

YOUR  
**COTSWOLD**  
YOUR **PLAN**

CREATING A FUTURE  
THAT IS GREEN TO THE CORE



# **Cotswold District Local Plan (2011-31) Partial Update Consultation: Draft Policies**

## Summary of Consultation Representations

Town and Country Planning (Local Planning)  
Regulations 2012  
Regulation 18 consultation  
1 February 2024 to 7 April 2024

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## Introduction

Cotswold District Council is partially updating its adopted Local Plan to make it “Green to the Core”. The adopted Local Plan covers a period from 2011 to 2031. At the same time, the Council is also considering the need for different types of development and supporting infrastructure beyond 2031 and options for how these may be delivered, which forms part of a Development Strategy and Site Allocations Plan – work on this commenced in January 2024.

The Council undertook a consultation on the draft policies of the partially updated Local Plan between 1 February 2024 and 7 April 2024 (formally known as a Regulation 18 ‘Preferred Options’ consultation). This built on the consultation responses that were received in 2022 at the previous ‘Issues and Options’ stage of the Partial Local Plan Update. The consultation also responded to changes in national guidance and new evidence base studies undertaken to inform the Local Plan Update.

This document summarises the consultation responses that were received on:

- the [survey questions on the draft Local Plan policy updates](#).
- the feedback on the wording of the [draft Local Plan policy updates](#);
- the [Integrated Impact Assessment \(IIA\) for the Cotswold Local Plan Update: Interim IIA Report to accompany the Local Plan Update Consultation \(AECOM, February 2024\)](#) and the [Integrated Impact Assessment \(IIA\) for the Cotswold Local Plan Update: Points of the Compass Appraisal \(AECOM, March 2024\)](#);
- what infrastructure people thought is needed in their area; and
- feedback on all other issues.

The full consultation responses are published alongside this summary report. A separate report summarises the responses to the Development Strategy and Site Allocations Plan (2026-41) consultation.

The assessment of sites submitted through the ‘Call for Sites’, which ran throughout the consultation period, will be presented in the forthcoming update to the Council’s Strategic Housing and Economic Land Availability Assessment.

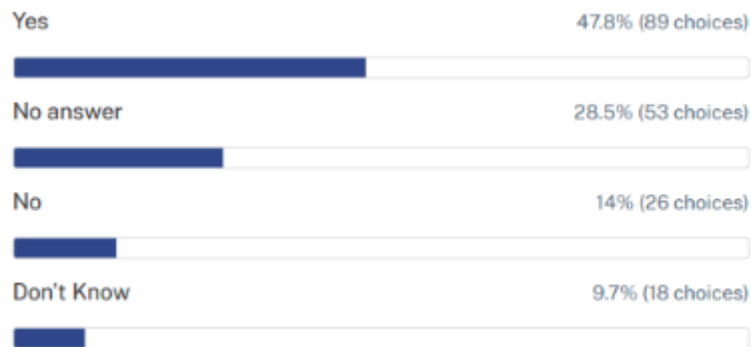
Please note, this report provides a summary of the consultation responses and feedback. AI has been used to assist in the summarisation process. The full comments / consultation feedback will be considered when policies are updated / produced.

### What will happen next?

The Council will consider the full consultation representations, as well as further evidence studies, and will refine the Local Plan policies further to produce a draft Partial Local Plan Update. The draft Local Plan will undergo a further round of public consultation (known as a Regulation 19 consultation) and you will be able to see and comment on this before the Local Plan is submitted to the Planning Inspectorate for an independent examination in public.

## Summary of responses to the Local Plan consultation survey questions on the draft policy updates

**LPU Q1: Policy SD3, the Cotswold Design Code, lists a series of design principles, do you think anything is missing from that list? Yes / No / Don't Know**



**LPU Q2: Tell us more about why you agree or disagree with the design principles.**

Respondents have raised several concerns and suggestions regarding the design principles. A recurring theme is the need for new developments to integrate well with existing infrastructure, including roads sewage systems and public transport. Many emphasise the importance of maintaining local character and avoiding generic, carbon-copy housing.

Accessibility and inclusivity are also highlighted, with calls for adherence to the Equalities Act 2010. Some respondents question the necessity of certain design elements, such as reducing carbon emissions or disassembly requirements for buildings.

Aesthetics and the need for new builds to be pleasing and innovative are mentioned as is the importance of sustainability and eco-friendly features like solar panels and rainwater recycling. Concerns about the impact on local services such as GP surgeries and schools are also noted.

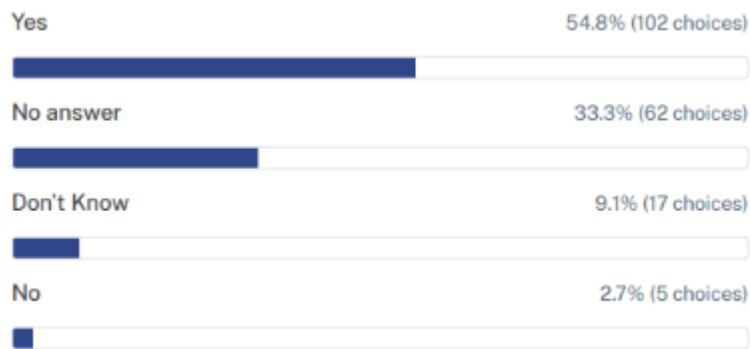
Several responses call for a ban on greenfield development, advocating for building on brownfield and derelict sites only. The need for clear guidance and graphics in the Design Code is suggested to engage developers more effectively.

There are also calls for more emphasis on renewable energy use in developments and some respondents express concerns about the potential impact of rural industrial developments on local roads and active travel.

The importance of providing adequate parking to prevent unsightly road scenes is mentioned as well as the need for developments to be carbon neutral or negative. Some responses indicate that the principles are too complicated or lack clarity on implementation.

Overall, respondents want new developments to be sustainable, well-integrated with existing infrastructure, aesthetically pleasing, and in keeping with local character, while also addressing concerns about environmental impact, accessibility, and the provision of local services.

**LPU Q3: Do you agree that the Local Plan should promote health and well-being, not just for residential development, but for other uses as well such as commercial and employment proposals? Yes / No / Don't Know**



**LPU Q4: Tell us more about why you agree or disagree.**

Respondents generally support the integration of health and wellbeing considerations into the Local Plan, not just for residential areas but also for commercial and employment developments. There is a recurring emphasis on the importance of green spaces, mental health, and the need for clear definitions of "Health and Wellbeing". Several responses highlight the importance of infrastructure, such as pedestrian and cycle access, public transportation, and the need for accessible health services, especially for aging populations.

The concept of donut economics and circular economy is mentioned as a model to support, while others argue that health and wellbeing are personal choices and should not be mandated by the Local Plan. The importance of economic viability and healthy workers contributing to a healthy economy is also noted. There are concerns about the environmental impact on native species and the need for developments to be environmentally sustainable. Some respondents believe that the Local Plan should reflect a holistic approach, joining up different aspects of living, working, and recreation to create well-designed places.

The need for accessible green spaces is frequently mentioned, with suggestions for country parks and the integration of green infrastructure into all types of development. The role of active travel in promoting health is also highlighted.

Some responses call for more specific regulations or metrics to measure health and wellbeing benefits, while others express concern about the potential prohibitive costs of promoting health and wellbeing without clear cost limits.

Overall, there is a strong consensus that health and wellbeing should be a priority across all types of development within the Local Plan, with a focus on sustainable living, access to nature, and community cohesion.

**LPU Q5: Policy CCI - Retrofitting and Decarbonisation Existing Buildings**

Although not referenced in policy CCI the council is exploring options to include an additional requirement that would require consequential improvements to be made to dwellings that seek permission to extend. This would be beyond existing building regulations and would address a significant component of carbon emissions in the district. This would emulate the existing Welsh Building Regulations; for example, a small extension of (10m<sup>2</sup>) in a house with less than 200mm loft insulation triggers a requirement to install 250mm of loft insulation to the main house. Would you support such a policy requirement? Yes / No / Don't Know.



**LPU Q6: Please state your reasons why.**

Respondents have expressed a range of opinions, with a notable divide between those who support the implementation of energy efficiency and sustainability measures and those who are concerned about the costs and practicality of such policies.

A significant number of respondents are sceptical about climate change or believe that policies based on climate change are not justified, Conversely, others argue for the necessity of improving energy efficiency and reducing carbon emissions.

The cost of implementing the proposed policies is a recurring concern, with several respondents highlighting the financial burden on homeowners, especially in the context of the current. Some suggest that home insulation should be government-subsidised to alleviate this issue.

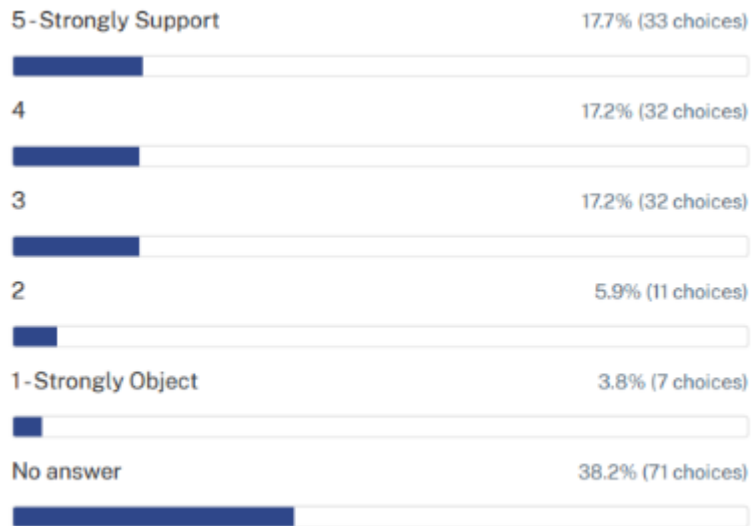
There is also a sentiment that the policy could be an overreach, imposing inappropriate costs and constraints on individuals. Concerns were raised about the impact on historical and listed buildings, which may not be suitable for certain retrofitting measures.

A few respondents call for more information or clarity on the policies, while others support the idea of improving insulation and energy efficiency to manage heat usage and reduce carbon wastage.

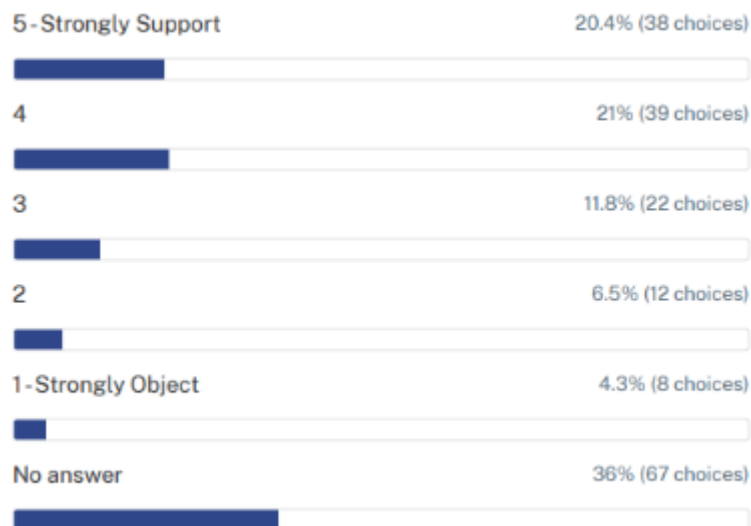
Some respondents believe that the original design of properties should be improved to avoid the need for extensions, while others argue that current regulations are insufficient to prevent catastrophic climate collapse.

In summary, while there is support for sustainability and energy efficiency measures in principle, concerns about cost, practicality, and the appropriateness of applying such measures to all types of buildings are prevalent among respondents. There is also a notable contingent of climate change scepticism.

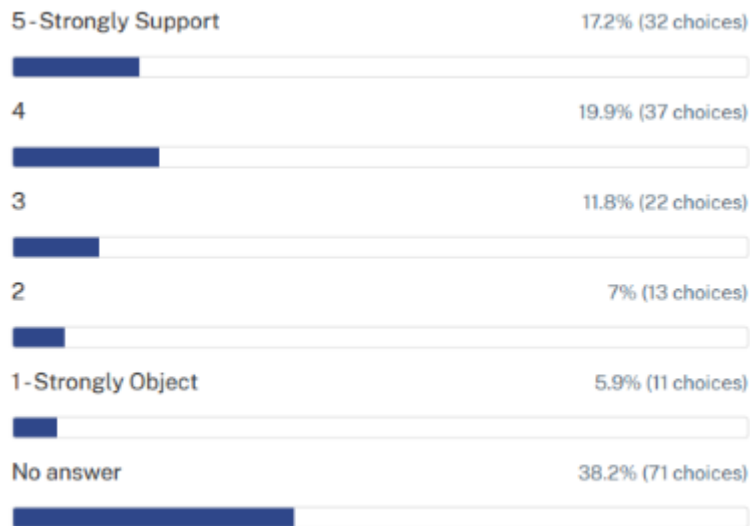
**LPU Q7:** The draft policy sets out a strongly supportive policy framework for renewable energy, energy storage and distribution infrastructure, prominently referencing the importance of increasing renewable energy generation in the context of climate change and the council’s climate emergency declaration. The policy will make mention of both positive and negative impacts arising from such proposals, including environmental, social, and economic impacts, amenity impacts and the loss of agricultural land. Do you: Strongly support, support, neutral, object, or strongly object?



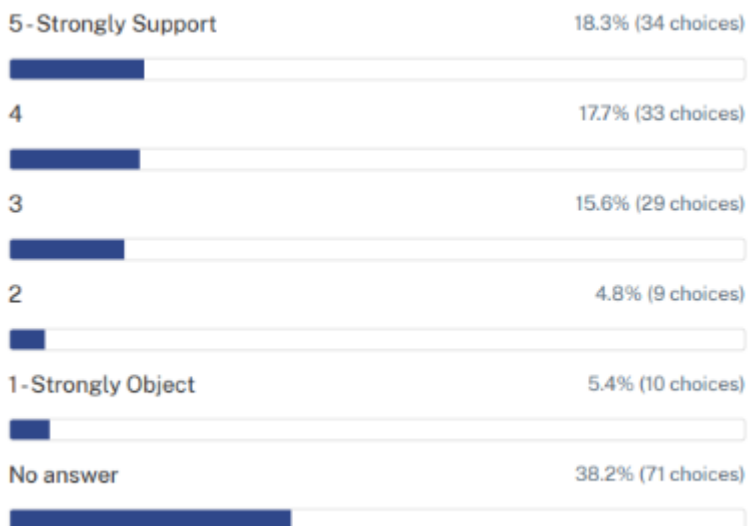
**LPU Q8:** The policy contains a target for the deployment of renewable electricity generation, reflecting the increase needed nationally to achieve net zero emissions by 2050, provided this reflects what can be achieved locally without giving rise to unacceptable landscape or other harm. Do you: Strongly support, support, neutral, object, or strongly object?



**LPU Q9:** This part of the draft policy suggest renewable energy development of all types may be acceptable in principle within the Cotswolds National Landscape (formerly an Area of Outstanding Natural Beauty), but that the benefits of development must outweigh harm to the designated area or its setting. Do you: Strongly support, support, neutral, object, or strongly object?



**LPU Q10:** The draft policy position is that fossil fuel energy plant which increases emissions unless it can be demonstrated that the objectives of the proposal could not feasibly be met by zero carbon alternatives such as battery storage. Do you: Strongly support, support, neutral, object, or strongly object?



**LPU Q11:** Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments to Policy CC2a.

Respondents to the 'Local Plan Update -Draft Policies' project expressed a range of views on renewable energy, climate change, and the impact of policy decisions on local landscapes and communities. A significant concern among respondents is the balance between renewable energy development and the preservation of the Cotswold National Landscape. Some respondents are

sceptical about the existence of a climate emergency or believe that climate policy should be determined at the national level rather than by district councils.

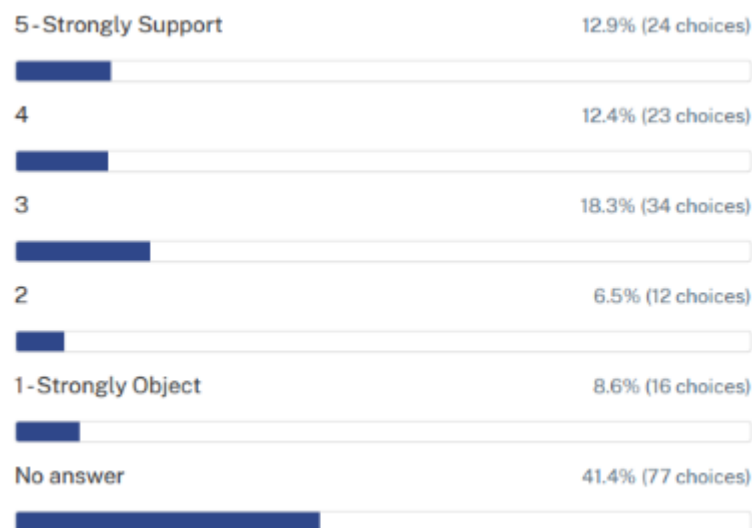
There is a broad support for renewable energy and the reduction of fossil fuel use, but concerns were raised about the visual impact of renewable energy projects, such as solar farms, on greenfield sites. The need for clear criteria to oppose fossil fuel use was mentioned, as well as the importance of considering external impacts like pandemics or economic factors when setting policy goals.

Some respondents highlighted the need for more action to prevent mass destruction of fields and forests and emphasised the importance of food self-sufficiency in rural areas alongside carbon reduction efforts. There were also calls for flexibility in policies to allow for fossil fuel use when green alternatives are not adequate or available.

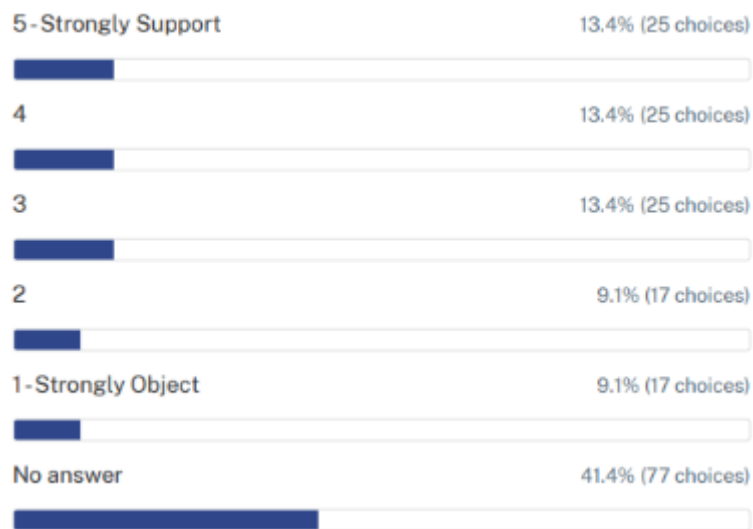
Safety concerns regarding battery storage installations were noted, suggesting that policy should include safety guidelines from relevant authorities. The potential for bias towards certain types of renewable energy due to targets was also a concern, with some respondents questioning the realism of these targets and their potential impact on the landscape and heritage assets.

Overall, while there is a recognition of the need to address climate change and support renewable energy, there is also a strong desire to ensure that these efforts do not compromise the natural beauty and heritage of the Cotswolds, and that policies are realistic, flexible, and considerate of various external factors.

**LPU Q12: Based on the Renewable Energy Strategy (not yet complete), the draft policy centres on identification of broadly suitable areas where onshore wind turbines may be developed, adopting wording to facilitate flexible approaches, whilst ensuring that unacceptable amenity and other impacts are avoided. Do you: Strongly support, support, neutral, object, or strongly object?**



**LPU Q13: The draft policy is that community-owned wind projects may also be acceptable outside of these defined areas, or commercial wind schemes if sited within large new developments or existing industrial estates. Do you: Strongly support, support, neutral, object, or strongly object?**



**LPU Q14: Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments.**

A significant number of comments highlight the visual impact of wind turbines on the countryside and areas of natural beauty, with some respondents, suggesting that they spoil landscapes and should be carefully positioned or avoided in sensitive areas like the Cotswold National Landscape (CNL).

There are also concerns about the environmental impact, particularly harm to wildlife such as birds and bats, and noise pollution. Some respondents question the efficiency and sustainability of wind turbines, while others point out the need for renewable energy to combat global issues like drought and famine.

The sourcing and lifespan of wind turbines are also mentioned, with concerns about them being produced abroad and not being eco-friendly. There is a call for exploring alternative forms of electricity generation, such as water energy from the estuary.

Several responses suggest that the policy wording is too vague or loose, and there is a need for clearer definitions and criteria. Some respondents are neutral or have no comment due to incomplete policy details.

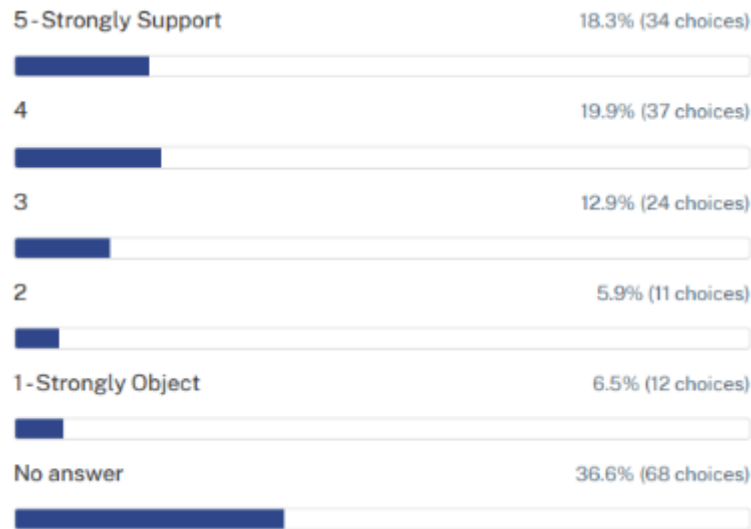
Community-owned wind projects receive some support, but there is also concern that policies may favour landowners over the majority of residents. The potential impact on agriculture, living conditions, and local sports is noted.

A few respondents are in favour of wind turbines as a preferable alternative to power stations or support their deployment if done sensibly. There is also a call for investment in offshore wind energy and for considering wind energy in industrial estates.

Overall, while there is recognition of the need for renewable energy, many respondents emphasise the importance of careful consideration of the visual and environmental impacts of onshore wind turbines, as well as the need for clearer policy guidance.

**LPU Q15: The draft policy is supportive for both rooftop solar photovoltaic (pv) and ground based solar farms, rather than a rooftop solar first approach, recognising that**

**both are likely to be needed to achieve carbon emission targets, and are largely separate sectors Do you: Strongly support, support, neutral, object, or strongly object?**



**LPU Q16: Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments.**

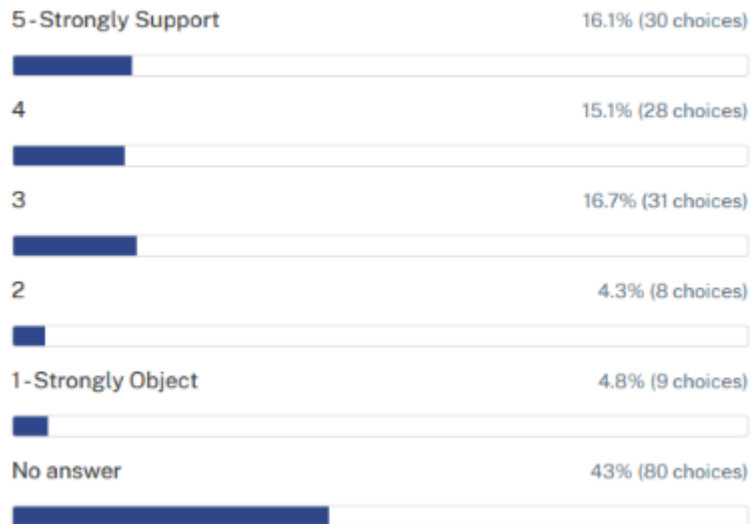
Respondents have expressed a strong preference for rooftop solar panels over ground-based solar farms, citing concerns about the impact on landscapes, particularly in areas of outstanding natural beauty (AONB). Many suggest that new buildings should include solar panels as standard, and some argue for a "rooftop first" approach.

There is concern about the use of agricultural land for solar farms, with some respondents suggesting that solar farms could be placed on less visually sensitive or flood-prone land. There is also a call for more research into discreetly sited solar panels.

Several responses highlight the need for careful consideration of visual impact and heritage constraints, with some suggesting that ground-based solar farms should be screened with hedging or trees. There is also a mention of the potential for solar farms to enhance biodiversity if managed properly.

A few respondents are indifferent or have mixed feelings about solar energy, while others are concerned about the sustainability and manufacturing process of solar panels. Some support the use of solar energy to achieve net-zero targets, but there are calls for a balanced approach that does not compromise food security or the local economy. Overall, the trend across responses is a clear preference for rooftop solar installations, concerns about the impact of ground-based solar farms on landscapes and agriculture, and a desire for sustainable, well-sited renewable energy solutions that consider local aesthetics, heritage, and biodiversity.

**LPU Q17: Express support being given to community led energy schemes which provide for a community benefit in terms of profit sharing or proportion of community ownership, including a more permissive policy framework for community owned onshore wind proposals. Do you: Strongly support, support, neutral, object, strongly object?**



**LPU Q18: Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments.**

A common concern is the visual impact on the environment, particularly in areas of natural beauty. There is support for renewable energy initiatives, especially solar, but wind energy is more contentious due to concerns about noise and efficiency.

Several respondents argue that decisions on wind energy should be made at a national level rather than locally. There is also a sentiment that community schemes should not be costly or serve interests outside the local community. The importance of genuine community support and benefit is emphasised, with some respondents noting that such schemes could foster community cohesion.

There is a call for clarity on what a 'more permissive policy approach' entails, and some respondents are against the idea of a more permissive framework, advocating for universal standards. Concerns about the potential for community disharmony and the impact on tourism are also mentioned.

The need to consider landscape sensitivity and heritage assets is highlighted by some, including the National Trust. Others express a lack of sufficient knowledge to comment or provide no comment at all.

In summary, while there is a general support for community-led renewable energy schemes, particularly solar, there are significant concerns about their visual impact, the need for genuine community benefit, and the appropriateness of wind energy solutions. The responses suggest a desire for careful consideration of local impact, consistent standards, and clear policy definitions.

**LPU Q19: Overall, is there anything missing from our proposed renewable energy policies?**

A recurring theme is the need for a balance between renewable energy generation and preservation of the landscape, with some respondents suggesting that solar farms should not be a blot on the landscape and that renewable systems must not destroy the natural Cotswold landscape.

There is a call for more emphasis on energy saving rather than just energy generation, and several respondents suggest that new developments should include renewable energy infrastructure from the outset. Rooftop solar is frequently mentioned as a requirement for new builds, and there is interest in exploring alternative renewable sources like Green Gas, micro-hydro, and ground source heat pumps.

The cost-effectiveness and impact of renewable policies are questioned, with some respondents expressing scepticism about 'panic power sourcing' and urging not to get carried away with unrealistic expectations. There's also a suggestion to link Council Tax to energy usage as an incentive.

Concerns about the compatibility of renewable energy infrastructure with the natural and historic environment are noted, as well as the challenges posed by older, traditionally built housing stock. The intermittent nature of wind and solar power and the need for grid stability and storage solutions are also highlighted.

Some respondents feel that local policies should be more proactive in facilitating renewable energy growth and that strict requirements and fines should be implemented to ensure compliance. There is also a call for considering hydrogen as an energy option and for the reinstatement of train lines for sustainable transport.

Overall, respondents are looking for a well-balanced, cost-effective approach to renewable energy that considers the unique characteristics of different areas, prioritizes energy saving, and integrates seamlessly with the local environment and infrastructure.

**LPU Q20: In late December, the government published a Written Ministerial statement that affects the policy CC3 – Net Zero Carbon New Buildings – which may affect the council’s ability to deliver the proposed policy. It is likely we will need to alter the policies, but it would be useful to know whether you believe we should continue to find ways to deliver net zero homes where possible.**

**Should the council:**

- **Defer to Building Regulations and government standards?**
- **Continue to propose higher local requirements (where justified)?**
- **Consider another approach?**



**LPU Q21: Please state your reasons why. Please use the free text box to explain your choices (if you wish to) or suggest amendments.**

A recurring theme is the tension between adhering to government standards and the desire for more ambitious local requirements to address climate change effectively. Many respondents support higher local standards for energy efficiency and net zero carbon buildings, arguing that this approach is necessary to combat climate change and will benefit residents in the long term.

Several respondents are concerned about the practicality and viability of implementing standards that exceed national requirements, citing potential impacts on development costs and housing delivery. There is a call for evidence-based policies and a balance between environmental goals and economic realities.

Some respondents suggest that the council should focus on other pressing local issues rather than creating additional bureaucracy, or that government experts are better equipped to set appropriate standards. Others believe that the council should learn from successful energy solutions in other European countries. There is also a suggestion that the council should wait to see how government policies evolve, especially with an upcoming general election, before setting their own standards. A few respondents feel that there is no need for multiple layers of rules or that current targets are not strong enough.

In summary, while there is a strong call for ambitious local action on energy efficiency and carbon reduction in new buildings, concerns about feasibility, consistency with national standards, and the impact on development viability are also prominent. There is a clear demand for a balanced and evidence-based approach to policy-making in this area.

**LPU Q22: What three services and facilities are most needed in your town or village (please name the town or village in your response)? (e.g. Doctors' surgery, school, post office, public transport, shop, etc.).**

Respondents across various towns and villages have expressed concerns and needs related to healthcare facilities, particularly the need for more NHS doctors and dentists. There is a strong call for improved public transport, including better bus services and rail links, to reduce reliance on cars and alleviate traffic congestion. Many responses highlight the inadequacy of sewage and water management systems, with some calling for state-of-the-art clean water treatment facilities. The lack of parking and the need for traffic management, including speed restrictions, are frequently mentioned.

Several respondents from Moreton-in-Marsh emphasise the town's rapid growth and the strain on infrastructure, advocating for no further development until current facilities are upgraded. They also mention the need for a secondary school, leisure centre, and better management of sewage and water to prevent flooding. Cirencester residents repeatedly mention the need for parking facilities, a doctors' surgery, and public transport improvements. Accessibility issues are raised, with calls for community buildings with disabled facilities, as well as recreational spaces. The closure of local shops and post offices has led to concerns about increasing isolation among older residents. There is also a desire for a wider mix of retail outlets, including greengrocers and clothing shops. Environmental concerns are present, with some respondents emphasising the protection of fields and green spaces from development. Lastly, there is a sentiment that further housing development should be halted until infrastructure issues, such as sewage capacity and traffic congestion, are resolved.

**LPU Q23: Is there a reason why any of the proposed site allocation deletions should be remain allocated in the Local Plan?**



**LPU Q24: Tell us more about why you agree or disagree.**

A recurring theme is the impact of development on local communities and the environment, with several respondents opposing further housing or development in specific areas like Northleach and expressing concerns about excessive development destroying natural habitats. There is also a call for re-evaluation of existing site allocations against new policies and for a wide range of deliverable sites, including those for older persons housing.

Several respondents are unclear or lack sufficient information to make informed judgments, while others point out specific issues such as the need for traffic mitigation and safety around schools, the inadequacy of infrastructure to support proposed housing, and concerns about local services like banking for older people and healthcare in areas with an aging population.

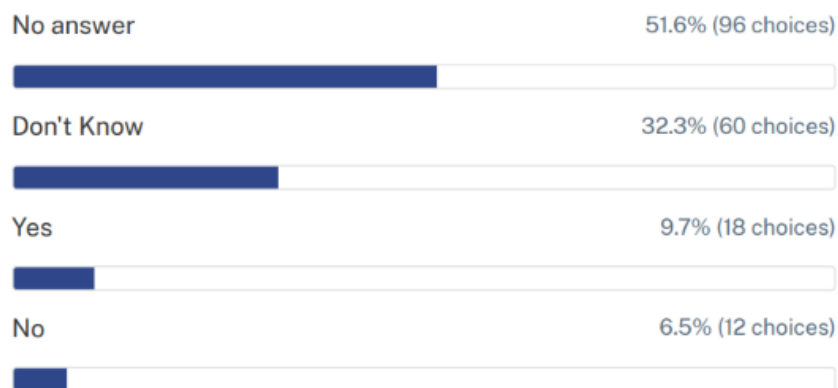
Transportation issues are highlighted, with Tetbury mentioned as having poor transport links despite being a significant settlement. Parking solutions are also suggested, such as removing long-term parking from high streets.

Some respondents are content with the status quo and see no need for change, while others admit to not understanding the questions or lacking knowledge to comment. There are also calls for clarity on which areas have been considered and deprioritized for future decision-making and for removing deleted allocations from the Local Plan to avoid confusion.

In summary, respondents express a need for more information and clarity, concerns about the environmental and infrastructural impacts of development, and a desire for careful consideration of local services and transport links in planning decisions.

## **Cirencester Town Centre**

### **LPU Q25: Do you agree with the vision and objectives in the revised Cirencester Town Centre Strategy (see policy S3)? Yes / No / Don't Know**



### **LPU Q26: Tell us more about why you agree or disagree.**

A recurring theme is scepticism about infrastructure improvements preceding new developments, with some respondents doubting that necessary enhancements will be made in a timely manner. There is also a sentiment that Cirencester is not the only area of concern within the CDC, suggesting a desire for a more inclusive approach.

Several respondents have highlighted the need for better healthcare facilities, such as a new Healthcare Centre, and raised issues regarding local transport and parking. One detailed response criticizes the reduction in off-street parking and emphasises the practical needs of locals, including the impact on their daily routines and contribution to the local economy.

Concerns about overdevelopment and the protection of local areas are also mentioned, as well as the need for expert consideration on mobility hubs and one-way streets. Some respondents feel that the town centre currently functions well and should not be significantly altered.

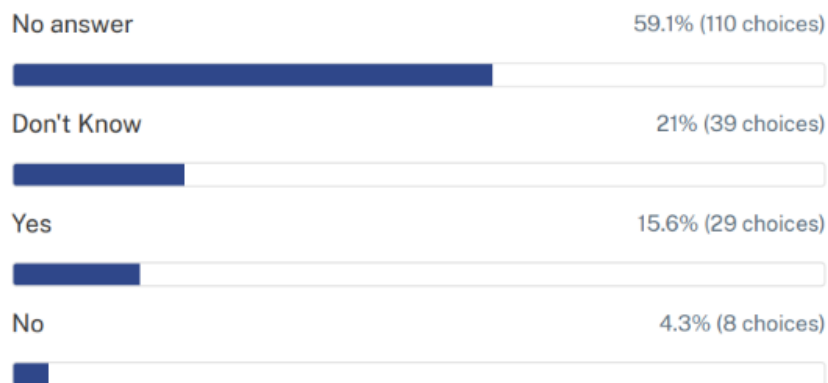
The responses include suggestions for discouraging motor vehicle dominance and promoting public and non-motorized transport, with some advocating for car-free areas and improvements to walking and cycling infrastructure. However, there is also opposition to reducing car usage and parking capacity, as some see car access as essential for business and healthcare in Cirencester and surrounding villages.

A few respondents have indicated that they do not feel qualified to comment on Cirencester-specific strategies due to not residing in or being familiar with the area.

Lastly, there is a detailed response from the Office of the Police and Crime Commissioner (OPCC) regarding the redevelopment of Cirencester Town Centre, including the potential residential redevelopment of the Magistrates Courts and Police Station. The OPCC emphasises the need for a suitable replacement Police Station before any redevelopment can occur.

**LPU Q27: Cirencester is a relatively healthy town centre in comparison with many other towns of similar size. But to retain that health it needs to be able to “roll with the punches” and be inherently flexible and responsive to change. The revised town centre strategy and emerging Framework Masterplan SPD seek to encourage a broader diversity of “main town centre uses”<sup>1</sup>.**

**Do you agree with that as a policy position and aspiration for the emerging Framework Masterplan SPD? Yes / No / Don't Know**



**LPU Q28: Tell us more about why you agree or disagree.**

A common theme is the need for town centres, particularly Cirencester, to adapt and evolve in response to changes such as the rise of online shopping. There is a recognition that residential developments could support town centre uses, and that diversity in town centres is important.

Several respondents are concerned about the consultation process and the integration of local views, with calls for residents to agree on any changes and for the consideration of existing local plans, such as the Moreton Neighbourhood Development Plan. There is also scepticism about the use of consultants and whether their proposals truly reflect the needs of the town and its people.

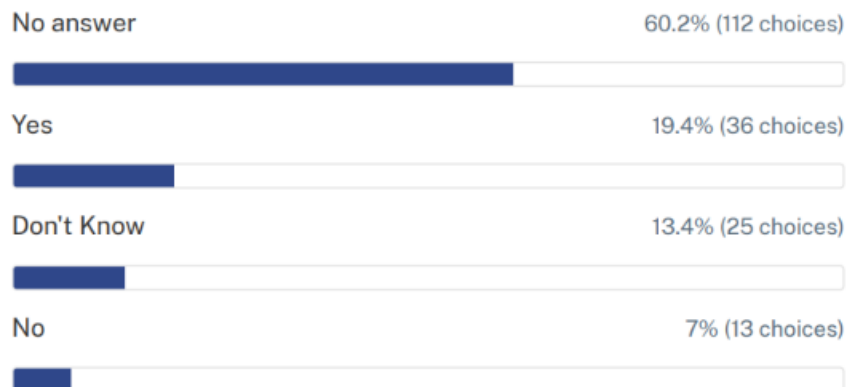
The importance of not negatively impacting surrounding smaller towns and communities is mentioned, as well as the need for sustainable transport links. Some respondents feel that there are more urgent public needs in the Cotswolds that should be addressed.

A few respondents did not provide specific comments or indicated they did not know enough about Cirencester to have an opinion. Others did not agree with the proposals but did not elaborate on their reasons.

Overall, while there is support for the evolution of town centres and recognition of changing shopping habits, there is a clear desire for more inclusive planning processes that consider the views and needs of local residents and businesses.

<sup>1</sup> Main town centre uses are defined in Annex 2 (p.71) to the [National Planning Policy Framework 2023](#)

**LPU Q29: As part of that push to a more diverse mix of uses, the encouragement of more evening activity might help to maintain liveliness and vitality over a longer timescale. Do you think that's a good idea? Yes / No / Don't Know**



**LPU Q30: Tell us more about why you agree or disagree.**

Respondents generally support the idea of increasing evening activities, recognizing the benefits for both young and older populations. However, there are concerns about the potential negative impacts, such as increased noise and disturbances for residents, and the risk of more drinking, less family-friendly environments, and potential drug issues. The need for targeted activities that cater to youth without leading to problems like drunkenness is highlighted.

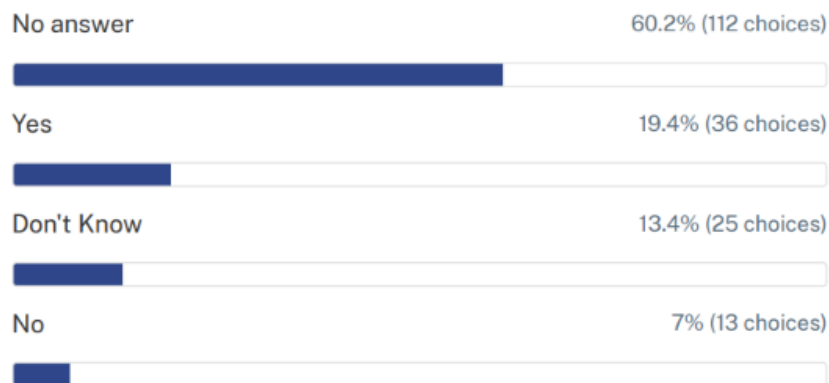
Some respondents express scepticism about the feasibility of increasing evening activities due to existing early closing times of hospitality outlets and question the affordability of such activities. There is also a call for optimizing current resources before expanding evening activities.

The importance of flexibility in policy to allow for a range of uses dictated by market forces is mentioned, suggesting that evening activity should not be enforced if there is no demand. The need for balance with town centre residential development and avoiding amenity impacts is also noted.

There are also broader concerns about the potential increase in demand for policing and emergency services due to an expanded night-time economy. Some responses are brief and do not provide substantial commentary, or they express agreement with previous statements without further elaboration.

Overall, while there is support for more evening activities to enhance community life and address isolation, respondents urge careful consideration of the type of activities promoted and their impact on the local community.

**LPU Q31: Do you think a more diverse mix of activities in the town centre should include more residential use if it's properly integrated and sensitively developed? Yes / No / Don't Know**



**LPU Q32: Tell us more about why you agree or disagree.**

Respondents generally support the idea of revitalizing town centres by integrating residential spaces, particularly above commercial premises, to create more vibrant and active communities. There is a consensus on the need for mixed-use development to sustain transport and town centres, and the potential for underutilized spaces above shops to be refurbished for residential use. Affordable housing, especially for social rent, is highlighted as a priority, with a focus on smaller units suitable for individuals or small families.

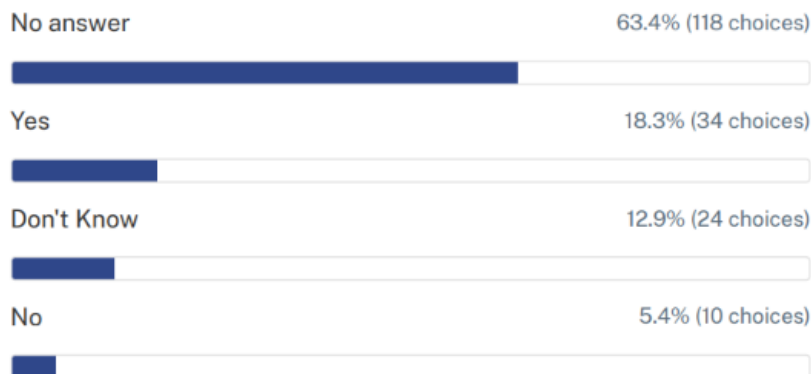
The presence of colleges and universities in the area is seen as an opportunity to provide town centre residential options for students, although there is recognition that car usage cannot be entirely dismissed due to rural connections. Concerns are raised about potential conflicts between residential areas and nightlife venues, suggesting that noise issues could negatively impact the night-time economy.

Some respondent's express worries about overdevelopment in certain towns like Cirencester, while others advocate for the use of brownfield sites to meet housing needs. The idea of creating 15- minute neighbourhoods is mentioned to support town centres, with a call for policies that are not too restrictive.

There is also a suggestion that residential developments could help increase evening activity in town centres and contribute to local economies, particularly if targeted towards older demographics who may spend more locally. The importance of maintaining a balance between residential and commercial spaces is noted, with some advocating for more office space in town centres as well.

Overall, respondents seem to agree on the potential benefits of integrating residential spaces into town centres but also emphasise the need for careful planning to ensure a harmonious mix of uses and to address potential issues such as noise and overdevelopment.

**LPU Q33: Would a more diverse mix of uses – including more cultural and leisure uses – make the town centre more attractive to visitors? Is this desirable? Yes / No / Don't Know**



**LPU Q34: Tell us more about why you agree or disagree.**

A common theme is the need to balance the interests of local residents with the desire to attract visitors. Several respondents argue that the town should prioritize making itself attractive to locals first, as visitors are a by-product of a thriving community. The lack of cultural activities in Moreton is highlighted, with a call for more diverse events that appeal to a wider audience, including younger residents.

Some respondents feel that there is already enough for visitors and that more focus should be on residents, while others suggest encouraging overnight stays and the development of new hotels to boost tourism. The Barn Theatre is mentioned as a positive example of cultural contribution.

Parking affordability is raised as a potential barrier to attracting more visitors. Some respondents are concerned about over-tourism and its impact on the local community, suggesting that the current level of tourism is already at capacity. Others believe that cultural and leisure activities could benefit the local economy and job market, and that diversifying town centres with such uses could compensate for the decline in retail.

The importance of flexibility in planning policy to adapt to market demands is emphasised, and there's a call for cultural and leisure sectors in rural areas to be recognized by planning policy. The unique character of Cirencester and its independent shops should be considered when developing leisure activities.

Overall, respondents seem to agree on the importance of cultural and leisure activities but emphasise that the needs of local residents should come first, and any development should reflect the character of the town and not overwhelm its resources.

**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 policies shouldn't be included in the Local Plan?**

Respondents generally support the updates and introduction of new policies in the Local Plan, with particular emphasis on the need for affordable housing and housing that meets local needs. There is a strong call for housing to be accessible and adaptable, particularly for the aging population and those with disabilities. Concerns were raised about the increase in affordable housing percentages potentially affecting viability and deliverability.

Some respondents expressed that policies H8 and H9 are not needed, while others highlighted the

importance of policies that restrict infill development in conservation areas. The need for policies to address homelessness was also mentioned.

There were suggestions for more flexibility in policy application, particularly regarding the types of housing provided, such as including maisonettes and flats. The impact of new requirements on development costs and the social impact of policies in rural areas were also points of concern.

Overall, while there is support for the policy updates, there is a clear need for careful consideration of their impact on housing affordability, viability, and the social fabric of local communities.

**LPU Q36: Apart from increasing the housing requirement or allocating additional land for development, are there any other ways that the Local Plan can deliver more affordable housing, particularly social rented housing?**

Various ways to increase affordable and social rented housing have been suggested without solely relying on increasing housing requirements or allocating more land. A recurring theme is the need to restrict the sale of lower- cost housing as second homes or holiday lets. Some respondents advocate for the redevelopment of existing buildings, including converting derelict buildings or unused office spaces into affordable housing units. There is also a call for the reintroduction of council housing and better management of these properties.

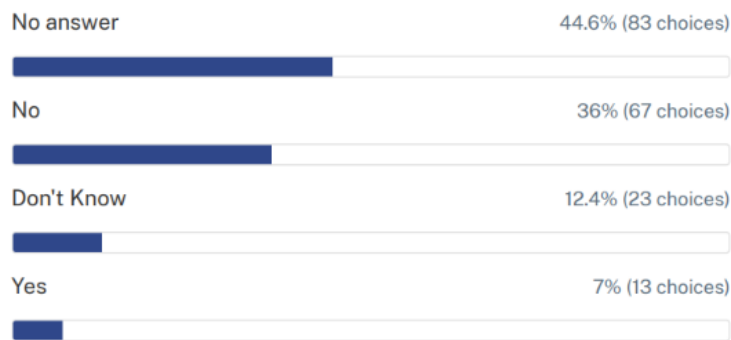
Encouraging self-build projects and utilising flats above shops are mentioned as ways to diversify housing options and support local economies. Some respondents believe that social rented housing is not the solution, and that focus should be on helping people onto the property ladder. Others suggest working with private landlords to unlock empty properties and increasing council tax on holiday and second homes to fund affordable housing.

Community Land Trusts are mentioned as a potential avenue for providing affordable housing, and there are calls for affordable housing to be located near employment to reduce commuting for lower-paid workers. Some respondents express concern about overdevelopment and its impact on local character.

A few respondents suggest that the Local Plan should include stipulations against holiday lets in new planning consents and consider windfall sites for affordable social rental housing. There is also a suggestion to reduce Community Infrastructure Levy (CIL) and Section 106 charges to enable more affordable housing.

Overall, respondents emphasise the need for innovative solutions, better management of existing resources, and policies that ensure affordable housing caters to local needs while preserving the character of communities.

**LPU Q37: To help meet a potential shortfall in Traveller sites up to 2041, should sites for Traveller communities be required as part of large developments for housing and / or employment? Yes / No / Don't Know**



**LPU Q38: Tell us more about why you agree or disagree. If you answered 'No,' how else can Traveller needs be accommodated up to 2041 if not enough sites have been identified?**

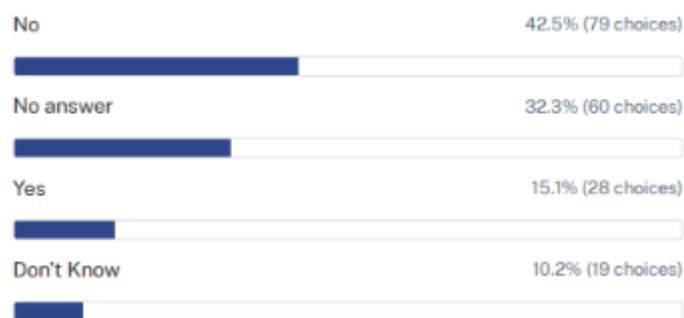
A common sentiment is the belief that Traveller sites should not be integrated within existing communities or new housing developments due to perceived differences in lifestyle and potential for conflict. There is a strong opinion that Travellers should fund their own sites, and concerns about increased crime and antisocial behaviour associated with Traveller sites were frequently mentioned.

Several respondents suggested that Traveller sites should be located away from residential areas, preferably on brownfield sites or in more rural settings. The idea that Traveller sites could devalue nearby properties was also a concern. Some respondents questioned the need for permanent pitches, suggesting that Traveller sites should be transitory, while others highlighted the need for consultation with the Travelling community to ensure that allocated sites are suitable and accepted.

There were also comments questioning the tax contributions of Travellers and suggesting that they should not be provided for if they do not contribute financially like other residents. A few responses indicated a lack of understanding or interest in the issue.

Overall, the responses reflect a mix of scepticism, concern for community integration, and questions about the financial and social implications of providing Traveller sites within existing or new developments.

**LPU Q39: Should the Local Plan include a policy requiring home working spaces within all new homes? Yes / No / Don't Know**



**LPU Q40: Tell us more about why you agree or disagree.**

Respondents expressed a variety of opinions on the inclusion of home working spaces in new homes.

A common sentiment was that mandating home working spaces in all new homes is too prescriptive and may not be necessary for everyone. Many argued that not all jobs are suited to home working, and that the trend towards working from home may not continue in the long term.

Several respondents mentioned that home working could be beneficial for certain groups, such as disabled persons, but there were also concerns about the negative impact on local shops and mental health. Some suggested that homes should be flexible to adapt to various needs, not just home working, and that it is up to individuals to decide how to use their space.

The potential increase in housing costs due to the requirement of dedicated home working spaces was a concern for some respondents. Others argued that the policy could be too rigid and not reflect the diversity of residents' needs, especially for those in retirement homes or affordable housing.

A few respondents did acknowledge the benefits of home working in reducing traffic and promoting environmental benefits. However, there was also a suggestion that instead of focusing on home working spaces, more efficient public transport and local working hubs could be a better solution.

Overall, while there was recognition of the increasing trend of home working, many respondents felt that a policy requiring dedicated home working spaces in all new homes would be excessive and not reflective of the diverse needs of the population. Flexibility and adaptability were emphasised as key factors in housing design.

**LPU Q41: Should the Local Plan include a policy requiring co-working spaces in larger housing developments?**



**LPU Q42: Tell us more about why you agree or disagree.**

Respondents have varied opinions on the inclusion of co-working spaces within larger housing developments. A common thread is the belief that the need for such spaces should be determined by demand and not be a blanket requirement for all developments. Some argue that co-working spaces can foster innovation, reduce commuting, and provide social interaction, while others feel that this is an overreach or too prescriptive.

Several respondents suggest that co-working spaces should be optional or considered on a case-by-case basis, and not necessarily within the housing development itself but perhaps in town or village centres. The potential increase in housing costs due to this requirement is a concern for some, as is the idea that not everyone works from home and may not need such a space.

There are also mentions of prioritising other amenities like community centres or doctors' surgeries over co-working spaces, and the importance of sustainable energy and reaching net zero goals. Some responses indicate a lack of clarity on what constitutes a 'larger development' and how this policy would interact with other requirements such as housing mix.

In summary, while there is recognition of the benefits of co-working spaces, there is also a strong sentiment that their inclusion in housing developments should be flexible, demand-driven, and not mandated across the board.

**LPU Q43: Do you agree with the proposals at the Fire Service College set out at policy EC4? Yes / No / Don't Know**



**LPU Q44: Tell us more about why you agree or disagree.**

Respondents have expressed concerns about the impact of new housing on local infrastructure, particularly roads, sewage, and water treatment. There is a strong sentiment that infrastructure improvements should precede or accompany any housing development. Several respondents are worried about overdevelopment and its effects on the town's character and resources.

Environmental concerns are also highlighted, with mentions of land and water contamination from chemicals at the Fire Service College (FSC) site. The need for a clear understanding of the FSC's future and its integration with the community is another recurring theme.

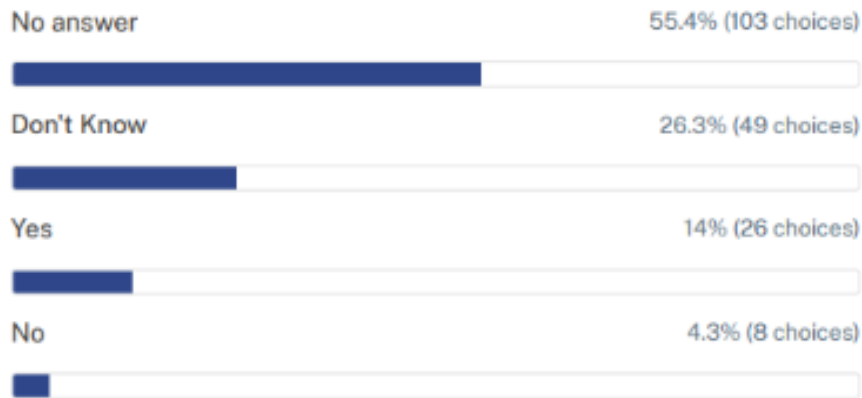
There is scepticism about the need for a new school given current birth rates and school subscription levels. The potential for increased traffic and parking issues is also a concern.

A few respondents suggest that development should focus on providing employment opportunities rather than just housing. Some support the idea of development if it includes light industrial use and is close to transport links.

There are also comments on the need for a holistic plan for the FSC site that benefits the local community and secures public access to recreational facilities. A few responses indicate a lack of familiarity with the FSC site or proposals, while others mention not having enough information to form an opinion.

Overall, there is a clear call for careful planning that addresses infrastructure needs and environmental concerns before proceeding with development. Respondents also desire transparency and community benefits from any future development at the FSC.

**LPU Q45: Do you agree with the proposals at the Royal Agricultural University set out at policy EC4? Yes / No / Don't Know**



**LPU Q46: Tell us more about why you agree or disagree.**

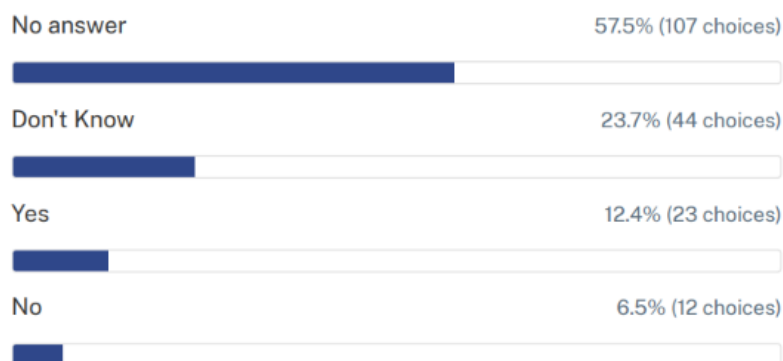
A common concern is the environmental impact of proposed developments, with emphasis on ensuring that any actions are nutrient negative and do not increase the phosphate or nitrate load on land or waterways.

The use of brownfield sites is seen as positive, and there is support for proposals that are entrepreneurial and likely to increase valuable employment in the district. Some respondents agree with expansion plans as long as they are in line with previous proposals and do not negatively impact the local environment. There is also a call for additional student accommodation to be built.

The Royal Agricultural University's (RAU) role is acknowledged, with suggestions that its expansion should include specific reference to innovation and support for live/work units, residential units, and business facilities related to the RAU. However, there is also a recommendation that any development at the RAU site within the Cotswolds National Landscape should consider potential impacts on natural beauty and comply with national planning frameworks, including demonstrating exceptional circumstances if the development is considered major.

Overall, while there are individual nuances in the responses, the trends indicate a desire for environmentally responsible development, support for the RAU's expansion provided it aligns with environmental and aesthetic considerations, and a need for more public information to form more informed opinions.

**LPU Q47: We have undertaken various updates to policies ECI to ECII and have introduced policy EC12. Do you agree these updates and new policies should be included in the Local Plan? Yes / No / Don't Know**



**LPU Q48: Tell us more about why you agree or disagree.**

A recurring theme is the need for clarity and specificity in policy wording to prevent misuse or misinterpretation. Many agree with safeguarding employment sites and supporting local employment opportunities, but there are concerns about the impact of residential development in rural and town centre areas.

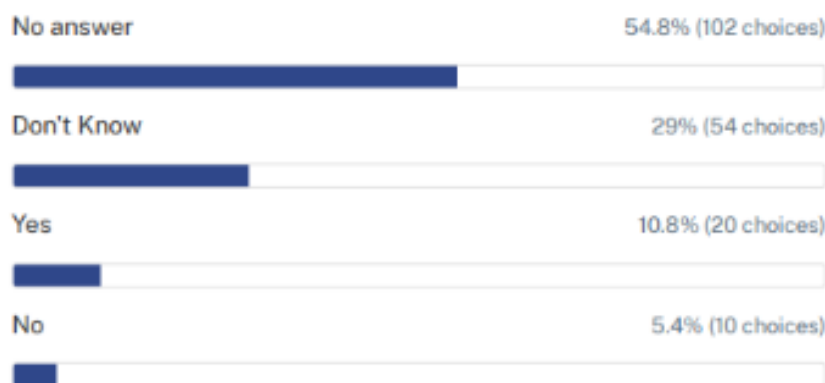
Some respondents feel that policies should not be approved en masse, as individual policies may have different levels of support. There is a call for transparency and genuine consultation on policy updates. The mix of industrial and housing is seen as problematic, especially regarding noise and parking issues.

Concerns about the conversion of rural buildings to residential use and the protection of the Cotswolds' natural and historic landscape are also mentioned, with some supporting a 10-year restriction on such conversions. The need for a balanced approach to tourism development that does not overburden local services is highlighted.

Several respondents have not read the policies or feel they lack enough information to comment effectively. Others suggest that the documents are too lengthy or challenging to navigate.

In summary, respondents are looking for clear, specific, and enforceable policies that balance economic growth with the preservation of the local environment and community character. Transparency in the consultation process and consideration of the unique needs of rural areas are also important to those providing feedback.

**LPU Q49: Do you support the Sherborne Estate policy (Policy EN18)? Yes / No / Don't Know**



**LPU Q50: Tell us more about why you agree or disagree.**

A significant number of respondents are worried about the lack of detailed information and local engagement in the planning process. There is a specific concern about Policy EN18 not being included in the document, which has left some residents feeling excluded and unable to provide informed feedback.

Several respondents are apprehensive about the potential impact on local wildlife and the environment, questioning whether the policies will truly protect these aspects. The issue of increased traffic and its effect on local infrastructure is also a common concern, with fears that more visitors could lead to congestion and safety issues.

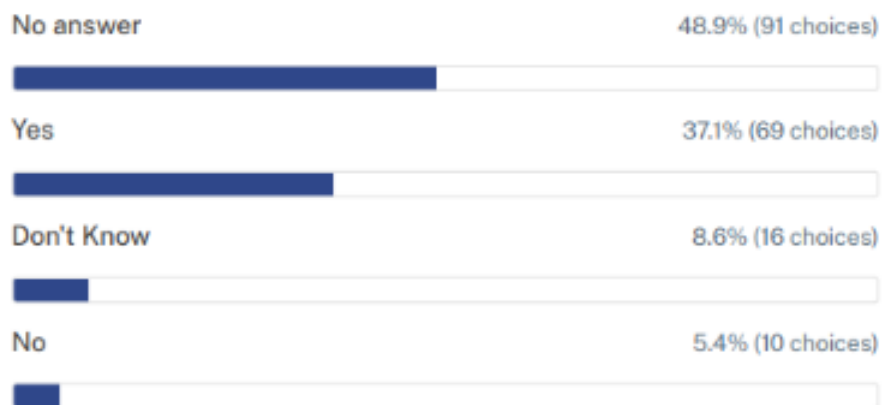
The National Trust's role and intentions are mentioned, with some respondents acknowledging the potential benefits of cooperation between the Trust and the Cotswold District Council, but others are wary of the Trust's plans to increase tourism and its impact on the community.

There is a mix of support for certain aspects of the proposals, such as improving public access and nature conservation efforts, while others support the idea in principle but seek more specifics before fully endorsing the policies.

A few responses are neutral or have no comment on the matter.

Overall, there is a clear call for more transparency, detailed information, and local engagement in the planning process to ensure that the policies reflect the needs and concerns of the Sherborne community while balancing environmental conservation with development.

**LPU Q51: Do you agree with a policy that seeks to reinforce local management of green spaces? Management of Accessible Open Green Spaces is a new policy, which reinforces the custodial role that Town and Parish Councils can play in the local management of accessible open green spaces. Yes / No / Don't Know**



**LPU Q52: Tell us more about why you agree or disagree.**

Respondents have expressed concerns about the management and maintenance of local green spaces, with a particular emphasis on ensuring accessibility for all abilities and disabilities. There is a general distrust of developer-led management organisations, with many respondents feeling they do not provide good value for money. The erosion of green spaces and the disappearance of protected trees are highlighted issues, with some respondents questioning the effectiveness of volunteer-led maintenance and the need for clear responsibility.

Several responses suggest that local councils, such as Town and Parish Councils, should have more power and involvement in protecting local green spaces for the health and mental well-being of residents. However, there are concerns about the financial implications of such policies, with some respondents indicating that additional funding would be necessary for councils to take on more responsibility.

The idea of pre-application engagement for development proposals is debated, with some respondents finding it costly and unnecessary for all cases. There is also a call for flexibility in policy approaches to ensure practical and long-term viable solutions for the management of open spaces.

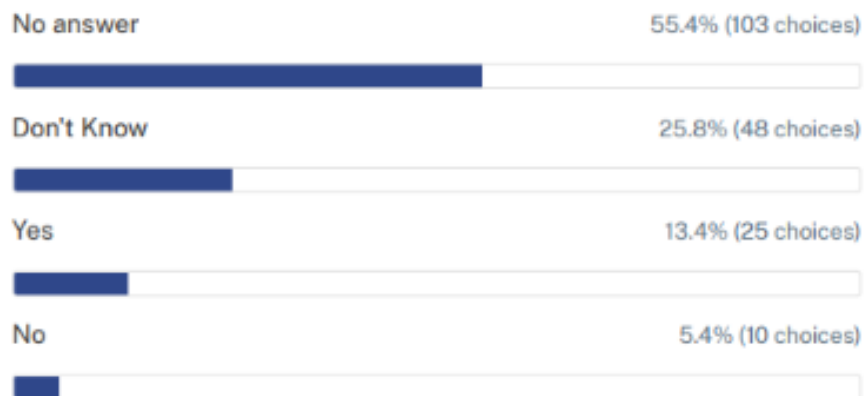
A few respondents are critical of private management companies handling public land, citing failures, and advocating for public bodies to manage these spaces. The need for clarity in homeowners' understanding of green space management is also mentioned, with suggestions that it should be clear that town or parish councils are responsible, provided they receive adequate funding from developments.

There are also concerns about whether smaller communities can handle the potential increased responsibilities and costs. Some respondents believe that local populations should have more control

over their spaces, while others are sceptical about the capabilities of some town councils to manage additional responsibilities effectively.

In summary, there is a strong desire for local management of green spaces with proper funding and support. Respondents call for flexibility, clarity, and enforcement in policies to ensure effective long-term management and protection of these areas.

**LPU Q53: We have undertaken various updates to policies EN1 to EC15 and have introduced policies EN16 to EN18. Do you agree these updates and new polices should be included in the Local Plan? Yes / No / Don't Know**



**LPU Q54: Tell us more about why you agree or disagree.**

Respondents have expressed a range of views, with particular emphasis on environmental and biodiversity concerns. Many support the inclusion of

swift bricks and bat roosts in new housing developments but suggest that the policy should extend to non-residential buildings and that compliance procedures should be clarified. There is a call for a more ambitious Biodiversity Net Gain (BNG) than the proposed 10%, with suggestions ranging from 15-30%.

Several respondents have not read or seen the policies they are being asked to comment on, indicating a lack of engagement or accessibility to the information. There is a call for transparency and brief inclusion of all relevant information.

Policy EN3 on dark skies is highlighted, with suggestions for major rewrites and detailed measures to be explained in the design code. Concerns are raised about the potential harm caused by development adjacent to Local Green Spaces (LGS).

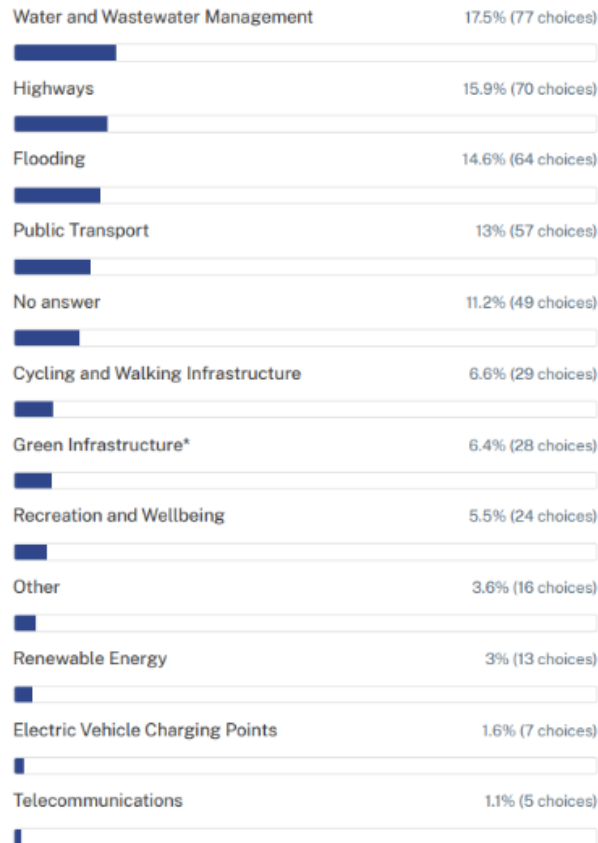
The policy updates are generally supported, but there is a reluctance to give blanket approval without understanding each detail. Some respondents feel that all development areas should pay attention to greening, not just those with a Landscape category. There is also a sentiment that the policies may not be realistic, prioritizing flora and fauna over practical considerations.

Policy EN16 on dark skies is specifically supported by several respondents, while others are concerned about the impact of BNG on development viability. The management of accessible green space in residential developments is also discussed, with suggestions for flexibility and options for residents to choose new providers.

In summary, respondents are engaged with environmental policies, particularly those related to biodiversity and dark skies. They seek greater ambition in BNG targets and clarity in policy implementation. However, there is a need for better access to policy information and concerns about

the practicality and viability of some proposals.

**LPU Q55: The Council is updating its Infrastructure Delivery Plan. Of the following types of infrastructure, what do you consider to be the three most significant issues in your area? 1. Highways; 2. Flooding; 3. Telecommunications; 4. Renewable Energy; 5. Cycling and Walking Infrastructure; 6. Public Transport; 7. Electric Vehicle Charging Points; 8. Green Infrastructure; 9. Recreation and Wellbeing; 10. Water and Wastewater Management; 11. Other**



**LPU Q56: If you selected 'other' please indicate the type of infrastructure.**

A recurring theme is the need for improved healthcare services, including access to GPs, NHS dentists, and healthcare provision in general. There is also worry that existing doctors and schools may not be able to cope with the influx of new residents from housing developments.

Transportation and road maintenance issues are also prominent, with complaints about potholes causing damage to vehicles and posing dangers to commuters. Traffic management concerns were specifically noted in Moreton due to the Fosse Way.

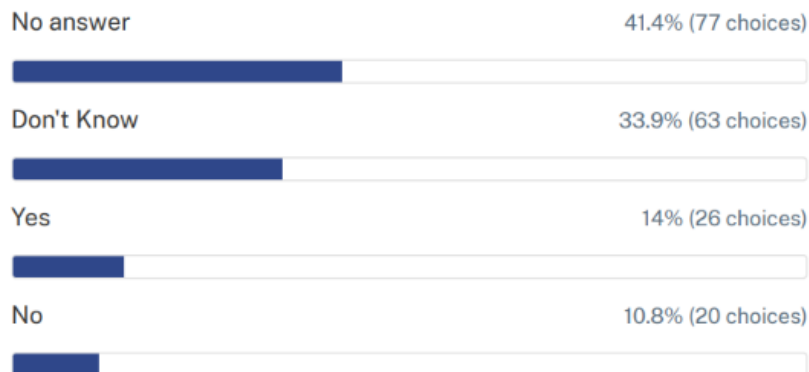
The need for infrastructure to support an ageing population, including specialist health and wellbeing facilities, was mentioned. Additionally, there were calls for better employment opportunities for the less academic population and improved amenities for visitors, such as toilets and parking.

Some respondents highlighted the importance of addressing existing deficiencies in infrastructure before adding new developments, while others pointed out the need for leisure facilities and emergency services. There was also a mention of the importance of renewable energy generation and electric vehicle charging points.

Overall, respondents expressed a need for a comprehensive approach to infrastructure that

considers healthcare, transportation, education, and facilities for both the ageing population and the general community.

**LPU Q57: Are any other changes required to the Policies Map? Yes / No / Don't Know**



**LPU Q58: If you selected 'Yes', please explain why.**

Respondents have raised several concerns and suggestions. A recurring theme is the classification and development of settlements, with some respondents requesting reclassification of specific areas like Willersey or expressing concerns about over-expansion without proper master planning, as mentioned for Moreton. There is a strong sentiment against development in Special Landscape Areas (SLAs) and a preference for using brownfield sites over greenfield ones.

Infrastructure is another key issue, with mentions of the need for wastewater treatment and natural flood management, and concerns about the lack of infrastructure to support new developments. Some responses suggest specific policy changes, such as incorporating a rail link between Cirencester and Kemble Station or extending Principal Settlement Development Boundaries.

Community assets like allotments are highlighted as important to protect from development due to their benefits for well-being and local wildlife. There are also calls for more public information and clarity in the consultation process, with some respondents indicating they are not familiar enough with the material to comment effectively.

A few responses are non-committal or indicate that the respondent has not seen or is unfamiliar with the proposals. Some respondents suggest that the survey questions are unrelated to the topics provided or not adequately explained.

Overall, there is a clear call for careful consideration of settlement boundaries, protection of community assets and landscapes, and ensuring adequate infrastructure to support any new developments. Respondents also desire more transparency and information in the consultation process.

**LPU Q59: Please complete if you have any additional comments on the proposed changes that have not been covered by this survey.**

Respondents have expressed a variety of concerns and suggestions. A recurring theme is the impact of proposed changes on local infrastructure, with many highlighting issues such as inadequate sewage systems, traffic congestion, and the need for improvements to roads and public transport.

There is significant opposition to overdevelopment, particularly in Moreton-in-Marsh, with concerns about the loss of green spaces and the character of villages. The need for affordable housing is mentioned, but respondents also worry about the affordability of new builds for local residents and

the potential for homes to be used as second homes.

Several respondents criticize the consultation process itself, describing it as hasty, confusing, and technically flawed, which may have hindered effective participation. There are also calls for more proactive engagement with communities before decisions are made.

The Cotswold Design Code's list of design principles is frequently mentioned as missing elements, although specifics are not often detailed in the responses provided.

Overall, the responses indicate a strong desire for sustainable development that respects the unique character of the Cotswolds, addresses infrastructure needs, and involves meaningful consultation with local communities.

# Summary of feedback on the wording of the draft Local Plan policy updates

## DSI - Development Strategy

### *Policy proposal*

The consultation proposed to update the five year housing land supply position but not the Local Plan housing requirement. Similarly, the overall Local Plan housing land supply / delivery was proposed to be updated to show the position between 2011 and 2031 (currently around 9,700 (C3 use class) dwellings). Clarity was provided to confirm that the housing requirement will be monitored against a residual 'stepped' requirement, which factors in the number of dwellings completed since the beginning of the plan period. It was also proposed to confirm that, in the absence of a housing requirement for the period from 1 April 2031, the housing need figure calculated using the government's standard methodology will instead be used to measure the five year housing land supply for that period after this date.

*For the supporting text of Policy DSI, you said (38 comments received):*

1. **Housing Requirement and Local Housing Need:** Multiple comments express concerns over the determination of housing requirements and local housing needs. There is a recurring theme of criticism regarding the adherence to or deviation from the Standard Method for calculating housing needs, where some view the increase in the local housing need figure to 9,094 dwellings as significant and indicate that current figures are based on outdated or incorrect data. A few comments argue for a reassessment or scrutiny of housing need figures and consider whether exceptional circumstances justify an alternative approach. Furthermore, there is a dispute over the interpretation of 'significant change' in housing need, questioning the methodology used by the Council. Suggestions have been made to adjust for factors such as affordability ratios, migration assumptions that don't account for economic recessions, and the needs of communal establishments.
2. **Climate and Development Strategy:** Comments point out that specific strategies and updates regarding climate change within the development plan need to be addressed to ensure the plan is 'green to the core.' There are also suggestions that the plan should accommodate a strategy that provides the optimum opportunity to progress with adherence to environmental considerations. Concerns were raised about the management of sustainable transport and the safe operation of the strategic road network (SRN) in relation to the proposed developments.
3. **Windfall Housing Figures:** Several comments challenge the optimism of the anticipated windfall housing figures, arguing that windfall should not constitute a significant portion of the housing land supply due to its unpredictable nature and limited contribution to affordable housing. It is suggested that a more conservative approach be adopted regarding windfall estimates, and they should be considered additional rather than primary sources of housing supply.
4. **Employment and Local Economy Considerations:** Comments reflect a need for a balanced approach to housing and employment opportunities. It is argued that new housing developments should align with local employment opportunities to prevent unsustainable commuting patterns. Furthermore, the plan should provide clarity on how it will bolster local employment in tandem with housing growth and consider the economic ambitions of the district.
5. **Policy DSI and Plan Updates Process:** There is a level of confusion and criticism regarding the process of updating the Local Plan. Some comments propose that the Council should transition

to a full update that includes a new plan period beyond 2031 or even 2041 to provide certainty and reduce confusion. There are suggestions for the Council to align the updates with the end goal of accelerating the plan-making process and ensure a plan period looking ahead at least 15 years.

6. **Sustainability and Infrastructure:** Some commenters voice concerns about sustainability and existing infrastructure, emphasising that new housing should align with the availability and capacity of existing local infrastructure. There is an overarching concern about the logical placement of new developments in relation to transport, employment, and education to prevent overcrowding and meet local needs effectively.
7. **Consultation Process Issues:** A few comments address issues with the consultation process for the Local Plan updates, suggesting the processes for the Partial and Full Updates be merged to eliminate confusion and ensure a more streamlined and effective strategy for updating the plan.

*For the Policy wording of Policy DS1, you said (17 comments received):*

1. **Housing Requirement and Local Housing Need:** Several comments highlight concerns about whether the Local Plan appropriately reflects the updated local housing needs, calculated using the Standard Method. There is a consensus that the housing requirement figures are outdated and do not reflect the true housing needs, leading to a discrepancy between the planned supply and actual demand. The issues raised include the incorporation of past over-delivery into future supply calculations, adherence to the Standard Method, and the need for a comprehensive Plan review considering increased local housing needs and deteriorating affordability.
2. **Infrastructure and Environmental Concerns:** Comments express concerns about the adequacy of existing infrastructure to support proposed developments. These concerns encompass sewerage and waste management, potential overreliance on a few large development sites, and the need for additional smaller developments across sustainable locations. There are also environmental concerns related to the protection of Special Landscape Areas (SLAs), the impact of development on areas at risk of flooding, and the preservation of rural character and tranquillity.
3. **Developer Influence and Profit Motivation:** Comment discusses the influence of developers and landowners on local planning decisions, driven by the quest for maximum profit. This comment also touches on the inadequacy of local infrastructure and administrative hurdles, particularly road maintenance and medical services, and how these are impacted by the developing landscape.

## DS2 - Development within Development Boundaries

*Policy proposal*

Confirmation was provided that development should not harm open spaces or gaps that make a positive contribution to the character of the settlements, which would make this policy consistent with DS3. Development boundaries were proposed to be updated to exclude undeliverable Local Plan site allocations and other undeveloped land and include built-up land.

*For the supporting text of Policy DS2, you said (6 comments received):*

1. **Preservation of Historic Environment:** There is concern about preserving the historic environment of Mickleton, with specific reference to avoiding the construction of disproportionate structures that could harm its character, specifically in the context of infilling visually important spaces that contribute positively to the settlement.
2. **Impact of Development on the Countryside:** Commenters are worried about the expansion

of residential development into the countryside, exemplified by the Shepherd's Fold/Furrow Way development which was built outside the existing development boundary and has extended the built environment, thereby possibly impacting open spaces and the rural character.

3. **Support for Project:** There is at least one explicit expression of full support for the project, although no context is given that connects this comment to specific aspects of the project.

*For the Policy wording of Policy DS2, you said (3 comments received):*

1. **Expansion of Development Boundaries:** Several comments suggest amendments to the current draft of the Development Boundaries. Comments propose extending the Development Boundary in Fairford to include areas that are considered part of the existing built-up areas. Comment requests an expansion of the development boundary for Tetbury to include the Land South of Hampton Street, noting initial support from local councils.
2. **Inclusion within Development Boundaries:** Comments assert that certain educational facilities such as the school campus in Chipping Campden should be included within the development boundary, referencing existing and potential community benefits, like public parking, theatre use, sports facilities, as well as the possibility to add residential units.
3. **Amenity Value Consideration:** Comment suggests that Policy DS2 – 6.2.6 should make reference to the amenity value of smaller open spaces including play areas. This comment highlights the importance of acknowledging and preserving amenities that contribute to quality of life within the development boundaries.

## DS3 - Small-Scale Residential Development in Non-Principal Settlements

*Policy proposal*

New accessibility standards are provided to 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 CO2 emissions. Further clarity provided to help applicants and case officers with determining what land qualifies as being 'in a non-principal settlement', as well as what is meant by 'proportionate scale to the settlement' and 'complements the form and character of the settlement'.

*For the supporting text of Policy DS3, you said (19 comments received):*

1. **Size and Proportion of Development:** Comments show concerns about the restrictions of development size to no larger than 1 hectare or 5% of the existing settlement. Respondents argue that these limits are arbitrary and may prevent the growth of villages, contradict the need for new housing to support services, and harm the viability of rural areas. They advocate for proportionate growth based on site characteristics rather than strict size limitations.
2. **Accessibility to Services:** There is a prevailing concern that the accessibility standards proposed for new developments are too restrictive, complex, and not appropriately tailored to the needs of rural communities. Several comments find that the required access to a set number of services within specific travel times by public transport is unrealistic, especially in light of the infrequent bus services available. The emphasis on service proximity may lead to a bias towards larger settlements and restrict sustainable developments in smaller villages.
3. **Support for Rural Vitality:** Comments express the need for policy to support the vitality of rural communities, arguing that certain policy criteria might inhibit the development needed to maintain and enhance services, facilities, and local businesses in small villages. Respondents advocate for the importance of new growth in enhancing the sustainability and social balance of

rural areas, including accommodating younger generations and enabling older residents to stay in their communities.

4. **Protection of Open Spaces and Rural Character:** Several comments support the protection of open spaces and the distinctive rural character of villages, emphasising the importance of maintaining the Cotswolds' identity. However, there are also concerns that policies may overprotect agricultural land or open spaces at the cost of limiting opportunities for infill and small-scale development that could benefit the community.
5. **Clarification and Flexibility of Policy Criteria:** Respondents call for greater clarity and flexibility in the wording of policy criteria, particularly in relation to what constitutes a sustainable development, the rigid application of standards for services accessibility, the designation and protection of green wedges or corridors, and the necessity or fit of certain services. They suggest that policies should allow for professional judgment and site-specific considerations.
6. **Housing Types and Affordability:** Commenters are concerned about the lack of affordable and diverse housing types in rural areas, especially for young people and first-time buyers. There is a call for policies that encourage a wider range of housing types and tenures and facilitate the development of more affordable and starter homes.

*For the Policy wording of Policy DS3, you said (20 comments received):*

1. **Accessibility Standards:** The addition of new accessibility standards (criteria e) in Policy DS3, which require developments to be within a specific travel time to services, has drawn criticism. Commenters argue that the standards are too complex, disregard the rural nature of settlements, could exclude appropriately scaled development, and may not be attainable for many smaller villages. Some fear this would halt sustainable development, causing settlements to stagnate and lose services, and conflicts with national policy objectives that support rural community vitality.
2. **Proportionate Growth and Scale Restrictions:** There is support for the principle of proportionate growth in Policy DS3 (criteria b), but concerns have been raised regarding the specific size limit of 1 hectare and not exceeding 5% of the existing settlement size. Commenters suggest that these restrictions are overly restrictive, may impact site viability, limit the community benefits such as public open space, and do not take into account the size of the settlement and existing services. Flexibility and a case-by-case approach are advised, and some request clarification on the measurement of the 5% limit.
3. **Impact on Rural Communities and Services:** Many comments highlight the importance of small-scale residential development for the vitality of rural communities. Commenters are concerned that amendments to Policy DS3 could restrict development in non-principal settlements, impacting the availability of affordable housing for younger generations and first-time buyers, leading to social exclusion and hindering the retention of essential village services and facilities. The need to accommodate more diverse housing types and improve affordability is emphasised.
4. **Suitability of Settlement Boundaries:** Opinions vary with respect to the use of settlement boundaries in determining the suitability of development locations. While some comments show support for clear boundaries that encourage sustainability and availability of local services, others argue for a more flexible approach that allows evaluation on a case-by-case basis, expressing concern that strict boundaries might limit opportunities for sustainable growth, particularly for non-principal settlements.
5. **Environmental Impact and Biodiversity:** Concerns are raised about the environmental impact and need for biodiversity net gain in new developments. Some commenters critique the

potential restrictions on developing sites larger than 1 hectare as this may impede the ability to deliver biodiversity net gains, landscape enhancements, and additional community facilities like public open space and allotments. They suggest these environmental benefits might outweigh the need for strict adherence to size limitations.

6. **General Support for Policy DS3:** General endorsement for the existing Policy DS3 is expressed, noting its previous success in facilitating sustainable growth in non-principal settlements. However, the proposed amendments are seen as increasing stringency that could undermine the policy's effectiveness and the ability to meet local housing needs.
7. **Clarifications and Evidential Support:** Several comments request further clarity or evidence for the proposed changes, particularly regarding the travel time requirements and the impact on the viability of residential developments. There is a call for additional information on how the criteria will be assessed and applied consistently, as well as clarification on the interpretation of the 5% settlement size limit.

## DS4 - Market Housing Outside Principle and Non-Principal Settlements

### *Policy proposal*

Minimal changes (e.g., clarification of the types of housing development that are supported in the open countryside).

*For the supporting text of Policy DS4, you said (7 comments received):*

1. **Housing Development and Local Needs:** Comments express concerns regarding housing development policies, emphasising the importance of local needs assessments and preserving village life. Commenters highlight the potential impact of housing growth on local infrastructure like schools and the significance of rural building conversions in sustaining rural economies and heritage.
2. **Policy Clarity and Modifications:** Some comments object to proposed modifications in policies related to housing, arguing that the existing wording provides necessary clarity, especially for those unfamiliar with planning documents. There's a fear that changes might confuse the process and reduce policy effectiveness.
3. **Strategic Infrastructure and Policy Separation:** There is a suggestion to create a separate policy specifically for strategic infrastructure related to buildings, to provide clarity and proper categorization within the planning documentation.

*For the Policy wording of Policy DS4, you said (5 comments received):*

1. **Policy DS4's Restrictions:** Comments commonly discuss the restrictiveness of Policy DS4 which prevents development outside settlement boundaries, questioning its suitability looking at good access to services and facilities, and suggesting need for a policy that permits development adjacent to existing settlements.
2. **Calls for Less Restrictive Strategies:** Several comments highlight the need for less restrictive strategies by the Council that can still ensure managed growth, such as flexibly drawn boundaries and policies encouraging development proximal to services, potentially incorporating climate change goals.
3. **Policy DS3's Provisions:** A few comments go into detail on Policy DS3's drafted provisions, including criteria relating to development scale, appropriateness of infilling, and access to services, suggesting amendments and more flexibility in terms of policy requirements.

4. **Housing Development in the Countryside:** Comments raise issues related to housing development in the countryside, such as concerns about sustainability, the impacts on transport and infrastructure, and the need for policy clarification for exceptional circumstances.
5. **Policy Clarification and Suggested Changes:** Respondents suggest changes to policy wording for clarity and to address perceived issues, proposing separation of certain policy aspects for better understanding, providing independent evidence on viability, and ensuring policies accurately consider various development impacts.
6. **Affirmation of Policy Effectiveness:** While not all comments are critical, some affirm that the current policies have worked well and thus imply endorsement of the status quo.

## Chapter 5A: Sustainable Development (New Chapter)

### SDI - Sustainable Development

#### *Policy proposal*

A new overarching policy is proposed to be introduced, which commits the Council to working proactively with applicants, stakeholders and other partners to support proposals that improve the economic, social and environmental conditions of Cotswold District. The policy sets out the expectations that developments will need to deliver. For example, mitigating climate change (including adaptation measures); protecting, enhancing and creating opportunities to improve access to nature and green spaces; secure measurable and ecologically meaningful Biodiversity Net Gain, as locally as possible; and so on.

*For the supporting text of Policy SDI, you said (16 comments received):*

1. **Sustainable Development:** Various comments express support or concern for Sustainable Development policy (SDI), referencing the importance of economic, social, and environmental principles such as the protection of employment sites, provision of affordable homes, and climate change mitigation. Clarity is requested on the Sustainability Checklist and on protected Best and Most Versatile (BMV) agricultural land. Some suggest that benefits should outweigh the costs in cases where BMV land is lost to development. The impact of the policy on transport, historic environment, local infrastructure, and community involvement is also discussed.
2. **Biodiversity Net Gain (BNG):** The importance of Biodiversity Net Gain (BNG) and its integration with developer contributions and spatial strategies such as the Green Infrastructure Strategy is emphasised, with a call for clarity in the related policies. There is a mention of a hierarchy of priorities for BNG: settlement, district, and county.
3. **Flooding and Infrastructure:** Comments highlight flooding as an issue, particularly in Moreton-in-Marsh, with concerns about building on floodplains and the need for adequate sewage and water infrastructure to support sustainable development. The involvement of organizations like Thames Water in providing infrastructure before development is stressed.
4. **Public and Parish Council Involvement:** There is a call for proactive involvement of Parish Councils in the planning process to ensure access to planning officers and to foster community support and behaviour change for the proposed policy changes.
5. **Reordering of Policy Priorities:** A suggestion is made to reorder the listing of the conditions for Policy SDI to place environmental conditions ahead of social and economic conditions, emphasising the priority of environmental considerations.

6. **Population Control:** An isolated comment addresses the broader issue of population control, arguing that sustainability cannot be achieved without managing the population and associated resource demands.
7. **General Support for Policy:** Various comments indicate general support for the draft policy on Sustainable Development.

*For the Policy wording of Policy SDI, you said (18 comments received):*

1. **Biodiversity Net Gain (BNG):** Several comments emphasise the importance of establishing a hierarchy to ensure BNG is retained and propose amending policy SDIc. They suggest creating a spatial operating strategy for BNG and updating the Strategic Principles for Green Infrastructure. They also commend policies that aim for ecologically meaningful BNG and request mandatory BNG requirements be reflected in policy.
2. **Sustainable Development Criteria Clarity:** There's concern about the clarity and implementation of sustainable criteria for development projects. Suggestions include aspirations vs. requirements, the impact on development costs, and the need for a mixture of policies that reflect the balance between different sustainability aspects. Amendments for clearer wording in policies are recommended.
3. **Sustainable Living and Transport:** Comments include support for policies promoting reduction in carbon emissions, sustainable transport modes, and tackling health inequalities. Some express scepticism about the feasibility of certain areas becoming commuter hubs due to high costs or infrastructure issues and propose addressing water pollution before more development.
4. **Policy Wording and Structure:** Recommendations for revising policy SDI include consolidating broad strategic aims, avoiding overly specific points, and reducing vague terminology. A typos correction is suggested for policy SDI, ensuring accuracy in policy language.
5. **Affordable Housing and Economic Opportunities:** Comments call for strategic planning regarding affordable housing based on actual need, rather than arbitrary quotas related to new developments. Employment as part of sustainable development is mentioned, with concern that it has been overlooked in the policy.
6. **Environmental and Historical Preservation:** Some comments highlight the importance of protecting the natural, historic, and built environment, emphasising the need to be sensitive to the impacts of development on scenic views, especially near protected areas like the AONB.
7. **Support for Sustainable Development Policy:** Organizations and individuals express support for policies that align with sustainable development goals, calling for actions that reflect the policies' intentions.
8. **Sustainability Checklist for Minor Developments:** A comment questions why minor developments are not required to submit a sustainability checklist, suggesting that cumulative minor developments can have significant sustainability impacts.

## SD2 - The Climate and Ecological Emergencies

### *Policy proposal*

A new overarching policy is proposed to be introduced, which confirms the Council's support for development proposals that deliver various climate and ecological principles. For example, minimising emissions resulting from the construction and lifetime use of buildings; maximising the use of renewable energy and resources; incorporating measures that provide climate change adaptation and increased climate resilience; and maximising opportunities to encourage a modal

shift in transportation from fossil fuelled transportation to more active travel and sustainable forms of transport.

*For the supporting text of Policy SD2, you said (19 comments received):*

1. **Climate and Ecological Emergencies (Policy SD2):** Many comments are supportive of Policy SD2, which outlines measures for addressing climate change and ecological emergencies, aiming for a carbon neutral district by 2045. There is a consistent recognition of the need to balance environmental actions with housing and economic development, and the necessity to implement sustainable and resilient strategies in light of changing weather patterns and the importance of local biodiversity.
2. **Sustainable Development and Environmental Improvement:** Comments highlight the support for sustainable development, such as promoting walking, cycling, reducing carbon emissions, and ensuring biodiversity net gain. The importance of development proposals being green and integrated with local job markets to reduce travel and the necessity of ecological and sustainable considerations in building and landscape design are mentioned.
3. **Local Implementation and Impact of Development:** Several responses emphasise the importance of local measures, suggesting that carbon offsetting and biodiversity net gain (BNG) should be local and that developments should not exacerbate existing environmental issues like flooding. Detailed suggestions such as more frequent and clean energy public transportation options, and concerns about flood risks in particular development areas are presented.
4. **Net-Zero Targets and Regulatory Measures:** Comments suggest an emphasis on moving towards net-zero carbon developments, advocating for strong building regulations and realistic timelines and costs. There are concerns expressed about the financial implications and the attainability for the average person regarding implementing these changes.
5. **Support for Policy SD2:** Specific comments express support for the policy, aligning with their organization's goals or teaching principles, though no specific recommendations or critiques are provided.

*For the Policy wording of Policy SD2, you said (11 comments received):*

1. **Policy Clarity and Enforcement:** Several comments express concerns about the efficacy of proposed policies, particularly regarding clarity and enforceability. Comment suggests that it should be clearer whether all developments must adhere to stated principles, proposing a rewording for better clarity. Comment advocates for stronger language to reinforce that adherence to climate and ecological principles is expected rather than merely supported, also suggesting specific rewordings for points 7 and 8 for accuracy and clarity.
2. **Environmental Impact and Biodiversity:** Comments highlight issues related to the environmental impact of developments, especially the need for biodiversity net gain and adherence to environmental goals. Comment argues for greater ambition in biodiversity net gain and amended wording to align with national policy and legislation. Comment questions whether biodiversity net gain is achievable with the proposed development in Moreton-in-Marsh, warning of the potential adverse impact on local ecosystems.
3. **Flood Resiliency and Planning:** Several comments focus on flooding concerns, emphasising the importance of avoiding building on floodplains and incorporating measures to increase flood resilience. Comments discuss not building on known floodplains and avoiding adjacent areas to existing developments with flooding issues. Comment also connects flood resiliency with the broader issue of sustainable transport and urban planning.

4. **Local Development Considerations:** Comments reflect concerns over the specific concentration of development around Moreton-in-Marsh and the impact on local objectives. Comments state that the proposed concentration of development will make achieving the objectives of policy SD2 impossible. Local support for policy SD2 is indicated by a comment but does not provide specific concerns or suggestions.
5. **Climate Change Awareness:** Comment expresses concern over the increasing core temperature of the planet and the implications of climate change, such as increased levels of precipitation, on local development decisions. Specifically, it questions the suitability of Moreton-in-the-Marsh for additional housing.

## SD3 - The Cotswold Design Code (formerly EN2)

### *Policy proposal*

The former Policy EN2 (Design of the Built and Natural Environment) is substantially updated and relocated within the Sustainable Development chapter, which provides the policy hook for the forthcoming update to the Cotswold Design Code. The policy sets out key design principles that will be required of developments, such as creating safe and accessible environments that are not vulnerable to crime, that 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. The policy also includes a set of additional overarching requirements: for example, avoiding or minimising light pollution; reuse existing buildings rather than constructing new ones; and be designed to be adaptable to prolong the useful life of the development. The Council has commissioned LDA to prepare an updated Design Code which will be delivered as a new Supplementary Planning Document in 2024. This policy will require further revisions to reflect this work. It will also need to be updated to reflect other evidence studies that justify the inclusion of new policies that seek to ensure new development is able to adapt and mitigate the effects of climate change (e.g. see Climate Mitigation and Adaptation chapter).

### *For the Policy wording of Policy SD3, you said (29 comments received):*

1. **Energy Efficiency and Building Regulations:** Several comments address the need for energy efficiency in alignment with national Building Regulations rather than imposing additional local requirements. Suggestions imply removing local standards that exceed national ones to avoid burden on developers and to ensure policies are positively prepared and nationally consistent.
2. **Sustainable and High-Quality Design:** Several comments support sustainable and high-quality design, emphasising the importance of minimizing carbon emissions through planning and design. They advocate for design that respects local character and promotes elements like community living, active travel, and health improvements.
3. **Use and Reuse of Buildings:** Comments express concern over policies that could potentially discourage new developments by emphasising the reuse of existing buildings over construction. Clarification is sought to ensure the district can meet housing needs without conflicting with council strategies for housing delivery.
4. **Design Code Flexibility:** The need for a flexible approach to Districtwide Design Codes is mentioned, allowing for unique circumstances and community engagement. It suggests that developers should have the ability to create codes for larger schemes, in line with the National Design Guide and Model.
5. **Environmental and Ecological Considerations:** Comments highlight the council's commitment to addressing climate and ecological emergencies, suggesting that developments

incorporate sustainable measures like solar panels and promote biodiversity, reflecting local aspirations.

6. **Clarity and Specification in Policies:** Responses ask for clearer definitions and examples within policies, such as specifying the types of buildings to be reused, detailing how design codes interact with existing local guides, and including specific design aspects for various health and safety considerations.
7. **Infrastructure and Utilities Coordination:** There are calls for comprehensive approaches to development that respect site constraints, including the presence of utilities and infrastructure, to ensure consistency with national policy.
8. **Active Travel and Accessibility:** Comments emphasise designing neighbourhoods that facilitate active travel and accessibility, ensuring storage and access for bicycles are considered, and creating walking and cycling connections to surpass the convenience of car travel.
9. **Cohesion with Existing Plans and Guides:** Some responses emphasise the importance of adhering to neighbourhood plans and design guides already in place and insist on planning enforcement to secure adherence to ecological, environmental, and climate policies.
10. **Consideration of Local Character and Setting:** Comments advocate for development that is in harmony with the local character and setting, calling for preservation of open spaces and views, and considering the environmental impacts of development, such as light pollution.

*For the supporting text of Policy SD3, you said (19 comments received):*

1. **Concern for maintaining local character and design quality:** Many comments emphasise the importance of maintaining local character and ensuring high-quality design by being responsive to the distinctive features of each locality. Innovations should not be inhibited by overly prescriptive approaches.
2. **Energy efficiency and climate resilience:** Energy efficiency, climate resilience, and the incorporation of green technology such as solar panels in new developments are reoccurring subjects, showcasing the community's desire for sustainable and environmentally friendly building practices.
3. **Design considerations and public transportation:** The need for comprehensive design guidelines that consider factors such as daylight, garden sizes, dark skies, and children's play spaces, as well as improvements to public transportation, is highlighted.
4. **Protection of local heritage and assets:** Comments reflect concern about protecting local heritage and natural assets by avoiding overdevelopment and ensuring any new developments are respectful of surrounding tranquil and rural areas, like the Moreton Special Landscape Area.
5. **Response to local policies and design guides:** Support and reference to local policies and design guides are mentioned, like the Cotswold Design Code, which indicate an active engagement with existing frameworks and the desire for local planning policies to be considerate of them.
6. **Concerns about development impacts:** Several comments express concerns about the negative impacts of development, such as flooding, loss of local character, and insufficient infrastructure like public transport and parking issues.

## SD4 - Health and Wellbeing

### *Policy proposal*

The environment in which we live affects our health and well-being, and as a social objective, it is a key component of sustainable development. The Council will support development proposals that promote health and well-being and maximise opportunities to ensure healthy and inclusive communities for all, by creating environments that encourage healthy lifestyles and appropriate health infrastructure. Proposals must consider and prioritise health outcomes, meeting the needs of different groups in the community, including older, younger people and those with disabilities. The policy includes both a requirement for a Health Impact Assessment (HIA) and the provision (and guardianship) of a defibrillator(s) for qualifying developments.

*For the Policy wording of Policy SD4, you said (11 comments received):*

1. **Policy SD4: Health and Wellbeing:** Commenters express their perspectives on Policy SD4, which focuses on health and wellbeing. Concerns include the need to ensure community public access defibrillators (CPADs), inclusion of specific phrasing and clauses within the policy, support for the policy's intent, and the importance of incorporating strategic planning for health and wellbeing. Additionally, there are remarks about the potential oversight of women's safety, the impact of development on community well-being, and reservations about specifying particular technology in the policy.
2. **Governance and Implementation of Policy Measures:** Some comments address concerns about ensuring proper governance and the operationalization of policy measures, particularly questioning the guardianship of CPADs and their maintenance, the specificity of policy text versus supporting documents, and the registration of technology proposed in the plan.
3. **Inclusivity and Accessibility in Development:** Several commenters highlight the importance of inclusivity and accessibility within the policy, calling for developments to cater to different community groups, including the elderly, youth, and those with disabilities, and to focus on providing safe and accessible amenities such as cycling and walking paths.
4. **Safety, Lighting, and Public Transport:** Concerns about safety, especially for women, the necessity of well-lit routes, and the availability of public transport during night-time are raised as critical issues for the wellbeing and security of residents.
5. **Adverse Impact of Development on Community:** Commenters question the negative impact that development might have on the existing community character, green spaces, and the residents' ability to access facilities, emphasising the importance of strategic planning to prevent such outcomes.
6. **Technology Specificity in Policy:** There is a suggestion to avoid embedding specific technological solutions such as defibrillators into long-term policy due to the rapid evolution of technology. The need for a more generalized expression of requirements is advised.
7. **Support for Policy SD4:** Multiple comments express explicit support for Policy SD4, with stakeholders from various backgrounds including a school and a parish council indicating approval.
8. **Policy Wording and Clarity:** A comment questions the need for particular wording within the policy, pointing out potential redundancy and seeking clarification for improved clarity and interpretation.

*For the supporting text of Policy SD4, you said (17 comments received):*

1. **Policy SD4 – Health and Wellbeing:** Comments reflect on a new policy directed towards

health and well-being in new developments. There are suggestions for amendments such as removing unnecessary repetition regarding energy efficiency and adaptable housing, questioning the relevance of defibrillator provisions within certain distances, and adding flexibility to food growing opportunities. Comments also point out the potential health benefits of specific types of housing like that for older people and emphasise the importance of maintaining rural village character and environmental health. The need for infrastructure improvements, particularly regarding sewage and water systems, was also highlighted as essential to health and well-being.

2. **Community Public Access Defibrillators (CPADs):** Multiple comments address the proposed policy requiring CPADs in major developments. There are concerns about the necessity and practicality of the policy, questioning national policies and suggesting potential revisions like increasing distance to 800 meters and considering existing coverage. The importance of accessibility, maintenance responsibility, and clear justifications for these requirements is also discussed.
3. **Infrastructure and Environmental Health:** Several comments address concerns about the current state and future planning of infrastructure and its relation to environmental health. The issues include handling of sewage and wastewater systems, the need to maintain rural village character, congestion, road conditions, and the ability to access natural environments without the influence of housing developments.
4. **Housing for Older People and Health Benefits:** The health benefits of housing specifically designed for older people are highlighted, with one comment suggesting that such housing can reduce demands on healthcare services and should be recognised within the policy. Suggestions include not requiring Health Impact Assessments for proposals of older persons' schemes due to their inherent health benefits.
5. **Engagement with Heritage for Wellbeing:** One comment proposes that the policy should refer to the relationship between well-being and the historical environment, suggesting that the interaction with heritage can support individual and community well-being. Reference is made to research and case studies on this theme.

## Chapter 5B: Climate Mitigation and Adaptation (New Chapter)

### CCI - Retrofitting Existing Buildings

#### *Policy proposal*

Retrofitting existing buildings with energy efficiency and adaptability to climate change measures often does not require planning permission. However, a new policy is provided to support the responsible retrofitting of buildings when planning permission is required. This includes the fitting of energy efficiency measures and the appropriate use of micro-renewable energy generation. The policy promotes the use of an energy hierarchy, which prioritises measures that reduce energy demand, followed by measures that increase energy efficiency and finally measures that generate renewable energy. The policy also requires retrofit measures to avoid compromising permeability, ventilation or structural stability, whilst also minimising harm to the heritage significance of buildings. There is policy for retrofitting different types of building, community scale retrofit, as well as encouraging low(er) carbon retrofit.

*For the supporting text of Policy CCI, you said (9 comments received):*

1. **Climate Action and Local Regulation:** Commenters express varying perspectives regarding the Council's climate action plans, in particular the implementation of local regulations that may

exceed government parameters. Some suggest that local requirements should align with government targets and building regulations, as per the Ministerial Statement. Concerns are raised about the complexity and cost implications of varying local standards.

2. **Retrofitting and Energy Efficiency:** Multiple comments emphasise the importance of focused energy efficiency and retrofitting in buildings to address climate change. Recommendations range from the use of renewable energy sources and adherence to environmental standards to the need for retrofit measures that are sensitive to heritage structures and the right materials for historical buildings. Fuel poverty is also a concern that retrofitting can mitigate, and retrofitting should precede the move to electric heating systems to ensure efficiency and resilience. Comment suggests a need for a more nuanced approach for retrofits in rural areas.
3. **Sustainable Energy Sources and Biomass:** There's a discussion about the promotion of various sustainable energy sources. While the inclusion of heats pumps, solar panels, and avoidance of gas connections are mentioned as beneficial, there's a question about whether biomass should also be considered as part of sustainable solutions.
4. **Policy and Planning Approaches:** There are views on the Local Plan and planning policies, with a suggestion for a more positive policy framework that allows measures to address climate change within new developments. Concerns are raised about the rationale of localized targets versus national or worldwide goals and their translation into district-level actions.

*For the Policy wording of Policy CCI, you said (9 comments received):*

1. **Flexibility and Pragmatism in Policy:** There is a request for policies to be more pragmatic and flexible, taking into account the practical challenges of transitioning to low carbon heating and retrofitting buildings, especially where demand might not be met, or it might be restrictive or impractical.
2. **Support for Green Infrastructure Integration:** Comments reflect support for integrating green infrastructure (GI) as part of retrofitting strategies to provide benefits like urban cooling, nature connectivity, well-being, and flood mitigation.
3. **Cooperation Among Stakeholders:** There is a desire for effective cooperation and coordination amongst various stakeholders, like suppliers, owners, and the council, to accomplish energy efficiency goals and retrofits in a cost-effective and contextual manner.
4. **Challenges with Historic and Listed Buildings:** The comments raise concerns about the challenges faced when attempting to improve the carbon efficiency of historic and listed buildings, due to planning permission constraints and the need for retrofitting to be sensitive to heritage and conservation areas.
5. **Need for Clear Definitions and Guidance:** There is a call for policies to have clearer definitions and more detailed guidance to avoid confusion and enable better implementation of energy efficiency and retrofitting measures.
6. **Financial and Policy Support for Schools and Public Buildings:** A point is made about the need for clear demonstration of how public buildings, like schools, will receive timely and adequate investment for improvements in line with the local plan.

## CC2 - Renewable Energy (including sub policies CC2a-CC2d)

### *Policy proposal*

Elements of this draft policy – particularly regarding identification of “broadly suitable areas” for deployment of facilities and the deployment target to 2050 - await completion of the Renewable

Energy Strategy. The policy, its supporting text and the Policies Map will be updated when that is complete.

The policy is in two parts. The first part of the policy is more generally applicable and sets out criteria for all standalone renewable and low carbon energy-generation, energy storage proposals and distribution networks. Subsequent parts of the policy set technology specific criteria / suitable areas applying to specific types of project, e.g. wind, solar, hydro, energy storage and community renewable energy schemes.

The first part of the policy sets out a provisional deployment target for the District to generate 20% of its electricity demand from renewable sources by 2050. This is subject to completion of the Renewable Energy Strategy and may be revised upwards. The supporting text for the policy explains how this target has been formulated.

*For the supporting text of Policy CC2, you said (24 comments received):*

1. **Renewable Energy Development and Landscape Considerations:** Comments emphasise the tension between renewable energy developments like wind farms and solar panels, and their impact on natural landscapes, including AONBs. Proposals such as compulsory solar panels on large building roofs as alternatives to land-intensive solar farms are suggested. Moreover, the importance of protecting military operations, biodiversity, and the visual impact on rural villages from renewable energy infrastructure is noted. A call for careful study and policy regarding renewable energy impacts is clear.
2. **Local and National Policy Alignment:** Several commenters discuss the need for local policies to align with national targets, noting concerns over setting standards that exceed national requirements, which may increase costs and undermine economies of scale. Additionally, references to specific statements and guidelines highlight the expectation that local plans should not propose energy efficiency standards beyond planned building regulations.
3. **Innovation and Sustainability in Development:** There is support for developments that prioritize sustainability, such as the RAU's Innovation Village, aiming to create ultralow energy-use buildings and achieve net zero targets. These initiatives are seen as exceeding policy principles and setting examples for sustainable design and construction.
4. **Economic and Practical Challenges of 'Going Green':** Concerns are raised about the affordability and economic feasibility of green policies, such as the phase-out of fossil fuel boilers without viable, affordable alternatives. The lack of funding and realistic deadlines is criticised, with a need for more flexible plans that incorporate potential solutions like hydrogen power.
5. **Utilisation of Existing Structures for Renewable Energy:** Encouraging the use of existing supermarket roofs and car parks for solar panel installations is suggested to avoid land wastage and leverage existing high-level power connections. France is mentioned as having strong regulations on car park solar installations, indicating international examples to follow.
6. **Concerns Over Specific Policy Changes and Asset Protection:** Objections to policy changes that remove protections for military operations are expressed, as well as a call for suitable area planning for ground heat source development within AONBs, and acknowledgment of National Grid Electricity Transmission (NGET) assets in the plan area.
7. **Community Involvement and Benefits from Renewable Projects:** The importance of community support and benefits, including financial returns from commercial renewable energy developments and development of community energy projects, is advocated. Additionally, there is a call for accessible pre-planning advice rates for community energy initiatives.

8. **Technological and Informational Gaps:** Criticism of the lack of public access to critical studies and the absence of certain technologies, such as ground heat source, from discussions is noted. Call for making such studies public and inviting comments on them are highlighted.
9. **Impact on Biodiversity and Agriculture:** Concerns are expressed about the requirements of renewable energy developments on biodiversity and agricultural land. The potential for renewable energy to improve or coexist with biodiversity and agricultural practices, such as agri-voltaics, is discussed.
10. **Solar and Wind Energy Infrastructure:** Comments discuss the aesthetic and environmental impact of solar farms and wind energy infrastructure and suggest that sound considerations and potential noise mitigation should be factored into planning.
11. **National Policy and Support for Tidal and Other Renewable Energies:** One commenter encourages national support for tidal energy, noting its potential as a consistent source of renewable energy. It is suggested that policies should broaden to include various sources of renewable energy.
12. **Neutral Comments:** Some comments offer no stance or specific input on the topics being discussed and are noted as neutral.

*For the supporting text of Policy CC2a, you said (10 comments received):*

1. **Concerns about renewable energy policy specifics:** Comments express concerns regarding the proposed renewable energy policies, mentioning the need for clarification on the 20% target (whether it is a binding target or an aim) and perceived arbitrariness. There's also worry about how policies will impact the natural landscape and local communities, the subjective nature of benefits versus harm assessment, and the need for community decision-making on such developments.
2. **Renewable energy impact on natural landscape:** Several comments indicate apprehension about the impact that renewable energy projects, specifically wind turbines and solar panels, may have on the natural landscape. These concerns include the appropriateness of developments in certain landscape sensitivity areas, clustering effects, and the visual impact of turbines. There is a call for defining heights and scales for wind and solar installations more carefully and contextually.
3. **Need for broader and informed public discussion:** Some commenters request more time and information to study the important issues surrounding renewable energy, suggesting broader discussions outside the Local Plan and the circulation of documents dedicated exclusively to renewable energy topics.
4. **Critical view on comparing renewable energy efficiency:** There is a criticism of discussing efficiency by directly comparing renewable electricity with fossil fuel use, arguing that it is an inadequate comparison due to fundamental differences in energy forms and applications.

*For the supporting text of Policy CC2b, you said (6 comments received):*

1. **Need for Clarity and Documentation:** Several comments highlight the lack of explanatory text, supporting documentation, or details regarding the strategy for onshore wind energy. Commenters emphasise the critical need for separate consultations, clear identification of suitable areas, and thorough documentation to support the proposed policies.
2. **Site Sensitivity and Environmental Impact:** There's a common concern about the environmental impact of wind energy development, especially on natural landscapes and sensitive habitats. Comments request information on how areas of suitable development are determined

and emphasise the need to avoid unacceptable impacts on the communities and environment.

3. **Community Involvement and Impact:** Some comments mention the importance of community involvement in decision-making processes for wind energy development and insist on guidelines regarding turbine clustering and site sensitivity, reflecting a desire for the public to have input on policy formulation and project planning.
4. **Policy Specifics and Criteria:** Commenters are asking for more precision in policy criteria, particularly how clustering of wind turbines should be addressed, what constitutes unacceptable impacts, and how 'broadly suitable areas' are defined, as well as how wind repowering should be treated in the planning terms.

*For the supporting text of Policy CC2c, you said (6 comments received):*

1. **Solar Energy Project Siting and Design:** These comments emphasise the importance of the careful siting and design of solar energy projects. They stress that solar farms and installations should avoid sensitive natural areas, minimize land use, and not be highly visible to the public, thereby protecting wildlife and preserving the natural landscape.
2. **Solar Energy Project Scale and Clustering:** Commenters express concerns about the size and clustering of solar projects. They suggest specific guidelines for the permissible scale based on location and argue for avoiding large clusters that can have significant landscape impacts.
3. **Integration of Solar Panels in Urban Environments:** One comment proposes the integration of solar panels into urban structures. Small-scale wind and solar installations on buildings and fabricated structures such as pavements are recommended, with a focus on meeting local energy needs with minimal impact on land use and wildlife.
4. **Health and Safety in Public Access Areas:** There is a concern raised about the health and safety implications of incorporating public access into solar energy project sites, with questions about what is required beyond maintaining footpaths.

## Policy CC2d

No comments.

## CC3 - Net Zero Carbon New Buildings (including sub policies CC3a-CC3f)

### *Policy proposal*

A suite of new policies that sets sustainable construction requirements for all new build residential developments. Net Zero carbon buildings in operation are supported by five core principles: energy efficiency, low carbon heat, Renewable energy generation, embodied carbon and no carbon offsetting and very limited role for energy offsetting. These principles have been used to inform the proposed policies. This includes a requirement for zero operational emissions and supplying energy demand through onsite renewables. Specific requirements are set for space heating demand; total energy use; on-site renewable energy generation; connection to a low- or zero-carbon District heating network where available; and for new developments to be fossil fuel free. There is also a requirement for developments to make a financial contribution to the Council's carbon offset fund where the use of onsite renewables to match total energy consumption is not feasible.

*For the supporting text of Policy CC3 you said (14 comments received):*

1. **Compliance with National Standards and Building Regulations:** The majority of comments stress the importance of aligning local policies with national standards and planned

building regulations, citing a recent Government response to a consultation and a ministerial statement cautioning against local standards that surpass national requirements. Contributors are concerned that varying local standards will complicate the building process, increase costs, and deviate from the industry's move towards standardized zero-carbon ready housing. They advocate for amendments that support the transition without imposing excessive demands on developers, especially considering urban brownfield developments and upcoming changes to the Building Standards legislation.

2. **Viability and Flexibility in Policy Application:** Several submissions emphasise the need for viability assessments to justify policies that exceed national standards, arguing that without these assessments, the policies should not proceed in their current form. They suggest that development must remain viable and that diverse local requirements could hinder housing supply and affordability. Comments propose policy flexibility to reflect changes in national standards and recognise that achieving net zero may not be feasible for all developments.
3. **Monitoring and Reporting of Energy Usage:** Concern is raised about the practicality and enforceability of policies requiring monitoring of energy usage and annual reporting, especially in sold dwellings where individual owners are responsible. There are doubts about the council's capacity to analyse the volume of monitoring reports and suggestions that this aspect may not be practical after occupancy.
4. **Industry Preparedness and Capability:** Comments suggest that the construction industry is ready and capable of adhering to zero carbon and efficient building practices but requires clear policies and incentives. There are calls for immediate implementation of updated or new policies rather than delayed staging. Additionally, it's emphasised that the policy should support designs that lead to low running costs, and there's recognition of the trade-off between initial construction costs and long-term savings.
5. **Supplementary Environmental Measures:** A couple of comments highlight the importance of additional environmental measures alongside carbon neutrality. One suggests the introduction of waterless toilets as part of the initiative, and another appreciates the exclusion of carbon offsetting from policy consideration, as it merely relocates the problem rather than solving it.
6. **Utility and Legitimacy of Current Policies:** Several commentators question the utility and legitimacy of policies set out in the Local Plan, such as Policy CC3, which some argue should be deleted or at least substantially modified to avoid duplication with national regulations. There is a strong drive for policy revisions to reflect the national position and avoid creating unnecessary obstacles to development.

*For the Policy wording of Policy CC3, you said (6 comments received):*

1. **Support for National Standards Over Local:** Comments highlight a preference for adhering to national building standards rather than implementing varied local standards due to concerns over complexity and costs. The comments call for deference to upcoming national regulations, which aim to provide clearer and more consistent guidelines.
2. **Concerns Regarding Increased Building Costs:** Several comments express concern about the higher costs associated with building net zero carbon or ultra-low energy buildings. These costs could impact affordability and the feasibility of projects, including those for schools and affordable housing.
3. **Emphasis on Embodied Carbon:** One comment suggests that the policy should place greater emphasis on embodied carbon, which is considered very important but currently only mentioned in notes and not in the main policy points.

4. **Reliability of All-Electric Infrastructure:** Concern is raised about the reliability of an all-electric infrastructure, especially given the susceptibility of power lines to damage from extreme weather. The commenter questions the logic of solely relying on electric connections and suggests that this should be considered in policy making.

*For the supporting text of Policy CC3a you said (3 comments received):*

1. **Space Heating Demand:** Comments express concerns over Policy CC3a's requirement for developers to undertake energy modelling and meet ambitious space heating targets. They highlight the issues of the policy being onerous, potentially creating additional work for the council, and question the availability of resources needed to implement and comply with such a policy. The difficulty in resourcing training and technical guidance is noted, as well as the overlap with existing Building Regulations and the Future Homes Standard. There's also a mention of the need for policy in the construction industry to justify increased costs for implementing Passivhaus standards.
2. **Policy Justification and Consistency:** Commentators argue that Policy CC3a is not justified or consistent with national policy and suggest that issues of space heating demand are already covered by existing regulations. There is also a suggestion that without such policy, the industry will not voluntarily include the additional cost of adhering to standards such as Passivhaus within their constructions.
3. **Technical Guidance and Training:** There is a clear call for guidance on predictive modelling and training for developers and architects to achieve compliance with the standards set out by Policy CC3a. Phrases like 'it is unclear how the preparation of this material will be resourced' and 'what the industry needs is policy' imply a need for clarity and support from the council.
4. **Modest Increase in Construction Costs:** One comment argues for policy that justifies the inclusion of the modest increase in construction costs associated with the construction industry's shift towards standards like Passivhaus. It suggests that without policy, these costs will likely be omitted due to the competitive nature of the industry.
5. **Predictive Modelling Specifics:** The comments call for more specifics regarding the predictive modelling used, such as the need for accreditation and details of when predictions are required. The goal is to standardize assessments, ensure comparability, and instill confidence that projected performance levels can be attained.

*For the Policy wording of Policy CC3a, you said (5 comments received):*

1. **Target Ambiguity and Feasibility:** Several comments express concern about the clarity and feasibility of the targets set by Policy CC3 and its variants. Comment emphasises the need for clearer evidence and recognition of variations in non-domestic buildings' use. Comment questions the affordability and the cost implications of extra requirements on new dwellings, implying that targets might be unrealistic or financially burdensome.
2. **Scope of Application:** Questions and requests for clarification about which types of buildings the policies apply to are evident in the comments. Comment explicitly asks whether Policy CC3a applies to all developments or new buildings only. Comment instructs that policies must clarify their applicability to new buildings, excluding existing ones and extensions. Comment suggests adding criteria related to design and orientation for new buildings to aid in their climate impact, which also ties into the scope of policy application

*For the supporting text of Policy CC3b you said (3 comments received):*

1. **Policy CC3b – Energy Use Intensity Comments:** Multiple comments indicate that concerns raised about Policies CC3 and CC3a are also relevant to Policy CC3b. These comments mention

the need for predictive energy modelling to demonstrate compliance with Policy CC3b, in addition to Policy CC3a

2. **Revision Suggestion:** One comment suggests revising items 1 and 2 to include the phrase 'aim to achieve'.

*For the Policy wording of Policy CC3b, you said (1 comments received):*

1. **Technical Feasibility and Exceptions:** The comment questions why 'where technically feasible' is referenced and suggests that while achieving the energy use intensity is feasible for certain buildings, it would be beneficial to have exceptions for specific sectors like vaccine production buildings, or scenarios where material use mandates frequent air changes.
2. **Energy Use Targets:** There's a proposal to reduce energy use intensity from 75kWh/m<sup>2</sup>/year to 55kWh/m<sup>2</sup>/year, and a recommendation that energy use targets should be effective immediately upon updating the plan, although meeting these targets before the end of 2024 might be too ambitious.
3. **Predictive Modelling Requirements:** The commenter suggests that providing more details regarding the predictive modelling, including the accreditation and timing of predictions, would standardize assessments and give confidence in the proposed performances. There is also a question posed about the consequences if the predicted performance isn't met, and whether there would be a payment under an energy offsetting policy.

*For the supporting text of Policy CC3c you said (5 comments received):*

Concerns about the feasibility and implications of transitioning to non-fossil fuel energy sources for heating: Several comments raise concerns related to the implementation of Policy CC3c regarding energy sources for heating. Comment questions the clarity of policy wording when considering the current reliance on fossil fuels and the possible use of natural gas or hydrogen for specific applications. Comment inquires about the consequences of transitioning the gas grid to hydrogen. Comment highlights potential issues with the grid capacity for implementing heat pumps or other electrical heating solutions. Comment seeks confirmation that the electrical grid can handle new requirements and raises the issue of the costs associated with reinforcing the existing system.

*For the Policy wording of Policy CC3c, you said (4 comments received):*

1. **Policy on Fossil Fuel Use:** Comments express concern about a policy seeking to prevent the use of fossil fuels in new developments. The policy in question is considered to go beyond national requirements and does not align with the NPPF as there is no blanket ban on fossil fuels. The comments emphasise that while low carbon energy is growing in the UK's energy mix, reliability issues exist due to renewable output variations. Therefore, current policy should recognise the need for fossil fuels, particularly for flexibility and peak demand times, until alternatives like battery storage are more viable.
2. **National Grid and Energy Demand:** One comment addresses the development of the national grid in relation to demand, questioning the relevance of grid issues to a local plan and suggesting that the bigger issue may be with 'pinch points' on the grid. It also recommends adding 'blue and green hydrogen' to the policy to avoid discounting potentially viable future green hydrogen solutions.
3. **Net Zero Building Design:** Two comments suggest changes to the language of planning documents to emphasise the importance of designing new buildings with Net Zero goals in mind. The suggestions include changing 'essential' to 'important' and advocating for the integration of

technologies like heat pumps to 'future proof' buildings in anticipation of a phase-out of fossil fuels.

*For the supporting text of Policy CC3d you said (5 comments received):*

1. **Renewable Energy Adaptability and Best Practices:** Comments express concerns about the adaptability and practicality of renewable energy policies in development projects. They suggest that renewable energy generation should be made flexible and yet adhere to other policies, insertion of 'where practicable' for feasibility, encouragement of alternatives like energy storage when renewable generation isn't viable, and questions about compatibility with local design codes.
2. **Policy CC3d Practicality and Constraints:** Comments question the practicality of policy CC3d, highlighting potential challenges in implementation. There is concern about the limitation on development due to insufficient grid capacity and the implications on traditional design elements like Cotswold Tile roofs and roof pitch in relation to solar photovoltaics.
3. **Energy Storage and Efficiency:** A comment emphasises the importance of energy storage systems, such as batteries, in boosting energy efficiency, especially where rooftop solar isn't feasible. This is noted as a means to reduce energy costs for residents and contribute to CO2 reduction by allowing more use of low CO2 off-peak electricity.

*For the Policy wording of Policy CC3d, you said (4 comments received):*

1. **Feasibility and Cost Concerns of On-Site Renewable Energy:** Commenters express concerns about the requirement for on-site renewable energy generation due to technical feasibility and the potential high costs associated with installation. These concerns include site conditions that may not be suitable for solar panels, and ongoing costs for maintenance, replacement, and decommissioning of renewable energy technologies.
2. **Policy Requirements and Amendments:** Several comments suggest amendments to current policy requirements citing inconsistency in language use and the imposition of renewable energy generation that exceeds national policy. They indicate that policy may be unrealistic and burdensome, leading to proposals for removal, language changes, and the reconsideration of infeasible mandates.
3. **Misleading Terminology:** Comments address the use of misleading terms regarding renewable energy, such as references to "free" electricity, which ignore the underlying costs associated with renewable systems. They recommend removing or revising such terms for accuracy.

*For the supporting text of Policy CC3e you said (4 comments received):*

**Policy CC3e Implementation Concerns:** Both comments express concerns over the application of Policy CC3e. One comment questions the method of implementation and who will bear the costs, suggesting smart meters and partnerships with supply companies. The other comment asks about the necessity and purpose beyond existing requirements, such as SAP reports, and wonders about the use of data collected over a five-year period.

*For the Policy wording of Policy CC3e, you said (2 comments received):*

1. **Onerous Monitoring:** Comments express concern that requiring developments to monitor energy use and renewable energy generation is overly burdensome and unclear. They question who would be responsible for this monitoring, particularly for homes that have already been sold, indicating that the requirement might extend beyond what is reasonable for developers.
2. **Policy Justification & Implementation:** Comments criticize Policy CC3e for being unjustified with little foundation in national policy. There are doubts about how compliance with the policy would be enforced or if it would be a valid reason for refusal during planning applications,

suggesting a disconnect between the policy and practical enforceability.

3. **Policy Relevance and Placement:** At least one comment hints that while the wording of the policy may be acceptable, its current position within the broader framework is inappropriate. It suggests relocating the policy or deleting it altogether, which points to concerns about the overall structure and cohesiveness of policies as they currently stand.

## Policy CC3f

No comments.

*For the policy wording of Policy CC3f you said (6 comments received):*

1. **Unjustified Policy and Viability Concerns:** Several comments express concerns over Policy CC3f relating to energy offsetting. They argue that the policy is not justified because it exceeds the National Planning Policy Framework (NPPF) guidance, and does not consider the economic viability of developments, which may lead to unfeasibility due to the scale of offsetting contributions required.
2. **Clarity on Energy Offsetting Implementation:** There are requests for clarity on how Policy CC3f will be implemented. Commenters are asking for example calculations and details on whether the offsetting is meant to be compensatory or punitive, how the funds will be used, who is going to pay, and the impact on cost.
3. **Opposition to Offsetting in Principle:** A perspective is shared that energy offsetting policies should be completely removed. The stance is that new buildings should fully comply with climate change targets without relying on offsetting measures.

## CC4 - District Heating

### *Policy proposal*

District heating, also known as a heat network, is a system that uses a singular central heat source to distribute hot water through a network of insulated pipes to multiple individual buildings. The structure is commonly used to fulfil heating and hot water requirements in apartment complexes and densely populated areas.

Cotswold District is less densely populated than more urban areas and district heating schemes will not always be the best solution. However, they can be an effective means of cutting carbon emissions where conventional systems are unsuitable. A new policy is therefore introduced to ensure that the district heating schemes are well-designed, equitable and are low carbon.

*For the supporting text of Policy CC4 you said (2 comments received):*

1. **Heat Distribution Flow in CDC:** Questions are raised about whether the heat distribution flow calculation for the CDC area has been conducted and if the CDC website's functionality issues are related to this inquiry.
2. **Clarifications in Terminology:** Clarifications are requested regarding specific terminologies used within the project; there is a need to specify the type of 'gas' referred to and to define what 'unabated' means in the context of biomass and waste.

*For the Policy wording of Policy CC4, you said (4 comments received):*

1. **Support for Heat Networks:** Both comments express agreement on the general support of heat networks due to their potential to reduce carbon emissions and improve energy efficiency. There is a consensus that such networks are specifically beneficial and justifiable in certain

conditions such as on large developments, mixed use town centre schemes, or where there is a significant production of (waste) heat.

2. **Conditional Feasibility:** The comments indicate that the feasibility and viability of heat networks are dependent on geographic and economic factors. For instance, densely populated developments, the presence of significant heat-producing commercial or industrial activities, or opportunities to partner with clean energy-consuming facilities like data centres are considered favourable conditions.

## CC5 - Managing Flood Risk (formerly EN14)

### *Policy proposal*

Formerly EN14, policy CC7 has been updated and moved to the 'climate change' (CC) chapter within the updated Local Plan. Extreme weather events and the future demands of development from population increase, are likely to increase flood risk to both development itself and areas downstream; and the policy will form a part of the overall response to the mitigation of, and adaptation to, climate change. The existing flood risk policy is updated to promote and trigger investigation into natural methods of flood mitigation, such as targeted woodland planting; and consideration of flood risk from all sources of flooding including that from surface water; a new clause to safeguard (in policy) two areas with the potential for flood storage near Cirencester; and to take into account the multi-functional benefits of Sustainable Urban Drainage Systems (SuDS) for all developments, to manage and help reduce the rate of water run-off.

### *For the supporting text of Policy CC5 you said (22 comments received):*

1. **Flood Risk and Development:** Many comments express concern about the potential impact of new developments in areas at risk of flooding. They cite policies and guidelines, such as Policy EN14, the NPPF, and the importance of directing development away from high-risk zones, such as areas designated Flood Zone 1, or employing sustainable urban drainage systems (SuDS) to manage runoff. Multiple comments also mention the need to make developments safe and not increase flood risk elsewhere.
2. **Policy Clarifications and Updates:** Several comments call for clarifications or updates to existing policies or studies related to flood risk management. Concerns include outdated references, the amalgamation of flood risk into the climate change section without clear justification, the need for updated Strategic Flood Risk Assessments (SFRAs), and the implementation of new policies replacing previous ones.
3. **Infrastructure and Capacity Concerns:** Comments highlight worries about the capacity and state of existing infrastructure to handle flooding and sewage from new developments. The responsibility of developers in these areas is stressed, emphasising the need to ensure that new developments do not exceed discharge limits and that downstream infrastructure such as sewers and pipes can cope with additional flow and are not damaged.
4. **Impact on Local Communities:** Comments from local councils and community representatives document the regular flooding experienced in specific regions, such as at Heath End Bridge or around Moreton. They include photographic evidence and express deep concern about the strain on local drainage systems due to proposed new housing developments, particularly in flood-prone areas with a history of increasingly frequent floods.
5. **Support for SuDS:** Comments express general support for policies promoting SuDS within developments, underlining the importance of water quality, landscape, and amenity benefits as well as mitigating flood risks. However, some comments seek clarity on the types of SuDS to be

implemented, suggesting that flexibility is needed, especially on smaller sites where open storage SuDS may not be feasible.

*For the Policy wording of Policy CC5, you said (6 comments received):*

1. **Flood Risk Management and Policy Compliance:** Several comments express concerns about the comprehensiveness and soundness of draft Policy CC5 on managing flood risk, emphasising the need for clear guidelines on development in flood zones, floodplain storage protection, safety measures for occupants, and adherence to national guidelines such as the NPPF.
2. **Natural Flood Management and Sustainable Solutions:** Comments highlight the necessity of employing appropriate Natural Flood Management (NFM) techniques and incorporating nature-based or sustainable solutions like SuDS, while also cautioning against the over-reliance on such measures where they might be ineffective or increase risk.
3. **Infrastructure and Development Precautions:** Several responses underscore the importance of establishing necessary infrastructure before occupancy of new developments and ensuring that the measures, such as soakaways and playing fields, are strategically implemented to avoid increasing flood risks or being counterproductive to sports and recreation.
4. **Environmental and River Pollution Concerns:** Concerns are raised regarding the pollution of local rivers because of flooding, stressing the need for rigorous enforcement by the council to prevent occupancy before the infrastructure to protect against such pollution is in place.
5. **Project-Specific Concerns:** Comments include requests for the removal of outdated references to flood storage area projects that are no longer taking place, the need to safeguard land for ongoing and prospective flood reduction projects, and concerns about resistant developments due to high groundwater levels.

## CC6 - Water Infrastructure Management (formerly INF8)

*Policy proposal*

This policy has been moved to the 'climate change' (CC) chapter within the updated Local Plan. There is increasing conflict between climate change scenarios (such as increased storm events and dry periods) and the future demands of development from population increase; on water resources in a 'seriously water stressed' area and water quality, with increased or concentrated pollutants entering watercourses. The policy seeks to ensure that there is adequate water and wastewater infrastructure to serve all new developments, and that development is designed to be water efficient and reduce water consumption. It also promotes Sustainable Urban Drainage Systems (SuDS) that can help limit as far as possible surface water entering the public sewer system. The policy requires the use of conditions to ensure where there is insufficient water/wastewater infrastructure capacity, the occupancy of new homes should not be permitted; and development that results in a new residential dwelling will be required to incorporate water conservation measures to achieve a maximum water consumption of 110 litres per person per day.

*For the supporting text of Policy CC6 you said (16 comments received):*

1. **Inadequate Infrastructure and Demand for Upgrades:** Multiple comments express concerns about the inadequate infrastructure, particularly sewage and water treatment, in the face of population growth and new development. Commenters emphasise the need for Thames Water to improve wastewater treatment facilities, address the issue of polluted water discharges, and ensure that infrastructure upgrades are planned and executed ahead of development. There is a clear call for a halt on new construction until existing issues are properly remedied.

2. **Policy and Regulation Compliance:** Several comments highlight the need for local plans to include policies that ensure development is synchronized with infrastructure requirements. Comments reference the National Planning Policy Framework, suggesting that development should meet sustainable development goals, align growth with infrastructure, and seek compliance with environmental standards. There is also a call for transparency and early engagement between developers, Thames Water, and local planning authorities.
3. **Flood Risk and Environmental Protection:** Comments express concerns regarding the risks of flooding and environmental damage due to overdevelopment and lack of adequate sewage handling. There is an urgent call to recognise and mitigate the impacts of new development on local watercourses and wildlife by incorporating robust flood management strategies and reducing pollution.
4. **Responsibility of Water Companies:** Commenters point out that water companies like Thames Water are legally responsible for providing sufficient water and wastewater services, as dictated by the Water Industry Act 1991. Comments suggest that the responsibility of ensuring adequate infrastructure should be with the water companies and not with developers or planning applicants.
5. **Lack of Trust in Thames Water:** There is scepticism regarding Thames Water's commitment and ability to deliver necessary infrastructure improvements, with comments citing missed commitments and financial struggles of the company. Commenters fear that without concrete plans and financial stability, Thames Water may not be able to support the proposed developments adequately.
6. **Need for Updated Planning and Studies:** Some comments call for updated water cycle studies and other planning documents to ensure they reflect the latest data, capacity, and legislation. This update is seen as critical for appropriately planning future infrastructure and understanding the impacts of development.
7. **Water Efficiency Standards:** A few comments advocate for policies on water efficiency and support for water-saving measures in new developments. These measures are seen as a way to reduce the demand on water infrastructure and contribute to environmental sustainability.

*For the Policy wording of Policy CC5, you said (20 comments received):*

1. **Water Infrastructure and Development:** There is a prevalent concern about existing water and wastewater infrastructure's capacity to support both current residents and future developments. Comments emphasise the need for infrastructure upgrades before occupancy of new units. Some also highlight specific issues, such as Moreton-in-Marsh's drainage problems, sewage smells, and discharge of untreated sewage into water bodies. There is a consistent theme that developments must not proceed without guaranteeing that water management can handle the increased load and prevent pollution.
2. **Regulatory Compliance and Enforcement:** Comments request robust policies and regulatory references to ensure that water quality guidelines, such as the Water Framework Directive, are complied with, and that development proposals are conditioned or binding agreements are made to secure necessary infrastructure improvements prior to development. There is a concern about Thames Water's financial stability and its potential impact on their ability to fulfil infrastructure upgrade promises.
3. **Pollution and Environmental Impact:** Commenters are worried about the impact of inadequate sewage treatment on the environment, citing regular pollution events and issues with water quality affecting local ecosystems. There are references to the need for sewage system

upgrades and concerns about the risk to designated water bodies like the Cotswold Waterpark.

4. **Transparency and Accountability:** Residents call for more transparency about how water management policies will be monitored and enforced. There's criticism that planning conditions are not being upheld, and there's scepticism about developers' and utility companies' commitments to necessary improvements.
5. **Sustainability and Conservation:** Several comments discuss the need for water conservation measures considering water stress and the management of water consumption, suggesting that developments should meet stringent efficiency standards.

## CC7 - Green Infrastructure (formerly INF7)

### *Policy proposal*

This policy has been comprehensively updated to take account of the new guidance in the NPPF, including the new definition of Green Infrastructure. The increased importance of linking new and existing GI using intelligence from the Nature Recovery Mapping, the Network and forthcoming Strategy all of which are mandatory under the Environment Act 2021. It has also considered new National guidelines and best practice, which are set out in Natural England's GI Framework published in 2021 and Building with Nature, an industry Best Practice Guide. The update also refers to the Cotswold District GI Strategy and Cotswold Design Code.

### *For the supporting text of Policy CC7 you said (9 comments received):*

1. **Green Infrastructure (GI) and Biodiversity Net Gain (BNG):** Comments emphasise the importance of incorporating green infrastructure (GI) and biodiversity net gain (BNG) in planning and development strategies. They suggest that developments should integrate GI for community wellbeing, comply with the Environment Act 2021 for BNG, and involve community dialogue. The comments also touch upon the idea of using third-party assessed standards for GI and ensuring multipurpose benefits such as human wellbeing and biodiverse wildlife.
2. **Clarity and Specificity in Policies and Requirements:** Several comments call for clearer and more specific language in policies related to development and GI. Suggestions include clarifying expectations for sports facilities and wording changes to ensure policies are realistic and achievable. Concerns are raised about the feasibility of off-site GI contributions and the inclusion of children's play spaces in design codes.
3. **Community Feedback and Engagement:** Commenters indicate a need for developers to engage with local communities when planning new sites to ensure the integration of green spaces that contribute to wildlife and provide aesthetically pleasing views. There's an emphasis on incorporating community feedback to better align developments with local interests.

### *For the Policy wording of Policy CC7, you said (4 comments received):*

**Policy CC7 and Green Infrastructure:** Commenters express support and recommendations for Policy CC7, emphasising that green infrastructure (GI) must be of high quality and provide ecological value. There's a call for amendments to ensure development proposals are only permitted if they contribute meaningfully to GI. The importance of a robust evidence base, such as a playing pitch strategy, is noted, and concerns are raised about the impact of new developments on existing GI. One commenter also highlights efforts to enhance biodiversity in an educational setting while balancing other priorities such as safeguarding.

## CC8 - Sustainable Transport (formerly INF3)

### *Policy proposal*

Formerly INF3. Comprehensive update. Amongst the many policy proposals, the policy links to the Gloucestershire Transport Decarbonisation Plan and Cotswold Transport Decarbonisation Strategy and includes targets from both documents. It includes a requirement for the early delivery of sustainable transport infrastructure. It also provides a hierarchy of road users for the design and layout of sites.

### *For the supporting text of Policy CC8 you said (11 comments received):*

1. **Sustainable Transport and Accessibility:** Many comments emphasise the importance of sustainable transport and accessibility in development planning. Comments discuss policies that prioritize pedestrians, cyclists, and public transport connections, such as Policy INF3, and the draft Policy CC8. There is mention of access points, bus stops, and the idea that developments should encourage active travel and public transport use, while also providing safe and suitable access for vehicles.
2. **Sustainable Development and Environmental Impact:** Comments address the need for development that aligns with environmental objectives, like reducing transport carbon emissions and integrating green infrastructure. There is concern about achieving a balance between development layouts and the viability of transportation services, and an emphasis on ensuring developments are designed to encourage environmentally friendly modes of transport and a shift away from fossil fuels.
3. **Transport Infrastructure Planning and Policy Guidelines:** A few comments touch upon the detailed requirements for transport infrastructure and service levels within development plans. They refer to specific metrics such as walking distance to amenities and bus stops, the frequency and viability of bus services, and demand congruence with transport policies and infrastructure standards, including healthy streets and guidelines for walking and cycling infrastructure.
4. **Implementation and Compliance Concerns:** Certain comments raise concerns about implementation, suggesting the need for developments to not only consider but meet the needs of people with disabilities and to provide infrastructure and services early, especially for sites impacting the Strategic Road Network (SRN). There are also requests for clarity and revisions to policies to ensure transport infrastructure is adequately provided for.
5. **Feedback on Policy Documents and Plans:** Comments include feedback on policy documents and the Local Plan, with suggestions for revisions, express support for updates and additions, and highlight areas where details are awaited or further clarity is required, as in the case of missing references to thresholds for Transport Assessments.

### *For the Policy wording of Policy CC8, you said (14 comments received):*

1. **Public Transport and Connectivity:** Comments frequently highlight issues relating to the need for improved public transport and connectivity. There are concerns about the adequacy of existing transport infrastructure, suggestions for specific improvements such as better bus connections, ways to alleviate traffic congestion, and the need for sustainable alternatives to reduce reliance on private vehicles.
2. **Cycling and Walking Infrastructure:** Several comments advocate for the explicit provision of improved cycling and bridleways and emphasise the importance of developing infrastructure that encourages walking and cycling. The notion is that such infrastructure supports local health, sustainability and tourism.

3. **Electric Vehicles (EV) Infrastructure:** Comments suggest that the local policy should include measures to support the adoption of EVs, such as convenient charging points and the ability to charge from domestic electricity supplies for residents without off-street parking.
4. **Environmental and Health Concerns:** Comments express concerns about environmental impact, emphasising the importance of sustainable transport to improve health, welfare, and biodiversity, and suggesting that current policies do not adequately address these issues.
5. **Policy Implementation and Effectiveness:** A common sentiment among the comments is scepticism regarding the effectiveness and implementation of transport policies. Concerns include the influence of builders' lobbies, financial constraints, and the perception that policy goals are merely wishful thinking without concrete action plans.
6. **Development Planning and Traffic Management:** Including both challenges and proposals, comments address the need for careful development planning that considers traffic management, such as the development of bypass roads, and ensuring that new developments contribute to an improved traffic situation rather than exacerbating congestion.

## Chapter 7: Delivering the Strategy

### SI and S4 to S19 - Principal Settlements

#### *Policy proposal*

It is proposed to delete development allocations from the Local Plan that are now under construction. The following development allocations would also be deleted as they have been reassessed and are no longer deliverable / developable:

- Cirencester (C17): 42-54 Querns Lane, as the site cannot deliver 5 or more dwellings.
- Fairford (F35B): Land behind Milton Farm and Bettertons Close, as the site is unavailable.
- Fairford (F44): Land to rear of Faulkner Close, Horcott, as the site is now unsuitable due to the neighbouring Site of Special Scientific Interest and because the access is unachievable.
- Kemble (K2A): Land at Station Road, as the site is unavailable and will become part of Kemble Community Gardens.
- Lechlade (LI8B): Land west of Orchard Close, Downington, as the site is unavailable.
- Willersey (W1A and W1B): Garage Workshop and Garden behind the Nook, Main Street, as the site cannot deliver 5 or more dwellings.

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.

Further site allocations would be made for different types of development if the Local Plan period was extended to 2041. The Sustainability Appraisal that accompanies this consultation identifies broad locations for potential growth of settlements. See Policy INF1 of this document where infrastructure requirements of additional growth are discussed.

#### Policy S1: Cirencester Town

*For the supporting text of Policy S1 you said (2 comments received):*

1. **Town Development and Land Use:** Comments suggest concerns and proposals related to urban planning, including the management of residential densities, town centre residential development, carrying forward existing site allocations, and maintaining the integrity of smaller villages by preserving green buffer zones. There is a focus on both the need for expansion and the cautious approach to ensure character and safety.
2. **Road Safety and Infrastructure:** The concern for safe pedestrian and cycling routes for children accessing schools, with emphasis on the dangers of the current recommended path and the inadequacy of existing measures to ensure safety, such as speed limits, which are highlighted as being insufficient.

*For the Policy wording of Policy S1, you said (2 comments received):*

1. **Cirencester Town Centre Development:** Comments suggest the incorporation of healthcare provision in Cirencester town centre developments, specifically combining the existing premises of Cirencester Health Group within a new allocation potentially funded through comprehensive redevelopment and assistance by CDC ownership.
2. **Funding Justification for Amenities:** There is a query about the justification behind funding allocations for certain amenities, such as the open-air swimming pool in Cirencester Town, indicating a need for clear and robust reasoning for financial contributions.

## Policy S2: Strategic site, south of Chesterton, Cirencester

*For the supporting text of Policy S2 you said (3 comments received):*

1. **Healthcare Centre Provision and Funding Mechanisms:** Comments suggest the allocation of additional residential units to fund the development of a new Healthcare Centre. This includes providing free land, either on the Chesterton site or a nearby alternative location, using the profits from the additional residential units to finance the construction of the Centre. The Integrated Care Board (ICB) would pay rent and rates to cover the construction costs, with the premises eventually being handed over to the ICB or another NHS body.
2. **Land Use Allocations and Policy Amendments:** One comment addresses the need for policy amendments due to changes in the Use Classes order, while another emphasises the identification of new site allocations for residential development beyond 2031, based on current planning and consultations.
3. **Construction and Development Incentives:** The comments detail an incentive system for a landowner to facilitate healthcare provision. This includes the offer of additional residential units in exchange for providing the necessary land and funding for the Healthcare Centre.

## Policy S3: Cirencester Central Area Strategy (and subsidiary policies S3(a) to S3(d))

### *Policy proposal*

Revised Policy S3 and its subsidiary policies features a fundamental redraft of the existing strategy for Cirencester Central Area. All but one of the land allocations that were formerly in Policy S1 have been carried forward and incorporated into the revised policy.

Several important (and ongoing) changes have taken place since the Local Plan was adopted in 2018:

- The Council has a new Corporate Strategy that places great emphasis on meeting the challenges of the Climate and Biodiversity Emergencies, requiring the Local Plan to now be “Green to the core” – this has many implications for the future planning of the town centre

including modal shift in transport and renewable energy that sit alongside orthodox issues such as conservation of the historic environment.

- Changes in the nature of the “traditional high street” due primarily to internet shopping are challenging the dominance of retail as a keystone policy for town centres. To be resilient and robustly meet the challenges of a rapidly changing future, town centres need to have a broader mix of “main town centre uses” and be more flexible and responsive to change.
- Work to progress a Framework Masterplan SPD for the Central Area – a requirement of the adopted Local Plan – has progressed significantly and is a major driver behind the changes to the Town Centre Strategy.

Taken together the cumulative effect is that the current retail-dominated town centre strategy is out of date. It is inadequate to meet the challenges of the future and assist in delivering the Framework Masterplan SPD. **Please note that a separate consultation and survey questionnaire on the emerging Framework Masterplan SPD is being carried out concurrently with consultation on the Local Plan Update – see [your.cotswold.gov.uk](http://your.cotswold.gov.uk)**

The revised Strategy is a significant departure from the adopted version. In blunt terms it is far more specific and directional about what the council wants to see when redevelopment takes place. For example, it proposes to divide the town into porously demarcated precincts (the subsidiary policies), each with their own distinctive mix of uses that mirror the proposals in the emerging Framework Masterplan.

Officers have worked closely with consultants Mace and with Cirencester Town Council in development of the Framework Masterplan and the revised policy.

Government changes to the Use Classes Order and Permitted Development Rights have made it more difficult for LPAs to be in complete control of how their town centres develop. Shops, some other main town centre uses together with some employment and light industrial uses are now lumped together in Use Class E. Change of use from Class E to Class C3 (dwelling houses) is possible as permitted development (subject to prior approval). A survey undertaken two years ago by officers indicated that up to 50% of premises in the town centre could be susceptible to this change. To date this existential threat has not materialised (probably due to the robust economic health of Cirencester’s town centre) but it does serve as an unhelpful “wild card” in the planning of our town centres.

*For the supporting text of Policy S3 you said (4 comments received):*

1. **Transportation Concerns:** Several comments express concerns regarding transportation, specifically focusing on the use of private cars and the implications of reducing parking capacity. Comment directly disagrees with policies that discourage private car use and reduce public parking, emphasising how reliant Cirencester and surrounding villages are on car access for business and healthcare. Comment suggests removing a certain restriction which could disadvantage Cirencester compared to larger towns and highlights the need for appropriate parking locations for visitors.
2. **Town Centre Development and Strategy Alignment:** Comments reflect a positive attitude towards the development strategy of the Cirencester Town Centre, especially in terms of sustainability, diversity, and integration. Comment welcomes the focus away from retail uses and appreciates the connection between the new local plan and the Masterplan Framework, indicating an alignment with detailed sub-policies for character areas identified in the Masterplan.
3. **Healthcare Provision:** There's an expressed need for improved healthcare infrastructure in Cirencester. Comment mentions the necessity of a new Healthcare Centre to replace the two

existing central premises for Cirencester Health Group, indicating a gap in the current plan when it comes to addressing healthcare facilities.

## Policy S4: Down Ampney

*For the supporting text of Policy S4 you said (5 comments received):*

1. **Local Infrastructure and Development:** Comments reveal that there is ongoing consideration and modification of non strategic infrastructure projects by the Parish Council, as well as discussions about the accuracy of local maps and development boundaries.
2. **Documentation Accuracy:** One comment corrects a geographical error in the documentation, noting that a certain piece of land is misrepresented in terms of its location relative to local landmarks.
3. **Policy Revision:** There is reference to a particular revision of a policy indicating that only one site remains concerning an unspecified matter.
4. **Non-substantive Comment:** One comment does not provide any information or opinion relevant to the projects or policies under discussion.

*For the Policy wording of Policy S4, you said (2 comments received):*

1. **Sustainability of Down Ampney as a Principal Settlement:** Comments raise concerns about Down Ampney's designation as a Principal Settlement given its lack of employment within the village, dependency on car travel due to inadequate public transportation, and comparable land availability for development to Non-principal Settlements. There's a call for a reassessment of its sustainability and designation.
2. **Transportation and Traffic Issues:** The increase in through-traffic and the lack of public transport are highlighted, with suggestions for traffic safety improvements, traffic calming measures, and a pedestrian crossing to ensure the community's safety, especially near the school.
3. **Local Infrastructure and Open Space:** The comments indicate a need for clearer definitions and updates concerning local infrastructure projects such as The Folley and Down Ampney Pits, contributions to new natural open space or pocket park, and more realistic options for countryside access.

## Policy S5: Fairford

*For the supporting text of Policy S5 you said (5 comments received):*

1. **Extension of Development Boundary to Fairford:** Two comments suggest that the Development Boundary to Fairford should be extended to include the area bounded by Totterdown Lane, Horcott Road, and New Road. They reference Paragraph 6.2.2 of the Reg 18 Consultation Draft Plan, which states that 'Development Boundaries essentially define the built-up areas of Principal Settlements' to support this idea, and argue that it's an anomaly for the area to have been excluded.
2. **Support for Potential Schemes with Community Benefits:** Fairford Town Council indicates support for potential projects at Jones' Field and Horcott Lakes, with the provision that specific conditions are met for any Local Plan allocations. They note the schemes could offer significant community benefits.
3. **Concern for Fairford and Horcott Local Gap:** One comment requests a rewording of policy 7.6.1 regarding Fairford and Horcott's relationship, emphasising the importance of a Local Gap

between them, while another criticizes the oversight of the Fairford Neighbourhood Plan policy FNP9, which protects the gap between the two locations. Both comments urge that the documentation reflect the significance of the gap for proper planning.

## Policy S6: Kemble

*For the supporting text of Policy S6 you said (4 comments received):*

1. **Local infrastructure and environment concerns:** Community members express concerns relating to local infrastructure and environmental degradation. This includes worries about the impact of sewage spillage on aquatic life, advocating for new housing in areas with smaller populations and available transport hubs, and calling for improved sustainable transport options.
2. **Suggestions for local development and transport improvement:** Comments suggest improvements in local development and transport. One comment advocates for the construction of new houses in Kemble and questions the integration of sewage and rainwater systems. Another comment proposes enhancing sustainable transport from Kemble station to key destinations.
3. **Specific amendments to documentation:** A comment suggests specific changes to a document, indicating a need for precise language regarding improvements, and recommends adding a reference to Cotswold Airport when discussing employment.

## Policy S7: Lechlade

*For the supporting text of Policy S7 you said (4 comments received):*

1. **Local Infrastructure and Capacity:** Comments express concern regarding the strain on local infrastructure and lack of capacity to support new development in Lechlade, highlighting issues with employment density, self-containment, community services, healthcare, and car parking.
2. **Opposition to Car Park Development:** Multiple comments are opposed to the development of a car park at LEC 3, questioning the necessity of additional parking and potential negative impacts on views and local character.
3. **Site Allocations and Development Strategy:** There is a reference to the site allocation strategy for Lechlade, including the removal of a previously designated site for housing and a suggestion to reallocate another site to fulfil updated requirements.

## Policy S8: South Cerney

*For the supporting text of Policy S8 you said (1 comments received):*

1. **Flooding Concerns:** The comment expresses concern about development in South Cerney needing to consider the high risk of flooding, both pluvial and fluvial, and a high water table. It also mentions that recent development has exacerbated flooding issues.
2. **Transportation and Infrastructure:** The commenter points out that while the development at Lakeside Business park is successful, the parking provided is inadequate. Additionally, the lack of bus service is contributing to traffic problems.

## Policy S9: Tetbury

*For the supporting text of Policy S9 you said (6 comments received):*

1. **Land Development and Urban Planning:** Several comments address concerns and suggestions regarding land development and urban planning in Tetbury. Comment discusses potential sites for residential development and emphasises the importance of preserving natural

areas and minimizing visual impact. Comment supports a comprehensive allocation of land for sustainable growth and the deliverability of the proposed site at Hampton Street. Comment suggests a traffic solution for a specific site, indicating the need for pedestrian safety and proper access roads. Comment adds further concerns about pedestrian access and safety in proposed development, highlighting conflicts that might arise with changes to existing pathways.

2. **Infrastructure and Transport:** Infrastructure and transport are key concerns throughout the comments. Comment from Tetbury Town Council provides a thorough perspective on the importance of good infrastructure, including public transport, to prevent loneliness and facilitate community engagement. The comment also mentions the need for an increase in parking, improvement in public transport, and diversification of shops. Comment acknowledges Wessex Water's role in the area and notes no additional allocations in the proposed updates, hinting at the importance of considering utility services in planning. Comment briefly touches on the need for safe pedestrian routes alongside proposed developments.
3. **Housing and Community Needs:** Housing needs and desires for supporting community life are major points raised. Comment outlines the need for more social housing, bungalows, and rental properties and expresses support for policies that would reduce the number of short-term rentals like AirBnBs to help foster a stable community. The need for additional primary school facilities based on housing growth is also mentioned.
4. **Environmental Sensitivity and Conservation:** Environmental concerns are evident, particularly in comment, which notes the need for careful design to minimize the impact on rural areas and suggests portions of land be set aside for wildflower or meadow areas. Comment supports the focus on renewable energy but stresses the importance of implementing it without compromising natural beauty. The same comment also points out the necessity of clear management of green spaces with adequate funding from developers.

*For the Policy wording of Policy S9, you said (6 comments received):*

1. **Tetbury's Housing and Infrastructure Needs:** Comments from various participants indicate a recognition of Tetbury as a growing town with a need for additional housing and improved infrastructure. The mention of potential housing developments, including the allocation for up to 180 dwellings, reflects an understanding of the demand for housing in the local community. The need for infrastructure improvements, such as better transportation services, increased employment opportunities, and concerns about traffic from new housing developments affecting current roads, are noted. Furthermore, the significance of communal spaces like the Dolphin Hall and the lack of burial land are highlighted.
2. **Community Amenities and Services:** Multiple comments emphasise the importance of community services and amenities in Tetbury, such as the renovation of the Dolphin Hall to serve as a community hub, the improvement of leisure provisions, and the potential contribution of new residential sites to funding these projects. There's also mention of the loss of local conveniences like the Wild Carrot, and suggestions for including a similar facility in future development plans. 3. **Traffic and Transportation Concerns:** The comments reveal concerns about traffic congestion and transportation issues in and around Tetbury and Moreton. The need for a by-pass to alleviate traffic blockages is mentioned, as well as the difficulties faced with access and transport services in Tetbury, especially regarding new housing developments like the one on Blind Lane. There are also calls for improved public transport connections to help residents travel for work or education and to support overall mobility within the community.
3. **Burial Ground Capacity:** Concerns about the approaching capacity of burial grounds are raised, specifically at Saint Saviours. Comments suggest that developers should contribute land or funding

for new burial grounds to accommodate the needs of the expanding population, advocating for this to be included as part of the infrastructure developments.

### Policy SI0: Andoversford

No comments.

### Policy SI I: Bourton-on-the-Water

*For the supporting text of Policy SI I you said (4 comments received):*

1. **Infrastructure Concerns:** Comments express concerns regarding the inadequate infrastructure to support new housing developments in Moreton, Stow, and Bourton, highlighting issues with doctor availability, school capacity, sewage systems, and road traffic, particularly emphasising that the Fosseway cannot cope with increased demand.
2. **Housing Affordability and Sustainability:** There are strong sentiments about the need for more affordable housing, suggesting that homes should be within financial reach for those earning £25k annually, and they should incorporate sustainable features such as solar panels, water recycling, and sustainable heating. The comments also mention the importance of building on brownfield sites as opposed to farmland.
3. **Economic Diversification and Employment:** Comments underline the reliance on tourism in Bourton-on-the-Water but also stress the importance of economic diversification and the necessity for developing employment opportunities alongside residential development to cater to the local population. The business Hacklings is cited as an example of a local employer wanting to expand without relocating, promoting available land for the purpose.
4. **Suitability for Development:** Comments mention specific areas within Bourton-on-the-Water, such as land north of Moor Lane and the area near the industrial estate, being considered optimal for development due to their sustainability and connection to transport routes.
5. **Policy SI I and Local Plan Engagement:** There is a mention of Policy SI I and the Local Plan, indicating some proposed unchanged elements, the need for additional residential development, and concerns that the future of local businesses like Hacklings must be taken into account in the policy to ensure they have the security to continue operations in the area.
6. **Lack of Comment:** One comment explicitly states, 'No comment', indicating either a neutral stance or abstaining from providing an opinion.

### Policy SI2: Northleach

No comments

### Policy SI3: Stow-on-the-Wold

*For the supporting text of Policy SI3 you said (3 comments received):*

1. **Infrastructure Concerns and Development Impact:** The comments express concern over the adequacy of local infrastructure to support new housing developments. They highlight issues with Doctors (long wait times), School capacities, Sewage systems (beyond breaking point), and Road congestion (particularly Fosseway). The mention of unsustainable pressure due to executive homes that are unaffordable to most local jobs and the lack of affordable housing is a common theme.
2. **Affordable Housing and Local Needs:** The comments articulate the need for affordable

housing in the area, noting the lack of real affordable development in Stow and the emerging Neighbourhood Development Plan's attempts to address this with a mix of housing. The pressing need for housing that is accessible to lower salary earners, with suggestions that homes should be affordable for those earning around £25,000 a year, is underscored.

3. **Community Sustainability:** Concern is expressed about the future sustainability of the local community, given the aging and declining population, along with suggestions for socially rented accommodation to support key workers, working families, and the local youth. A lack of social housing and the need for new community facilities is mentioned as critical for sustainable development.
4. **Environmental and Planning Policy Critique:** There is a critique of current planning policies as insufficient for meeting local needs, with calls for more positive policies that address population needs rather than restrictive approaches. Criticism is also directed at proposed overdevelopment and its potential impacts on congestion and the local environment, emphasising the need for balanced district-wide housing distribution.

### Policy SI4: Upper Rissington

No comments.

### Policy SI5: Blockley

*For the supporting text of Policy SI5 you said (2 comments received):*

1. **Community Development and Infrastructure Improvements:** Comments indicate that there is engagement with local infrastructure projects such as securing an allotment site, addressing the need for additional burial ground space, and enhancing footpaths and cycle paths to connect villages and employment sites. There is also an effort toward improving public transportation, such as the reinstatement and safety enhancement of a bus stop.
2. **Youth Facilities and Public Transport:** There is a concern expressed about the lack of facilities for youth and in the interim, a suggestion to improve public transport and access to existing local facilities to better serve the younger population.
3. **Correction on Mentioned Business Park:** A specific comment indicates a correction related to the mention of Upper Rissington Business Park, suggesting a need for accuracy and fact-checking in the documentation or discussion.

### Policy SI6: Chipping Campden

*For the supporting text of Policy SI6 you said (8 comments received):*

1. **Affordable and Social Housing:** Multiple comments express concerns over the affordability of housing in relation to local wages and the need for housing that younger, working, and economically challenged residents can afford. The high market rates make it difficult for lower-paid workers to afford homes, and there are suggestions to redefine 'affordable' based on local incomes. There are also issues with covenants on houses meant for local working people being ignored.
2. **Employment Opportunities:** The comments highlight the need for sustainable employment opportunities in Chipping Campden and the fact that many residents commute to Evesham and Stratford upon Avon for work. The issue with expensive housing is linked to the problem of insufficient local employment that could sustain the economic viability of the town.
3. **Infrastructure and Public Transport:** There are remarks about the inadequacy of current bus

services and road infrastructure due to heavy traffic and accidents, with suggestions to improve public transport services like bus timetables and the re-opening of the railway station to alleviate traffic and foster employment and tourism. Concerns are present about the impact of housing on the highway network due to the potential removal of a new railway station from major infrastructure schemes list.

4. **Covenants on Houses:** Comments mention that Housing Associations are not adhering to covenants stating homes should be for working people with local connections. It is suggested that covenants should be registered with the Land Registry to enforce adherence and support economic viability.

*For the Policy wording of Policy S16, you said (2 comments received):*

**Housing Development Concerns:** The comments express concerns about the proposed development of more than 36 dwellings on land at Aston Road. There are worries about insufficient road infrastructure and potential drainage and flooding problems if significant new housing is added within Chipping Campden itself. An alternative suggestion is to build a new village at the site of the old Polish Camp on the A44, which could include social amenities and a convenience store.

## Policy S17: Mickleton

*For the supporting text of Policy S17 you said (15 comments received):*

1. **Preservation of Mickleton's Allotments and Vineyard:** Several comments reflect concern over the loss of community assets, including the allotments and vineyard, due to proposed housing developments. These spaces are seen as vital for local food production, community spirit, ecological diversity, and educational purposes. There is also a mention of the historical importance of these allotments and their contribution to soil fertility.
2. **Inadequate Local Infrastructure:** Multiple comments highlight that recent and potential future developments have outpaced infrastructure improvements in Mickleton. Concerns include the lack of medical services (such as GP and dental practices), loss of post office services, traffic congestion, and the absence of adequate public transport. Some comments suggest that the village cannot support further population expansion without significant investments in local infrastructure.
3. **Residential Development and Land Use:** Comments touch upon residential development plans and appropriate land use within Mickleton. They suggest assessing land west of Stratford Road Lane for housing and questioning the suitability of certain areas for development based on issues like surface water flooding, ecological impact, and the necessity to protect functioning community spaces.
4. **Community and Environmental Impact:** There are concerns about the impact of housing development on the community and environment. The importance of community spaces, conservation of wildlife, maintenance of a communal spirit, and the reduction of carbon emissions were emphasised. There are also references to the negative effects of urbanisation on local biodiversity.
5. **Need for Specific, Up-to-Date Information:** A few comments criticize the lack of current, specific data justifying the need for increased housing in the region. They call for a clearer understanding of who the developments are for and what the actual local demands are.

*For the Policy wording of Policy S17, you said (4 comments received):*

1. **Removal of Paragraph 7.20.4 and Housing Development Concerns:** Commenters

express concerns and differing views about the removal of paragraph 7.20.4. Some argue for the removal to enable housing development, particularly advocating for affordable housing and sustainable sites. Others worry that the removal might disregard environmental constraints, local infrastructure inadequacies, and the village's recent growth. They fear it could lead to unplanned developments and increases in traffic without addressing the lack of local amenities.

2. **Infrastructure and Local Amenities:** Several commenters mention the lack of infrastructure and local amenities as a concern should further development be pursued. They note the absence of facilities like health centres and shops, the loss of a Post office, narrow roads, and the potential issues with moving amenities like allotments, which could lead to increased car usage.
3. **Sustainable Development and Environmental Protection:** Comments touch on the need for sustainable development, with references to the National Planning Policy Framework (NPPF) from December 2023. Commenters highlight the importance of prioritizing sites that offer sustainable transport options and mention the potential negative impact of new developments on community health, green spaces, and carbon activities.

## Policy S18: Moreton-in-Marsh

*For the supporting text of Policy S18 you said (88 comments received):*

1. **Infrastructure and Services Concerns:** Many comments reflect concerns about the adequacy of existing infrastructure and services in Moreton-in-Marsh, such as sewage treatment, roads, medical facilities, and parking. The influx of new housing is perceived to exacerbate these issues without clear plans for upgrades, particularly in light of potential developments at the Fire Service College site.
2. **Environmental Impact and Flooding Concerns:** The threat of increased flooding due to overdevelopment on local floodplains, along with concerns about environmental damage and preservation of areas such as the Special Landscape Area (SLA), were prominent. Some comments also highlight pollution issues and the presence of 'forever chemicals' at the Fire Service College site.
3. **Traffic, Road Safety, and Public Transport:** A significant theme revolves around traffic congestion, as Moreton-in-Marsh is already facing issues that are expected to worsen with new housing additions. There are calls for improved road safety and pedestrian access, while the potential benefits of a new bypass are debated, along with its funding and environmental impact. Questions are also raised about the effectiveness of public transport and whether it can support an increased population.
4. **Housing Development, Growth, and Character of Moreton-in-Marsh:** There is a strong sentiment against the disproportionate allocation of housing to Moreton-in-Marsh, as it is perceived to threaten the town's character. The consultation process is criticised as inadequate, with a need for transparency and accounting for 'garden village' implications. Concerns also include the lack of employment opportunities for new residents and the impact on community and tourism.
5. **Management and Enforcement of Development:** Citizens question the ability of the Council to effectively manage and enforce development, highlighting past experiences where infrastructure promised by developers was not delivered. CDC's capability to control such outcomes is a recurring doubt, with many advocating for strict, enforceable financial penalties for non-compliance.

*For the Policy wording of Policy S18, you said (33 comments received):*

1. **Infrastructure and Services Concerns:** Many comments express concerns about the adequacy of current infrastructure and services to support proposed developments. Issues include inadequate road systems, insufficient healthcare facilities, and concerns about sewage and waste management. Some comments specifically question the capacity of existing schools, the need for new educational facilities, the ability to provide enough employment for incoming residents, and whether transport services can handle the increased demand.
2. **Development and Growth:** Comments reflect concerns about the pace and scale of growth in Moreton-in-Marsh, with many expressing that the development plans are too aggressive and risk changing the character of the area. Fears include overdevelopment, strain on amenities, loss of green spaces, and the change to the rural nature of the area. The adequacy of plans involving Farmland and the Fire Service College site for residential and commercial expansion receive critical attention.
3. **Environmental Concerns:** Environmental issues are a significant concern, with multiple comments highlighting the impact of development on local ecosystems, including farmland, wildlife, waterways, and the overall landscape. The risks of increased flooding due to overdevelopment and strain on sewage systems are recurring themes. Comments also mention concerns about the impact of a new bypass on the landscape and infrastructure.
4. **Transportation and Traffic:** The potential increase in traffic and insufficient road capacity are common concerns, with questions about the viability of a new bypass and whether it will actually alleviate traffic problems. There is scepticism about whether new developments will be sustainably connected to existing transport infrastructure and whether the public transport services will be able to support the increased population.
5. **Housing and Population:** Numerous comments question the necessity and impact of significant new housing developments, expressing worry that the influx of residents will outstrip local services and infrastructure. Concerns are also raised about the actual need for additional housing in light of existing capacity and the demographic trends, as well as scepticism about employment opportunities for new residents.
6. **Planning and Engagement Process:** Some comments criticize the consultation and planning processes, suggesting they are inadequate for the scope of proposed developments. There are objections regarding the short comment period, confusing methods for collecting feedback, and a perceived design to deter comments. There are also demands for more detailed impact studies and an independent local/master plan for development.

## Policy S19: Willersey

*For the supporting text of Policy S19 you said (2 comments received):*

**Local Development and Sustainability:** Comment 7767 stresses the importance of developing settlements like Willersey to support local services, referencing policies that encourage growth in rural villages and promote sustainability. The need for new housing, particularly in light of recognised affordability issues, is highlighted. Willersey's role in the district and the need to reevaluate previously dismissed development opportunities, such as the Moore Lane site, are discussed to support the viability of the community.

## Chapter 8: Housing to Meet Local Needs

### HI - Housing Mix and Tenure to Meet Local Needs

#### *Policy proposal*

Removal of references to the scrapped government Starter Homes scheme. New requirement for accessible housing to enable people to live longer at home in older age.

#### *For the supporting text of Policy HI you said (13 comments received):*

1. **Housing diversity and local need:** Several comments express concern about ensuring a diverse mix of housing to meet local needs, including affordability, occupancy, and opportunities for self-building. They emphasise the importance of policies encouraging a variety of housing types and sizes, suitable for different demographics, and support community-led development.
2. **Regulations on second homes and holiday lets:** The comments address the negative effects of second homes and holiday lets on the housing market and local community. Suggestions include policy measures to prevent these dwellings from being unoccupied full-time and to reduce carbon emissions caused by commuting.
3. **Supporting accommodations for ageing residents:** There's concern over the lack of suitable and affordable housing for the ageing population. The comment mentions the shortage of appropriate properties, like bungalows, for elderly residents.

#### *For the Policy wording of Policy HI, you said (6 comments received):*

1. **Policy HI – Housing Mix and Tenure to Meet Local Needs:** Multiple comments discuss Policy HI, which is focused on achieving a diverse housing mix and appropriate tenure to satisfy local needs. Specific mention is made of the need for a large percentage of accessible and adaptable housing, following M4(2) and M4(3) Building Regulations standards. Some comments seek clarity on the justification for the set percentages, while another notes the revision adding requirements for housing accessibility.
2. **Affordability and Provision of Affordable Housing:** Several comments highlight the importance of affordable housing provision. There's a call for maximizing affordable home delivery and an outline stating that developments of certain sizes contribute to this. Issues raised include the potential conflict with self-build housing for older people and the viability of such projects, as well as a need to prioritize affordable housing over self-build lot provision in some circumstances.
3. **Technical Requirements for Accessibility:** Comments refer to amendments in the housing policy requiring a certain percentage of housing to meet different categories of accessibility and adaptability standards (M4(2) and M4(3)). They discuss the need for evidence to justify these requirements and the alignment with national policies and local assessments.
4. **Diversity of Housing and Opposition to Segregation by Housing Type:** Some concerns are voiced about the danger of housing segregation, emphasising that developments should not be solely for affordable or social rent but should ensure a mix to maintain balanced communities. The planning policy is urged to recognise the presence of Service Family Accommodation (SFA) within the mix.
5. **Concerns Over Housing Occupancy:** A couple of comments address the issue of vacant housing, critiquing the distortion of housing shortage figures due to properties being underused or uninhabited, such as those kept for weekends, short-term rentals, or holiday lets.

6. **Support for Self-Build Housing:** There is advocacy for self-build housing, suggesting it produces higher quality, better-designed, and more energy-efficient homes compared to developer-led constructions. However, issues of practicality and policy expectations around self-build plot provisions on new developments are noted.
7. **Policy Support from Local Employers:** One comment, presumably from a local school as a significant employer, simply expresses support for Policy H1 without providing further specific details.

## H2 - Affordable Housing

### *Policy proposal*

Various proposals to increase affordable housing delivery. Includes: increasing the affordable housing requirement from 30% to 40% on brownfield and from 40% to 50% on greenfield sites; changing the requirement for a financial contribution in the Cotswolds National Landscape and any future 'designated rural areas' from 6-10 dwellings to 3-9 dwellings with all developments of 10 or more homes requiring on-site affordable housing provision; removing a loophole for avoiding affordable housing contributions by submitting several smaller schemes; a new policy for entry-level exception sites; and many more.

### *For the supporting text of Policy H2 you said (31 comments received):*

1. **Viability Concerns over Affordable Housing Increase:** Commenters express concerns over the increase of the affordable housing threshold and percentages, emphasising the lack of viability testing and the potential financial impact on developers. The increase is deemed not thoroughly justified or assessed for its economic implications, especially considering the introduction of additional regulations and requirements like CIL, BNG, and policy H11 which increase building costs.
2. **Affordable Housing on Brownfield vs. Greenfield Sites:** There are divergent opinions on the proportion of affordable homes on brownfield versus greenfield sites. While some suggest incentives for brownfield developments, others argue for a higher percentage of affordable housing across all new developments, regardless of the type of site, to mitigate the shortage of affordable housing in the area.
3. **Policy Details and Specific Contributions:** Commenters discuss the specific details of policies related to affordable housing, such as the Housing SPG, which outlines the contributions of social rent and first homes. There's mention of the specific allocation of affordable homes and how they should be distributed, reflecting the community's needs.
4. **Increasing Affordable Housing Supply:** Some comments focus on the urgent need to increase the supply of affordable housing, suggesting that all new developments should include a significant percentage of affordable homes. Additionally, they propose measures to convert second homes or holiday lets into long-term affordable housing for local residents.

### *For the Policy wording of Policy H2, you said (5 comments received):*

1. **Affordable Housing Requirements:** Comments often discuss the updated Policy H2, reflecting a push towards delivering a greater percentage of affordable housing within developments. Changes include the reduction of the threshold from 11 to 10 dwellings and increasing the affordable housing contribution from 40% to 50% for non-brownfield sites. Several comments express support for the emphasis on affordable housing to meet identified needs. Concerns are raised about the policy's impact on the viability and deliverability of new developments, especially for smaller sites and developers. Some comments question whether the policy changes have been

adequately viability tested and suggest maintaining the current thresholds or re-evaluating the policy based on solid viability assessments.

2. **Viability Concerns:** A recurring theme in the comments is the concern over the viability of developments in light of the increased affordable housing requirements proposed in Policy H2. Commenters question whether the necessary viability assessments have been conducted to justify the increased percentages. They argue that the combined costs of development constraints, such as affordability thresholds, infrastructure levies, and sustainability requirements, may hinder the development of not just affordable but also market-rate housing. Many comments outline the need for an updated and robust viability assessment that would guide realistic and deliverable policies.
3. **Distribution and Types of Affordable Housing:** Comments highlight the importance of ensuring a proper mix of housing to meet local needs. Some express support for policies aiming to increase the amount of affordable and social housing, specifically citing the high demand and the necessity to match the type of affordable housing with locality-specific needs. Others imply that affordable housing should not only increase in quantity but also cater to a range of sizes and types appropriate for the community. It is suggested that an Affordable Housing Supplementary Planning Guidance (SPG) be developed to provide further details.
4. **Impact on Rural Development:** Several comments convey a specific concern about the potential negative implications of the updated affordable housing policies on rural development. The concern stems from a belief that higher affordable housing thresholds might disincentive the development of needed housing types in rural areas and might disproportionately affect smaller and individual housebuilders. Suggestions are made to reconsider or adjust the affordability contribution requirements for rural sites to maintain development viability and to better align with realistic and sustainable growth in rural communities.
5. **Local Benefits and Sustainability:** There is general acknowledgment among some comments regarding the positive impacts that well-planned affordable housing can have on local communities, such as increasing vitality and supporting amenities and services. However, there is also a call for housing strategies to ensure that such benefits are realistically achievable without compromising sustainability and the ability of developments to proceed.

### H3 - Rural Exception Sites

#### *Policy proposal*

Minimal changes, including defining a “strong local connection”.

#### *For the supporting text of Policy H3, you said (4 comments received):*

1. **Community and Local Connection:** Concerns about development should consider the needs of the local community and its connection to the locality.
2. **Meon Support for Policy:** There is expressed support for a specific policy (H3) by an educational institution.

#### *For the Policy wording of Policy H3, you said (4 comments received):*

1. **Exceptions in Development Strategy:** Several comments discuss the need for the development strategy to include exceptions beyond affordable housing and self-building projects. They emphasise incorporating housing that accommodates the elderly or disabled, housing with enhanced low carbon and climate resilience features, and housing with better ecological credentials than currently mandated.
2. **Confusion Over Language Regarding Subsidies:** One comment expresses confusion over

the term 'no public subsidy' as it relates to grants from the government, suggesting a need for clarification about government funding and whether it constitutes a subsidy.

## H4 - Specialist Accommodation for Older People

### *Policy proposal*

No changes to the housing requirements. Clarity on how the requirements will be monitored. New requirements for developments to promote active lifestyles and older peoples' engagement in community life. Changes also proposed in the Design Code.

### *For the supporting text of Policy H4 you said (8 comments received):*

1. **Housing Needs and Policy Updates:** Comments highlight concerns regarding the updates and new policies for housing, specifically relating to older people's accommodation. They emphasise that the housing requirement figures are outdated and do not reflect current needs. There is a demand for an assessment based on up-to-date local housing needs, reflecting the changing demographics, and accommodating different types of older persons' housing as recognised by national policy.
2. **Affordable and Inclusive Housing:** Several comments call for a broader range of affordable, inclusive housing solutions. Some express concern that specific demographic groups, such as young people under 35 and the less affluent older local residents, are being overlooked or outpriced. There is also a suggestion to explore alternative housing options like residential conversions, hostels, and HMOs, which could cater to residents with special needs or those seeking low-cost residential opportunities.
3. **Clarity and Specificity in Housing Policies:** Comments point out that the new policy wording lacks clarity, and more refined definitions and expectations are needed. There is ambiguity related to vacant units, affordable housing criteria, and how dementia-friendly design principles are integrated into all types of older persons' accommodation. Respondents suggest revisions for greater precision in policy language, accurate assessment methodologies for different types of accommodations, and how to operationalize mixed-age developments.

### *For the Policy wording of Policy H4, you said (4 comments received):*

1. **Need for Specialist Housing for Older People:** Multiple comments highlight the need for allocating specific sites for retirement housing and specialist accommodation for older people. Commenters state this requirement is in line with the National Planning Policy Framework (NPPF) and emphasise that current provisions are insufficient for the predicted demographic changes. They express concern that the current draft policies do not adequately reflect the needs of older people within planning policies and could lead to imbalances in the community and strain on healthcare services due to demographic concentration. Commenters also suggest that the local plan lacks a sound strategy for meeting these needs, thus potentially failing to conserve the character of certain areas by encouraging unplanned and speculative developments.
2. **Availability of Services for Older People:** Some commentators argue that there should be clarity and certainty in planning policy to provide for housing that meets the needs of older individuals. This includes accessible services and facilities that support active travel and independent living.
3. **Impact of Demographic Imbalance:** Comments bring up the need to address demographic distribution issues, warning that neglecting to properly plan for the housing needs of the aging population may lead to imbalances that strain services and impact local employment due to a lack of workforce within the necessary age groups.

4. **Support for Policy H4:** Some responses specifically support Policy H4, suggesting it benefits the community by facilitating downsizing for older individuals and leading to the availability of family homes for younger people.
5. **Lack of Policies:** Commenters mention the absence of certain policies from the draft Local Plan, indicating that policies related to Residential Hostels, HMOs, and Residential conversion are missing and needed.
6. **No Comment:** A response labelled 'No comment' offers no actionable feedback or specific concerns for analysis.

## H5 - Dwellings for Rural Workers Outside Principal and Non-Principal Settlements

### *Policy proposal*

Various proposals to ensure new dwellings for rural workers and extensions to those dwellings do not go beyond what is needed and do not enable the creation of market housing in locations that would otherwise be unsuitable.

### *For the supporting text of Policy H5 you said (2 comments received):*

1. **Rural Workers' Dwelling Policy:** The comment discusses proposed changes to policy H8, which may affect the development of rural workers' dwellings by precluding applications to replace temporary dwellings with permanent homes. It suggests that policy H5 should be clarified to ensure development for rural workers' dwellings is supported, following a proving period with a temporary home
2. **Lack of Comment Content:** One comment simply states, 'No comment', indicating either a refusal to comment or that the commenter has no opinion or relevant information to provide on the topic at hand.

## H6 - Removal of Occupancy Conditions

### *Policy proposal*

Merger of different policies that deal with the removal of occupancy conditions. Requirement for newly created dwellings to comply with the Nationally Described Space Standard.

No comments.

## H7 - Gypsy and Traveller Sites

### *Policy proposal*

Updated need for Traveller pitches, as well as updates to the supporting text to identify how needs are being accommodated.

### *For the supporting text of Policy H7 you said (2 comments received):*

1. **Flood Risk and Site Location:** The comments express concerns regarding the location of Gypsy and Traveller Sites in relation to flood risk areas, emphasising the need for policies to consider climate change impact and avoid placing these sites in high-risk zones.
2. **Lack of Specificity in Site Planning:** One comment points out the lack of clarity in the planning documents regarding the additional sites under consideration for Gypsy and Traveller communities, suggesting the need to include secondary and tertiary site considerations.

## H8 - Replacement Dwellings

### *Policy proposal*

New policy, ensuring that replacement dwellings are not inappropriately large. It also closes a loophole where applicants gain permission through permitted development rights or a Certificate of Lawful Existing Use of Development and build a new replacement dwelling in a location that would otherwise be unsuitable. The new policy reinstates several aspects of a revoked policy from the former adopted Local Plan.

### *For the supporting text of Policy H8 you said (7 comments received):*

1. **Policy soundness and justification:** Multiple comments express concerns about the lack of justification and inconsistency with national policy for the proposed policy H8. These concerns focus on how the restrictions on replacing buildings could be unsound due to arbitrary limits instead of individual development impact assessments, the unclear benefits of limits on dwelling sizes in relation to the character of the area, and existing measures that already safeguard against harmful developments.
2. **Flood risk and sustainable construction:** One comment suggests adding to the policy the requirement that any enlargement of dwellings should comply with sustainable construction standards and not increase flood risks, to ensure a sound local plan.
3. **Clarity of policy language:** There is a request to clarify the language in a sentence regarding the scale and volume of replacement dwellings, implying that the current wording can lead to misinterpretation about the allowed size of enhancements to existing structures.

### *For the Policy wording of Policy H8, you said (3 comments received):*

1. **Policy on Replacement Dwellings:** Several commenters express concern over the existing policy regarding replacement dwellings, particularly focusing on criteria that could be seen as restrictive and unnecessary. The core issues revolve around Policy H8's criteria that do not permit replacements of converted dwellings within 10 years. Commenters argue that once a building's principle for housing is established through conversion, its replacement should be permissible, and that blanket restrictions on future modifications are unjustified. They advocate for a case-by-case consideration rather than across-the-board rules.
2. **Community Impact and Housing:** Two comments provide contrasting views regarding the impact of housing policies on the community. One comment supports the policy that restricts the replacement of smaller houses with larger ones, claiming it preserves land for more affordable development and thus enhances the community vitality. Another comment disputes the need for strict restrictions, arguing that replacement dwellings often improve the local housing supply with better quality, energy-efficient homes. Both comments highlight the balance between development and community needs.
3. **Permitted Development Rights:** Commenters are voicing their concerns about policy proposals to remove permitted development rights on future extensions or alterations to replacement dwellings. This proposal is deemed contrary to national guidance, which advises such restrictions only in exceptional circumstances. Commenters emphasise that blanket policies lack justification, calling for more nuanced, case-specific policymaking.
4. **Clarity and Specificity in Policy:** Some comments call for clarity and specificity in policy guidelines, suggesting that vague terms can lead to unusual designs and potential abuse. Reference is made to needing explicit numbers to avoid ambiguity and to questionable exceptions to rules regarding family needs.

5. **General Policy Support:** There are comments expressing general support or disagreement with the policy discussed without delving into specific details, thus showing a divide in overall reception of the policy.

## H9 - Extensions and Alterations to Dwellings

### *Policy proposal*

New policy, which supports extensions but sets some limitations on the size of extensions to help protect the unspoilt character of the Cotswolds and the wider district and to maintain a range of housing types, particularly the stock of smaller / typically lower priced house types to meet the needs of Cotswold communities.

*For the supporting text of Policy H9 you said (5 comments received):*

**Policy Restrictions and Clarity:** The comment expresses concern over arbitrary limits to household extensions proposed by Policy H9, arguing that these limits are not in line with national policy, except in the Green Belt. It challenges the soundness and effectiveness of the policy due to lack of clarity, especially with the term 'mathematically subservient'. Furthermore, it argues that current design policies sufficiently ensure that extensions are in proportion with their surroundings and maintains the character of the area, making the blunt tool of Policy H9 unnecessary. It also criticizes the provision for 'exceptional circumstances' as indicative of the flaws in the policy's limits and calls for the deletion of restriction H9(4). The exemption for particular applicants in H9(5) is highlighted as problematic, as it contradicts the principle that the merits of a proposal should be the basis for planning decisions, not the characteristics of the applicant.

*For the Policy wording of Policy H9, you said (1 comments received):*

1. **Policy H9: Extensions and Alterations:** Policy H9 in the Cotswold Local Plan is critiqued for limiting extensions to a fixed percentage of the existing dwelling's floorspace, especially outside Principal Settlements, and is seen as not 'positively prepared' or 'justified' due to lack of evidence demonstrating the need for such restrictions. Concerns are raised that the policy could lead to inadequate or harmful design outcomes, implying that each extension should be assessed individually.
2. **Permitted Development Rights:** There is concern regarding the aesthetic impact of front-facing developments like porches on the character of established villages, suggesting the need for control or restriction on such developments to preserve street scenes.
3. **Daylight and Design Guide Consideration:** Proposals are made for Policy amendments to include considerations of daylight, sunlight, and the overbearing impact on nearby residents, with a suggestion to cross-reference the design guide for a more comprehensive approach to planning.
4. **Flexibility in Size Restrictions:** There is feedback indicating that the specific floorspace and size restrictions mentioned in the policy are overly restrictive and that these should be more flexible and left to the planning process to decide based on the context of each building.

## H10 - Community-Led Housing

### *Policy proposal*

New policy providing further support for community-led housing developments to deliver more genuinely affordable housing, whilst providing a further boost to the housing land supply.

*For the supporting text of Policy H10 you said (4 comments received):*

1. **Community-Led Housing & Definitions:** The comments highlight the need for consistency in definitions of community housing terms like Community Land Trusts (CLTs) and emphasise their alignment with rural exception development policies. The importance of CLTs being locally responsive and favouring social rent due to being a community response to need is also noted.
2. **Strategic Infrastructure Building & Housing Policy:** A point raised revolves around the stipulation for market housing in conjunction with affordable housing to facilitate strategic infrastructure as part of local planning policies. The requirement of a viability assessment to prove the necessity of the market housing for the infrastructure is also mentioned.

*For the Policy wording of Policy H10, you said (2 comments received):*

1. **Policy and NPPF References:** Several comments mention the National Planning Policy Framework (NPPF) and the need for the policy to align with it. One comment suggests that the policy has more exacting locational criteria than found in NPPF and should be redrafted along the lines of NPPF's paragraph 73. Another comment advises to compare the policy's definition with the NPPF 2023 for any meaningful variations and emphasises that supporting text should make clear the role of CLH in delivering affordable housing.
2. **Support for the Policy:** A member of the Cirencester Cohousing group expresses support for the proposed policy, commending the CDC on its proposition.
3. **Irrelevant Comment:** One comment simply states, 'No comment.' and does not contribute to the themes being discussed.

## H11 - Homelessness Housing Provision

### *Policy proposal*

New policy requiring all major housing development (for example, 10 or more dwellings) to contribute towards homeless housing provision to meet the identified need in the District and address the Council's strategic objectives on meeting affordable housing. Contributions will be by way of a financial contribution from the developer.

*For the supporting text of Policy H11 you said (7 comments received):*

1. **Homelessness Policy Clarity and Implementation:** The comments express concerns regarding the clarity of the new policy and its practical implications, particularly regarding how it will be delivered, its main aims, and the responsibilities of Local Authorities. Moreover, there are concerns about how contributions to homelessness prevention will be integrated with affordable housing requirements and secured through Section 106 contributions.
2. **Policy Terminology Consistency:** One comment points out a lack of consistency in the draft document concerning the use of terms such as 'the applicant' and 'the developer,' suggesting a need to standardize terminology for clear understanding.
3. **Document Completeness:** A comment identifies an issue with the completeness of the draft policy document, noting an instance of an incomplete sentence, which may indicate the need for thorough proofreading and editing.

*For the Policy wording of Policy H11, you said (3 comments received):*

1. **Compliance with Statutory and Policy Tests:** Comments express concerns that Emerging Policy H11 does not align with regulatory requirements such as Regulation 122 and the NPPF criteria. The policy is criticized for not meeting the necessary criteria of being directly related to development, and fairly and reasonably scaled.

2. **Incorporation of Homelessness Provisions into Affordable Housing Policy:** Several remarks suggest that homelessness housing provisions should be integrated within the broader affordable housing policy and wider housing strategy, rather than as separate financial contributions that do not meet the CIL tests.
3. **Impact on Housing Affordability:** Comments reveal a belief that placing additional financial burdens on housing developments to tackle homelessness will inadvertently raise housing costs, thus making homes less affordable and exacerbating the need for more affordable housing solutions.
4. **Effectiveness of Policy H11:** A critique is levelled against Policy H11's effectiveness, stating it is counterproductive and bound to fail scrutiny during examination. The recommendation is to delete the policy on the grounds that it is misdirected and burdensome.
5. **Policy Clarity and Aims:** There are comments indicating that the policy wording is unclear concerning how it will be implemented and what its main goals are, leaving commenters unable to discern the policy's exact aims and mechanisms.
6. **Support for New Policy Basis:** While there is major criticism of Emerging Policy H11, at least one commenter is satisfied that the policy offers an appropriate new approach to addressing housing issues.
7. **Guidance for Policy Implementation:** One comment suggests the addition of guidance to help applicants understand how funds from the policy will be used to alleviate homelessness.
8. **Neutral or Non-Substantive Feedback:** A comment provides no substantive feedback or opinion regarding the policy.

## Chapter 9: Economy, including Retail and Tourism

### EC1 - Employment Development

#### *Policy proposal*

Minor textual changes to improve comprehension. An additional requirement for applicants to encourage travelling to and from work by sustainable methods of transport.

*For the supporting text of Policy EC1 you said (3 comments received):*

1. **Support for Employment and Training Opportunities:** Comments express a desire to create policies that encourage the development of employment sites offering training for young people and upskilling or re-training for residents, with a focus on the green or circular economy.
2. **Transportation Alternatives to Private Vehicles:** There's support for policies that highlight the need for alternatives to private vehicle transportation, emphasising this in relation to employment and economic policies.
3. **Local Employment Opportunities:** Comments underscore the importance of ensuring that towns with limited public transport have accessible local employment opportunities, especially for young people.

*For the Policy wording of Policy EC1, you said (3 comments received):*

1. **Support for Local Business Growth:** Comments highlight the need for explicit policies that support the growth and certainty of local businesses. There is also a concern regarding existing policies that may not adequately encourage local investments.

2. **Improving Infrastructure and Economic Strategy:** There's a call for a more positive economic strategy and targeted infrastructure investment in the comments, which could influence commercial development and strengthen connections to larger networks.
3. **Employment Opportunities and School Collaboration:** Comments mention the importance of developing employment opportunities in connection with local schools to provide career paths for graduates, thereby ensuring the vitality of the communities.
4. **Protection of Existing Employment Sites:** The commentary suggests that weak policies might lead to a reduction of sustainable employment in communities, turning them into retirement or dormitory towns without adequate job opportunities.

## EC2 - Safeguarding Employment Sites

### *Policy proposal*

As noted in the summary of Policy SI, the government's changes to the Use Classes Order and subsequent amendments to Permitted Development rights have had a significant impact on policy planning. And not just in town centres. It has presented a major challenge to the council's long-standing policy of safeguarding employment sites to ensure the district's economic prosperity and resilience. Unless an industrial unit is classed as B1 or B8, all other existing units on an established employment or industrial estate are within Class E and could, with prior approval, change use to residential (Class C3). It hardly requires detailed explanation to see the myriad difficulties this can cause, not least for the people and families who may end up living in one of these conversions.

Our powers of control are limited. The use of Article 4 Directions is possible but can attract prohibitive levels of compensation. Officers have surveyed extant employment and industrial estates. The egregious ones have been identified and the policy is now amended thus:

*Appendix E identifies established employment sites that are important for general or heavy industry, waste management, storage and distribution, or a mix of such uses. These sites and their locations are likely to raise compatibility issues with residential use and proposals for change of use need to be scrutinised carefully. Consequently, to safeguard both the employment uses and the living conditions of any prospective residential occupiers of converted premises, some Appendix E sites are identified as requiring prior approval and may require express planning permission for a change of use.*

Having regard to new employment development on established or allocated sites, it is proposed to prevent automatic permitted change to residential by requiring that conditions are imposed restricting the use and requiring express planning consent for any subsequent change.

Other alterations to the policy and supporting text are minor textual amendments to bring it up to date with legislative and related changes.

### *For the supporting text of Policy EC2 you said (6 comments received):*

1. **Safeguarding of Employment Sites:** Multiple parish councils and stakeholders express a strong desire to safeguard existing employment sites. Concerns revolve around retaining local employment opportunities and ensuring that established sites are not hastily repurposed without exploring their potential for continued economic contribution or accommodating community-oriented initiatives.
2. **Policy EC2 Clarifications:** There is a consensus that Policy EC2 could benefit from further clarification. Commenters are seeking more precise definitions of terms like 'the area' in the context of unmet needs and a clearer understanding of the conditions under which alternative uses of employment sites may be appropriate. They also request more information about the

referenced Appendix E and the definition of 'prior approval'.

*For the Policy wording of Policy EC2, you said (4 comments received):*

1. **Safeguarding and Expansion of Employment Sites:** Several comments emphasise the importance of safeguarding existing employment sites and allowing for their expansion to facilitate local economic growth and retain businesses. Concerns are raised about the policy's lack of provision for extending into adjacent lands, which is seen as necessary for the growth of businesses that have outgrown their current sites. The policy's flexibility is appreciated, but its failure to address the potential extension of sites such as Bourton Business Park is highlighted, as well as the need to safeguard sites like the Springhill Industrial Estate for future growth.
2. **Clarification and Policy Details:** The comments seek clarity on various aspects of the local plan policies, including the meaning of 'no reasonable prospect' for development, the scope of 'the area' where unmet needs should be met, restrictions to specific classes of uses on employment sites, and the need for clear guidelines on permissions and prior approvals. They point out ambiguities in policy language that could complicate implementation and suggest that there should be room for beneficial co-existing uses on employment sites.
3. **Support for Local Economy and Character of Towns:** Some comments express support for policies that contribute to the local economy and retain the character of towns, such as the continuation of small, long-standing employment sites within market towns. The comments encourage comprehensiveness in reviewing and covering all sites to ensure they are protected and suggest considering Article 4 Directions as a tool for this protection.
4. **Provision for Diverse Business Types:** A few comments address the need for policy provisions that support various business types, including professional, high tech, and not exclusively industrial businesses, suggesting that these should be accommodated within residential areas when they do not adversely impact local residents.
5. **Marketing Criteria for Employment Sites:** There is an agreement with the policy's criteria of requiring a 5-year genuine marketing period to demonstrate that there's no reasonable prospect for the employment use of a site before redevelopment, which is seen as a way to ensure sites are not prematurely turned over to alternative uses.

## EC3 - Proposals for all types of Employment-Generating Uses

*Policy proposal*

Minor textual amendments to bring the policy and supporting text up to date with legislative and related changes.

*For the supporting text of Policy EC3 you said (2 comments received):*

1. **Support for Flexible Development Boundaries:** Comments reflect a support for flexible development boundaries to accommodate both large-scale and small-scale developments. While large-scale developments outside of development boundaries are generally discouraged, some comments acknowledge that small-scale developments generating employment opportunities can be suitable even outside the traditional boundaries. There's acknowledgment that development boundaries should be flexibly drawn to allow for economic growth, job creation, and expansion of settlements.
2. **Economic Growth Through Development:** A theme that emerges from the comments is the need for development policies that promote economic growth. This includes development flexibility for businesses to expand, and the recognition that economic growth may be stifled by

restrictions imposed by tight development boundaries.

3. **Diverse Employment Opportunities:** Comments highlight the importance of fostering diverse local employment opportunities. This diversity of opportunities is supported in the context of providing for different aspirations and needs, including those of students transitioning from academia to the workforce.

*For the Policy wording of Policy EC3, you said (3 comments received):*

1. **Need for Flexibility in Planning Policies:** Both comments stress the importance of amending planning policies to allow for increased flexibility to accommodate the growth and evolution of businesses. They highlight the need for policies that are not overly restrictive and can adapt to changing economic circumstances, new working practices, and unanticipated needs.
2. **Expansion of Development Boundaries:** The comments suggest that development boundaries should be drawn in a way that allows for future growth and job opportunities. There's a concern that current development boundaries are too restrictive, which could stifle economic growth and limit the potential for businesses to expand and attract new customers.

## EC4 - Special Policy Areas

### *Policy proposal*

The proposals primarily relate to the Royal Agricultural University (RAU) in Cirencester and the Fire Service College (FSC) in Moreton-in-Marsh. The policy is still under development, but the policy proposal shows the direction of travel.

- The RAU is seeking to grow its role as the UK's global agricultural university, including the delivery of a new Innovation Village and growing its student population. The update makes Policy EC4 more flexible to accommodate the RAU's growth plans by broadening the types of use that will be supported on the site and requiring purpose-built student accommodation to support the expansion of the RAU.
- The FSC proposal allocates 2ha of the existing site for a new primary school, which would be in addition to the existing St David's Primary School. The existing 7ha employment site allocation (ref: MORE6) would be expanded to around 10ha and the uses would be broadened from office to also include general industrial and storage and distribution uses (B2, B8 and E(g) use classes). The proposal also includes some 'enabling' housing development, the profits from which would be secured towards redeveloping life expired buildings on the FSC site and regenerating the wider site. Mitigating highway impact on the town centre is a key aspect of this proposal with a potential new road connecting Todenham Road to London Road (A44).

*For the supporting text of Policy EC4 you said (4 comments received):*

**Local Plan Development Proposals:** The comments reflect discussions around proposals for the development and expansion of local institutions, in this case, the Fire Services College and the Royal Agricultural University (RAU), in the context of the local planning framework. Comment critically analyses the plan for the Fire Services College, questioning the sustainability and local impact of planned developments. Comment is a supportive and detailed evaluation of the local plan for the RAU's proposed expansion, including the Innovation Village, with considerations for the university's growth, the parkland setting, and local community integration. Comment requests a special policy area for Fairford, indicating an interest in local development plans. Finally, comment generally supports the variations proposed for the Special Policy areas outlined for three sites, endorsing the support and development efforts.

*For the Policy wording of Policy EC4, you said (13 comments received):*

1. **Development at the Fire Service College (FSC):** Several comments express views on the proposed policy changes for development at the FSC and its impacts: explains the proposed policy updates, requesting further clarification and amendments for sustainable independent operation of developments, and mentions a typo in policy wording. point out traffic and accessibility issues associated with increased development. calls for transparency in agreements related to the FSC. asserts that proceeds should benefit local infrastructure rather than the FSC. expresses concern over community cohesion and opposes overdevelopment. Sport England supports leisure and playing fields protection at the FSC.
2. **Local Infrastructure and Community Impact:** Comments highlight the stress on Moreton-in-Marsh's infrastructure due to recent developments, indicating the need for infrastructure improvements to accommodate new homes. argue that further developments could strain community integration and resources, suggesting that development proceeds should be allocated to enhance the town's infrastructure.
3. **Policy Clarity and Planning:** Comment provides substantive feedback on draft updates to Policy EC4, including requests for clarifications, flexible master planning, and typo corrections. Meanwhile, questions the impact of Policy EC4 changes on safety measures and active travel routes, despite a railway station no longer being planned.
4. **Support for Policy Proposals:** express explicit support for the proposals outlined in Policy EC4, especially regarding the development and expansion opportunities at RAU and potential synergies with local employers like BRI and FSC.
5. **Transportation and Access Concerns:** Access issues and transportation concerns due to development are brought up in which details the inadequate road links to Moreton-in-Marsh from the FSC and addressing the necessity for cars due to the distance of the FSC from shopping areas.
6. **Policy Updates and Removals:** notes the removal of Policy EC4 concerning land safeguarding for a railway station as it is no longer proposed, reflecting changes in local transport plans and the implications for planning.

## EC5 - Rural Diversification

*Policy proposal*

Minor changes to ensure new rural buildings are necessary and, where they are built, safeguards are in place to remove a loophole for subsequent redevelopment into housing in an otherwise unsuitable location.

*For the supporting text of Policy EC5 you said (4 comments received):*

**Rural Diversification and Housing Conversion Loophole:** Blockley Parish Council supports the concept of rural diversification, but they are in favour of closing the loophole that permits the conversion of rural buildings to housing soon after their development for farm-related diversification purposes. They would like to extend the minimum period before conversion beyond the current span of 10 years unless there's evidence of a significant material change in circumstances that justifies the conversion sooner.

*For the Policy wording of Policy EC5, you said (1 comments received):*

1. **Support for Policy EC5 and the emphasis on rural diversification:** Multiple comments express support for Policy EC5, particularly appreciating the clarity it offers around rural diversification and the protection of biodiversity. There's a specific mention of support for clauses

9.6.4 and 9.6.5. However, there is a suggestion to use the term 'rural buildings' instead of 'agricultural buildings' to better capture the range of diversification activities.

2. **Terminology Correction Suggested:** Two comments suggest a correction in the terminology used within the policy text. Both comments argue that the term 'agricultural' should be replaced with 'rural' to accurately reflect the context of rural diversification mentioned in the policy.
3. **Alignment with Existing Regulations:** One commenter notes the alignment of the proposed changes with the requirements set forth in the General Permitted Development Order, expressing their support for this consistency.
4. **Collaboration between Education and Business:** A comment from a school shows a willingness to support local employment by enhancing their curriculum. This reflects a desire for collaboration between educational institutions and businesses, particularly in response to local employment initiatives.

## EC6 - Conversion of Rural Buildings

### *Policy proposal*

Clarification that this policy does not apply to conversions to dwellings. Clarification that works must not go beyond what might sensibly or reasonably be described as a conversion, as opposed to a rebuild, which is not supported.

*For the supporting text of Policy EC6 you said (2 comments received):*

**Conversion of Rural Buildings to Residential Use:** The comments discuss various aspects of Policy EC6 which deals with the conversion of rural buildings to alternative uses, including residential. The comments address the need for flexibility, potential amendments, and the balance between preventing unsustainable development and supporting rural vitality. Some comments suggest adding exceptions to allow conversion under exceptional circumstances, while others focus on the potential to create affordable homes, extending the time period before conversion to residential use to deter misuse of the policy, and revising the policy to be in line with national guidance and support the survival of rural heritage buildings.

*For the Policy wording of Policy EC6, you said (4 comments received):*

1. **Conversion of Rural Buildings:** Comments discuss rules about the conversion of rural buildings to other uses, and whether that should be allowed or restricted under certain conditions.
2. **Time Restrictions on Conversions:** Comments address the topic of time restrictions imposed on converting rural buildings to residential use, with one seeing this as unnecessarily restrictive and the other agreeing with the provision.
3. **Impact on Immediate Setting:** One comment suggests that requiring development to enhance the immediate setting is ambiguous and proposes that the requirement should instead ensure no negative impact, while the other comment does not discuss this aspect.

## EC7 - Retail (deleted policy)

### *Policy proposal*

Policy deleted. The discussion regarding Policy S3 touched on the need for town centres to diversify and not be “monocultures” revolving around a dominant retail use. It is important however to note that retail remains, plainly, a very important town centre use. But it can no longer be seen as the keystone. A broader mix of “main town centre uses” will help to ensure our centres

remain healthy, vibrant places that are able to flex and adapt to changing economic, environmental, and other circumstances. Revised Policy EC8 retains policy “essentials” regarding retail: the baby has not been thrown out with the bathwater.

*For the supporting text of Policy EC7 you said (1 comments received):*

**Environmental Impact in Agriculture & Forestry:** The comment suggests that agricultural and forestry policies should align with the climate emergency response by encouraging practices that mitigate greenhouse gas (GHG) emissions and promote CO2 capture. It recommends that planning permissions should consider the GHG emissions of farming and forestry activities, steering away from high-emission practices like industrial-scale intensive animal farming and favouring regenerative farming practices that reduce emissions and can sequester CO2.

## EC7 - Agricultural and Forestry Buildings

*Policy proposal*

A new policy for (typically larger scale) agricultural building proposals, which are not covered by permitted development rights.

*For the supporting text of Policy EC7 you said (3 comments received):*

**Environmental Impact in Agriculture & Forestry:** The comment suggests that agricultural and forestry policies should align with the climate emergency response by encouraging practices that mitigate greenhouse gas (GHG) emissions and promote CO2 capture. It recommends that planning permissions should consider the GHG emissions of farming and forestry activities, steering away from high-emission practices like industrial-scale intensive animal farming and favouring regenerative farming practices that reduce emissions and can sequester CO2.

*For the Policy wording of Policy EC7, you said (4 comments received):*

1. **Feedback on Agricultural and Forestry Policy:** Comment voices a concern regarding the lack of feedback from professional bodies representing the agricultural and forestry industries on the new policy developments. The comment also appreciates the efforts made to address biodiversity but points out missed opportunities in considering the impact of new agricultural and forestry buildings on waterways (e.g., nitrates and greenhouse gas emissions) and suggests integrating regenerative farming practices to reduce emissions.
2. **Policy Wording Suggestions:** Comment suggests an amendment to the policy text by adding 'and forestry' after 'agricultural' to ensure both industries are included in the policy discussion.

## EC8 - Town Centres

*Policy proposal*

Formerly “Main Town Centre Uses” this policy is a significant revision in respect more of emphasis than textual addition or amendment. It incorporates elements of EC7 retail.

In a nutshell this revised policy plays down the dominance of retail while elevating the profile of other main town centre uses. It is, in other words, an attempt to level the playing field. The reason for this has been explained earlier in relation to S1. “Main town centre uses” do not include residential use but the policy is explicit that, in certain circumstances, this may be acceptable.

The revision also encourages towns preparing or revising Neighbourhood Development Plans to consider preparing strategies for their town centres to make them more resilient to change. While this is not a compliance requirement for NDPs it would represent good strategic planning if this

general move away from retail dominance was adopted across the district.

*For the supporting text of Policy EC8 you said (2 comments received):*

1. **Policy Consistency and Accordance with NPPF:** Comments express concern over policy updates that may be in conflict with the National Planning Policy Framework (NPPF), particularly with respect to the need for policies to exclude proposals that align with up-to-date plans as stated in paragraph 94 of the NPPF. They suggest explicit referencing to ensure consistency between clauses and policies.
2. **Policy Clarity and Duplication:** Concerns are raised about redundant clauses and overlaps in policies, as well as ambiguity due to the existence of two clause 1's. Commenters are seeking revisions for clearer referencing and to prevent repetition between Policy EC8 and EC9.
3. **Protection of Existing Use and Town Centre Vitality:** Comments call attention to the need for policies protecting existing commercial operations against pressures from residential conversions, especially in smaller centres and town centres. They underscore the importance of making a genuine effort to market properties for their current use and the implementation of appropriate measures, such as Article 4 Directions or specific provisions, that would avert the loss of town centre use frontages.

## EC9 - Retail and Leisure Impact Assessment

*Policy proposal*

This remains a requirement of the NPPF and is retained for that reason. Minor textual amendments to bring the policy and supporting text up to date with legislative and related changes. This includes amending the title to “Retail and Leisure Impact Assessments.”

*For the supporting text of Policy EC9 you said (2 comments received):*

1. **Document Editing:** Multiple comments mention areas in the document that require editing, including deletion and additions of specific terms.
2. **Terminology Clarification:** One comment suggests the need for a footnote to clarify the meaning of a specific term used within the document.

## EC10 - Development of Tourist Facilities and Visitor Attractions

Policy amended to close a loophole where attractions are proposed that are alleged to only be viable if they are accompanied by accommodation. DM advises that the accommodation is often the main business interest rather than the attraction. Effectively therefore the amendments seek to prevent market housing proposals coming forward by the back door. This is at present a “hot topic” as the current government consultation on further changes to permitted development rights includes a proposal to enable change from short-term lets to permanent dwellings and vice versa.

No comments

## EC11 - Tourist Accommodation

*Policy proposal*

This policy has been completely redrafted from the title “Tourist and Visitor Accommodation” onwards.

The existing policy is not coherent in places. It has inherent contradictions and has proved

challenging for DM colleagues to use.

From hotels to caravans and “glamping” sites the revised policy is far more systematic, rigorous, and straightforward in addressing the various permutations and types of accommodation available for visitors. For example, the revised policy follows national policy (NPPF (2023) Annex 2) in identifying hotels as “main town centre uses”. In that context the sequential approach to assessing proposals is embedded in the revised policy. Therefore, hotels should be in designated town centres. Proposals outside designated centres – sequentially edge of centre and then out of centre - are subject to progressively more rigorous assessment and planning hurdles.

Apart from straightforward compliance with the NPPF, there are sound planning reasons for taking this approach. The need to diversify the mix of uses in our town centres has been pointed out elsewhere, and hotel accommodation will assist greatly in that. The need to encourage modal shift in transport means that concentrating uses of this type in centres may reduce the need for car journeys because public transport or other forms of movement are more available and attractive. Concentrating this type of use in designated centres, and discouraging their development in other areas, is more sustainable in the long term.

*For the supporting text of Policy EC11 you said (4 comments received):*

1. **Planning Policy and Tourism Accommodation:** Comments highlight concerns and suggestions regarding the planning policy as it interacts with tourism accommodation, particularly in varying contexts such as town centres and rural areas. One commenter points out the flexibility within the NPPF to recognise the need for tourist-centric developments like hotels in rural areas. Another commenter discusses potential policy changes, balancing residential use with tourism benefits, and suggests conditionally restricting new residential builds from converting to tourism accommodation.
2. **Use Class Legislation Changes:** One comment addresses proposed changes to the Use Class legislation that would separate holiday let accommodation from regular residential classifications. It emphasises the need for clarity and potential policy formulation regarding such changes, especially as they could affect residential use and the tourism economy.
3. **Inclusion of Visitor Hostels in Policy:** One comment suggests adding references to 'visitor hostels' in the planning policy to ensure they are adequately covered, showing the necessity to consider various types of tourist accommodation within policy documents.

## EC12 - Equestrian Related Development

### *Policy proposal*

Policy EC12 is a new policy, incorporating former Policy 31 from the Local Plan (2006), to support equestrian related development; to ensure new uses for traditional buildings and reduce the pressure for new, isolated buildings in the countryside. In permitting private and commercial enterprises, the policy seeks such development to be in keeping with and prevent an adverse (and/or cumulative) impact on the landscape and surrounding environment, including existing buildings, dwelling(s) (residential amenity), or highways and to take into account local biodiversity and habitats. Dwellings proposed in connection with equestrian related development will only be permitted following certain criteria, to prevent the creation of such a development as a pretext for future housing/building in the countryside.

*For the supporting text of Policy EC12 you said (2 comments received):*

**Policy EC12 amendments and support:** Comments indicate a focus on the addition and modification of Policy EC12 concerning Equestrian Related Development. Comment suggests a

need to clarify the policy regarding dwellings for staff to prevent the building of large, isolated houses, which can defy another policy, DS4. Comment expresses support for the inclusion of biodiversity considerations within the same policy. Comment notes endorsement from Sport England on the principles of Policy EC12 and emphasises the need for robust justification for equestrian-related developments, suggesting collaboration with relevant national governing bodies.

## Chapter 10: Built, Natural and Historic Environment

### ENI - The Built, Natural and Historic Environment

#### *Policy proposal*

Minimal changes. The changes made to ENI are for points of clarity.

*For the supporting text of Policy ENI you said (7 comments received):*

1. **Protection and Enhancement of the Historic Environment:** Comments emphasise the importance of policies (especially Policy ENI) directed at safeguarding and improving natural and historic environments, multi-functional green infrastructure, addressing climate change, and ensuring design standards are in harmony with local character.
2. **Updates to Official Documents:** Several comments state that the Annual Operating Budget (AOB) has not been updated to reflect the current Cotswolds National Landscape (CNL), indicating a need for documentation to be kept current.
3. **Environmental Protection and Impact of Development:** Comments discuss the significance of the Moreton SLA designation and the potential detrimental impact of proposed developments on the environment, highlighting issues like flooding, pollution, and the need to maintain the character and tranquillity of local villages.

### EN3 - Local Green Spaces

#### *Policy proposal*

Extend LGS6 Kemble – Community Gardens at Station Road to include the land that was formerly allocated for residential development (ref: K2A).

*For the supporting text of Policy EN3 you said (1 comments received):*

1. **Inclusion and recognition of Local Green Spaces:** Several comments suggest that specific green spaces should be formally recognised or included in policy EN3. Some point out recently designated areas, such as Duke's Meadow in Down Ampney, that should be added to the list of Local Green Spaces. Others advocate for currently overlooked spaces, including playing fields and spaces mentioned in Neighbourhood Development Plans, to be considered.
2. **Ecological enhancement of Local Green Spaces:** There is a recommendation to encourage initiatives for ecological enhancements of Local Green Spaces within policy EN3. This is suggested to ensure clarity and accuracy in the encouragement and support of development proposals that increase the ecological value of these areas.
3. **Consistency and Fairness in Designation:** Comments express concern over the perception of inconsistency in the designation of Local Green Spaces. There is confusion about why certain playing fields are included while others are not, underlining a need for a clear and consistent framework for what qualifies as a Local Green Space.

## EN4 - The Wider Natural and Historic Landscape

### *Policy proposal*

The policy, which applies to the whole District, (including Special Landscape Areas and the Cotswolds National Landscape), remains unchanged. Additional supporting text is included to clarify the holistic role of the landscape as recommended by Natural England, where it not only has aesthetic value but also plays a key role in health, biodiversity, the local economy, tackling the climate and ecological emergencies, as well as providing a clear sense of place; and the opportunities and challenges in often competing needs i.e. when balancing the need for new development (residential or renewable energy proposals), with the conservation and enhancement of the high quality landscape.

Retaining all the landscape policies broadly as is (EN4, EN5, EN6), they remain a counterweight to increased pressures for development and can be considered on a case-by-case basis.

*For the supporting text of Policy EN4 you said (4 comments received):*

1. **Protection of Natural and Historic Landscape:** Multiple comments express the importance of protecting the natural and historic landscape, emphasising the requirement to only permit development where it does not significantly impact this landscape, specifically in the Cotswold District. There's a shared concern for safeguarding tranquillity, visual quality, settlement patterns, and heritage assets against detrimental development.
2. **Enhancement and Management of Landscape Features:** Comments highlight the need to enhance, restore, and better manage the landscape, emphasising the value of significant landscape features, such as key views and the settings of settlements. Proper management of these aspects is seen as key to maintaining the area's character and value for both residents and tourists.
3. **Contribution of Landscape to Well-being and Ecology:** There is a recognition of the landscape's contribution to well-being, ecological diversity, climate change resilience, and carbon sequestration. Maintaining dark skies, tranquillity, and open spaces is seen as beneficial for mental health and local tourism, as well as for encouraging low-carbon lifestyle choices through recreational walking.
4. **Impact of Development on Visual Quality and Local Distinctiveness:** The comments reflect on the potential negative consequences of housing development on the visual quality and distinctiveness of the area, particularly when close to an Area of Outstanding Natural Beauty (AONB). The protection of key visual landscapes like Meon Hill is underlined for its importance in providing a sense of place and supporting local tourism and residents' well-being.

## EN5 - Cotswolds National Landscape

### *Policy proposal*

The policy remains unchanged. On 22<sup>nd</sup> November 2023, the Government rebranded Areas of Outstanding Natural Beauty (AONBs) as National Landscapes. In Cotswold District the Cotswolds AONB becomes the Cotswolds National Landscape. This retains the same designation and status in practical terms. Consequential changes have been made to EN5 to reflect the rebranded name. We are aware that other references to the AONB in the emerging Local Plan update will also need to be updated. This will be done in the next iteration of the Local Plan update.

*For the supporting text of Policy EN5 you said (6 comments received):*

1. **Policy EN5 and Landscape Preservation:** The comments express a common concern and focus on Policy EN5, which relates to the Cotswold Area of Outstanding Natural Beauty (AONB). The policy aims to protect and enhance the natural beauty, character, and special qualities of the AONB. Commenters emphasise the necessity of any development integrating well without harming the landscape, complying with Policy EN5 as well as national policies and guidelines. Mitigation measures, enhancements, and landscape-led development approaches are highlighted as crucial.
2. **Development Planning and Design:** The comments address the planning and design principles for development within the AONB, including conserving and enhancing landscape qualities, incorporating high-quality design, and using appropriate materials. Emphasis is placed on the site analysis, preserving existing vegetation, providing open space, and ensuring development is congruous with the village and surrounding properties.
3. **Major Development and Exceptional Circumstances:** Some comments highlight the need for major developments within the AONB to satisfy the exceptions outlined in national policy and guidance. They mention the terminology update from 'AONB' to 'National Landscape' and a slight amendment in the supporting text of the policy, underscoring the need for developments in these areas to be justified as exceptional and the requirement for compliance with local and national planning frameworks.

## EN6 - Special Landscape Areas

### *Policy proposal*

The policy remains unchanged. Consequential change in the supporting text due to the more recent review of Special Landscape Area (SLA) designations.

### *For the supporting text of Policy EN6 you said (2 comments received):*

1. **Protection and Management of Landscapes:** The comments express concerns regarding the protection and management of landscapes, specifically emphasising the need to safeguard hedgerows, ridge and furrow fields, and special landscape areas like the chalk stream Tetbury Avon valley and surrounding fields. One comment references a particular case where heritage land was mismanaged, resulting in inflated prices and stress for local residents, indicating a need for better scrutiny and legislation to prevent such occurrences.
2. **Legislation and Scrutiny of Land Sale and Development:** There is a call for improved legislation and scrutiny when it comes to the sale and development of agricultural lands to prevent abuse and profiteering, ensuring that local heritage, such as the ridge and furrow fields, and the well-being of residents are not compromised.
3. **Preservation of Local Heritage and Well-being of Residents:** The comments also highlight the importance of preserving local heritage and maintaining the well-being of the community. This includes protecting traditional agricultural landscapes from being damaged or sub-divided and ensuring the 'Green to the Core' philosophy is maintained in local planning decisions.

## EN7 - Trees, Hedges & Woodlands

### *Policy proposal*

New guidelines have emerged since the adoption of the Local Plan and the policy has been updated to reflect these changes. In particular, the NPPF 2023, The England Tree Action Plan 2021-2024, the Gloucestershire Tree Strategy 2021 and forthcoming Action Plan and the Gloucestershire Nature Recovery Network and forthcoming Nature Recovery and Action plan. The NPPF specifies

that the plan should provide street trees in new developments, to recognise the contribution trees play to climate change, the environment, and Green Infrastructure (GI) and the opportunities to incorporate trees in new development such as parks and community orchards. Veteran trees and woodlands are referenced in the policy, but their role as irreplaceable habitats is new. The policy now includes intelligence from The Gloucestershire Tree Strategy, which highlights the deficit of trees in the Cotswold District and the number needed to address the deficit. The definition of 'trees hedgerows and woodland' has been updated and broadened to include small copses, orchards, linear belts, and woodland blocks. New guidelines from the Gloucestershire Nature Recovery Network and forthcoming Nature recovery and Action plan provide the ecological mapping data needed to plant more trees in the right places, this along with the Cotswold Design Code, and Cotswold GI Strategy. Missing and now added from the original policy was the need to plant more trees and their long-term maintenance.

*For the supporting text of Policy EN7 you said (3 comments received):*

1. **Policy Language and Clarity:** Comments stress the importance of clear and precise language in policy statements. Comment suggests a rephrasing of a policy sentence to avoid confusion about development measures around new trees. Meanwhile, comment requests the addition of the word 'only' to strengthen a policy concerning the protection of irreplaceable habitats.
2. **Environmental Preservation and Development:** There is concern over environmental protection in the face of development. Comment emphasises the need to prevent developments that could harm irreplaceable habitats, such as ancient woodlands and trees.

*For the Policy wording of Policy EN7, you said (1 comment received):*

**Compensatory Planting Requirements:** The comment suggests that the section on 'compensatory planting' should include more details regarding the replacement plants. Specifically, there is a need for clarity on how the plants will offer similar or superior wildlife benefits and compensate for the lost biodiversity and biomass in a timely manner.

## EN8 - Biodiversity & Geodiversity: Features, Habitats & Species

### *Policy proposal*

There are four key updates to the policy.

- 1) The need to provide at least 10 % Biodiversity Net Gain (BNG) in line with the expected mandatory figure required by Government via the Environment Act 2021.
- 2) Reference to the mitigation hierarchy, (avoidance, mitigation, compensation) which developers will need to apply.

The mitigation hierarchy is the principle that environmental harm resulting from a development should be avoided, adequately mitigated, or, as a last resort, compensated for.

- 3) The Ten Biodiversity Net Gain Good practice principles have also been included in the policy. For development these are:

Principle 1. Apply the Mitigation Hierarchy

Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere

Principle 3. Be inclusive and equitable

Principle 4. Address risks

Principle 5. Make a measurable Net Gain contribution

Principle 6. Achieve the best outcomes for biodiversity

Principle 7. Be additional

Principle 8. Create a Net Gain legacy

Principle 9. Optimise sustainability

Principle 10. Be transparent

4) Added to the policy is the requirement for all new housing to provide three swift bricks and opportunities for bat roosts within each new dwelling, located on a suitable elevation.

*For the supporting text of Policy EN8 you said (9 comments received):*

1. **Biodiversity and Protection of Habitats:** Commenters highlighted the importance of protecting and enhancing biodiversity and habitats, including species of principal importance, provision of strategies for habitat creation and restoration, and protection of non-priority habitats like ponds. Specific recommendations are made for policy language to be strengthened to reflect the urgency in conserving ecological networks and to prevent habitat fragmentation. Additionally, concerns were raised over the inclusion of certain terms that might undermine conservation efforts.
2. **Biodiversity Net Gain:** Comments reflect support and suggestions for the Council's approach to Biodiversity Net Gain (BNG). There's support for the mandatory minimum and the prioritization of onsite BNG, with a suggestion to confirm policy in light of the Environment Act. Concerns were raised about ensuring policy aligns with recent government guidance/regulations and the suggestion to maximize BNG opportunities, especially in nature recovery areas.
3. **Specific Species and Nesting Sites Protection:** Several comments call for policy to directly address the protection of specific endangered species and their nesting sites, with an emphasis on building-dependent species like swifts and house martins. This includes a mandate for swift bricks and their proper installation, as well as the independent analysis of biodiversity and green network gain before further development.
4. **Invasive Species:** There is a recommendation to include policy language that mandates developers to consider the presence of non-native invasive species and to take steps for their removal and eradication, in line with existing legal regulations, to prevent detrimental impacts on native biodiversity and ecosystems.
5. **Use of Playing Fields:** There is concern expressed by Sport England regarding the potential use of playing fields for off-site BNG which could compromise their primary use as playing fields, suggesting this should be avoided.

*For the Policy wording of Policy EN8, you said (7 comments received):*

1. **Biodiversity Net Gain (BNG) Requirement:** Multiple comments refer to the policy amendment that requires a 10% biodiversity net gain for development proposals. While some respondents support the requirement as aligned with the Environment Act 2021, others see it as unnecessary duplication of national policy, and there's mention of adhering to both site-specific and broader ecological mandates. The comments also mention the importance of onsite BNG versus the potential need for off-site strategies due to site constraints.
2. **Policy EN8 and Ecological Considerations:** Commenters address the amendments and requirements detailed in Policy EN8 regarding conservation, biodiversity, and geodiversity. There

are suggestions to remove duplications with national policy, to acknowledge technical assessments that have been started, and to highlight the policy's alignment with corporate targets. Additionally, there's a call for funding mechanisms to police developers' commitments to these ecological obligations.

3. **Protection and Enhancement of River Corridor:** There is a strong appeal for a stand-alone policy that emphasises the ecological value of river corridors and mandates their protection and enhancement. The comments outline the multifaceted benefits of conserving not only biodiversity but also the water quality and flood management aspects of these ecosystems. Suggestions for specific policy features, such as buffer zones and de-culverting, are also provided.

## EN9 - Biodiversity & Geodiversity: Designated Sites

### *Policy proposal*

The updated policy includes specific reference to habitat sites in or near the Cotswold District. As a point of clarity, the hierarchy of UK nature conservation designations and two maps illustrating where these are, are also included. Also, new to the policy is the reference to the mitigation strategy for recreational effects on North Meadow and Clattinger Farm and Cotswold Beechwoods Special Areas of Conservation (SAC). To enable development to come forward that might otherwise cause likely significant recreational effects on the North Meadow and Clattinger Farm SAC or the Cotswold Beechwoods SAC, the Council has worked with Natural England and neighbouring Local Authorities to prepare recreation mitigation strategies for the SACs.

No comments.

## EN10 - Historic Environment Designated Heritage Assets

### *Policy proposal*

The policy remains 'sound' and no update is proposed.

*For the supporting text of Policy EN10 you said (7 comments received):*

1. **Heritage and Conservation Policies (EN10):** Multiple comments address the importance of Policy EN10 in safeguarding the character, setting, appearance, and significance of designated heritage assets within the historic environment. Specific references were made to the site within Didmarton's Conservation Area, and there is mention of its proximity to listed buildings. There is also reference to a 'Green to the Core' principle that suggests prioritizing conservation in development plans. Additionally, the comments suggest that greater weight should be given to heritage assets and conservation.
2. **Historic Environment Strategy and Assessments:** The comments inquire about the robustness of the existing suite of heritage policies, questioning if they are up to date as per NPPF paragraph 31 and whether the Conservation Area Appraisal Pilot Project has been successful. Additionally, queries were made regarding the compilation of local lists for non-designated heritage assets, indicating a need for thorough assessment and documentation of historical sites.
3. **General Observations and Updates on Heritage Sites:** One comment provides an update by recommending the deletion of Tetbury Goods Shed as a topic of concern because the project is marked as completed, while another remark indicates that the Gloucestershire County Council officers have no further comments and acknowledge that protection and enhancement of the historic environment are well accounted for in the current proposals.

*For the Policy wording of Policy EN10, you said (2 comments received):*

Heritage Protection: Both comments emphasise the importance of recognizing and considering heritage sites when planning new developments. Chasleton House is a grade I listed building that requires consideration in local planning. Similarly, Meon Hill, as an Iron Age hillfort, holds significant historical importance and its protection should be given considerable weight in planning decisions.

## EN11 - Historic Environment Designated Heritage Assets (Conservation Areas)

### *Policy proposal*

Very minor alterations requested by the Council's Development management and Heritage and Design teams to do with the significance of heritage assets.

### *For the supporting text of Policy EN11 you said (5 comments received):*

1. **Development within Conservation Areas:** The comments share concerns about ensuring new developments within Conservation Areas respect the special character and heritage of the area. Compliance with Policy EN11 is essential, and factors such as siting, scale, form, proportion, design, materials, retention of features, and landscaping are reiterated as important considerations. Open spaces and sightlines should be preserved to maintain the character and appearance, and any developments should be assessed in line with available Conservation Area appraisals.
2. **Policy EN11 and Local Planning:** Several comments reference the need for adherence to Policy EN11, highlighting its role in preserving the character of Conservation Areas through careful consideration of new developments. There is mention of the National Planning Policy Framework (NPPF) and suggestions for updates to the Local Plan to include clear guidelines on Conservation Area designations and Article 4 Directions related to them.
3. **Conservation Area Appraisals and Article 4 Directions:** The need for Conservation Area appraisals is identified, which guide new developments within these areas. One comment specifically suggests that new policies or clarifications be added regarding the designation of new Conservation Areas and the application of Article 4 Directions, which control certain types of work on premises to preserve the character of an area.

## EN12 - Historic Environment: Non-designated Heritage Assets

### *Policy proposal*

Textual amendments to bring the policy and supporting text up to date with legislative and related changes. Additional requirement for assessment of land prior to submission of applications included at the request of DM/specialist officers.

No comments.

## EN13 - Historic Environment: The Conversion of Non-Domestic Historic Buildings

### *Policy proposal*

Textual amendments to bring the policy and supporting text up to date with legislative and related changes.

### *For the supporting text of Policy EN13 you said (1 comments received):*

**Policy Wording and Clarity:** The comment expresses concern about the unclear guidance on weighing harm against public benefits within the policy and suggests that the wording should be amended for better clarity or that the focus should be shifted solely to the protection and enactment of heritage assets.

## EN15 - Pollution and Contaminated Land

### *Policy proposal*

The policy remains unchanged. Additional text in the reasoned justification to highlight overlapping issues, such as water quality, and links to other policies elsewhere in the Local Plan i.e. to provision of green infrastructure, biodiversity net gain and water management infrastructure.

*For the supporting text of Policy EN15 you said (3 comments received):*

1. **Environmental Impact and Infrastructure:** Comments raise concerns about the environmental impact of local developments and infrastructure capacity. Comment appreciates the inclusion of wastewater and infrastructure capacity in local council documents. Comment questions the wisdom of burning noxious materials near proposed developments. Comment describes past flooding issues due to inadequate flood risk assessments and potential light pollution from future developments.
2. **Community Concerns:** Residents express concerns over how local developments affect their living conditions. Comment discusses the direct impact of flooding on residents' homes and the disturbance caused by subsequent remedial measures. The potential disruption from additional lighting is also a concern that may affect the community's current experience of dark skies.

*For the Policy wording of Policy EN15, you said (3 comments received):*

**Policy Amendment Suggestions for Pollution and Contaminated Land:** The comment suggests various amendments to Policy EN15 to improve clarity and accuracy in addressing pollution and contamination issues related to new developments. Suggested changes involve a finer depiction of pollution effects on the environment and health, stressing the role of controlled waters, the importance of protecting groundwater, the use of the best-practice guidance in design, and the responsibilities of developers in cases of land contamination.

## EN16 - Dark Skies

### *Policy proposal*

A new policy to recognise the importance of Dark Skies in the Cotswold District. The Cotswolds National Landscape has relatively dark skies at night, compared to other parts of the country. The District is ranked 13<sup>th</sup> in terms of the darkest skies in England. The policy aims to protect the dark skies of the Cotswold District, to reduce light pollution by requiring development to use the latest lighting technology and the retrofitting of old lighting. This policy reflects the policy stance of the National Cotswold Landscape.

*For the supporting text of Policy EN16 you said (5 comments received):*

1. **Support for Dark Skies Policy and Need for Clarity and Enhancement:** Multiple comments express general support for Policy EN16: Dark Skies, recognizing its value and proposing enhancements to the policy. There is an emphasis on strengthening policy language, clear guidelines (like defining 'dark sky' locations), and consideration of the policy's integration with other environmental objectives such as protecting wildlife and reducing light pollution, especially near natural habitats.
2. **Concerns Over Development's Impact on Dark Skies:** Several comments raise concerns about development projects that could potentially impact the dark skies, highlighting a perceived contradiction between promoting dark skies and approving developments that may contribute to light pollution. There's also mention of the need to balance dark skies with safety, security, and

feeling safe within the development areas.

*For the Policy wording of Policy EN16, you said (11 comments received):*

1. **Dark Skies Policy Implementation and Enforcement:** Several comments express a desire for stricter implementation and enforcement of the Dark Skies Policy. Comment is satisfied with the increased enforcement of the policy. Comments advocate for further integration of detailed requirements into the policy itself for clarity and effectiveness, suggesting amendments that include references to important paragraphs and expansion of the policy to cover ecological sensitivities. Additionally, a comment acknowledges a caveat which aligns sports lighting with the Dark Skies Policy using controlled LED lighting.
2. **Impact of Development on Dark Skies and Light Pollution:** Comments reflect concern over the effects of urban development on the dark skies. Comment specifically mentions the negative impact of new developments, such as street lighting and additional properties, on light pollution, which contradicts the core values of CDC policy on environmental conservation.

## EN17 - Management of Accessible Open Green Spaces

*Policy proposal*

A new policy to address concerns about the long-term management of these spaces, by providing clarity regarding what is required by applicants. How and what will be managed for how long, the source of funding and by who and the approach taken to manage the space.

*For the supporting text of Policy EN17 you said (4 comments received):*

1. **Policy EN17 Green Space Management Requirements:** Comments express concern regarding the onerous requirements of Policy EN17, which mandates developers to provide costings for the design and long-term management of open spaces. Additionally, the policy necessitates engagement with parish councils about the proposed green spaces and their accessibility. Provisions are included for the possibility of open space being transferred to a parish council, charity, or community trust. If developers retain ownership, they must demonstrate the means of maintenance at the planning application stage or appoint a maintenance company. There are suggestions that these matters could be negotiated with the Council informally post-application, deeming the detailed policy as unnecessary.
2. **Potential Negative Impact on Open Space Quality:** One comment raises the issue that Policy EN17, with its focus on management of accessible green spaces, may inadvertently result in lower quality open spaces because it does not address the quality directly.
3. **General Support Without Specific Feedback:** One comment indicates general support for the undisclosed subject matter but does not provide any specific feedback.

*For the Policy wording of Policy EN17, you said (2 comments received):*

1. **Policy Enforcement and Management:** Commenters are expressing concerns about the management and enforcement of policies related to open green spaces and green infrastructure. One commenter emphasises the necessity for effective enforcement to ensure that open spaces are maintained in an adoptable condition, while another stresses on the importance of clarity in management agreements, particularly regarding the option for reviewing and potentially changing service providers to prevent escalating charges.
2. **Clarifications in Agreements and Long-term Provisions:** There is a request for clarification on certain elements within the policy, such as the meaning of 'the required agreement' and what the provisions are after a set duration of time, in this case, 20 years. There is also a suggestion for

the inclusion of a feature allowing residents the flexibility to choose different service providers upon contract renewal, which reflects concerns over being locked into long-term agreements without the option for competitive pricing or services.

## EN18 - Sherborne Park Estate Masterplan

### *Policy proposal*

A new policy is provided for the Sherborne Park Estate near Northleach. The policy enables the production of a masterplan for the estate, which will provide the framework for determining planning application(s) on the estate in future. The policy identifies the various things the masterplan will include. It also specifies that small-scale development will be supported where it is consistent with the masterplan for nature-based tourism; rural land use-based employment; education; access improvements; habitat creation; and climate change mitigation and adaptation.

### *For the supporting text of Policy EN18 you said (28 comments received):*

1. **Concerns about increased traffic and parking issues:** Many commenters express concerns about increased traffic through the village and parking issues because of the EN18 policy and National Trust's plans, citing narrow roads, single-track lanes, and potential congestion, which could pose safety risks for residents, school children, and increase the danger for cyclists.
2. **Impact on natural environment and wildlife:** Residents and stakeholders are worried that additional visitor traffic and development could negatively impact the natural environment, wildlife habitats, and reduce biodiversity, including endangered species. There is also concern about potential pollution and human waste issues.
3. **Insufficient information and lack of community engagement:** Several comments indicate frustration with the lack of detail provided in the National Trust's plans and policies, as well as a lack of meaningful community engagement and consultation with residents. Commenters seek greater transparency and involvement in the planning process.
4. **Potential for negative impacts on village character and community:** There is a fear that changes proposed by the National Trust could alter the character of Sherborne and potentially impact the quality of life of its residents. Increased tourist activity and possible loss of privacy are specific issues mentioned.
5. **Need for infrastructure improvements and sustainable travel options:** Comments suggest that the infrastructure, including roads, sewage systems, and public transport, may not support the anticipated increase in visitors. There are calls for improvements and sustainable travel options to mitigate the environmental impact.
6. **Priority for conservation and sustainable development:** Some commenters recognise the potential benefits of the Trust's plans for conservation and nature recovery but emphasise the importance of undertaking these efforts in a sustainable and environmentally sensitive manner that preserves the area's historical and cultural significance.
7. **Preservation of housing and provision of affordable housing:** Concerns have been raised about the preservation and maintenance of existing housing stock, as well as the need for affordable housing for local residents, with some commenters noting the National Trust's obligations as a landlord and the current vacancies in NT-owned properties.

### *For the Policy wording of Policy EN18, you said (6 comments received):*

1. **Community Engagement and Transparency:** There is a prevailing concern about the lack of engagement with local communities and the opacity of the project's details. Residents express

disappointment with the National Trust's failure to invite local commentary or provide sufficient information about the Big Nature Big Access project, as well as dissatisfaction with the manner in which plans are being implemented without genuine consultation or consideration for ramifications.

2. **Infrastructure and Accessibility:** Comments highlight worries about the adequacy of local infrastructure to cope with increased visitor numbers, focusing on accessibility concerns, traffic congestion, road safety, and parking issues within Sherborne village, on the A40, and on narrow country lanes. Commenters are specifically troubled by the prospect of roads becoming unable to manage the additional traffic predicted with the estate's development.
3. **Ecological and Conservational Impact:** Residents are expressing unease over the potential ecological damage that could result from higher visitor numbers and infrastructure development. Concerns range from the adverse impact on wildlife and vegetation to the disruption caused by pollution, litter, and intrusive human activity, as well as the overarching threat to the estate's ecological balance and the historical Cotswold landscape.
4. **Management and Stewardship of Estate:** Several comments criticize the National Trust's current management of properties and resources in Sherborne. Specific points of discontent include neglected properties, unmet promises for managing the Sherborne Brook, and scepticism regarding the Trust's capability to responsibly manage a larger initiative given the apparent mismanagement of existing assets.
5. **Local Livelihood and Village Character:** There is a voiced apprehension regarding potential negative changes to the character and way of life in Sherborne Village. Commenters worry about negative repercussions on village life, such as noise, litter, privacy invasion, and loss of tranquillity due to increased tourism and infrastructural expansions.

## Chapter 11: Infrastructure

### INF1 - Strategic Infrastructure Delivery (formerly policies SAI, SA2 and SA3)

#### *Policy proposal*

It is proposed to merge the three strategic infrastructure policies into one and remove completed infrastructure projects from the Local Plan. An update of the Infrastructure Delivery Plan will be undertaken to assess the strategic infrastructure requirements of any additional planned growth (e.g. health care, education, water and wastewater, transport, flood risk, libraries, etc.). Additional required infrastructure items will be specified in the next iteration of the Local Plan.

The proposals at Moreton-in-Marsh come with some high priority infrastructure considerations (e.g. education, water infrastructure and highways). Discussions are ongoing with the lead education authority (Gloucestershire County Council) and the water infrastructure provider (Thames Water). We are aware of the need for a new primary school and the desire for a new secondary school in Moreton.

Highway congestion in Moreton is believed to be an issue, especially in and around the town centre. Transport modelling is being undertaken to confirm the situation. First and foremost, options are being explored to reduce traffic and deliver modal shift from private vehicle trips to more sustainable forms of transport. A new road may be required to direct some through traffic away from the town centre. This would need to be planned in combination with the future movement strategy for Moreton town centre. The route of the road has not been confirmed but it would likely be via the east of the town where the land and landscape are less constrained. The

type of road and the road users also require further consideration. We are working the cost and viability of this proposal.

A plan for the delivery of required delivery will be included in the new Infrastructure Delivery Plan and the next iteration of the Local Plan.

*For the supporting text of Policy INFI you said (8 comments received):*

1. **Infrastructure Planning and Development:** Several comments express concerns regarding infrastructure challenges associated with development plans. Comment critiques the use of the A429 and its incapacity to handle increased traffic from new developments. Comment suggests incorporating ecological considerations into infrastructure policy, while Comment stresses the necessity of including Emergency Services Infrastructure in Policy INFI. Comments address the lack of public transport and the need for improved connectivity between communities, emphasising the importance of strategic planning for roads and other transport facilities to support new development. Comment advocates for healthcare infrastructure planning to accompany housing growth, and Comment calls for upgrades to the A419 due to increased traffic from the Air Balloon upgrade.
2. **Financial and Resource Considerations:** Comment indicates that establishing a crematorium in the Cotswold District could be a potential source of income. This comment ties into broader discussions of how local infrastructure developments could be financially leveraged or impact the local economy.
3. **Green and Blue Infrastructure:** Comments emphasise the importance of integrating ecological considerations into infrastructure policies. Comment specifically urges for the inclusion of blue infrastructure, like sustainable drainage systems and the preservation/restoration of watercourses, to enhance biodiversity and ecosystem services.
4. **Healthcare Infrastructure:** Comment from NHSPS welcomes the recognition of health infrastructure as essential and expects that development proposals will provide funding for healthcare infrastructure necessitated by development. The need for collaboration with the Integrated Care Board and a process for determining developer contributions is highlighted.
5. **Policy Clarifications:** Comment requests more detail for the GCC Transport Planning team to adequately comment on infrastructure requirements, highlighting a need for clearer policy communication and detailing within the planning framework.
6. **Traffic Management Concerns:** Comment brings attention to traffic management issues related to the Air Balloon upgrade, suggesting that the infrastructure is not adequate to handle the predicted increase in traffic, and calling for specific improvements to the A419.
7. **Emergency Services Infrastructure:** Comment highlights a gap in Policy INFI, advocating for the inclusion of Emergency Services Infrastructure to ensure proper planning and provision for police, fire, and ambulance services in response to new developments.
8. **Sustainable Transport and Public Transit:** Comments discuss the need for sustainable transport solutions and the current inadequacy of public transit options, particularly in rural areas where private vehicle usage is often the only viable means of transportation.

*For the Policy wording of Policy INFI, you said (2 comments received):*

1. **Infrastructure Improvements and Development:** Multiple comments propose the development and improvement of infrastructure across different areas, covering flood management, transportation, leisure facilities, and educational provisions. Comment discusses

improving flood management in the North Cotswolds, while comment highlights the need for improved footpath and cycle links in Kempsford. Comment points out the need for improvements on the A44 as a strategic transport route, and comment suggests establishing a further education college to address skills shortages. The necessity to repair sewers and upgrade sewage treatment in Fairford is detailed in comment.

2. **Healthcare and Welfare Facilities:** Suggestions for healthcare facilities and associated infrastructure are made with an emphasis on solving current deficiencies and planning for future needs. Comments include the approval and need for new healthcare centres as in comments and while mentions the need for supplementary payment for street lighting to support a healthcare centre. Comments note the need for new burial grounds, questioning whether it is considered infrastructure.
3. **Sport and Recreation:** The advancement and accessibility of sports and recreation facilities are discussed. Comment promotes the strategic importance of the Tetbury Rugby ground development. Comment speaks on the re-use of the former Severn-Thames Canal route for cycling. The need for a leisure facility including a swimming pool is mentioned in comment.

## INF2 - Infrastructure Delivery (formerly Policy INF1)

### *Policy proposal*

Textual amendment to delete clause 3 which requires applicants to submit viability assessments where infrastructure requirements are a threat to scheme viability. In effect an “exceptions” trapdoor. Deleted because, following advice in Planning Practice Guidance, the Local Plan is subject to a viability assessment that includes the infrastructure requirements identified during plan preparation and included in relevant policies. It follows that proposals that are fully in accordance with the policies of the Local Plan are deemed to be compliant and, by extension, viable. If proposals are not viable, they are not compliant with the Local Plan. It is a matter for the applicant to address that – and that may include submitting a viability assessment in certain circumstances - rather than seeking an exception to a policy requirement as a matter of course.

### *For the supporting text of Policy INF2 you said (7 comments received):*

1. **Community and Infrastructure Impact:** The comments express concerns and observations regarding the effects of development and policy on community cohesion and local infrastructure (such as transportation and healthcare). Comment reflects a sense of loss in community cohesion with the mention of an empty village. Comments discuss the need for comprehensive infrastructure delivery and its impact on growth, specifically mentioning the importance of healthcare provisions, sports facilities, and educational support.
2. **Infrastructure Funding and Development Contributions:** Several comments address the need for funding and developing contributions to support infrastructure growth and ensure it keeps pace with development. Comment emphasises the expectation that infrastructure costs should be met by development proposals, highlighting healthcare infrastructure. Comment mentions the requirement for funding confirmation before expanding school capacity. Additionally, healthcare flexibility in meeting development-related demands is noted in comment.
3. **Engagement and Process in Infrastructure Planning:** Comments underscore the importance of engagement and transparency in infrastructure planning and delivery. Comment calls for collaboration between the NHS, Council, and other partners, recommending the inclusion of a specific process for developer contributions in the Local Plan. Comment demands an agreed timescale for the delivery of infrastructure upgrades, focusing on sewage and wastewater services.

4. **Access to Amenities and Green Spaces:** Comment highlights access to transportation services and green spaces as an important aspect of community wellbeing, mentioning that the countryside in Ashton Manga is appreciated, while also indicating a desire for improved communal facilities such as bus shelters.
5. **Sports and Recreational Facilities:** Comments suggest the addition or enhancement of sports and recreational facilities to meet community needs, aiming to ensure that policy changes facilitate healthy lifestyles and accessible public services.

## INF3 - Social and Community Infrastructure (formerly Policy INF2)

### *Policy proposal*

Textual amendments for clarification and to tighten up the policy requirements.

### *For the supporting text of Policy INF3 you said (7 comments received):*

1. **Policy INF3 and NHS Flexibility:** Some comments express concern about Policy INF3, especially in how it restricts NHS flexibility with assets that are no longer needed for healthcare provision. There is a suggestion that policies preventing the loss or change of use of community facilities could be harmful to the NHS's ability to deliver and reinvest in essential services. NHSPS proposes a modification to the policy to support the principle of alternative uses for NHS land when it becomes surplus to requirements.
2. **Clarification and Strengthening of Policy INF3:** Comments show a desire to clarify and potentially strengthen Policy INF3. One suggestion is to include specific wording about the absence of active processes to restore a community facility, while another seeks clarification on the use of 'and' or 'or' in the policy's language. These concerns point to a need for clear guidelines to ensure the viability and effectiveness of the policy.
3. **Support for Policy INF3:** Several comments show support for Policy INF3 emphasising its alignment with existing strategies and frameworks such as the playing pitch strategy, the CDC Playing Fields Strategy, and the NPPF (2023). These comments highlight the importance of the policy in providing a robust evidence base for contributions to social and community infrastructure.

### *For the Policy wording of Policy INF3, you said (6 comments received):*

1. **Infrastructure development and policy compliance:** Commenters are discussing the development of infrastructure in accordance with policies like INF3, INF2, and INF1. They are emphasising the importance of providing and optimizing walking, cycling, and public transport connections. Additionally, there is support for updates to Social and Community Infrastructure policies, as they relate to community safety and emergency services. There is also a mention of the precedence of community facilities over other developments.
2. **Healthcare facilities and capacity issues:** Concerns are raised about the capacity issues faced by the Phoenix Health Group and the need for a new healthcare facility due to the rising patient list size. The comment indicates that the current facility is at capacity, causing distress to patients and difficult working conditions for staff. The proposal includes the development of a new bespoke building to improve healthcare access.
3. **Need for additional community amenities:** Two comments highlight the need for additional community amenities. There is a mention of the need for additional burial space in the Blockley Parish and other areas of the Cotswolds, as well as a suggestion to add 'Burial Ground' in policy 11.3.4 as it may become Strategic Infrastructure.

4. **Environmental concerns and green policies:** One commenter raises environmental concerns, mentioning the importance of reducing the carbon footprint and ensuring that access to services does not rely solely on private motor vehicles. The comment criticizes developments that may contradict the council's policy of being green to the core.

## INF4 - Highway Safety

### *Policy proposal*

Various updates to optimise highway safety in new developments. For example, requiring design that constrains vehicle speeds; avoids the severance of communities; installs footpaths along 'desire lines;' and requiring development not be designed in accordance with the Manual for Streets guides, LTNI/20 and guidance issued by Active Travel England.

*For the supporting text of Policy INF4 you said (4 comments received):*

1. **Highway Safety and Integration:** Comments emphasise the need for safe integration of new developments with the transport network, minimizing conflicts between traffic and other road users such as cyclists and pedestrians, and avoiding areas where congestion or other impacts on the transport network would be severe.
2. **Dedicated Cycle Routes:** There is a concern about the safety of cyclists on narrow, busy A-class roads and the suggestion to create dedicated cycle routes for better safety and to avoid congestion, with a specific proposal for repurposing an old railway line for this purpose.
3. **Reference to Design Standards:** One comment requests that a policy reference specific design manuals or standards applicable to road safety to ensure consistency in the design and development of transport infrastructure.

## INF5 - Parking Provision

### *Policy proposal*

Various updates, which will include: a requirement for electric vehicle charging points; revised parking standards; a requirement for developments to also include parking for bicycles, eBikes, micro-mobility modes, shared vehicles and Blue Badge holders at preferential locations; a new requirement that car parking in developments does not dominate the street scene or public realm and should be located in non-preferential locations; and a requirement for parking for delivery vehicles.

*For the supporting text of Policy INF5 you said (9 comments received):*

1. **Transportation Infrastructure and Traffic Impact:** Comments express support for provisions of bicycle and EV charging infrastructure while also expressing concern about the impact of increased traffic and vehicular parking in residential areas, affecting quality of life, the character of the area, and the environment.
2. **Accessibility and Convenience of Bicycle Storage:** There is a suggestion to make the storage of bicycles more accessible than cars, implying that garden sheds are not sufficiently convenient locations for this purpose.

*For the Policy wording of Policy INF5, you said (3 comments received):*

1. **Inadequacy of Parking Policy for Delivery Vehicles:** Comments discuss the impracticality and unjustified nature of requiring specific parking spaces for delivery vehicles as stipulated in Policy INF5. Both stress that such requirements lack national policy support, could lead to negative

environmental impacts, and suggest that flexibility should be allowed.

2. **Need for Adequate Offroad Parking and Transport Considerations:** Comments touch on the necessity for sufficient offroad parking due to the inadequacy of public transport, with specific focus on the Cotswold area, the impact of new developments on level crossings, and the need for collaboration on parking standards and sustainable travel options.
3. **Mixed Feedback on Parking Location and EV Charging Policies:** Comments provide specific feedback on the placement of parking provision along the plot sides and the policy on electric vehicle (EV) charging, highlighting the need for high-speed charging that adapts to grid improvements and suggesting a check on the percentage of Blue Badge parking provision.
4. **Safety Addendum:** Comment briefly suggests the addition of safety considerations to the existing policies or commentary.

## INF6 - Vale of Evesham Heavy Goods Vehicle Control Zone (deleted policy)

### *Policy proposal*

This policy is shared by Cotswold District, Stratford-on-Avon, and Wychavon Councils. Wychavon has confirmed that the policy will be deleted from its Local Plan (the South Worcestershire Local Plan, currently under review) because the county council deems it unnecessary. The policy is therefore not implementable. Consequently, it is proposed to delete it from the Local Plan. There is no reference to the policy in the Gloucestershire Local Transport Plan (LTP) and Gloucestershire County Council has not objected to the policy being deleted.

*For the supporting text of Policy INF6 you said (8 comments received):*

1. **Traffic and Infrastructure Concerns:** Several comments express concerns over traffic and infrastructure, particularly concentrating on the impact of HGVs. There are ongoing issues with HGV routing, potentially outdated traffic solutions, and inadequate policy revisions to address the increased traffic and its actual and potential impact on local roads and communities.

## INF6 - Telecommunications Infrastructure (formerly INF9)

### *Policy proposal*

The policy and supporting text have been updated to avoid reference to specific technologies (given the pace of change); including consequential changes to remove out of date references, for clarity, and in response to development management suggestion for the use of a condition and seek the optimum infrastructure available. This will enable the development to be 'future proofed' in respect of digital connectivity as far as possible and provide future occupiers for example, the opportunity to work at home, reduce car use/emissions and enhance the provision of local services. The changes help clarify and support the policy as beneficial to the environment, economic growth, and social wellbeing, in line with the NPPF.

No comments were received on this update.

## Chapter 12: Other Spatial Issues

### SPI - Gloucester and Cheltenham Green Belt

No update is proposed to this policy and no comments were received.

## SP2 - Cotswold Airport

No update is proposed to this policy and no comments were received.

## SP3 - The Thames and Severn Canal

### *Policy proposal*

This policy has been adjusted to include a reference to the need for infrastructure contributions to support the operation of the canal. The supporting text now reflects that the River Thames is a key Green Infrastructure asset in the District and as such offer's opportunities for wildlife and biodiversity. The supporting text reiterates the Council's support for the reopening of the Thames and Severn canal and its wider potential for wellbeing including active travel.

*For the supporting text of Policy SP3 you said (3 comments received):*

1. **Support for Environmental Initiatives:** Comments express support for environmental and ecological initiatives within a plan area. One comment endorses the restoration of the Thames and Severn Canal, emphasising the belief that life is better by the water and noting improvements to the plan's policies. Another comment supports the inclusion of biodiversity and references to the Gloucestershire Nature Recovery Action Plan in the updated wording of the plan.
2. **No Relevant Content:** One comment contained the text 'No comment', providing no substantive feedback or input on the plan area or policies in question.

## SP4 - The River Thames

### *Policy proposal*

The supporting text now reflects that the River Thames is a key Green Infrastructure asset in the District and as such offer opportunities for wildlife and biodiversity. A reference to Gloucestershire Nature Recovery Network and Cotswold Green Infrastructure are signposted for when environmental improvements are made. No comments were received on this.

## SP5 - Cotswold Water Park Post-Mineral Extraction After Use

### *Policy proposal*

The policy remains unchanged. Additional text in the reasoned justification both notes the recent expansion of the Sites of Special Scientific Interest (SSSI) to reflect the ecological importance of the Cotswold Water Park; and to consider future guidance and agreements that relate to this cross-boundary area.

*For the supporting text of Policy SP5 you said (3 comments received):*

1. **Sustainable Access and Transport:** There is interest in developing sustainable transport options for the CWP. The suggestions include linking the CWP with cycle paths to encourage public transport and cycling, specifically connecting CWP to Kemble station and creating a continuous east-west cycle path from Somerford Keynes to the eastern Spine Road.
2. **Renewable Energy and Environmental Impact:** There is a suggestion for incorporating renewable energy policies concerning water-based solar installations at the CWP, with specific considerations for avoiding negative impacts on biodiversity and preserving views.

*For the Policy wording of Policy SP5, you said (1 comments received):*

**Policy Support and Sustainability:** Support is expressed for Policy SP5 relating to the

Cotswold water park, with an emphasis on the development of a masterplan to ensure financial sustainability and strategic necessity of sports facilities for the benefit of local residents.

## SP6 - Former Cheltenham to Stratford-upon-Avon Railway Line

### *Policy proposal*

No update is proposed to this policy.

*For the supporting text of Policy SP6 you said (2 comments received):*

1. **Protection of former railway lines:** The comment supports the continued protection of the former Cheltenham to Stratford railway line, referencing its alignment with the NPPF, the Gloucestershire Local Transport Plan, and the Gloucestershire Rail Investment Strategy. The emphasis is on preventing development that would compromise the integrity of the disused rail corridor for potential future rail use.
2. **Lack of commentary:** One of the comments provides no feedback or opinion, simply stating 'No comment'.

## Appendices

### Appendix E - Established Employment Sites

#### *Proposal*

Appendix E has been updated to show know updates to Established Employment Sites. Work is ongoing to reappraise the Established Employment Sites, which will inform the next iteration of the emerging Local Plan. Particular consideration is being given to whether sites are important for general or heavy industry, waste management, storage and distribution, or a mix of such uses, or where there may be an unacceptable impact on intended occupiers resulting from the introduction of residential uses either now or in the future, which has an impact on permitted development rights. No comments were received on this.

### Appendix K - Glossary

#### *Proposal*

The Glossary is updated to include revised or new definitions that are important for the Local Plan. For example, a new Affordable Housing definition is provided, which reflects national policy.

*For the supporting text of Appendix K you said (2 comments received):*

**Affordable Housing Terminology:** There is a discussion surrounding the appropriate use of terms related to affordable housing, with one comment questioning whether 'affordable homes' should be specifically referring to 'First Homes' and another remarking on a grammatical point requiring 'Affordable Housing' to start with a capital 'H'.

### Appendix M - Vacant Building Credit Calculation Methodology

#### *Proposal*

The Council has already adopted a methodology setting out how Vacant Building Credit is calculated in the District. It is being incorporated within the Local Plan. No comments were received on this.

## Appendix N - Schedule of Strategic and Non-Strategic Policies

National policy now requires Local Plans to identify strategic and non-strategic sites. This schedule does this job. No comments were received on this.

## Appendix O - Map of Biodiversity & Geodiversity Designated Sites

### *Proposal*

A map of the main Biodiversity & Geodiversity Designated Sites has been provided, which supports Policy EN9. No comments were received on this.

## Appendix P - Schedule of Biodiversity and Geodiversity Designated Sites

### *Proposal*

Because some of the Biodiversity & Geodiversity Designated Sites are so small and are not easily identifiable on a District-scale map, a schedule of the sites has also been provided. This includes coordinates of the sites. This currently only contains Sites of Special Scientific Interest, but the schedule will be expanded to include other types of Biodiversity & Geodiversity Designated Sites to further support Policy EN9. No comments were received on this.

## Appendix Q - Light Pollution and Dark Skies

### *Proposal*

A map showing the areas of the district with light pollution and dark skies has been provided to support of Policy EN16. No comments were received on this.

## Policies Map

### *Proposal*

A schedule of changes to the Policies Map has been provided. This will be updated to reflect any additional site allocations or further evidence prior to the next iteration of the emerging Local Plan. This schedule of changes includes the following proposals:

- Changes to Principal Settlement Development Boundaries (Policies DS1 and DS2) to exclude undeveloped land or include developed land / proposed site allocations.
- Changes to Policies S1-S19, H7 and EC4 to remove deleted site allocations and include new or extended site allocations.
- Changes to the boundaries of Established Employment Sites (Policy EC2). For example, to include extensions of sites or where land has been lost to residential development.
- Update to the Chipping Campden Key Centre boundary (Policy EC7) to incorporate some additional Main Town Centre Uses.
- Extension to Kemble Community Gardens at Station Road, Kemble (Policy EN3).
- Revision of the Special Landscape Area at Moreton-in-Marsh (Policy EN6) to exclude land that is now developed.
- Inclusion of the location of designated biodiversity and geodiversity sites.
- Inclusion of new Cotswold District Dark Sky areas (Policy EN16).

*For the supporting text of Policies Map, you said (2 comments received):*

**Development and Land Allocation:** Comments express support for extending development boundaries to accommodate new local facilities and emphasise the need for precise demarcation to protect certain areas from development.

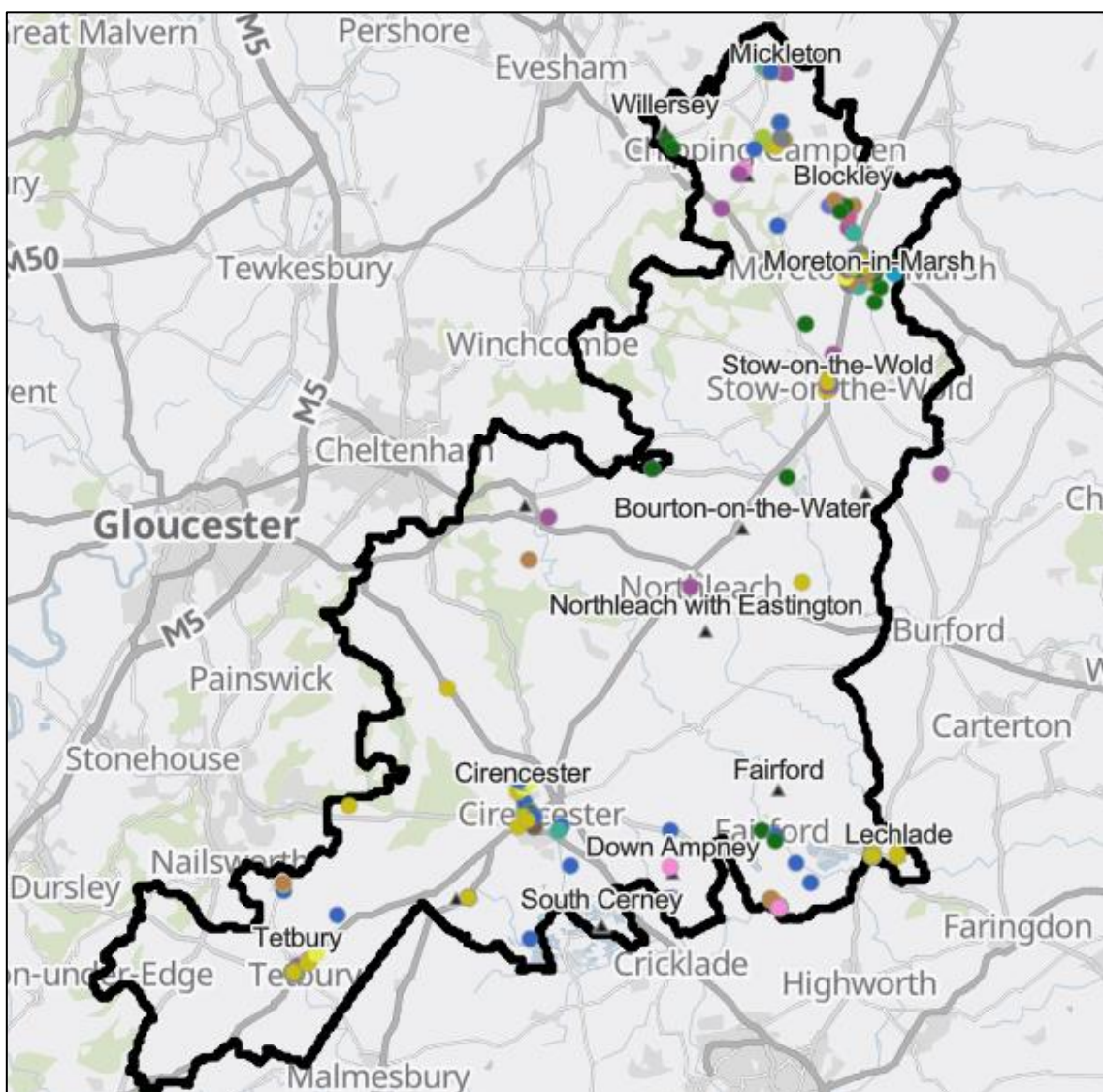
## Summary of feedback on what infrastructure people thought is needed in their area

### Proposal

We asked what infrastructure people thought is needed in their area. We explained that, as part of the Local Plan Update, we are also updating our Infrastructure Delivery Plan (IDP). The IDP will be used to help ensure future development is supported by appropriate infrastructure. In addition, growth can often leverage wider investment to help fix / improve longstanding issues with the district's infrastructure.

To capture this feedback, the Council trialled technology as part of the government's drive to digitise the planning system. An [interactive map](#) was provided, where respondents could place a pin on the map or type an address in the search bar. Respondents could then select the type of infrastructure from the list and say what needs improving.

*The following map summarises the feedback that we received (key provided on following page and the full responses can be viewed in the [interactive map](#)):*





### Infrastructure Survey results

- Affordable housing
- Employment
- Education - Infant school and child care facilities
- Education - Primary school
- Education - Secondary school
- Library
- Transport - Cycling and Walking
- Transport - Highways / Roads
- Transport - Parking
- Sport and Leisure
- Environment - Public Green Spaces
- Environment - Biodiversity / Nature Improvements
- Renewable Energy
- Waste and Recycling
- Emergency Services
- Utilities (water, wastewater, energy, broadband, etc.)
- Flood prevention

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### Principal Parish



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### District Boundary



## Summary of feedback on Integrated Impact Assessment and Local Plan evidence

We asked whether people had any comments on the Integrated Impact Assessment and Local Plan evidence.

*For the supporting text of Integrated Impact Assessment (IIA), you said (2 comments received):*

Respondents to the 'Local Plan Evidence' project have raised several concerns, with a notable focus on the potential development of Mickleton, particularly the use of the allotment and community vineyard site (MICK2) for housing. Many emphasise the importance of these community spaces for biodiversity, local food production, and social activities.

Other concerns include the lack of infrastructure to support an expanding population in Moreton in Marsh, with references to unsustainable development levels and the need for a master plan to address infrastructure needs. There are also comments on the inadequacy of the Integrated Impact Assessment, suggesting it overlooks important factors such as biodiversity and community facilities, and fails to consider the wider impact on traffic and existing services.

Some respondents feel that the consultation process is confusing, and that information is being presented in an overwhelming manner, leading to potential obfuscation of important details. Concerns about outdated evidence bases, such as those for sports facilities and housing, were also mentioned, suggesting a need for more current data to inform the plan.

A few respondents have pointed out specific issues such as missing information for certain areas on maps, like MOR9 in Moreton, and a lack of detailed sharing of plans for places like Sherborne, which hinders informed decision-making by residents.

Overall, there is a strong sentiment among respondents for preserving community assets, ensuring sustainable development that does not overburden local infrastructure, and improving the clarity and inclusiveness of the consultation process.

## Summary of feedback on other issues

1. **Inadequate Consultation and Accessibility:** Comments have highlighted issues with the consultation process, finding the material provided excessively complicated, lengthy, and difficult to understand, which discourages broad community engagement. The documents are deemed not straightforward enough for those with limited time or individuals who struggle with dense text, potentially restricting responses to well-informed minor groups, excluding the public.
2. **Need for Early Engagement and Transparent Planning:** Comments reflect the sentiment that early and effective engagement between communities, agencies, and plan makers is critical. The lack of early community engagement has led to significant concerns and suggestions that additional meetings and consultations are needed to foster a transparent and effective planning process.
3. **Impact on Local Amenities and Environment:** Commenters are concerned about the impact of increased population density on local amenities, such as healthcare and employment, and the environmental repercussions, such as flood risk and the impact on public safety. The suggestion of a resourced, fully developed Masterplan indicates the desire for careful consideration of these issues.
4. **Consideration for Strategic and Operational Sites:** Specific comments from the Office of the Police & Crime Commissioner and the Ministry of Defence highlight the importance of planning policies in relation to operational and strategic sites. These policies should consider the future developments of such sites and protect them from adverse effects due to other developments.