (and therefore a council vehicle coming through the village to empty these bins). And the same will apply with an increase in visiting dogs (although many dog poo bags are left on the fences or in the walls). More people in the village will lead to less security for the residents; there have been a number of break ins and car break ins in recent years and this will only increase. We are most concerned about the possibility of short term holiday accommodation within the village as this not only removes a much needed housing from the local area but destroys rural communities. The empty housing in the village should be available to young ,local people at an affordable rent, who wish to live in the area and contribute to village life. In terms of providing an interesting visitor experience, Lodge Park has the space and has had much investment, but is rarely open. We would suggest a visitor centre there would be ideal to explore the history and culture of the Estate. There is space to build a cafe and shop there using sustainable building materials and methods. Two of the main aims of EN18 are to greatly increase visitors numbers to the Estate and improve the habitats for nature.....how can this possibly work? More people means less wildlife. We have seen what has happened to Bibury and Lacock..... The suggestions in EN18 are contrary to the wishes of Lord Sherborne as documented in his Will.

Respondent	Policy	Comment
Sara Ingamells	Policy EN18: Sherborne Park Estate Masterplan	We have been here for 14 years. I agree with aspects of policy EN18. I absolutely agree with a policy that helps to protect the the flora, fauna and historical landscape of the Sherborne Park Estate. However, the policy criteria then seems to counter this by proposing to maximise the opportunities for travel to the estate. There are areas of the estate that have been allowed to deteriorate over the 14 years that I've lived here. When I first arrived in the village of Sherborne, thousands of migrating birds could be seen resting alongside the brook, close to the weir in the centre of the village. 14 years later and even the swans have left, unable to take off or land anymore due to lack of essential maintenance of this historic landscape left for the National Trust (NT) to take care of. I am concerned that new footpath routes identified on maps within EN18 pass very close to nesting sites for birds that the NT wardens have been keeping visitors away from for years in order to protect the wildlife. The existing pathways through the estate have recently been upgraded to enable visitors to access the park all year round, which are also now pushchair and wheelchair accessible. This has led to a greater use of the estate throughout the year. If new footpaths are necessary (which at present I don't believe they are), these need to be designed extremely carefully so as not to interfere with the precious wildlife - this being one of the "The Ten Biodiversity Net Gain Good Practice Principles" - Principle 6 - Achieve the best outcomes for biodiversity. The plans by the National Trust to develop new ponds that will not be accessible to the public but there to improve habitats for flora and fauna is something I'm very much in favour of. Likewise the planting of new trees is something I'm sure everyone will support - providing they are carefully planted to protect the historic design features of the landscape. Work on the boathouse and turbine that has been undertaken over the last year or so is also supported as these were once very important aspects of the estate and should be protected as such. I am not against more people being able to enjoy this beautiful area. As I run the local village shop and coffee shop in Sherborne an increase in visitors would probably benefit me. However, I am also a part of the community and would not want the area spoiling in the same way as has happened in other Cotswold towns and villages, that have basically

Respondent	Policy	Comment
Chris Marsh (Pegasus Group) 334	Policy EN18: Sherborne Park Estate Masterplan	Policy EN8 – Biodiversity and Geodiversity 3.58. The Policy has been amended to include reference to delivering a 10% biodiversity net gain. This is considered unnecessary and a duplication of national policy requirements, with 10% Biodiversity Net Gain now mandatory for all major developments (as of 12th February 2024) and all non-major developments (as of 2nd April 2024) as required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Reference to BNG within Policy EN8 is therefore considered sufficient to address the requirements of BNG within the Local Plan with BNG tools and guidance available at a national level. Summary of the amendments required 3.59. Remove the duplication of national policy requirements within the policy. This will ensure a justified policy which is consistent with national guidance.

Respondent	Policy	Comment
Bruce Fletcher (Sherborne Park Residents Company) 192	Policy EN18: Sherborne Park Estate Masterplan	Sherborne Park Residents Company, Ltd (SPRC) is the largest private landowner in Sherborne, as we represent 30 homeowners, with property and buildings valued at more than £40 million. We sit within the overall National Trust footprint in Sherborne, just West of the main village, overlooking the Sherborne Brook broadwaters. We believe that the proposals of the National Trust and the endorsement of this by the CDC, as evidenced in EN18, are premature and have the potential to negatively impact environmentally sensitive surroundings, our peaceful enjoyment of this historically significant village, as well as our property values. We recognise, however, that there may also be some benefits. But to realise benefits without detrimental impact to nature, the village and homeowners, there must be a recognition of the issues in the past between the National Trust and the people of Sherborne. This is necessary because it has impact on 1) what is contained in EN18, 2) how the CDC should approach the National Trust's (NT) proposal, and 3) the way that the CDC, NT, and Sherborne Parish Council, along with other key stakeholders, should work together over the coming years. 1) The issues in the past which are relevant to EN18 and the way forward include: - When Lord Sherborne bequeathed the bulk of his estate to the National Trust in 1982 so that 'safeguard the continuity of the Sherborne Estate which over the years has been fostered by my family'. The family acquired the estate in 1551. While the properties were not in perfect condition when granted, their condition has deteriorated drastically under NT ownership. - The historic and culturally significant Grade II listed Sheafhouse as well as the Northfield buildings have a large number of holes in the roofs that have been left unrepaired for many years. This has caused rotten wood, a partial collapse in one area, and an unsustainable situation. (separate document entitled 'Sherborne Park Estate – New photos documenting mismanagement' provided separately) - The Broadwaters, the pride of the village and a historic man-made feature of the Sherborne Brook is turning into a swamp of invasive species, and which is now largely overgrown in summer. Traditionally this was used as a sheep-wash in medieval and subsequent times, and even was able to sustain small boating. It was regularly weeded and dredged to keep it open. Instead of a sight to behold, it is an eye-sore. It has been dredged periodically for more than 400 years, but the last time the NT did this was many years ago (separation document entitled 'Evolution of the Broadwaters' provided) - The quality of the rental housing owned by the NT has consistently deteriorated. As of the writing of this note there are 9 vacant properties. A number of properties have issues with mould, and poor heating. This has been a constant issue which is well documented by the Sherborne Parish counsel. While some work is periodically done the NT has not commissioned an appropriate holistic engineering report to ensure that all issues are identified and remediated once and for all - In the lead up to EN18 there was no community engagement by the NT on what it might contain. In fact, even after EN18 was issued there was no proactive engagement by the NT to the village, and the village had to get a copy of the proposal through other means, and only obtained it after a few weeks. Consultations and communication has also been very poor in the past, and has left the village sceptical that this will change - Essentially, the NT is a poor landlord, and has provided inadequate investment in the needs of the property. Lord Sherborne's dying wish that the 'continuity of the estate' be assured is significantly at risk as the current situation is not sustainable. If the NT cannot manage what they have adequately, and provide appropriate

Respondent	Policy	Comment
Mrs Kelly 114	Policy EN18: Sherborne Park Estate Masterplan	I am horrified to hear about the plans which are laid out for the future of The Sherborne Estate. This is one of the few iconic estates left in the south of England. It is a peaceful, quiet, unpoluted, unexploited place, a diamond surrounded by over populated areas of tourism, leaving litter and human waste where ever one goes, but at Sherborne we have a precious GEM. We have here otters and water voles and kingfishers on our Brook, water which is crystal clear, which we drink. Please consider all the amazing wild life which would be distroyed by this horrendous plan, wildlife can only survive in quiet unpoluted, unpopulated areas, and these areas are now very few and far between. This one we must retain, and not be tempted by financial gain and greed which has caused so much destruction all over our small country.

Respondent	Policy	Comment
C Humphreys	Policy EN18: Sherborne Park Estate Masterplan	Policy EN18 Sherborne Park Estate Masterplan - The whole Policy EN18: a new policy in tandem with the National Trust's plans for the Estate. Concerns about traffic, parking, and privacy see attached sheet. EN 18 SHERBORNE PARK ESTATE MASTERPLAN - LPW Q49. There is not enough detail in the policy to be able to gauge its effect on the village, other parts of the Estate & surrounding roads. So I can only support so far the landscape protection and natural habitat recovery plans, and continued farming within the estate. The Conservation Management Plan is not yet available to see. - Comments concerns about effects on village residents of increased traffic, parking on village street & possible loss of privacy. - All six arms in the village (bar one from the A40) are unsuitable for increased traffic - being single track for all or part of the way from the nearest main road (A40/bypass) The village street has 2 blind corners & for some of its length is single track due to local parked cars, working vans etc. Village traffic includes that for the Primary school, The shop, farmers & estate staff, and cyclists following the National & North Leach Northward Cycle route. In the event of an accident on the local A40 traffic is redirected through the village. Horse riders also come through. For most of its length the verges on south sides of the street are very narrow; & pavement along the north side and walls of varying heights along both sides all the way. Any traffic entering the west end of the village from the only two way road would reach the Northfield/ water meadow car park to the north east by going through the village. Already some visitors choose to park on the village street rather than in the 2 car parks and this can cause problems for safety and residents. Access to walks from the village street results at time on street parking at those points - there are 2 (to south) one of which is by the school shop; only further access by works or the park from the street would increase this problem. Further public access to areas in the village could mean some residents being overlooked on all sides, resulting is loss of privacy. Too great an increase in number can change the level of visitor's expectation - who might feel free to roam at will including into private areas (such as gardens) It is not clear whether a Country Park at Sherborne is envisaged by CDC or if so what that would involve or mean for management priorities, funding, how promoted and the effect on local area / communities. Obviously there is, besides all the above, concern about the effect on the natural flora & fauna of many visitors (and dogs) especially if some are not aware of how damage can be done. As much as anyone, the Trust knows this & so would manage access accordingly.

Respondent	Policy	Comment
Duncan Ward	Policy EN18	masterplan for the Sherborne Park Estate will be produced by the landowner in consultation with the local communities and relevant stakeholders and, subject to the approval of the Local Planning Authority, will provide the framework for determining any - where is this plan, and where is the consultation with local communities and relevant stakeholders relevant planning application(s)
Pauline Rigby (Town Clerk)	Policy EN18	Northleach with Eastington Town Council believes that Sherborne Parish Council and neighbouring parishes and villages should be consulted and given the opportunity to engage fully in the development of the Sherborne Master Plan. We note that the Lodge Park grounds lie within the parish of Northleach with Eastington.
John Hamwee	Policy EN18	1. It is essential that the masterplan is indeed created in consultation with the local communities. In my experrience it is well night impossible to engage the National Trust in any consultation about Sherborne Park estate and the way it is currently managed. This must change if the plan is to work 2. Sub clause f speaks of the enhancement of the parkland setting. Currently, the state of the grade 2 listed landscape is a disgrace - compare its state now with how it looked - plenty of photographs- when the Trust became owners.

Respondent	Policy	Comment
Jonathan Briant 129	Policy EN18	Comments on the Sherborne Big Nature Big Access Concept Paper I live at Lindens, Sherborne, in Gloucestershire and am sending my comments in respect of the Council's consideration of the National Trust Big Nature Big Access project. I am one of the few non-tenants in the village. I am a freeholder and will be potentially significantly affected by the plans being proposed by the National Trust (as far as I can tell from the paucity of information that has been made available). This is a project that the National Trust have been pursuing for a number of years. They have repeatedly failed to engage with the local community to set out their thinking regarding this project and at no stage have they invited our involvement or commentary on their plans. They have also started to implement parts of it under the cloak of doing something else: I specifically refer to the paths they introduced into the woodland leading across the border of the estate towards Lodge Park. These were described as being for forestry purposes in the planning application, but are not used for forestry and are marked as part of the new foot/cycle paths in the Concept Paper. This kind of disingenuous and misleading action by the National Trust causes one to have reservations about their good faith and whether their stated intentions are to be trusted. The Trust wants to attract more people to Sherborne, but does not say how many more. A few more might be welcome; a lot more, less so. This kind of general and detail deficient statement is difficult to object to – and one has a sense that this is the very point of it being so light on detail. Nonetheless, on the basis of its deficiency, I do object. The document refers to the 1.5 million tourist visits per annum to Bourton and Burford. How many of these do the Trust envisage being diverted to Sherborne? Have they given it any thought? How might this be managed? What if we get more than planned for? Many more people will bring significantly more traffic and the attendant parking issues: if car parks are to be paid for, which I believe is the proposal, then people will park in the village near the excellent village shop. It will also bring good people and bad people; well mannered wanderers and litter dropping fools. A small village needs only a few of the latter to be changed beyond recognition. The document refers to "flow modelling" that is underway on the Sherborne Brook. The Trust has singularly failed to manage the Brook over the last 15 years and it is now largely silted up. They have promised solutions and that they are working on it for many years. It is laughable that this document – itself prepared in 2022 I believe – refers to this modelling and that in 2024 there is still no outcome proposed by the Trust. The Trust's abdication of its responsibilities regarding the Brook is a disgrace, and sets a poor example of how they might manage any wider project to do with Sherborne. The document refers to the possibility of redundant farm buildings that might offer a fantastic opportunity to drive new forms of income for the estate. What these "new forms" of income might be is not set out. The Trust currently has between 9 and 10 vacant properties in the Sherborne village area that could drive revenue if properly managed and let out, but they are driving no income currently because the Trust cannot manage them. The suggestion that "new forms" of income might be derived from

Respondent	Policy	Comment
Robert Robotham Cheni Adams 129	Policy EN18	SHERBORNE PARK ESTATE MASTERPLAN COMMENTS IN RELATION TO EMERGING LOCAL PLAN POLICY (POLICY EN18) AND FROM THE NATIONAL TRUST BIG NATURE BIG ACCESS CONCEPT PAPER ●In their Concept Paper, The National Trust say they want to "deliver landscape change" and "grow visitor numbers" to the Sherborne Park Estate. Their 'target market' is the surrounding areas comprising 998,000 people, people visiting the 'Tourist Towns' of Bibury and Bourton-on-the-Water and also from new holiday lets in Sherborne village. ●It is noted that this project was set up by the National Trust in January 2022 with no consultation with the residents of Sherborne. ●Also, the Concept Paper states that Cotswold District Council's Local Plan has "Ambition to include Sherborne Estate as a Country Park". However, it is clear that the proposals will have an adverse ecological impact, a severe effect on the village, its' residents and surrounding area, unsuitable and even hazardous transport links, all in a conservation area. Ecological Impact ●Adverse impact on local wildlife which will almost certainly decline with uncontrolled and increased visitor numbers following the construction of 50% more paths. ●Noise and intrusive behaviour from increased visitor numbers will have an adverse impact on the lives of birds, owls, small mammals, bats, farmland birds and insects that form part of the food chain by the large increase in human activity into their established habitat areas and most likely frighten some away from the area. ●Increased visitor numbers will lead to the disturbance of the wonderful deer population who have the right to live at Sherborne Park Estate without harassment from visitors' dogs etc. ●Adverse impact on wildflowers, rare and ancient trees, funghi and grasses with the construction of more paths, people going off paths, having picnics, and even barbeque's creating fire hazards. ●Litter and food waste creation. ●No adequate toilet facilities leading to fouling of areas either side of paths and in woods. ●Limit of space for grazing cattle and sheep which is a material change to the appearance of the area away from the traditional Cotswold landscape. ●Public access to farm buildings will adversely affect bat and owl habitats. ●The construction of a path along the Brook will have an adverse effect on water mammals, reptiles and flora and in wet times become a mud bath limiting the chance of re-growth. Accessibility ●Significant increase in pollution from cars, coaches and minibuses. ●Risk of [illegible]

Respondent	Policy	Comment
Alex Whiffen 147	Policy EN18	I am writing with my concerns over the National Trust's vision for greater access to nature and "visitor experience", by way of education and leisure facilities such as refreshments , toilets, car parks, bike hire and many more miles of foot and wheel friendly tracks and paths. All the above are very laudable, but has anybody thought about the access roads to all these places? Sherborne is a very small village, so far unspoilt and unexploited, probably because of its single track and passing place only lanes which, on a sunny week-end become very congested as it is. Local people know the limitations of these roads and therefore are usually very patient when it is obvious that the car or truck hurtling towards them is a ' foreign ' vehicle that does not know how to drive on country lanes. Inevitably, somebody has to reverse, but that isn't always possible when there is already a queue of cars behind you which may well include the school bus or a sheep lorry. And what happens at school going in or coming out time twice a day? That is an accident waiting to happen anyway . The A40 unfortunately runs between Lodge Park and the rest of the Estate. How will plans safely allow vehicles to cross from one side to the other? And that includes pedestrians with prams, bikes, children and dogs. Not a good mix. There were several fatal accidents on our stretch of the A40 in the last few years. We already have a lot of cyclists through the village. Like everywhere, the potholes in Sherborne are horrendous as are sides of the roads where the tarmac has crumbled away leaving the surfaces very dangerous, and especially for bicycles sharing small roads with cars And parking? It is all very well making bigger car parks for all these visitors but human nature being what it is (lazy and not wanting to pay unless it is absolutely necessary) means that our little village street will become one large car park. At the moment parking on the road, the only place to park for most of the cottages, already becomes difficult on a sunny Sunday when dog walkers, rambling groups etc decide to boycott the two existing car parks and park on the road outside our houses for the day. On a separate note, I see that the NT wants to build some affordable housing in Sherborne. No details given. But as they have approximately nine empty properties (some of these have been sitting empty for many years) on the Estate. We would all feel happier if they let these first before building more.... Three cottages in very close proximity to me are currently empty. Why, when thousands of new homes are being built in Gloucestershire alone?
Geoff Tappern	I	The Air Balloon upgrade will evidently generate 50% more traffic on the A419. The on and off slip roads require extensive upgrading. At present on particularly far to short. Road requires tarmac instead of concrete finish. Concrete major noise to surrounding area.

Respondent	Policy	Comment
Andrew Brian Crump	I	It is all very well lumping together Blockley, Chipping Campden, Mickleton, Moreton and Willersey into some kind of infrastructure bubble, but the reality is that they do not enjoy good public transport provision to each other and so reliance upon private vehicle usage to travel to many required facililites is still the primary mode of transport. Mickleton itself has a reduced infrastucture now that the Post Office has gone and, if a large household shop is required, then it is several miles to travel to Moreton for example, or to Evesham or Stratford, out of the District. Even attending the GP requires travelling three miles to either Lower Quinton or Chipping Campden, and such bus timetables as there are do not readily dovetail with appointment times.

Respondent	Policy	Comment
NHS Property Services	I	Policies INF1 and INF2 set out the overarching policy for ensuring development makes a positive contribution to sustainable growth through the delivery of appropriate infrastructure including healthcare in a timely manner. NHSPS welcomes the recognition of health infrastructure as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan. We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area. NHSPS recommend that the Local Plan have a specific section in the document that sets out the process to determine the appropriate form of developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements. The Local Plan should emphasise that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. As a starting point, we suggest the following process: • Assess the level and type of demand generated by the proposal. • Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality. • Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery. • Identify the appropriate form of developer contributions. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.
Amartya Deb (Gloucestershire County Council)	I	More detail will be required for the GCC Transport Planning team to comment on the exact infrastructure requirements.

Respondent	Policy	Comment
Grace Lewis 153	1	Chapter 11: Infrastructure Policy INF1 – Strategic infrastructure delivery, is to replace and merge former policies SA1, SA2 and SA3 in the local plan and looks to acknowledge and address the highway issues within Moreton in Marsh by constructing a new road to reduce traffic and encourage sustainable transport use. Under the updated policy 18 - strategic planning is required to safeguard the route from potential development and, if strategic growth does occur in Moreton, that this is supported by the necessary infrastructure. Necessary infrastructure should also refer to mitigations for level crossings impacted by commercial development.

Respondent	Policy	Comment
Daniel Parry-Jones 177	1	INF1 Strategic Infrastructure Delivery In the updated drafting for this policy and its explanatory text the broad definition of infrastructure set out in paragraph 11.1.3 includes Transport, Education, Health & Social Care, Children's Play Space, Community Facilities, Green Infrastructure & Open Space and Flood Management infrastructure, but it does not include Emergency Services Infrastructure (Police, Fire and Ambulance). To address this Emergency Services Infrastructure (Police, Fire and Ambulance) should be added to paragraph 11.1.3 and be fully included in Policy INF1. Full justification is below: It is an indisputable fact that everyone, no matter the development scheme they are in, its size or where it is, expect and require the fire and rescue, ambulance and police services to be available at all times when emergencies happen affecting them, their families or their friends. Whilst the emergency services will always endeavour to deliver help to those who need it when called upon, such provision must be planned and provided for in advance, as is the case with any other essential infrastructure type. Failure to plan for this would put peoples' lives and property at a constantly higher risk of danger than would otherwise be the case. The infrastructure needed takes the form of new on or off-site provision or improvements to the capacity of existing emergency and rescue services infrastructure either on or off-site. It is this context that explains why the Government has made it abundantly clear that it is entirely reasonable and proper for emergency services infrastructure to be delivered alongside new development. This is demonstrated by the following: • The Levelling-up and Regeneration Act 2023 states in its definition of 'infrastructure' for the new Infrastructure Levy 'facilities and equipment for emergency and rescue services' (see Schedule 12 – Part 1 – Section 204N (3)). • The National Planning Policy Framework (December 2023) makes clear at paragraphs 8(b), 16 (c), 20(b), 96 (b), 97, 101, 116(d) and 135 (f) that crime reduction, safety and the infrastructure to deliver these are material considerations that should be fully accounted for by planning policies and decisions. • Statutory Planning Practice Guidance states the following in relation to the current legislative context and the spending of CIL receipts: "The Levy can be used to fund a wide range of infrastructure, including transport, flood defences, schools, hospitals, and other health and social care facilities (for further details, see section 216(2) of the Planning Act 2008 and regulation 59, as amended by the 2012 and 2013 Regulations). This definition allows the Levy to 7 be used to fund a very broad range of facilities such as play areas, open spaces, parks and green spaces, cultural and sports facilities, healthcare facilities, academies and free schools, district heating schemes and police stations and other community safety facilities. This flexibility gives local areas the opportunity to choose what infrastructure they need to deliver their relevant plan (the Development Plan and the London Plan in London). Charging authorities may not use the levy to fund affordable housing. (our emphasis) Local authorities must spend the levy on infrastructure needed to support the development of their area, and they will decide what infrastructure is needed. The Levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development. (our emphasis)
Daniel Parry-Jones 177	1	Additional appendix to previous comments.
Daniel Parry-Jones 177	1	Additional Appendix to previous comment

Respondent	Policy	Comment
Judith Montford The EA 207	I	Policy INF1: Strategic Infrastructure Delivery While many policies of the local plan advocate for the integration of ecologically directed strategies into their development plans, (including the subsequent policy INF2), these crucial considerations are neglected in the Strategic Infrastructure Delivery Policy. Given the scale and scope of the plans and the impact to be imposed onto the landscape and the biodiversity it supports, there is both a pressing need and a valuable opportunity to implement key environmental initiatives into this strategic policy. This lacks explicit discussion of the necessary ecological gains needed from infrastructure developments and completely overlooks the aquatic environment. Instead, this should outline the requirement of the development to alleviate the ecological pressures via adequate mitigation strategies in addition to supporting the net gain of biodiversity via the promotion of both blue and green infrastructure. Therefore, for the Green Infrastructure and Open Space point under paragraph 11.1.3, we suggest the title is amended to include 'blue' and the following is included; [new text] Green and Blue Infrastructure and Open Space: • Prioritize the integration of both green (and blue) infrastructure elements to enhance biodiversity and ecosystem services (including green corridors, sustainable drainage systems, and the preservation/restoration of watercourses and riparian habitats)
CR Ayers 223	I	Use of the A429 Corridor North of Northleach. Your Plan promotes development along the A429 corridor in order to reduce road movements to more remote locations as part of the local "green agenda". The A429 between Northleach and the Warwickshire border is a relatively narrow single carriageway in each direction road with limited overtaking opportunities which carries a very high level of mixed small vehicle and HGV traffic. The traffic loading increases to saturation point during holiday periods and when other major roads such as the M5 become closed or overloaded. It is used as an alternative routing to join the Warwick Bypass and thus route around Birmingham on the eastern side rather than the M5 route to the west. Unfortunately, little improvement has taken place in the Gloucestershire section over the last 40 years and there are 2 major bottlenecks in this section; Stow on the Wold and Moreton in the Marsh where long queues frequently build up. At the Stow choke point the constriction is caused by the junction with the tributary roads A424, A436, B4068 and B4077 which either merge with the A429 or provide interrupting cross traffic. GCC recognised this problem in their A429 study but were unwilling to commit to expenditure to improve it (the local population does not warrant the spend) but agreed to downgrade the importance of the A429 to a minor A road so as draw traffic away from it! This concept does not appear to have been communicated to the drivers that use it! Now CDC wants to add more traffic in pursuance of their Moreton in Marsh builds and increasing focus on it in their "Green agenda" – right hand CDC not knowing what left hand GCC Highways does?
CR Ayers 223	I	Beyond Life. Why has the Cotswold District not got their own Crematorium? Most counties have district facilities. Would this not be a source of income to CDC?

Respondent	Policy	Comment
gina stephens	Policy SA1: - South / Mid / North Cotswolds - Principal	The strategic infrastructure proposals for MIM are not sustainable in relation to the following points: The sewage pumping station is not fit for purpose and already there is a CSO in place by Thames Water. The upgrade/replacement of this utility is not in the control of CDC and at the earliest it is proposed for 2028. The Transport Hub that is lauded as a reason for strategic development is just a car park and a bicycle shed at the GWR train station. This station provides an hourly service to London/Hereford with no east west journeys possible. The suggestion by CDC of the re-opening of the Honeybourne to Stratford rail link will not happen. It is not even currently on the GWR list of proposed rail links. Road infrastructure: Even with a proposed ring road around the town this will not alleviate the significant additional car numbers that will result from the proposed additional residential development in the town. Any relief for the town re HGVs will just exacerbate the bottle neck at Stow on the Wold.
Bathurst Estate 175	Policy SA1: - South / Mid / North Cotswolds - Principal	No comment
David Hindle	Policy SA1 / SA2 / SA3 INF1	after Romney House add in brackets (Planning Committee have agreed approval for a new Healthcare Centre Nov 23,_____ To the Cirencester GP Surgery Need add._____ (Either I new large Healthcare Centre is needed, or two smaller ones (the need generated by Chestertons whilst separately covered in the Local Plan, may become integrated with the development(s))._____To Sorts and recreation add_____Tetbury -- Completion of the 3 Pitch RFU new pitches

Respondent	Policy	Comment
David Hindle	Policy SA1 / SA2 / SA3 INF1	As noted earlier under Chestertons, I consider that the needs for Phoenix, and of Chestertons should be combined. A logical place would be an enlarged fee land provision on that site,. But it could be elsewhere provided it is within one mile of Chestertons site, or on a good public transport network from the site. There would also need to be accessibility criteria for the existing Phoenix patients. As noted borrowing by the land owners of Chestertons could take place, with the ICB paying rent and rates up to the point the loan has been completed. Then the Healthcare Centre wold be given free to the ICB. The 'intentive' to the landowners would be up to 50 additional units, with affordable to match % on remainder of the site. Exact number of additional units would need negotiation.----------The other needed new surgery for the 2 premises Cirencester Health Group should ideally be located centrally, so as to be very accessible by public transport networks. ----------I am not from Cirencester, but consider that given the size of Cirencester, and the need to maximise accessibility for ,Patients other than car a 2 premises solution is preferable. It is obviously up to the 2 Practices, the ICB, residents of Cirencester, and the landowners of Chestertons to express their own views. The Local Plan needs to be a focus for developing a way forward, that should be made easier, as the ICB is also updating its own proposed priorities for 2024 onward.
Nikki Ind	Policy SA1 / SA2 / SA3 INF1	Is burial land classed as infrastructure - I am not sure?
David Hindle	Policy SA1 / SA2 / SA3 INF1	Whilst not relevant to a Pan ending tn 2031, an additional requirement for the South wold be a new burial ground situated in proximity Cirencester to serve a much wider area. A Crematorium, also to be considered in view of the distances to the 3 used by CDC residents.
David Hindle	Policy SA1 / SA2 / SA3 INF1	Under South Cotswolds New Healthcare Centre Tetbury, also include 'Supplementary payment, (added to developers contribution), for Street lighting along Cirencester Road, between Trubsaw Close, and Steeding Later Living residential.

Respondent	Policy	Comment
Chris Marais	Policy SA1 / SA2 / SA3 INF1	Please consider Tetbury Rugby's new ground development at Pike Field in Tetbury as a significant piece of Strategic Infrastructure Delivery in the category of Sport & Recreation. Completion of the Pike Field facility will contribute to increased physical activity participation by all sectors of the community, improving the health and wellbeing of 2,000 local people, engaging over 500 children and young people in sports programmes, allowing adults of all ages to volunteer and play sports, by developing a venue for inclusive physical activity in Tetbury and the surrounding areas. It will also create a new fully accessible nature space for local people to safely enjoy the outdoors and contribute to environmental improvement. The Club would love to work with CDC to deliver this facility for the Tetbury and surrounding South Cotswolds area. We are also engaged on the CDC Playing Fields Strategy and would encourage and welcome some joined-up activity across these initiatives - to ensure strong and timely outcomes for all stakeholders. Thank you.
Fairford Town Council	Policy SA1 / SA2 / SA3 INF1	We think the following services/facilities considered most needed in Fairford are of a 'strategic' nature and should therefore be included here: 1) Leisure Facility including Swimming Pool (provided for under s106 agreement for applications 09/00872/OUT and 09/00882/OUT) 2) Repair of the sewers and uprating of the Fairford Sewage Treatment Works (really a prerequisite for any further development)
Blockley Parish Council	Policy SA1 / SA2 / SA3 INF1	INF1 Education A further education college/centre to generate opportunities for young people, address skills shortages that exist in the Cotswolds, and Lifelong Learning provision / reskilling the existing workforce, would be beneficial in the North Cotswolds. Traditional skills in Heritage Crafts are as relevant as Technology skills needed to service and maintain wind and solar, electric vehicles and hydrogen infrastructure. There are also skills gaps in re-use, repair, retrofitting etc.
Blockley Parish Council	Policy SA1 / SA2 / SA3 INF1	INF1 BPC consider improvements are also needed on A44/Five Mile Drive which is a strategic transport link between Worcester and Oxford. The A44 is omitted from the Advisory Freight Route Map due to there being no data.
Bathurst Estate 175	Policy SA1 / SA2 / SA3 INF1	No comment
Stephen Andrews (Kempsford Parish Council)	Policy SA1 / SA2 / SA3 INF1	o Junction improvement at A417/Whelford Road junction - why? This may be justified for improved access to the adjacent employment site (EES28) but otherwise would encourage the inappropriate use of the C124 by heavy vehicles. [Comment: I suspect that it is a hangover from a time when there was an idea that the C124 would be developed into a “spine road” with land also protected for a Fairford bypass.] o Sport and Recreation – Re-use of the former Severn-Thames Canal route for cycling, linking Lechlade to the Cotswold Water Park via Kempsford.

Respondent	Policy	Comment
Stephen Andrews (Kempsford Parish Council)	Policy SA1 / SA2 / SA3 INF1	The following points should be included in respect of Kempsford: o Improvements to the provision of footpath and cycle links between Kempsford and both Fairford and Lechlade, the Cotswold Water Park and canal route, in particular the provision of a bridleway between Ham Lane and Dudgrove Lane in order to connect Kempsford with the Severn Thames Way, to be provided through negotiation of footpath re-routing with local landowners and as part of the Restoration Plan for the Kempsford Quarry; o The retention of reserved rights of way lost to the development of RAF Fairford, to be restored as rights of way should RAF Fairford close; o The provision of suitable land for allotments; and o The provision of suitable land for a burial ground.
Judith Montford The EA 207	Policy SA1 / SA2 / SA3 INF1	The Flood management section only refers to SUDs and 'soft measure e interventions to manage flood risk. This section could also include Natural Flood Management measures. We note that, it is listed that the strategic infrastructure requirements for the North Cotswolds Sub-Area include, Flood alleviation bund and channel to the north-west and south of Moreton-in-Marsh. We would be happy to have discussions with Cotswold District Council about this flood alleviation bund in the north. We advise that the above proposed amendments to the text of the policy are added for accuracy and clarity.
David Hindle	Policy INF1 INF2: Infrastructure Delivery	2.2.4 add_____Sports and recreation facilities_____Library provision enhancement,
Chipping Campden School	Policy INF1 INF2: Infrastructure Delivery	The School recognises its strategic role as an essential element of infrastructure that is needed to support the ambitions of the Local Plan and the local community. The School is actively exploring the possibility of up-dating its accommodation, having grown like 'Topsy' over the last seven decades to reach a point now where we accommodate 1475 students and 160+ staff. However we cannot unconditionally offer to increase the capacity of the School before we receive confirmation that realistic funding will be made available when needed for a complex multi-stage re-development programme. We have met with the Education Authority and have received no reassurance that adequate and timely funding would be available.
David Hindle	Policy INF1 INF2: Infrastructure Delivery	II.2.2 Add Burial Ground; Sports pitches

Respondent	Policy	Comment
jamie ball	Policy INF1 INF2: Infrastructure Delivery	INF2 Infrastructure Delivery para 2 states 'new or upgraded infrastructure will be provided in accordance with an agreed, phased timescale" Please show us the 'agreed' approval by Thames Water to provide new and sufficient sewage and waste water infrastructure for new proposed building in Moreton In Marsh. Also provide a timescale.

Respondent	Policy	Comment
NHS Property Services	Policy INF1 INF2: Infrastructure Delivery	Policies INF1 and INF2 set out the overarching policy for ensuring development makes a positive contribution to sustainable growth through the delivery of appropriate infrastructure including healthcare in a timely manner. NHSPS welcomes the recognition of health infrastructure as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan. We also emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area. NHSPS recommend that the Local Plan have a specific section in the document that sets out the process to determine the appropriate form of developer contributions to health infrastructure. This would ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements. The Local Plan should emphasise that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. NHSPS recommends that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. As a starting point, we suggest the following process: • Assess the level and type of demand generated by the proposal. • Work with the ICB to understand the capacity of existing healthcare infrastructure and the likely impact of the proposals on healthcare infrastructure capacity in the locality. • Identify appropriate options to increase capacity to accommodate the additional service requirements and the associated capital costs of delivery. • Identify the appropriate form of developer contributions. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.

Respondent	Policy	Comment
Daniel Parry-Jones 177	Policy INF1 INF2: Infrastructure Delivery	INF2 Infrastructure Delivery The updates to this Policy and its explanatory text are supported by the OPCC. Please see the OPCC's response to INF1 Strategic Infrastructure Delivery immediately above which is relevant to INF2 Infrastructure Delivery
Bathurst Estate 175	Policy INF1 INF2: Infrastructure Delivery	No comment
Julie Shett 415	Policy INF1 INF2: Infrastructure Delivery	1. Is it easy to travel where you need to: 1x Cheltenham + retun bus 608 + 2x Hedgehog buses. 2. Do you feel like part of the community: I did until the locals vanished, the village regularly feels empty. No community at the moment 2024. 3. Do you have access to green spaces: Not as issue in Ashton Manga the contryside is lovely. 4. What would you change: Where the popultation recovers: better use of the bus shelter x2 per information + book susps etc. The Blockley news + free monthly - very useful. Some structure to bring the community together again.
Bob Sharples	Policy INF1 INF2	Policy INF2: Infrastructure Delivery. Sport England believes that Playing fields and sports facilities can and should be included in the list 11.2.4 as the new playing pitch strategy and built facilities strategies once completed will be the robust evidence base required or seeking contributions.
Andrew Brian Crump	Policy INF1 INF2	There was inadequate infrastructure provision in relation to the 257 dwelling units built in Mickleton after the commencement of the current Local Plan in 2011- some seven years before it was finally adopted in 2018. This position has been exacerbated by the closure of the Post Office in the village. Mickleton cannot simply continue to accommodate continuous additional development, to be absorbed like a sponge, as it lacks suitable infrastructure and is at risk of its rural and historic character being emasculated should this process continue.

Respondent	Policy	Comment
David Hindle	Policy INF2 INF3: Social and Community Infrastructure	11.3.4 add 'Burial Ground, for the immediate area, or wider area, when it may become Strategic Infrastructure, under INF1.
Andrew Brian Crump	Policy INF2 INF3: Social and Community Infrastructure	The key phrase here is "across the District". Reduction of the carbon footprint in accessing such services and amenities will not be achieved if access to them can only be achieved in practical terms by reliance on private motor vehicles. Additional development in such locations will only serve to militate against the Council's avowed policy mantra of being green to the core.
Blockley Parish Council	Policy INF2 INF3: Social and Community Infrastructure	INF3 There is also need for additional burial space in Blockley Parish and other parts of the Cotswolds

Respondent	Policy	Comment
Dr Peter Hill (Phoenix Health Group)	Policy INF2 INF3: Social and Community Infrastructure	I would like to provide a contribution to the local plan on behalf of the Phoenix Health Group, Cirencester. The Phoenix Health Group has expanded considerably since it moved in to its current premises at 9 Chesterton Lane, Cirencester. The Practice registered list size continues to grow. The list size in January 2019 was 21858 and this had increased to 24551 by April 2023. It is projected to grow to 26547 by 2031. The Practice is spread over 5 sites with approximately 11,000 patients currently using the Cirencester site. The building in Cirencester is at capacity. This has an impact on waiting times for doctor and nurse appointments resulting in distress for patients and difficult working conditions for staff. We have installed two portacabin rooms in our car park and these are at capacity. The portacabins have reduced the available car parking and led to access difficulties for patients and disruption to traffic on Chesterton Lane. The Practice would like to develop a new bespoke building in Cirencester to improve access to healthcare for our population.
Fergus Dignan 126	Policy INF2 INF3: Social and Community Infrastructure	11.2 (INF2) Where a need has been demonstrated, community facilities must take locational precedence over other developments. For example, a housing development should not be permitted in a central location when a need for a community facility, such as a medical centre, has been identified and the placement of the housing would prevent the development of the community facility in an appropriate location.
Daniel Parry-Jones 177	Policy INF2 INF3: Social and Community Infrastructure	INF3 Social and Community Infrastructure The updates to this Policy and its explanatory text are supported by the OPCC. The reference to "community safety and emergency services (fire, police, ambulance: the "blue light" services)" in paragraph 11.3.2 of the explanatory text, as unchanged. Again, please see the OPCC's response to INF1 Strategic Infrastructure Delivery immediately above which is relevant to INF2 Infrastructure Delivery.

Respondent	Policy	Comment
Sworders 248	Policy INF2 INF3: Social and Community Infrastructure	Section 2 of the policy states that: 'Development must provide and optimise walking, cycling and public transport connections, to key offsite origins and destination.' Our clients' site (M74) lies some 700m south of the town centre, within walking and cycling distance of the full range of shops, services and amenities that it offers. Along the western boundary of the site is the Monarch's Way, which is a National Trail, which connects the site to the town centre without needing to walk along the A429 Fosse Way. The pavement linking the town along the A429 to the GP surgery could be extended by only some 150m to link the site with a footway along the Fosse Way. There is a bus stop outside the North Cotswolds Hospital; service 855 connects the town to Cirencester and Kemble. Allocation of this site would fully comply with the provisions of Policy INF3.
Tom Clarke MRTPI (Theatres Trust)	Policy INF2 INF3	Part 2 of this policy manages loss of facilities in line with paragraph 97 of the NPPF (2023) which we support.
David Hindle	Policy INF2 INF3	Given the importance of the adopted CDC Playing Fields Stratagy, this should be referred to in INF3 in some way or if inappropriate reference should sill be made in the sub text, amplification of Policy..
Bob Sharples	Policy INF2 INF3	Policy INF 3: Social and Community Infrastructure: Sport England is supportive of this policy as the new playing pitch strategy and built facilities strategies once completed will be the robust evidence base required or seeking contributions.
Fairford Town Council	Policy INF2 INF3	[Should it be 'and' or 'or' in clause 2 a.?] We support the addition to clause 2 b.
Clare Turner	Policy INF2 INF3	INF3 11.3.10 Could this be strengthened with the addition of wording to include a reference to there being no active process to restore a community facility e.g. "has not been viable in that use for a period of at least 12 months and is not subject to current community efforts that demonstrate the potential to return it to viable use."

Respondent	Policy	Comment
NHS Property Services	Policy INF2 INF3	Policy INF3 focuses on supporting and sustaining social community facilities. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community. All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (shown in italics) to Policy INF3 to ensure the principle of alternative uses for NHS land and property will be fully supported: Proposed Modification to Policy INF3: Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use.
Highways England 133	Policy INF4: Highway Safety	Policy INF4: Highway Safety National Highways requests that Point E of this policy references the Design Manual for Roads and Bridges which sets out the design standards applicable to the SRN.
Bathurst Estate 175	Policy INF4: Highway Safety	No comment.

Respondent	Policy	Comment
CR Ayers 223	Policy INF4: Highway Safety	Traffic Loading on Roads & Cycling. Busy, narrow, A class roads are not the place for cyclists, unless you want squashed ones, and the recent change of the Highway Code rules on avoidance limits of 2 metres for overtaking, if actually observed, reduces traffic speeds to a crawl thus making congestion even worse. The answer is for dedicated cycle routes. There was a proposal to improve the cycling access to Moreton, Stow, Bourton and Andoversford by creating a cycle route along the old railway line between Andoversford to Kingham via Bourton and Stow. Why is this not included in the Plan? The similar use of old railways tracks and dedicated cycle ways are going ahead in the Gloucester / Cheltenham area. Do not encourage cycling in inappropriate places for safety reasons and resurrect the proposed cycleway on the railway line.
Morgan Elliot Planning	Policy INF4: Highway Safety	Call for sites. 349 Policy INF4 refers to highway safety and permits development where: a) "is well integrated with the existing transport network within and beyond the development itself, avoiding severance of communities as a result of measures to accommodate increased levels of traffic on the highway network; b) creates safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoids street clutter and where appropriate establishes home zones; c) provides safe and suitable access and includes designs, where appropriate, that incorporate low speeds; d) avoids locations where the cumulative impact of congestion or other undesirable impact on the transport network is likely to remain severe following mitigation; and e) has regard, where appropriate, to the Manual for Gloucestershire Streets or any guidance produced by the Local Highway Authority that may supersede it."

Respondent	Policy	Comment
Fergus Dignan 126	Policy INF4	11.4 (INF4) b. creates safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoids street clutter and where appropriate establishes home zones; -developments must enable conflict-free passage between traffic and pedestrians/cyclists without reducing the extent to which pedestrians and cyclists are able to make journeys safely. [In bold] The above clause, in its current form, would enable developers to minimise conflicts by reducing accessibility for pedestrians and cyclists, [end Bold] such as by having barriers along roadsides or paths that make convoluted routes to avoid roads (as is currently the case).This wouldn't be acceptable, so more detail is needed here. -slow speed-limits should be in place ready for first occupation/use of developments. -where a development will prompt increased use of adjacent roads by pedestrians and cyclists, speed limits on these adjacent roads should be lowered (or other appropriate traffic-calming measures) as part of the development.
David Hindle	Policy INF5: Parking Provision	1. totally disagree with reference to side of plot. That has been shown to be a perfectly reasonable and sensible place to provide provision, and is not dominant, or noticeable, as there is built form between the side plots. Also a highly logical place to park a car if there is a garage_____The logic of the policy is creating parking spaces at the rear a series of properties, and reducing the space for the higher priority of gardens.
David Hindle	Policy INF5: Parking Provision	3e This is a location Policy not a design one, so should be deleted., reworded, or a stand alone Policy._____Note as you will know related to Public EV charging the speed is the current issue. Thefore relating to Public RV consider adding wording like, 'maximises the speed of charging within the constraints of the Electricity Grid connectivity, and capacity, at the point when it is being installed, and operators of car parks are encouraged to update the EV charging, as speed and connectivity improves in the locality of the installation.----------5d check a percentage Blue Badge provision. I think it may be recommended to be 6%, but I may be wrong,m
David Hindle	Policy INF5: Parking Provision	7. add safety

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy INF5: Parking Provision	The relevant GCC team would like to be further involved in the discussion on parking standards. Parking controls can influence trip generation/mode choice behaviours and as such can be a useful tool in encouraging sustainable travel modes. Any changes to the parking provision should comply fully with para.111 and para. 112 of the NPPF. Specifically, the policy to develop evidence-based lorry parking with co-location benefits. To review policy to work together with GCC officers, National Highways and the Western Gateway STB to identify potential sites or the criteria for sites for lorry parking suitable for the provision of alternative fuels, freight consolidation,sustainable last-mile delivery options and the opportunity to support future autonomous vehicles, drone technology or similar. To gain maximum benefit from the allocation of space that has co-benefits such as transport interchange hub.

Respondent	Policy	Comment
Grace Lewis 153	Policy INF5: Parking Provision	Draft Policies Document Paragraph 11.5.3 of the Draft Policies positively identifies the need to assess the transport impact of new development in relation to rail and provide mitigation to these impacts where they may occur. This assessment should be in the form of a submitted transport assessment and where development impact on level crossings, the impact on pedestrian and vehicular use should be assessed within the document. Paragraph 11.5.4 identifies how the volume and type of traffic generated by a development is a key planning consideration but does not address the volume of pedestrian traffic within this. Increase in pedestrian traffic generated in PROW use needs to be assessed in terms of level crossings within a development proposals submitted transport assessment. Paragraph 11.5.6 states development should actively promote sustainable transport modes and provide links with existing public transport as well as pedestrian and cycle networks through design. Where these transport networks involve PROW that go over a level crossing, consultation with Network Rail is required. Level Crossings Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. There are a number of level crossings within the plan area that will be affected by development: 1. Moreton-in-Marsh Footpath Crossing (OWW 91m 22cns) 2. Northfield Farm Bridleway LC (OWW 89m 79cns) Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail. Level crossings can be impacted in a variety of ways by planning proposals: • By a proposal being directly next to a level crossing • By the cumulative effect of development added over time • By the type of crossing involved • By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing • By developments that might impede pedestrians ability to hear approaching trains • By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs • By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
Bathurst Estate 175	Policy INF5: Parking Provision	No comment.

Respondent	Policy	Comment
CR Ayers 223	Policy INF5: Parking Provision	Parking Provision. Any new development needs adequate offroad parking with suitable visibility splays to ensure safe access. The total inadequacy of public transport dictates the need for a high level of private transport in the Cotswold area a factor which is recognised in the Gloucestershire transport plan. However, when new developments are created in local communities their access and the need for adequate visibility splays erodes the availability of existing on street parking. In the main the current permanent population spread does not warrant the further provision of public transport which will be underutilised, burn more fuel on routine scheduled running and cannot replicate the spread of destinations plus time availability coverage that dedicated personal transport gives.
Chris Marsh (Pegasus Group) 334	Policy INF5: Parking Provision	Policy INF5 – Parking Provision 3.62. Various revisions have been made to this policy, which are generally supported. However, the requirement for specific parking spaces for delivery vehicles has no basis within national policy and is therefore unjustified. Some sites may be too constrained to be able to accommodate additional parking for this purpose, and where this is not the case, greater amounts of hard surfacing and parking could have an adverse impact on the public realm, biodiversity, and potentially increase surface water runoff and flood risk on a site. Therefore, it is contended that this element of the policy should be removed. Summary of the amendments required 3.63. The reference to having to provide additional parking specifically for delivery vehicles should be removed as this is unjustified. At the very least, some additional wording should be provided to clarify that flexibility should be permitted with regards to this requirement, i.e. this should be considered on a case-by-case basis.
Chris Marsh (Pegasus) 335	Policy INF5: Parking Provision	Policy INF5 – Parking Provision 3.63. Various revisions have been made to this policy, which are generally supported. However, the requirement for specific parking spaces for delivery vehicles has no basis within national policy and is therefore unjustified. Some sites may be too constrained to be able to accommodate additional parking for this purpose, and where this is not the case, greater amounts of hard surfacing and parking could have an adverse impact on the public realm, biodiversity, and potentially increase surface water runoff and flood risk on a site. Therefore, it is contended that this element of the policy should be removed. Summary of the amendments required 3.64. The reference to having to provide additional parking specifically for delivery vehicles should be removed as this is unjustified. At the very least, some additional wording should be provided to clarify that flexibility should be permitted with regards to this requirement, i.e. this should be considered on a case-by-case basis.
Clare Charlton	Policy INF5	Point 3: yes, can it specifically say garden sheds are not considered convenient locations for storage of bicycles if they are to be easier to access than cars?

Respondent	Policy	Comment
Andrew Brian Crump	Policy INF5	Parking in Mickleton is already a major problem which extends not only to the main High Street, but also to residential roads to the north of the village centre. An increase in vehicular traffic, through the building of additional dwellings in the village, will only serve to aggravate this problem. As the policy narrative states, traffic generation can have an impact on the quality of people's lives, the character of an area and on the local and wider environment. Clearly, noise and air pollution will impact both upon residential amenity and also the enjoyment of those visiting the village and its immediate environment, including the Heart of England Way.
Clare Turner	Policy INF5	INF5 BPC supports the new wording around provision for bicycles (INF5 clause 2 and INF5 clause 3) and EV charging (INF5 clause 4)
Blockley Parish Council	Policy INF6: Vale of Evesham Heavy Goods Vehicle Control Zone	Deletion of policy INF6: Although the policy is being discontinued by Wychavon, some of the issues are still relevant. The A44 has not been factored in as a HGV route in the GLTP's Advisory Freight Routes which BPC consider an oversight. Extensive housing development at Ashchurch on the Tewkesbury M5 junction, has pushed HGV traffic onto the A44 as a more direct route to the A34 and onto the M40 / M4, M25. The repeated weekend closures of the M4 between Maidenhead / Slough and the M25 have also been an additional contributing factor. Local developments and expansion will also result in more traffic therefore, improvements to the A44 along Five Mile Drive are crucial to smooth traffic flow and mitigate pollution caused by braking and acceleration. BPC suggest these improvements might include roundabouts at the accident hot spots at Troopers Lodge at the junction of the A424 Stow Road and at the top of Fish Hill at the Buckle Street crossroads and road widening, feeder lanes and slip roads at the junctions of Greenhill Road and the B4081 Chipping Campden / Snowshill crossroads to smooth traffic flow. HGV movements to and from local Industrial Sites including Northwick Power, Northcot Brick, Wellacre Quarry and the frequent heavy goods traffic that is associated with Northwick Business Centre and Draycott Business Park have a detrimental impact and should be considered in the context of these policies.

Respondent	Policy	Comment
Amartya Deb (Gloucestershire County Council)	Policy INF6: Vale of Evesham Heavy Goods Vehicle Control Zone	The Vale of Evesham is an important area for the processing and redistribution of food products. Consequently, the number of Heavy Goods Vehicles (HGV) has risen. For villages in the Vale and surrounding areas, an increased level of HGV traffic impacts on the quality of life of residents through the generation of increased noise, vibration, pollution, and other adverse impacts. To reduce the impacts of HGV traffic this policy seeks to ensure that the road haulage industry uses, wherever possible,the most appropriate roads, e.g. the A46(T) for HGVs travelling within and through the Vale of Evesham. Robust Travel Assessments (TA) showing the proposed supply and distribution routes will ensure adequate consideration can be given to HGV traffic impacts resulting from planning proposals affecting the Cotswold District. GCC officers understand, following the discussions between Wychavon and Malvern Hills District Councils and Worcestershire County Council (WCC) on the matter of removal of policy South Worcestershire Development Plan policy SWDPR11 (Lorries in the Vale of Evesham Goods Zone), there is a further conversation to be had around SWDPR11 with neighbouring authorities. GCC officers understand that a decision has been taken to produce a separate Statement of Common Ground with all neighbouring authorities to address this specific matter and cover all other general policy matters in individual statements with each authority. GCC officers understand that Wychavon and Malvern Hills District Councils will be producing an individual Statement of Common Ground with Cotswold District Council (CDC), which will exclude matters relating to SWDPR11. Gloucestershire Local Transport Plan (2020-2041) sets in policy that we will continue to observe the Vale of Evesham Heavy Goods Vehicle Control Zone policy (INF6) adopted by Cotswold District Council, (LTP PD3.1 – Gloucestershire's Freight Network). Although, GCC officers do not collect any data or report on compliance related to this policy, we have taken the view that it is difficult (with the current available data) to anticipate the impact on Gloucestershire of removing this policy. We are satisfied that an update to CDC's Local Validation Checklist to make it a requirement to consider any additional HGV trips generated as part of a development proposal, where Policy INF5 would be the policy driver, will be sufficient as part of the development management process, to be covered under a Duty to Cooperate. However, should further HGV monitoring become available in the Vale of Evesham that shows adverse effects that would benefit from a specific policy, we would like to engage further with our neighbouring authorities regarding the reinstating of INF6 or similar, if necessary, to be considered in future planmaking reviews.

Respondent	Policy	Comment
Julie Walkling 118	Policy INF6: Vale of Evesham Heavy Goods Vehicle Control Zone	I live in South Cerney, was on the Parish Council, and voted for the Lib-Dem Council we have. I would be very interested to know what the plans are, especially as I very much care about our environment and our planet and I know that CDC is trying to include this. Plus I see that South Cerney is part of the 17 areas referenced. But as a process I think the way that consultation is set out on the web page is so inaccessible. There isn't any simple summary, lots of extensive text and documents, so detailed and only really accessible if you've got lots of time and intelligence to read and digest, plus can cope with so much text in that format - so that will make some neurodiverse people struggle. So I don't think this is right for the community. Suspect you won't get lots of comments and the ones you do will be from a minority- especially businesses and land developers. Not the wider community of the CDC area. Certainly for me, I work full time in a university, have two governance roles, and just don't have the time to try to read and digest this and comment. If I didn't know several Councillors and have high regard for them, I'd think this was deliberately difficult to avoid getting community engagement, but assume that's not the case. Disappointing.

Respondent	Policy	Comment
Paul Hinton 161	Policy INF6: Vale of Evesham Heavy Goods Vehicle Control Zone	Other comments and issues The Ministry of Defence has significant land interests within the area covered by Cotswold District with three operational establishments, as well as other safeguarded zones associated with establishments in neighbouring authority areas. The three operational establishments are RAF Fairford, RAF Little Rissington and Duke of Gloucester Barracks. RAF Brize Norton, RAF Colerne and the Central WAM Network are located within neighbouring authority areas but could be affected adversely from planning decisions within Cotswold District. At present, other than paragraph 7.6.2 of the Cotswold District Local Plan Updated Consultation, which acknowledges RAF Fairford as an important strategic airfield, there is no recognition of these strategic national infrastructure sites. Indeed, RAF Fairford is of international importance. As set out in our comments to the Issues and Options consultation there is the opportunity within the Local Plan update to preserve the operation and capability of these defence assets and sites and support future needs. Additionally, MOD establishments provide civilian employment and training opportunities and many service personnel and their families choose to settle within the District both during and after their military service. The MOD welcomes the opportunity to work closely with Planning Authorities in the development of policies and strategies within the Development Plan. In line with the National Planning Policy Framework (NPPF) it is important that planning authorities and development plans recognise that MOD Establishments are of strategic military importance to the UK. It is important that Planning Authorities consult with the MOD during the preparation of their plans and take into account the need to safeguard operational sites. We would like to draw your attention to paragraph 101 of the National Planning Policy Framework (December 2023), which states: "Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:… b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area." The importance of operational capability is recognised by virtue that the MOD are exempt from action under the Environmental Protection Act for noise nuisance. In addition, paragraph 193 of the NPPF and the 'agent of change' principle protects MODs continuing and future military needs of operational sites from any unreasonable restrictions being places on it as a result of development permitted after it was established. It is important that the MOD establishments are considered within the new Local Plan for two principal reasons, firstly, ongoing operational defence needs and secondly,

Respondent	Policy	Comment
Daniel Parry-Jones 177	Policy INF6: Vale of Evesham Heavy Goods Vehicle Control Zone	Set out below are the Office of the Police & Crime Commissioner for Gloucestershire's (OPCC's) responses to the questions [see survey] within in the additional Regulation 18 consultation document that are relevant to police and emergency services infrastructure provision within Cotswold District in the revised period to 2041. A total of 13 of the consultation questions are responded to below, preceded by a summary of statutory and national planning context as relevant to these representations. Statutory context: Part 1 of the Police Reform and Social Responsibility Act 2011 states that a Police and Crime Commissioner (PCC) must secure the maintenance of the police force for their area, whilst ensuring that it is efficient and effective under the direction and control of the Chief Constable. Under the Policing Protocol Order 2023 the PCC has a specific responsibility for the delivery of community safety and crime reduction. Section 17 of the Crime and Disorder Act 1998 (as amended by the Police and Justice Act 2006) requires local authorities to do all that they reasonably can to prevent crime and disorder including anti-social and other behaviour adversely affecting the local environment in the exercise of their various functions. The Levelling-up and Regeneration Act 2023, in its definition of 'infrastructure' for the new Infrastructure Levy, includes 'facilities and equipment for emergency and rescue services' (see Schedule 12 – Part 1 – Section 204N (3)). National planning context: In line with NPPF (revised December 2023) guidance, emergency services are a crucial part of service delivery to sustainable communities. Paragraph 101 requires that "Planning policies and decisions should promote public safety and take into account wider security and defence requirements…" 2 NPPF paragraph 135 f) states that: "Planning policies and decisions should ensure that developments…….create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience." With regard to promoting healthy communities, paragraph 96 of the NPPF guides that "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which…… are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion." NPPF paragraph 100 states that: "To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted." The NPPF references at Paragraph 57 the three tests for planning obligations as set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended). Paragraphs 96 (b) and 135(f) of the NPPF and the following content of Planning Practice Guidance: "Planning provides an important opportunity to consider the security of the built environment, those that live and work in it and the services it provides. (our emphasis)

Respondent	Policy	Comment
Daniel Parry-Jones 177	Policy INF6: Vale of Evesham Heavy Goods Vehicle Control Zone	Additional appendix to previous comment
CR Ayers 223	Policy INF6: Vale of Evesham Heavy Goods Vehicle Control Zone	Policy INF5 – Vale of Evesham Heavy Goods Vehicle Control Zone. In1999 Gloucestershire County Council heeded complaints about HGV traffic travelling east / west and vice versa from the South East of England along the A44 through Moreton in Marsh and Bourton in the Hill to the Vale of Evesham vegetable and fruit distribution centres. The "temporary" solution was to reroute this traffic from the Oxford node westwards along the A40 to Northleach, then north up the A429 (Fosseway) to Stow on the Wold where it would join the Evesham Road A424 to travel to Troopers Lodge to rejoin the A44. This temporary measure is still in force despite suggestions by GCC Highways (in the A429 Study) that they would divert it via Cheltenham / A46. Furthermore, the local policy INF5 has fallen into disuse with suggestions that it be deleted in entirety. This policy needs revamping and with the increased importance of Moreton in the Marsh under the current District Plan review the problems in that town need to be resolved, if needs be by bypass to the north so that this HGV traffic is restored to the A44, being taken away from Stow on the Wold to relieve the pressure on Stow.

Respondent	Policy	Comment
Sarah Hart (Morton-in-Marsh Town Council) 156	Policy INF6: Vale of Evesham Heavy Goods Vehicle Control Zone	The concerns of the Towns residents and those living in the surrounding area have been significant, resulting in the need for an additional meeting hosted by yourselves at the Fire Service College (FSC - a site to be considered in the Local Plan Update) and a Parish Meeting hosted by the Town Council. Proposals for development at the FSC in the Updated Local Plan to 2031 and the suggested development strategy for Moreton in Marsh have resulted in disquiet in the Town. Moreton in Marsh Town Council believes that the opportunity to engage at an earlier stage might have aided CDC in commencing the Regulation 18 Consultation process to meet the suggestion outlined in the National Planning Policy Framework (NPPF) Chapter 3 paragraph 16c: •Plans Should: be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. The consultation itself has proved difficult for residents to voice their concerns. The 394 page document containing Local Plan Consultation Draft Policies Tracked Changes, requiring it to be read in conjunction with the Local Plan Development Strategy Options and Preferred Strategy Option Topic Paper and the Executive Summary Consultation Instructions and Questions document seems to fall short of the expectations set out in CDCs Statement of Community Involvement: Extract page 6 CDC Statement of Community Involvement January 2024: Consultation publications will be clear and concise and will not include avoidable jargon, without understanding the complexities of any decision. As a supporting document, the Integrated Impact Assessment (IIA) Cotswold LPU Interim IIA report 2024, at the current stage of plan making, suggests delivering growth in sustainable locations as a key tenet. In terms of Moreton in Marsh, it is incredible to believe the impact of significantly increasing population density will have no impact in terms of access to healthcare and employment even though reference is made to healthy places and specialist housing…Given the reference to improved flood management measures yet omitting the River Evenlode, subsequently mentioned in an updated version of the report made during the formal consultation period, further undermines the credibility of the Initial Impact Assessment and its scored, underpinning Appraisal Findings. Expecting residents to answer questions such as question 15 relating directly to Moreton in Marsh without providing sufficient information such as a map or sight of the 2022 Strategic Housing Economic Land Availability Assessment (SHELAA) is only one example of a shortfall in this consultation. Indeed, as a number of issues specifically related to proposals for Moreton in Marsh have emerged in response to this consultation, the Council request that CDC engage in a further, specific consultation exercise, prior to Regulation 19 commencement. If CDC intend to implement the Development Strategy to run from 2026 to 2041, the Town Council proposes that the current proposed development at the FSC is postponed pending inclusion into a resourced, fully developed Masterplan specifically determined for Moreton in Marsh prior to 2026. Please regard this letter as part of the consultation process and acknowledge its acceptance and respond accordingly. In respect of the Council's submission and thoughts on the policies and Local Plan Update, we look forward to seeing updated versions as a result of the consultation exercise, prior to Regulation 19.

Respondent	Policy	Comment
Bathurst Estate 175	Policy SP1: Gloucester and Cheltenham Green Belt	No comment.
David Hindle	Policy SP2: Cotswold Airport	Check with the employment person on broad number of businesses. Also an opportunity to emphasis the growing aviation related uses there, giving a couple of prominent examples. Also he may be able to say if stating around 300 is still about right
Bathurst Estate 175	Policy SP2: Cotswold Airport	No comment
Clare Turner	Policy SP3: The Thames and Severn Canal	I support the updated wording that references biodiversity and the Gloucestershire Nature Recovery Action Plan
Canal and River Trust 157	Policy SP3: The Thames and Severn Canal	The Canal and River Trust do not own or manage any assets within the plan area. However, we are fully supportive of the the proposals to restore that Thames and Severn Canal as we believe live is better by water. The waterway is acknowledged as significant green infrastructure in the within the plan and the Trust notes improvements and clarification to plan Policy SP3 and supporting text.
Bathurst Estate 175	Policy SP3: The Thames and Severn Canal	No comment

Respondent	Policy	Comment
Bathurst Estate 175	Policy SP4: The River Thames	No comment
Mike McKeown	Policy SP5: Cotswold Water Park Post-Mineral Extraction After	Ensuring the CWP is linked via cycle paths to would align with the sustainable transport goals. In particular 1) Linking CWP with Kemble station to encourage more public transport use by CWP visitors 2) Linking the Somerford Keynes end of the CWP with the eastern Spine Road cycle path would create a continuous east-west cycle path connection, with ongoing connection to Cirencester this would encourage more sustainable travel to/from and within the CWP
Mike McKeown	Policy SP5: Cotswold Water Park Post-Mineral Extraction After	related the renewable energy policy the CWP should be considered for water based solar in areas of lakes where this would not cause biodiversity or view impacts
Bathurst Estate 175	Policy SP5: Cotswold Water Park Post-Mineral Extraction After	No comment
Bob Sharples	Policy SP5	Policy SP5 - Cotswold water park: post-mineral extraction after use, Sport England is supportive of this policy and would encourage a masterplan to be developed to ensure the any sports facilities are finically sustainable and are strategically needed and therefore have a longevity which will be benefit the residents in the Cotswolds.

Respondent	Policy	Comment
John Morgan	Policy SP6: Former Cheltenham to Stratford-upon-Avon Railway	Support the continuing protection of the former Cheltenham to Stratford railway line, POLICY SP6: FORMER CHELTENHAM TO STRATFORD-UPON-AVON RAILWAY LINE. Such safeguarding would be in accordance with NPPF, December 2023, para 110.c) on route protection of former rail lines, the Gloucestershire Local Transport Plan, 2020 and the Gloucestershire Rail Investment Strategy, March 2020. Continuing protection must ensure that no prejudicial development would be permitted that would threaten the integrity of the disused rail corridor for future rail use, that could emerge in Policy CC7, Green Infrastructure.
Bathurst Estate 175	Policy SP6: Former Cheltenham to Stratford-upon-Avon Railway	No comment
Mike McKeown	Appendix E: Established Employment Sites	Should the RAU innovation village be added to the list?
David Hindle	APPENDIX K: GLOSSARY	Should affordable homes specifically refer to First Homes? Maybe not as discounted is referred to.
David Hindle	APPENDIX K: GLOSSARY	Just spotted. Need capital H, at the start of the explanation on Affordable Housing.

Respondent	Policy	Comment
Fairford Town Council	Policy DS2 Map 9	It would be appropriate to modify the overall Fairford development boundaries map (marked as DS2 Map 8) as well as DS2 Map 4 to exclude SHELAA site ref F_44 if this is to be deleted from the site allocations in policy S5.
David Hindle	Policies Map and Key	Tetbury needs adding to Settlement Boundary Changes to include land for the Healthcare Centre, and the associated residential._____As I said earlier keep it nice and tight to the Healthcare Cente, then down the back gardens of the houses that are just beyond the tall tress. Refer to the approved plans for clarity, as the actual site included significant other parts that should be excluded, as they must not be developed. The other parts were trees, areas to be 'read' as rural, the realigned track to the Farm House and the realigned Tetbury Trail path.
Susie Stephen (Stantec)	Policies Map and Key	The proposed changes to the Policy DS2 Map 8 to extend the development boundary to include the land proposed to be allocated for the primary school and enabling residential, employment, and local centre uses at the FSC Site are supported and considered necessary to ensure the effective implementation of Policies S18 and EC4 (as amended).
Daniel Parry-Jones 177	Policies S1-S19 Map3	Policies Map Policies S1-S19 Map 13 Extend the Magistrates Court allocation to include the Police Station Please see the OPCC's response on LPU Q26 [survey question] above in relation to Policy S3 Cirencester Central Area Strategy. Policies Map and key xxvi The Police Station is a key site, which is an important component of the Cirencester Town Centre Framework Masterplan. The OPCC supports this reason however please see the OPCC's response on LPU Q26 above in relation to Policy S3 Cirencester Central Area Strategy.