

User name	Comment
David Hindle	Agree. But do not include investigation of the village cluster scenario, as it will add dispersal element. Public transport in rural areas, is also very poor also highly unlikely to link villages in one cluster
Darren Curry	1.9 - proposed growth on this scale in Moreton is completely unviable. It will increase pollution, lead to environmental destruction, spoil precious natural habitats, make traffic congestion worse and very likely lead to large scale flooding.
Darren Curry	1.9 Allocation of nearly 50% of the required housing growth to Moreton is completely out of proportion and does not reflect the fact that Moreton has only 5% of the district population. Housing should be even distributed in a larger number of smaller scale developments, enabling all towns and villages across the district to benefit from the provision of new, green to the core affordable housing
Richard Noble	1.9. Moreton-in-Marsh has already seen significant development in recent years and already suffers from heavy traffic congestion and is starting to suffer from a lack of adequate facilities to support the hundreds of new homes that have already been built in recent years. I don't think this makes Moreton a viable area for large numbers of new homes. There needs to be significant improvements to infrastructure and local facilities in Moreton as it is, just to support the homes already built.
Jerome Cook	<p>Paragraph 1.9 states that "development is directed away from areas with higher flood risk". According to the Government's Gov.uk 'Check the long term flood risk for an area in England', areas of Moreton-in-Marsh (MiM) outside of the Cotswold Landscape includes areas that are high risk and should be excluded from development, such as the Fire Service College site and the agricultural (Special Landscape designated) land between the Ellenbrook. Though other areas are not currently deemed at high risk of flooding, the risk level of these areas and existing parts of MiM could increase if there's overdevelopment and the expected heavier rainfall and storms as a result of the climate emergency. An environmental, and specifically flooding, assessment should be conducted on current and future flooding risk under different development scenarios.</p> <p>Land between (northeast) Kemble and (southwest) Cirencester appear to have the lowest flood risk in the District outside the Cotswolds National Landscape area and so a lower risk area for development from a flooding perspective.</p>

Jerome Cook	<p>Paragraph 1.9 states that Moreton-in-Marsh (MiM) "is a transport hub, which has a railway station." The updated Local Plan includes a new line, in policy section H1, about "providing housing only where it is needed helps to avoid commuting journeys" and policy EC1 "encourages travelling to and from work by transport modes other than private vehicles." However, the Development Strategy as currently drafted is based on assumptions, rather than data, on how residents travel for employment and services/facilities. For example, a sample survey of working age residents in my area of MiM indicate that approximately 20% use the train, 65% use a car and the remaining walk/cycle to work. This suggests car use will remain a primary mode of transport given the limitations of public transport (e.g. not all employment locations are served by the train) and the rural location, which means many services and facilities are further afield of MiM. If these survey figures are extrapolated across around/over 1,500 additional houses, there will be increased congestion and pollution in the town. An independent transport and/or highways impact assessment, and infrastructure assessment, should be conducted on the sustainability of MiM as a transport hub.</p>
Jerome Cook	<p>Further regarding paragraph 1.9's statement of Moreton-in-Marsh (MiM) as a transport hub, CDC officers referred to buses during the Q&A event on 21 March. There are limitations to this mode of transport as they do not run frequently and the limited destinations. For example, there are about 7 buses a day from MiM railway station to Stratford-upon-Avon (No.1 and 51); just under a dozen buses a day to Cheltenham; and no buses on Sundays or to Cirencester, Gloucester or Oxford. Most residents rely on private vehicles for employment and use of services/facilities and so increased housing will increase congestion and pollution. So an independent highways impact assessment should be undertaken.</p>

Jerome Cook	<p>Paragraph 1.9 states that Moreton-in-Marsh (MiM) has "good provision of services [and] facilities." While MiM does provide some services/facilities for the town's residents and surrounding areas, there remain limitations. For example:</p> <ol style="list-style-type: none"> 1. Several of MiM's services/facilities - such as the library, main supermarket, local hospital and GP services - are located in the south-west of the town. This is about a c.30minutes walk from prospective development sites to the east/north-east of the town and residents continue to rely on private vehicles to use services (for example, to conduct a weekly food shop for a family requiring multiple shopping bags; I had to be driven to the hospital as a fractured foot meant I couldn't walk to the hospital). 2. Almost 50% of the premises on the high street are residential and do not provide services, including retail/commercial. As the Local Plan notes in paragraph 7.13.3, MiM is ranked lower than Bourton-on-the-Water for its retail centre; MiM residents already drive elsewhere for other services and facilities, including retail and commercial. <p>In these cases, congestion and pollution is likely to increase; so an independent highways and/or transport assessment should be undertaken.</p>
Jerome Cook	<p>The reference to "over 1,500" in paragraph 1.9 needs to be changed as the CDC councillors and officials have been clear - in the 21 March Q&A and other communications with residents - that it's "around 1,500" that's being considered. This document therefore needs to reflect this.</p>
Matthew Bevan	<p>Paragraph 1.9: The 'strategic scale growth' of around 1500 new homes for Moreton is a patently absurd number for a town with a current population of 5015 (2021 census). The word 'around' makes this too vague and should be replaced with a clear and honest capping number. Even with mooted additional infrastructure including a north-south bypass to the east of the town for the A429, any residents of new build homes to the east will still need to access town centre services via the already congested A44 London Road, which regularly sees tailbacks hundreds of yards long at peak times.</p>
Alison Coggins	<p>Minimum guesstimate cost for a North/ South bypass around Moreton is around £60 million pounds, quoted by the County Councillor. How many houses need to be built to facilitate a by pass. The mini roundabouts were at 98% capacity before the Dunstall farm application. How will you manage the additional traffic and pollution generated by 1500 new homes?</p>

Lesley Langley	<p>A development of 1,500 homes will cause a serious flood risk to Moreton-in-Marsh. Homes, lives and the wellbeing of residents have been damaged in the past at great cost to residents. Our home has been seriously damaged by previous flooding. It damaged the mental health of a neighbour, who suffered great distress and died shortly afterwards. The council has a duty to the town to find land for new homes not at risk of flooding.</p>
Fiona Loomes	<p>If 1,500 houses are build this is likely to add at least 2,500 cars. As there is no guarantee that sufficient, long term, well paid jobs will become available in Moreton most people who can afford any new housing will have to use the present main Moreton roads. Thereby creating more congestion and pollution. (New electric cars will, under present legislation, only become compulsory from 2035)</p> <p>There is a suggestion that a link road would be built , but as there is no confirmed route this would be unlikely to happen for some time.</p> <p>At present there are three proper crossings, in Moreton:</p> <ul style="list-style-type: none"> a) One on the London Road, by the bridge. b) One on the main road in the middle of Moreton c) One (Zebra crossing) by the Library on the road to Stow on the Wold. <p>These are inadequate at the moment and there has been at least one fatality on the Zebra crossing and there are regular 'near misses' as cars do not stop.</p> <p>The roads are already busy and given the present layout can be dangerous, adding more, regular local traffic will only exacerbate the current problem.</p> <p>Yes, Moreton has a rail station but only one train each hour in either direction. Has GWR given any indication that it intends to timetable an increase in the number of trains that will run?</p>
Fiona Loomes	<p>Public Services</p> <p>The present main sewerage system is Victorian and inadequate for any more housing.</p> <p>Building on flood plain fields has happened , however the rainwater has to go somewhere. If we concrete over our natural defences then there has to be a co-ordinated plan to deal with this problem. There is no indication that this serious issue has been properly thought through.</p> <p>To assume that Thames Water will be able to provide the solution is misguided. At a recent Public meeting in Moreton they were very clear that they have no immediate plans to do anything to deal with the current sewerage issues, or to upgrade the present system for several years.</p> <p>Furthermore to rely on a Company facing major financial problems is , in itself, very concerning.</p>

Lesley Langley	<p>A development of 1500 homes will prevent the residents of Moreton from staying healthy adding to the burden of the NHS. It is already dangerous to walk, cycle or run in and around Moreton with the current level of traffic. The little employment in the area will mean that families moving here will need to drive to work and school and to go shopping adding greatly to the congestion of local roads. A development of this size will make life for those who want to be healthy dangerous. Local authorities have a duty to preserve green spaces for children and adults to exercise safely and they must be reached by walking or cycle routes which it will be impossible to have if a development of this size goes ahead.</p>
William Langley	<p>A development of anything close to 1,500 new homes will completely overwhelm and destroy the character of Moreton in Marsh. It will cease to be a historic market town, and become a housing sprawl with a few old buildings. There is a strong sense among residents that Moreton has already taken 'more than our share' of new housing, and that additional development on this scale would be unjustified and destructive. The town's already overburdened infrastructure will be unable to cope, and the risk of flooding will be acute.</p>
Janet Heady	<p>Around 1500 (or even more) homes will totally destroy the historic market town of Moreton in Marsh, which lies half in the Cotswolds National Landscape (previously the AONB) and half in a Special Landscape Area (with a very small exception along the London Road). A size of this development is totally out of keeping and will not benefit the town - as we've already learned, a secondary school will require another 5000 houses. This is just another example of piecemeal development that will not offer any benefit to the town, but aggravate existing problems such as traffic congestion, air pollution, drainage and water supply etc.</p>

Fiona Loomes	<p>Why do we need a new Primary School, if the intention is only to build 1,500 houses?</p> <p>The present school has the ability to take 45 pupils in each year group, that allows for 315 pupils. At present there are 255 pupils on the register.</p> <p>This is the lowest for many years, reflecting:</p> <ul style="list-style-type: none"> a) The fact that the total fertility rate (TFR) in England and Wales decreased in 2021 to 1.49 children per woman. There has been a downward trend for several years and this is the lowest level since 1939. An issue which has received National news coverage. b) The Office for National Statistics UK Population Estimate shows the dramatic drop in the number of primary school places that will be needed in the coming decade. c) Many people who have lived in Moreton for many years have raised a family but still live in Moreton even though their children have grown up and left home. d) The older age of the people who have bought houses in Moreton in the last 15 years. <p>In the Survey it says that a Secondary School would require an extra 5,000 houses. The DoE site says a new , medium sized (5 form entry, approx. 986 pupils) Secondary School will need 8,107 new homes. A disingenuous comment.</p>
Lesley Langley	<p>The effect of 1500 homes on the nature surrounding Moreton in Marsh will be damaging to tree cover and hedgerows damaging wildlife. Such volume building cannot preserve the natural wildlife that makes the town a healthy place to live. Moreton attracts swifts, has hedgehogs, badgers and woodpeckers. It is irresponsible to future generations to destroy the habitats of these creatures.</p>
Janet Heady	<p>Cotswold District Council loves to promote the fact that it is "Green to the Core" - how does concreting over the countryside around Moreton in Marsh by building 1500 houses reflect a "Green to the Core" policy? It is simply destroying a Special Landscape Area adjacent to the Cotswold National Landscape. Think of the destruction to the environment, to hedgerows, wooded areas etc and affects on rights of way. It's not acceptable.</p>
Lesley Langley	<p>This development of 1500 homes is damaging to a town that does not have its own secondary school. Children will face long and difficult journeys to Campden School along congested roads damaging to the economy of the town and adding to already high pollution levels.</p> <p>It is irresponsible to build this number of homes here. They should be closer to a town that has its own secondary school.</p>

Mark Perry	The proposed development of 1,500 will exacerbate the risk of flooding - all that additional concrete and water would surely push the problem down stream. Has an environmental study taken place to look at the issues that could occur with the loss of agricultural land, vital habitat for wildlife, hedgerows and trees.
Jerome Cook	Regarding paragraph 1.9's reference to "over 1,500" homes: the current population density of Moreton-in-Marsh (MiM) is 3,299 people per km ² (sources: 2021 census data > population 5,015; citypopulation.de notes area as 1.520 km ²). Based in the current draft proposal of "over 1,500" additional homes in the plan to 2041 and the ONS (Office of National Statistics) current figure of 2.36 people per household, this equates to a population estimate of 8,555 with a population density of 5,628 km ² (note: to get a sense of proportion, the population density of London is currently 5,598 km ²). Given this potential population growth and density in MiM as per the proposed figure included, further development without the guarantee of infrastructure first will place immeasurable pressure on the town's infrastructure that is already under pressure such as congested roads, school places, waste water/sewage and pollution, flooding and genuine employment opportunities in the town.
Sheryl	I am very sad and very much against the plan to build so many houses in Moreton. We are not able support the people here already with any kind of infrastructure. I would like to oppose this plan
David Fitt	The government's "standard methodology" is inappropriate for a council most of whose land is designated as areas of Cotswold National Landscape, and where a specific town such as Moreton has long-standing issues of flooding, sewage escape and extensive areas of industrial pollution through toxic chemicals.
David Fitt	"Standard methodology" inappropriate. Most of CDC land is Cotswold National Landscape, Moreton has significant issues such as flooding risk, overspill of sewage and waste water, and historical contaminated land.
Darren Curry	The housing volume to be placed in Moreton is disproportionately high - a town that has 5% of the district population should not condemned to take 50% of the district housing growth to 2041, when the town (Moreton) has already grown 50% since 2011.

Darren Curry	<p>Placing housing in Moreton on the basis that it will lead to reduced car journeys compared to housing being placed elsewhere is hopelessly flawed. An indicative survey of residents suggests nearly 70% drive to work owing to the location and lack of public transport, and only around 12% walk or cycle to work in Moreton. Considering the range of places that people work, and the times they work, it is extremely unlikely that there will be a sudden change in the travel patterns of Moreton residents. The required increase to public transport to accommodate the range of locations and the frequency of the service required to make public transport viable, is highly unlikely to be economically feasible without enormous subsidies from taxpayers.</p>
Darren Curry	<p>Without radical changes to the management of excess rainwater, 1,500 houses will almost certainly create flooding in Moreton - it is simply not logical to think otherwise. The Spitfire estate, for just 250 houses, has very large trenches running around the site to cope with the excess water.</p>
Lisa Davies	<p>1.9 I am opposed to the idea of 1500 or more houses being allocated to Moreton. Existing infrastructure and public services are already inadequate for the current housing stock and population. The road system is overburdened already causing congestion and pollution and danger to pedestrians walking into town. For those who live in Moreton it is evident that flooding risks are increasing as the climate becomes warmer and wetter, and surface water flooding is more frequent. The scale of proposed development is out of proportion to the size and nature of the historic market town - and at the consultation when I asked what sort of area 1500 houses would cover, it effectively doubled the footprint of the town. Unless you work in Oxford, Reading, Worcester or London the railway is unlikely to reduce car use for commuting. The railway brings people in to work for tourism, or takes some out of town for work. It does not solve the issue of getting from one end of the town to the other, or from one village to another, so this many additional houses will only exacerbate the current problems. And it will inevitably mean loss of nature and hedgerows - the hedge was removed for the new development opposite the hospital destroying habitats and the altering historic entrance to Moreton. This scale of development will cause additional flooding, congestion, pollution, impact public services, impact nature conservation etc.</p>

Nick Loat	<p>I am opposed to the proposed development of 310 houses on the fire college prior to 2031 as Moreton has already met its allocation set out in the 2031 local plan. I am also opposed to the proposed development of a further 1,550 as all infrastructure (roads, sewage, medical) is widely regarded by CDC and GCC to be at or over capacity. Climate change is likely to exacerbate the problems of water management and flood risk. Infrastructure can't be left to chance. If CDC are true to their "Green to the core" strapline then development needs to be where the jobs are. The railway is only one part of the transport network required, by its nature its very "linear", other transport options are required to give centres around stations "radial" connectivity. The suggestion of a new road to mitigate on aspect of failing infrastructure has been mooted, but no details have been given, and a GCC councillor has indicated that it would cost in the region of £60m. 1,550 homes wouldn't seem to generate the income to fund such a scheme. Such schemes (and potential much larger ones such as the mooted "green village") will have a huge, detrimental impact on Moreton, with increased burden on already stretched infrastructure, roads, parking, doctors, increase the risk of flooding, in an area that has already witnessed 3 major flood events in the last 20 years, plus the additional pollution will also affect the wellness of existing residents and local ecology. The town will be unrecognisable and its charm and unique character lost.</p>
Prue Leith	<p>It puzzles me that there is no emphasis in the main consultative document of the proposed green village which is dealt with in this paper. Since this so-called option seems to me the heart of the matter, to not invite comments on it, is strange if not suspicious.</p>
John Playfair	<p>Why is there no mention of the proposed green village discussed here, in the main consultative document? Surely this is something we should have been asked to comment on.</p>
NICK MARCHANT	<p>1.9 An additional (circa) 1500 houses in Moreton will presumably increase the resident population (c5000) by at least 3000 (at a rate of 2 persons per household). This represents an increase of at least 60% which feels an intolerable burden to place on a small rural community and its already creaking infrastructure. Even if it is deemed desirable to change the nature of this community so dramatically, prior to those changes, the existing infrastructure of roads, waste water / sewage treatment, flood management, parking and public transport needs considerable upgrades just to accommodate existing demand. Further improvements will of course be mandatory to accommodate an increased population. I accept that Government targets need to be met but expecting Moreton to contribute nearly 50% of the required housing feels unreasonable and other communities need to accept a greater proportion of the burden.</p>

<p>e a hodes</p>	<p>The supporting documents are mainly outdated - due in part of changes caused through the COVID Pandemic. Nonetheless, the whole aspect of infrastructure needs to be more compleely addressed. e.g. Moreton will need a new school with such additional housing, the impact upon the roads and infrastructure of Chipping Campden will be imeasurable if this does not occur. Throughout the document transport does nt take sufficient account of rail - Chipping Campden does require the station to be re-opened so enabling visitors to the BRI site easier access (? more trade) Also ability to encourage further employment site development. The re-opening of his station should enhance the links of rail Stratford- Honeybourne link. Even without the increased numbers of housing, there is a requirement in the north for tertiary education facilities -skills and skills plus training.</p> <p>There ought ot be more emphasis upon light pollution. Street lights other than main shopping centres ought to be designed as low level and up lighters on properties banned.</p> <p>Whilst much is made of solar panels and electric vehicles (pushing pollution into other areas?) there are opportunities to ensure that all sewage plants harvest methane for electricity production.</p> <p>Perhaps a very old fashioned energy saving item could be made in including gardens that have sufficient for washing lines - also help with wellbeing that greater green infrastructure is made within new build estates. In areas that are less sensitive, renewable materiasl should be used for building (wood)</p> <p>Whilst it is important to</p>
<p>Angus Jenkinson</p>	<p>Regarding Moreton: A vision and its strategy should both be clear and make sense to those consulted as well as to professionals designing and implementing. I have concerns on this matter. Is the vision for Moreton clear to responding residents given the way information is (especially to begin with) distributed through various locations and documents? I sense that the alarms are clear but not CDC and county planners' intended outcomes. Very positive actions are indicated ("From the evidence we have gathered so far, we think that one potential solution may be for around 1,500 additional homes being located at Moreton-in-Marsh, which would be accompanied by..." see 'Plan for Moreton' below). But what the town will be and how it will get there is inevitably not available. Thus, many assume or at least worry about a trashed large town. A basis to advise yeas or nays on an informed basis is needed,</p> <p>If the plan assures delivery of a better, healthier, more vibrant and enjoyable Moreton (in line with my vision above), then I would support it. Otherwise, I would not support it.</p> <p>I came to live here some five years ago because my wife and I liked the town and the location we still do. But we soon became aware of problems in the town and it was with this in mind that I agreed to volunteer to stand as a district councillor. During 20/22/23, I knocked on thousands of doors speaking with many people across the town. This made clear many things that are valued locally such as community and its heritage as a market town in the Cotswolds. Neighbours do not want to lose this. It also made me clear about multiple problems, reinforced since I was elected. I canvassed on the basis that future development must lead to a resolution of significant problems while at the same time preserving important values. It must lead to a better town. I will defend this outcome.</p> <p>Much of the development took place while no plan existed. So this should be clarified. Developers built without due regard or compensation. Thus, the CDC administration until the Plan was adopted fully - at times let houses be developed in ways that led to imbalance in Moreton.</p> <p>Be aware that the impression locally is that the high street retail is declining, although service centres (cafes, pubs and so on), supermarkets, and some destination stores remain.</p>

Jason Seaward	<p>Re 1.9: 'good' in reference to facilities in Moreton-in-Marsh is not defined. There is no community leisure centre located near the town centre (unlike e.g. Bourton-on-the-Water, Chipping Campden), or Secondary School (unlike Bourton-on-the-Water, Chipping Campden), no arts centre/theatre (unlike e.g Chipping Campden), no police station (unlike e.g Stow-on-the-Wold)...</p>
Debby Bayliss	<p>The idea that Moreton being a transport hub and therefore the right place to develop is flawed. Public transport is limited and unreliable. Many people in new developments will continue to drive increasing traffic in the area which is already at capacity.</p>
Liz Sajewicz	<p>This email forms part of Stow on the Wold Town Council's response to the current consultation on CDC's Local Plan and its Update exercise. It covers concerns that cannot be adequately addressed by responses to the preset questions in Cotswold District Local Plan Update Consultation Executive Summary and Consultation Instructions and Questions. Answers to those preset questions have been submitted separately via the participation platform.</p> <p>The existing Local Plan shows little understanding of the exceptional problems Stow faces. For years and years Stow has suffered from the unintended consequences of well meant but repressive policies aimed at preserving Stow's beauty and that of the surrounding countryside.</p> <p>Those consequences have been bleak leaving Stow with a starkly aging and declining population and crises in housing and parking. Against this all the Existing Plan offers is platitudes and support in principle for a Town Museum and a new community facility without any indication as to how they might be created.</p> <p>We might have hoped that the drafts now before us might have taken on board the evidence and policies of our Neighbourhood Plan.</p> <p>Far from it. The draft policies section of the update does nothing substantive to address Stow's needs and confines S13 policy to a simple regurgitation of the wording of the Existing Local Plan's support in principle for a Town Museum and a new community facility.</p> <p>If this is all CDC can offer Stow then we face a further sixteen years of benign neglect and further decline in our community's sustainability. CDC needs to rethink and accept that our town is more than a piece of cultural heritage set in a National Landscape and develop positive policies that address the needs of our population.</p> <p>CDC also needs to recognise that the proposition that small rural exemption sites would cater for Stow's needs is fallacious. There is an acute scarcity of such sites and little reason to assume that any further ones will come forward.</p>
Wotton-under-Edge TC	<p>It is noted that Cotswold District Council would look to neighbouring councils to accommodate any shortfall in housing development. This would be unacceptable as neighbouring districts have their own difficulties in meeting housing requirements and targets.</p>

Zesta Planning	<p>This topic paper has been produced alongside the policy updates. The paper discusses the amount of additional development that may be needed up until 2041 and proposes preferred development strategy options and areas for growth.</p> <p>1.42. The paper proposes that a blend of Scenarios 1 (Additional non-strategic site allocations), 2 (main service centre focus), 6 (new strategic sites) and 7 (focus growth around transport modes) are believed to be the most appropriate way to accommodate the bulk of additional development needs up to 2041.</p> <p>1.43. While a combination of development scenarios will lead to the most balanced delivery of homes, CO consider the incorporation of dispersed growth (Scenario 3) and village clusters (Scenario 4) to be necessary. These scenarios, particularly Scenario 4, whereby growth is dispersed across small groups of villages based in the services, facilities and infrastructure they offer, reflects the distinct nature in which the villages in the Cotswolds are visited and used. It would allow for a sustainable level of growth and new development to enhance the vitality of these settlements. It would also reflect the objectives of paragraph 83 of the NPPF. These development scenarios are also appropriate for small and medium scale sites and would assist the Council with meeting the requirement of paragraph 70 of the NPPF to identify 10% of their housing requirement on sites no larger than a hectare. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Indeed this would assist the Council with maintaining a rolling supply of deliverable housing land going forward.</p> <p>1.45. As previously explained, growth through non-principal settlements would welcome the opportunity for a wider range of housing types and tenure to be built, along with improving affordability of the area. It would also aid in the retention of the local facilities and services within the village; development within these rural areas would increase expenditure within the local area.</p> <p>1.46. Small-scale development at small settlements is necessary in the vitality of</p>
Blue Fox Planning (representing Redrow Homes)	<p>As previously raised, Redrow are concerned that the decision to undertake a partial update of the Local Plan rather than a full review, represents a significant missed opportunity.</p> <p>The currently adopted Cotswold Local Plan covers the plan period from 2011 to 2031. It is noted that the CDC committed to review the Local Plan at least every five years through the Local Development Scheme. In June 2023 it was agreed to undertake a partial update of the Local Plan. This update would consider only the issues that needed modification within that plan period (to 2031) and did not invite consultation and examination on matters beyond that.</p> <p>Its is acknowledged that delays and pauses to reviewing the Local Plan update have been the result of changes to legislation and guidance. However, it has now been nearly 4 years since the decision was made to carry of a partial review of the plan, a matter which was not anticipated at the original cabinet decision in 2010.</p> <p>The plan review places a clear commitment on delivering climate change, affordable dwellings and reviewing housing delivery figures (matters which are addressed in turn in subsequent sections). A full review of the plan is thus considered necessary to put forward a strategic vision in order to deliver a longer-term policy framework to deliver these objectives. The current approach represents a missed opportunity to provide certainty as to the strategy for delivering new homes, job opportunities, community facilities, services and infrastructure for the longer term which could bring into question the overall soundness of the LPPU.</p>

<p>Judith Montford The EA 207</p>	<p>Topic papers</p> <p>We note the topic papers (in the 'vision, objectives and development strategy document) where the Council currently proposes options for how to tackle these matters through the Local Plan update. We have a particular interest in the following topics: Topic paper 1 -Responding to the Climate Crisis; Topic paper 3- Biodiversity; Topic paper 6 -Green Infrastructure; Topic paper 11 – Infrastructure and Topic paper 18 - Water Quality, Water Resources and Flooding.</p> <p>Whilst we are not been able to answer the questions asked under the various topics, we believe we have been able address the issues of main concern (to the Environment Agency) which the draft local plan must address when we reviewed the draft policies above.</p> <p>We would like to add that these strategic issues listed below must be considered as they are relevant to the review and revision of the Cotswold District Council Local Plan update. The Environment Agency would expect your local plan to cover these range of topics including, but not limited to:</p> <ul style="list-style-type: none"> • Net Gain - an approach to managing the environment that leaves it in a measurably better state • Flood risk management - ensuring development is steered towards areas of lowest flood risk, underpinned by a robust and up-to-date strategic flood risk assessment that follows our guidance. Securing contributions to flood risk management infrastructure to unlock development potential • Climate change - ensuring policies, site allocations and design of development takes climate change into account • Strategic water planning - quality, quantity and efficiency to support new development and safeguard the environment • Drainage and infrastructure - ensuring new development has adequate infrastructure to manage waste water and surface water disposal • Green and blue infrastructure - for flood risk management, water quality management and biodiversity • Contaminated land - bringing land back into beneficial use • Water Framework Directive objectives - no deterioration and water body improvements • Biodiversity - safeguarding protected species and habitats, highlighting opportunities for habitat creation and • Waste management - advising on waste management strategies and providing advice that spans the
<p>Hugh A. V. Wainwright 225</p>	<p>EXECUTIVE SUMMARY PAGE 2 PARAGRAPH 1.9</p> <p>Moreton has seen a 43% increase in housing since 2010, higher than any other local town and the infrastructure cannot cope with any more development. This includes sewage, traffic, doctors and schooling. In addition, CDC have already provided sufficient development to meet the requirements to 2030. The current facilities are not coping.</p> <p>Do not develop the proposed 310 houses on Fire College land and do not grant permission for the proposed 'Garden Village' of up to 10000 houses.</p>
<p>Julia Cross</p>	<p>Executive Summary Page 2 Paragraph 1.9</p> <p>If the proposal for 1,500 houses goes ahead around Moreton in the coming years all the points made above in this email will be amplified by x 6 – and more. It will completely destroy what was once a thriving, prosperous market town with a good economy and a tourist industry and turn it into an area that will have gobbled up nearing villages and land and turned it into a place that maybe people do NOT want to come and live.</p>

Newland Homes 241	<p>Housing Need</p> <p>This includes an assessment of housing need. Based on the current standard method, the need for the extended plan period puts the need between 2026 and 2041 at around 7,400 dwellings. Although it is noted that the Council suggest this could be reduced to 6,330 dwellings if over-delivery is deducted. There are significant concerns about using a reduced housing figure to take into account over-delivery. The NPPF is clear at paragraph 61 that “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance” (our emphasis). As a result, the starting point for calculating housing supply should be for around 7,400 dwellings. It is confirmed that the Standard Method already takes into account past delivery. Any document looking beyond the plan period must use the Standard Method and cannot include over-delivery. As a result, the starting point for the period 2026-2041 should be based on the current standard method which requires around 7,400 dwellings to be delivered.</p> <p>Cotswold District Council have acknowledged that there is a housing affordability crisis in the Cotswolds and recently consulted on the ‘Cotswold Housing Strategy 2024-2029’. This document clearly sets out that there are not enough affordable homes within the district, and a number of top actions which are:</p> <ol style="list-style-type: none"> 1. “Working with like-minded partners 2. Increase the supply of affordable housing 3. Update our Local Plan 4. Increase delivery of affordable housing in rural areas” <p>Realistically the majority of affordable homes are delivered via the Section 106 requirements on larger sites. Whilst policy H2 is looking to reduce the threshold for affordable housing, ultimately it will be the larger sites which will continue to deliver affordable housing. The Housing Strategy sets out that 1,460 people are currently on the Councils waiting list.</p> <p>In order to reduce this number, the Council must look to deliver at least 7,400 dwellings over the extended</p>
Guy Wakefield, Ridge (on behalf John Hackling Holdings) 243	<p>The whole document has a major emphasis on housing, with only a minor emphasis on employment sites. There is no real indication of how much employment land is proposed to be allocated or where it will be located.</p> <p>As part of this, and given its importance within the area, Bourton-on-the-Water should remain as a principal settlement. In this role, there must be additional employment allocations made to ensure that the settlement can continue to thrive. An extension to the existing and well-established Bourton Business Park would be a sensible way to meet future needs and provide businesses with the certainty they require to expand and grow in the future within Cotswold district.</p> <p>At the present time, Hacklings feel unable to comment on this document as it provides little indication of the direction of proposed employment allocations as part of the Local Plan review. As such, they reserve the right to provide further comment on this in due course.</p>

<p>Sarah Hart (Moreton in Marsh Town Council) 156</p>	<p>Executive summary point 1.3 bullet 2 Extract: For example, more homes may be required to increase affordable housing delivery or fewer homes may be required to protect assets or areas of particular importance (e.g. the Cotswolds National Landscape). If you propose to update the Local Plan to 2031 increasing the percentage of affordable homes from 40% to 50% it is hard to see why more homes would be required? Extract Exec Summary point 1.3 bullet 3: Around 5,150 dwellings' worth of housing land supply for the extended plan period has already been identified. CDC has yet to disclose the outcome of the SHELAA 2022 where presumably this land was identified. It would be helpful to share this with Town Councils who responded to the 2022 consultation.</p> <p>Extract Exec summary 1.3 bullet 5: The adopted Local Plan includes 14% more housing land supply than the housing requirement to provide flexibility in case any sites were not delivered as expected. This is the reason why Moreton in Marsh Town Council cannot understand the need to include upwards of 310 houses on the Fire Service College (FSC) site immediately in the Updated Local Plan proposal.</p> <p>Extract Exec Summary 1.9: Additional non-strategic site allocations for different types of development would be made at the Principal Settlements whilst ensuring that the scale and extent of development within the Cotswolds National Landscape (formerly the Cotswolds Area of Outstanding Natural Beauty) remains limited and that development is directed away from areas with higher flood risk. In addition, given that Moreton-in-Marsh is a transport hub, which has a railway station; good provision of services, facilities and employment; and has various sites outside the Cotswold National Landscape, the town would become a focus for strategic-scale growth of over 1,500 additional dwellings and additional land for employment development. A longer-term vision, including additional development, may be required to deliver some infrastructure items such as a secondary school. As half of the Town of Moreton in Marsh sits in the Cotswold National Landscape it is inevitable that the scale of proposed development will adversely impact on the National landscape and in particular the surrounding areas of the North Cotswolds.</p>
<p>Mrs Susan Hatfield 432</p>	<p>Executive Summary Page 2 Paragraph 9.</p> <p>I am concerned about the effects on all areas of Moreton - includes infrastructure/density/overdevelopment.</p> <p>I am concerned about the burden on the road infrastructure and the effects this will have on the overused roads in Moreton.</p> <p>Please consider Kemble as this is the best alternative. Please do not build any more houses in Moreton.</p>

Kelly Prosser	<p>The adopted Local Plan became more than 5 years old in August 2023 and at that point needed reviewing. Moreover, now that plan's strategic policies are over 5 years old the Council is required to identify a 5 year housing land supply against its Local Housing Need calculated using the Standard Method in accordance with NPPF paragraph 77.</p> <p>1.8. It is noted that the Council have carried out a footnote 42 review of the relevant policies in August 2023 and concluded that Policy DS1 does not require updating. On this basis, the Council propose to maintain the adopted housing requirement and only make minor changes to the development strategy through a partial update to the Local Plan.</p> <p>1.9. This is however considered to be a flawed outcome. It is clear that the housing requirement in the adopted Local Plan is now out of date and the standard method Local Housing Need should be applied instead.</p> <p>1.10. Paragraph 33 of the NPPF makes it clear that relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly.</p> <p>1.11. Paragraph 62 of the Planning Practice Guidance (PPG) on Plan Making then states that: "Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for a quickly as reasonably possible (Reference ID: 61-062-20190315)."</p> <p>1.12. The PPG on Housing and Economic Needs Assessment addresses whether or not the standard method is mandatory for strategic policy making purposes and states that: "No, if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will</p>
David Hindle	Good summary.
David Hindle	Good summary.
Steven Marshall	Chipping Campden has insufficient services infrastructure (I.e. school - Chipping Campden High School is full - and doctors for further expansion. That is notwithstanding the traffic issues which already exist in the town
Jon Campbell	<p>I question Down Ampney as a principal settlement?</p> <p>Certainly it is close to the A419; and would have been attractive for the CoOp company to exploit for building, but that is no longer the case as they have disposed of their land. The village has negligible social and economic sustainability. Due to the ages of respective volunteers in the post office and shop (which makes a sustained loss), and are poorly supported, leaves only a primary school as the only working asset in this village.</p>
Sally Mackie	I am against more development in or close to Moreton in Marsh as the area will be completely spoilt. The Fosse Way is already choked with traffic and a ring road would be totally out of keeping with the beauty and rural feel of the locality.

Richard Noble	2.3. Moreton-in-Marsh has already seen significant development in recent years and already suffers from heavy traffic congestion and is starting to suffer from a lack of adequate facilities to support the hundreds of new homes that have already been built in recent years. I don't think this makes Moreton a viable area for large numbers of new homes. There needs to be significant improvements to infrastructure and local facilities in Moreton as it is, just to support the homes already built.
David Eglise	Down Ampney as a principal settlement should be reassessed. Down Ampney has minimal social and economic sustainability. Its main social asset consists of a primary school. By-directional transport links to major conurbations i.e. Cirencester, Swindon or Fairford are non-existent making travel difficult or impossible. The Village Hub which includes a Post Office outlet is supported and run only by local volunteers making it an impermanent asset. There needs to be significant improvements to the infrastructure and local facilities in Down Ampney to even warrant consideration as a principle settlement.
Fairford Town Council	Typo? Surely the adopted plan period is to 2031?
John Loomes	Development should be spread across the district and not all lumped in just one or two locations.
Highways England 133	<p>Cotswold District Local Plan Update Consultation</p> <p>Thank you for providing National Highways with the opportunity to comment on the Cotswold District Local Plan Update Consultation. The consultation consists of updated Local Plan policies (to 2031) plus a vision, objectives and development strategy topic paper (to 2041). This builds on the previous Regulation 18 Cotswold District Local Plan Issues and Options consultation in March 2022. National Highways previously provided comments on the March 2022 Regulation 18 consultation and our response below should therefore be read in conjunction with our earlier comments.</p> <p>As you will be aware we are responsible for operating, maintaining and improving the strategic road network (SRN), which in the Plan area comprises the A417/A419 trunk road, specifically the A417/A449 Cirencester junction. The purpose of the SRN, which is a critical national infrastructure asset, is to provide a safe, free-flowing and reliable highway network for strategic movements to support economic growth. It is because of these responsibilities that our comments below are made.</p> <p>National Highways and the Plan Making Process</p> <p>National Highways expects transport and land use planning policy to be closely integrated. In this respect, we draw your attention to DfT Circular 01/2022. This document sets out how we engage with the planning system and how, in the context of the SRN, sustainable development should be achieved through planning. National Highways recognises that prosperity depends on our roads, so aims to support growth and facilitate development based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety. To constructively engage in the Local Plan making process, we require a robust evidence base so that sound advice can be given to Local Planning Authorities on the appropriateness of proposed development in relation to the SRN. This also extends to include the identification of transport solutions that may be required to mitigate adverse impact on the SRN and support the delivery of sustainable growth across the plan area.</p> <p>SRN Status and Schemes</p> <p>Within the NPPF "Preparing and Reviewing Plans", it is stated that all plans and policies should be underpinned by relevant and up-to-date evidence. Whilst we recognise that work to develop the transport evidence base for the emerging Local Plan is in its early stage, it will be required for later stages of</p>

<p>M Newer 403</p>	<p>Delivering the strategy 7.2.8</p> <p>The TOTAL incompatibility of 'Green to the core' within this statement i.e. 7.28.</p> <p>In the last 10 years the whole area has been subject of a series of housing developments which in many cases have swamped the area with new housing - sheet 1</p> <p>Tetbury, Fairford, Stow, Moreton, Ashton Keynes, Northleach, Lechlade, Cirencester. This - has continued up to the present, leading to significant loss of countryside and now against the prevailing view that greenfield sites must be avoided.</p> <p>Stating that you will be 'Green to the core' is the total antithesis of any plan to 'develop' Chesterton - Comment 2 7.3.6</p> <p>Not only is this an area which amounts to increasing the urban area of Cirencester by a third, the concomitant increase in population and - use will have a devastating 'urban' effect in an already - plagued town.</p> <p>General Comment I feel that the unique qualities of the Cotswolds have been significantly compromised in the last decade, almost solely due to insidious double-talk by Government and big builders. Local Corners have been effectively sidelined by ' Objectives' inspections who always promote more housing. Council must listen to their - and put a stop to this in areas such as ours.</p> <p>DELIVERING THE STRATEGY - 7.2.8.</p> <p>In summary, Cirencester MUST abandon the Chesterton Brief, as it is flying against all the present environmental and climate warnings in the most blatant 'anti-green' way.</p>
<p>M Newer 403</p>	<p>Fairford (Policy S5) Inset 4</p> <p>This map is out of date as it does not include 3 large estates of recent construction literally doubling the size of Fairford. This outrageous number of new houses has totally overwhelmed the Town leading to significant loss of Greenfields and a huge and unwanted/unattained increase in the population, with no prior significant notification to the indigenous residents, in the town or in close proximity.</p>
<p>Mark Dukes 421</p>	<p>Development strategy - and Preferred options Topic Paper Executive Summary Page 2 Paragraph 1.9 Cover the over 1,500 proposed homes.</p> <p>Moreton-in-Marsh has a bustling and thriving market town but now it is mainly used by people buying houses to get to London. We have next to no shops to speak of. The doctors surgeries cannot cope with the people we have now. The primary schools will need to be extended. Little country roads that cannot cope with the traffic on them will struggle even more with more houses.</p> <p>We do not need any more houses or the Infrastructure Moreton-in-Marsh will collapse. The old Victorian sewers will not cope with more houses as they are not coping now. Moreton-in- Marsh is a market town and should stay a market town and not just on a whim of Cotswold District Councillors to build more houses. NO MORE HOUSES.</p>

Martin Barnett 429	<p>The need for village clusters and the planning village clusters has not be appropriately effectively and fully investigating the planning team as in my view potential decisions by the council have already agreed to Moreton to be come a garden village.</p> <p>Investigate other sections on the district for construction of the required number of homes, with the - the AONB and request the acquired building land in Mickleton, Willersey and south carney.</p>
Martin Barnett 429	<p>6. Development Strategy</p> <p>Moreton cannot be viewed as a transport hub just as kingham choubury, honeybourne, over other must stop on the time between oxford and Worcester -. Oxford yes Moreton No! Just become the CDC has a cycle shed built at great expense does not make Moreton a transport hub.</p> <p>This factor disputes the CDCs plan for Moreton to be tangible for additional development. In addition during the autumn winter and spring months (3/4 of the year) when it's wet and miserable people will use their cars to travel, so destroying the through of this being a GREEN TO THE CORE plan.</p>
David Lock 164	<p>Policy DS1 – Development Strategy</p> <p>OBJECT</p> <p>The Council proposes to update Policy DS1 (Development Strategy) to capture the following:</p> <ul style="list-style-type: none"> • Update to clarify that the housing requirement will be monitored against a stepped (residual) requirement, which takes into account past completions; • Updated housing requirement for period between 2011-2031; • Update to confirm that the Standard Methodology will be employed from the period starting 1st April 2031; and • Updated housing land supply position. <p>Hallam strongly objects to the proposed amendments based on the reasons set out below.</p> <p>Firstly, Hallam objects to the Council’s approach of counting past oversupply in its housing requirement calculations. This methodology is flawed as it precedes planning guidance on when and how past oversupply can be counted. Therefore, Paragraph 2 of Policy DS1 should be deleted, and the housing requirement should not rely on past oversupply.</p> <p>Secondly, the Council suggests that the housing requirement for the period 2011 – 2031 is based on the adopted housing requirement (8,400 dwellings) less completions over that period. However, the adopted Local Plan became five years old on 3rd August 2023, rendering Policy DS1 out of date.</p> <p>It is acknowledged that the Council published a “Review of the Cotswold District Local Plan 2011-2031 Housing Requirement” in August 2023. The Review concluded that the strategic housing requirement policies do not need updating because future housing needs (calculated as 9,094 homes) are not significantly different to those implicit in the Adopted Plan, and because the housing requirement of 420 per annum in the adopted plan is to be understood and regarded as a minimum figure. However, the latest Local Housing Need (LHN)* figure is approximately 90% higher than the current Local Plan target (504 vs 265 dwelling per annum).</p> <p>In addition, neither the Review nor the assumptions underpinning the Review have been tested through any</p>
David Hindle	<p>Clear reasoning. Hopefully the government will permit oversupply up to 2026, related to the last Plan to be taken into account. Such would also aid a degree of reelection of 80% of CDC being being Natural Landscape, and despite this the past Plan is delivering at above minimum need. Therefore, CDC can be trusted to view the figure in the future as a minimum, and not a cap.</p>

Timothy Phillips	Interestingly the chosen sites are northern Cotswolds centric 10 out of the 17. Reference to being green seems to have its challenges as housing spread over areas meaning high commute levels from some of the developments. Individuals are not all working from home as latest figures are showing employers tending to want more in the office now.
e a hodes	affordable is out of financial reach for many of the core workers of the area. Consideration ought to be given to 'house-a-loos' i.e. 1bed bungalows - which can easily be extended into roof (with common design guide) in order to retain families in the area. The key issue in area is affordability
Boyer Planning 273 Call for sites	<p>Affordable Housing 3.46</p> <p>There has been no updated report relating to Affordable Housing need since 2016. Rather the Council seek to rely on and carry forward the proportion of affordable housing that the Inspector considered to be deliverable at the time, rather than the full need. The Council in their 2031 Housing Requirement review note that Plan has over-delivered on affordable housing requirement set out in the Plan, but without an up to date assessment of affordable housing need, it is not clear what the level of under-provision is against the actual need. In addition, given the higher levels of housing delivery in the early part of the plan period, it is to be expected that there would be a corresponding level of affordable housing, however given that nationally there is an affordable housing crisis due to undersupply, it is likely that the percentage of provision against need may well be significantly under that recommended by the Inspector.</p> <p>3.47</p> <p>This provides a further justification as to the need to review and increase the housing requirement.</p>
David Hindle	Agreed
David Hindle	Agree that the Local Plan should be a new one running from 2026 - 2041. It will give much more certainty over the future, and as a revised one would only have 5 years to run, it is far more logical to have a new 15 year one instead. preparing 1 not 2 Plans will also be much cheaper.
David Hindle	Agreed, and highly supportive of having a new Plan from 2026 - 2041. It would give certainty about the future; far more sensible than having a reviewed Plan that would only run for 5 years. That would have to be followed by a new Plan, running for either 15 or 20 years. Having a Plan up to 2041, would also be a cheaper option, and also ensure that a 5 year supply of land would remain towards the end of a partially reviewed Local Plan ending in 2031.

Richard Grant	<p>Development Strategy, Vision and Objectives (2026 – 2041)</p> <p>2.35 Given our conclusions above, we welcome the Council embarking upon a process to produce a full update of the Local Plan which extends the plan period to at least 2041. As we have noted, our suggestion is that the Council moves quickly to combine the two local plan update processes into a single new Local Plan which can address all of the issues that have been set out, including housing need and supply, in one place.</p> <p>2.36 We also believe that moving swiftly to the development of a new Local Plan will enable the Council to put in place a strategy for addressing housing need and the housing crisis in Cotswold District most expediently, but putting in place a longer term strategy for meeting needs, and identifying new housing sites which would come forward quickly to provide much needed homes for residents and communities. We set out below and in the Call for Sites our case that the land West of Field Lane in Willersey could be allocated and brought forwards quickly to provide homes for that community.</p> <p>2.37 We note that the Development Strategy, Vision and Objectives (2026 – 2041) Document (DSVO Document) is at an early stage, setting out options for comment, and is not a draft Local Plan. We also note that it aims to provide some thoughts regarding the approach that should be taken in a new Local Plan, focusing on Vision and Objectives, the Needs to be addressed by the plan and the potential development scenarios that could be used to accommodate needs.</p> <p>2.38 We comment below on the suggested approach to housing need and to development scenarios in the DSVO Document. We would, however note that if the Council were minded to merge these approaches with the detailed new policies and new policy wording as set out in the Local Plan Update – Draft Policies Consultation, it would seem that the work that has already been done developing new policy approaches, particularly as they concern climate change and ensuring that the Local Plan is ‘green to the core’ could easily be adapted to a full update of the Local Plan. The main areas needing to be developed concern the approach to meeting housing and other needs over a new plan period up to at least 2041, but once these have been determined the new policy wording would only need limited changes to be brought into line with the new plan period. We would again urge the Council to take this approach.</p>
Blockley Parish Council	<p>Blockley Parish Council appreciates the importance of having a robust Local Plan in Place to steer development in Cotswold District and of having a land supply to deliver the Plan, to avoid being vulnerable to large scale development happening without any strategic input. However, BPC has concerns about the scale of development proposed in Moreton in Marsh and how existing challenges will be addressed (lack of suitable infrastructure etc.) before additional development exacerbates problems.</p>

<p>Blue Fox Planning (representing Redrow Homes)</p>	<p>The Local Plan Vision updates the Vision and Objectives of the adopted Local Plan to reflect extending the plan period to 2041, looking ahead over a 15 year period from the base date of 1 April 2026. The vision document forms a separate consultation matter to the LPPU update, however forms part of the consultation material which members of the public are currently being requested to consider upon.</p> <p>The purpose of the 'vision consultation' is unclear. Paragraph 1.2 states that the document is 'not a draft local plan and no decision has been made on where future development need will be located'. This adds confusion to the consultation process and understanding of why this consultation is being run alongside the LPPU. As noted previously, Redrow are concerned regarding the limited scope and opportunity that the partial review of the local plan currently presents.</p> <p>With regards to extending the plan period to 2041, consideration should have been given to this matter, prior to continuing the current misguided approach of the partial update. The consultation on the 'vision document', further emphasises the need for a full review of the plan process and preparation of a new local plan, which co-ordinates a thorough assessment of how local needs are addressed and how future development will be located.</p>
<p>Bathurst Estate 175</p>	<p>Savills is instructed by the Bathurst Estate (hereinafter 'BE') to submit the following comments on the Cotswold District Local Plan (CDLP41). BE owns land across the District, notably in and around Cirencester. BE also owns land at Siddington and Kemble.</p> <p>BE welcomes the positive approach towards Cirencester as the main service centre for the District alongside Kemble being identified as a Principal Settlement.</p> <p>BE is grateful for the opportunity to comment on the CDLP41 to help shape planning policies going forward and on the emerging development options to 2041.</p> <p>New Local Plan or Partial Update</p> <p>The Cotswold District Council Local Development Scheme (LDS) and Local Plan Regulation 18 Consultation documents identifies that both a new local plan and a partial update to the Cotswold District Local Plan (2011 to 2031) are anticipated. However, it is not clear how these two components interact, or indeed, if they are intended to? However, there are some inconsistencies between the two components and we therefore seek clarity over this matter.</p> <p>BE generally supports the need for an update to the Local Plan to reflect changes since the extant plan was adopted in 2018. But seeks clarity as to whether the Council intends to simply update the policies in the extant Local Plan or if it is intending to update the policies and extend the plan period to 2041, allowing for additional development for the period 2031-2041? This matter should be made clear for the next round of public consultation as it is confusing as currently set out.</p>

Star Planning 269	<p>Richborough consider that the Council should be undertaking a full review of the extant Cotswold District Local Plan (2011 to 2031) Local Plan to enable for proper planning for a period of 15-years after the adoption of the new Local Plan which may well be the year 2041.</p> <p>4. A full review of the Local Plan, as advocated by Richborough, is consistent with the National Planning Policy Framework (the Framework) where strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities. The current partial updated Local Plan would still only have an end date of 2031 which, based upon the Local Development Scheme (LDS - January 2024), would be a plan period of less than 5-years.</p> <p>5. Given the LDS indicates the same timetable for preparing the partial updating and the preparation of the Local plan review (i.e. adoption Q3 2026) it appears to Richborough that a lot of time and wasted resources will be incurred by the Council and the community in producing 2 Local Plans.</p> <p>6. Further, the partial update is out of kilter with the neighbouring local planning authorities who are reviewing their plans for a longer time horizon. The approach is also out of kilter with the Gloucestershire Local Transport Plan (2020 – 2041).</p>
Chris Marsh (Pegasus Group) 334	<p>Plan Period</p> <p>3.1. Presently, the proposed New Local Plan period, as outlined, runs from 2026 until 2041. Paragraph 22 of the NPPF requires strategic policies should look ahead over a minimum 15-year period from the date of adoption.</p> <p>3.2. The latest Local Development Scheme of the Council was published in January 2024 and suggests that the New Local Plan will be submitted for examination in Q2 2025 and adopted within c.15 months in Q3 2026. This is considered unrealistic, especially given the significant issues to be addressed in Cotswold District owing to its constraints and the current pursuit of what we consider to be an insufficient amount of housing. Indeed, since the NPPF was introduced in March 2012, the average time taken from submission to adoption of new local plans has been 1.68 years.</p> <p>3.3. This has remained broadly consistent with those plans submitted between March 2012 and January 2019 under the transitional arrangements of paragraph 220 of the NPPF having taken 1.68 years on average and those submitted since having taken 1.65 years. Assuming that the Local Plan is submitted in Q2 as envisaged by the Local Development Scheme and that following this the examination takes 1.68 or 1.65 years, the Local Plan wouldn't be adopted until the first part of 2027 at the very earliest.</p> <p>3.4. Given the uncertainties around the timing of plan adoption, which include the prospect of a general election and change in government within the next 10 months, to accord with national policy and look ahead for 15 years from adoption we suggest the New Local Plan will need to cover the period to 2043 as an absolute minimum.</p>

<p>Chris Marsh (Pegasus) 335</p>	<p>Plan Period</p> <p>3.1. Presently, the proposed New Local Plan period, as outlined, runs from 2026 until 2041. Paragraph 22 of the NPPF requires strategic policies should look ahead over a minimum 15-year period from the date of adoption.</p> <p>3.2. The latest Local Development Scheme of the Council was published in January 2024 and suggests that the New Local Plan will be submitted for examination in Q2 2025 and adopted within c.15 months in Q3 2026. This is considered unrealistic, especially given the significant issues to be addressed in Cotswold District owing to its constraints and the current pursuit of what we consider to be an insufficient amount of housing. Indeed, since the NPPF was introduced in March 2012, the average time taken from submission to adoption of new local plans has been 1.68 years.</p> <p>3.3. This has remained broadly consistent with those plans submitted between March 2012 and January 2019 under the transitional arrangements of paragraph 220 of the NPPF having taken 1.68 years on average and those submitted since having taken 1.65 years. Assuming that the Local Plan is submitted in Q2 as envisaged by the Local Development Scheme and that following this the examination takes 1.68 or 1.65 years, the Local Plan wouldn't be adopted until the first part of 2027 at the very earliest.</p> <p>3.4. Given the uncertainties around the timing of plan adoption, which include the prospect of a general election and change in government within the next 10 months, to accord with national policy and look ahead for 15 years from adoption we suggest the New Local Plan will need to cover the period to 2043 as an absolute minimum.</p>
<p>David Hindle</p>	<p>Logical.</p>
<p>Richard Grant</p>	<p>Extended Local Plan Period</p> <p>2.39 Paragraph 3.3 sets out that extending the plan period so that it runs from 2026 to 2041 would bring the Cotswold Local Plan into line with the other Gloucestershire authorities with the exception of Stroud, whose plan period runs to 2040. We have commented on this point above, but would make further comments at this stage</p> <p>2.40 We would suggest that the plan period should be significantly longer than 2026 - 2041, for the following reasons:</p> <p>a. The NPPF sets out that strategic policies should look forward for at least 15 years from the point of adoption (para 22 of the NPPF published in December 2023). Clearly, once the Local Plan is submitted it will need to go through an Examination process, which even according to PINS guidance could take between 12 and 18 months on average. Even if the Local Plan is submitted by 30th June 2025, as suggested by the LDS above, the plan may not finish the Examination process before the end of 2026 and then be adopted in 2027. A plan period running to 2041 would not therefore meet the requirements of the NPPF.</p> <p>b. Paragraph 22 goes on to say that "Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery." The Local Plan will clearly include strategic growth including the Chesterton Strategic Site, indicating that it should have a plan period long enough to include the timescale for full delivery of this site.</p> <p>c. We would therefore suggest that the plan period should aim to cover at least 20 years from the point of adoption, running from 2026 to 2046. We also note that clearly the adopted Cotswold Local Plan used a 20 year plan period from 2011 to 2031.</p>
<p>David Hindle</p>	<p>Agree to changes</p>

David Hindle	Agreed.
Clare Charlton	Providing more socially rented homes doesn't allow those with home ownership aspirations to thrive. Consider homes to buy for those with a local connection.
Fiona Perry	<p>Ref: Vision and Objectives - making local plan green to the core /supporting health and well being.</p> <p>Please consider the lack of medical facilities available in Moreton-in-Marsh when thinking of adding new developments to the town. In the last month we have had to make trips to hospitals (for various appointments) in Stroud 56 mile round trip, Gloucester 64 mile round trip, Cheltenham 46 mile round trip and Tewkesbury 48 mile round trip = 214 miles Total. Moreton-in-Marsh is on the edge of Gloucestershire, sometimes we get lucky and are referred to Banbury. Another 1,500 (minimum) as I understand it will inevitably lead to another 1,500 cars and people having to travel to the hospital destinations I have mentioned. I'm not sure how you solve this. Presumably there isn't a plan for a new hospital in any of the proposals. Please consider this.</p>
Richard Grant	<p>Vision and Objectives</p> <p>2.41 Paragraphs 3.7 to 3.15 set out how the revised Vision and Objectives for the Local Plan would be framed, noting that specific changes have been made later in the DSVO Document.</p> <p>2.42 We would simply note that given the severity of the housing crisis in Cotswold District, and the unaffordability of housing across the board, it would be helpful to have an element of the Vision referring to the need to ensure that all current and future residents have access to a home they can afford, and to have an objective confirming that the Council will ensure that housing needs are met in full to ensure that all current and future residents have access to suitable accommodation in the future.</p>

Angus Jenkinson	<p>The vision begins not with a vision but with values for a vision and only outlines additional values followed by a set of additional objectives:</p> <p>“The adopted Vision is proposed to be updated to also include:</p> <ul style="list-style-type: none"> • Responding to the climate crisis; • Providing more socially rented homes; • Making the Local Plan Green to the Core; • Supporting health and well-being; and • Enabling a vibrant economy.” <p>I would like to see a real vision such as:</p> <p>“The Cotswold District will be a destination to live and work in, to visit, learn from, and enjoy for its rich blends of agricultural and urban ecologies and resources, its living heritage, and vibrant open communities. It will be a de facto global brand noted as an exemplar in responding to challenges of 21st century resilience, a nature-friendly carbon sink that supports healthy and fulfilling lifestyles and rich culture.”</p>
Coates Parish Council	<p>3.5 The adopted Vision We agree with: Responding to the climate crisis; Supporting health & well-being; Enabling a vibrant economy</p> <p>3.6 The adopted Objectives We agree with: Transitioning to low carbon while maintaining a vibrant economy; Delivering Biodiversity net gain; Ensuring that development supports positive health outcomes</p>
Blockley Parish Council	Blockley Parish Council supports the overall visions and objectives as set out in sections 3.5 and 3.6
Bathurst Estate 175	<p>Vision</p> <p>The amended text refers to a number of Corporate Strategies. It is not clear how a Local Plan, built around development can help the first strategy, namely “Deliver the highest standards of service”?</p> <p>BE supports the focus on Cirencester for housing and employment growth and enhancing its position. Cirencester is by far the most dominant location both in size and economic benefits.</p> <p>The Vision should be updated to reflect the proposed development strategy if that is to be focussed on another settlement, for example, Moreton in Marsh.</p> <p>Objectives</p> <p>Under Local Economy, BE would encourage the use of employment, training and skills plans for any large scale developments. This will encourage local job creation and purchasing as well as capitalising on the large employment opportunities from such developments. This will aid local employment as well as upskilling the local labour force for the benefit of the District’s economy. This will include apprenticeships as well as outreach in to local schools and colleges.</p> <p>In relation to Sustainable Travel, BE supports the need to reduce transport carbon emissions and reducing car use by promoting a hierarchy of users. However, it must also be recognised that the District is rural in character which creates a limit to which people can switch to alternative modes of transport, for example in terms of commuting to work. To enable this to happen better and more frequent public transport would be required to existing villages and main employment centres.</p> <p>Part of the reduction in carbon emissions will take place through the switch to electric vehicles over the plan period, as well as the significant levels of home working that has seen a material change in traffic congestions in the main centres.</p> <p>On Climate, criterion “a” refers to development being zero carbon. This is a wide ranging criteria and should be</p>

Walsingham Planning 260	<p>The Topic Paper outlines the Council’s intention to build upon the existing vision and objectives within the adopted local plan. The updated Vision is supported and the emphasis on responding to the climate crisis and supporting nature recovery are welcomed. Regarding the updated objectives, the proposed changes are generally supported. However, updates to Objective 6 raise concerns regarding the intended scope of the local plan. As outlined previously in this representation, the Government is taking forward a national approach via the Future Homes Standard which will deliver a national standard for building, through building regulations, to achieve net zero carbon in construction. To reflect this approach, it is recommended Objective 6a is amended as follows: “Supporting new development to be net zero carbon and supporting the sympathetic retrofit of historic buildings.”</p>
Deborah Guy 435	<p>Vision and objectives</p> <p>The local plan pays very little regard to the climate crisis and making it green at the core. Moreton-in-Marsh is on a flood plain. There have been 635 hours of sewage being dumped into the Evenlode tis year. There has been no consideration of the effects of this development on the rivers or groundwaters.</p>
Lechlade Town Council 135	<p>Vision, Objectives and Development Strategy Options Topic Paper</p> <p>1The topic paper raises important matters for Lechlade in relation to its role as a Principal Settlement and its capacity to accommodate further housing growth. It presents a development strategy following consideration of a number of development scenarios, which are the focus of this response in terms of the implications of relevant scenarios for Lechlade and the delivery of its Neighbourhood Plan Vision and Objectives.</p> <p>2Eight potential development strategy options have been identified to accommodate the additional growth:</p> <p>3Scenario 1: Additional non-strategic site allocations</p> <p>4Scenario 2: Main service centre focus</p> <p>5Scenario 3: Dispersed growth</p> <ul style="list-style-type: none"> •Scenario 4: Village clusters •Scenario 5: New settlement(s) •Scenario 6: New strategic site(s) •Scenario 7: Focus growth around transport nodes •Scenario 8: Request neighbouring authority to deliver some of the housing need <p>•The Topic Paper suggests that ‘a blend of Scenarios 1, 2, 6 and 7 are believed to be the most appropriate way to accommodate the bulk of additional development needs up to 2041’. Under this combination of approaches, Lechlade would continue to be supported as a location where the principle of development would be supported. An important statement is also made, as follows....’ However, the updated development strategy would have a greater focus on reducing carbon emissions and focussing growth in locations with good transport connectivity and access to services, facilities and employment. Accordingly, having been reviewed as part of this process, some Non-Principal Settlements may become a Principal Settlement and some Principal Settlements may have their Principal Settlement rescinded’.</p> <ul style="list-style-type: none"> •In relation to additional non-strategic site allocations at Principal Settlements, the aim would be to limit the scale and extent of development within the Cotswold National Landscape and to direct it away from areas with higher flood risk. Moreton-in-Marsh is suggested as capable of accommodating a strategic site allocations to accommodate over 1,500 additional dwellings and land for employment development.

<p>Boyer Planning 273 Call for sites</p>	<p>The Vision, Objectives and Development Strategy Options Topic Paper considers whether the Plan period should be extended to 2041, covering a period of 15 years from 2026, albeit that it is not clear from the document how this relates to the partial review up to 2031. In setting out the calculations it is clear that the housing need of 7,400 dwellings over 15 years (which will now need to be updated to reflect the latest affordability ratio's) was seeking to rely on past over delivery from the early part of the Plan period. However, in his Ministerial Statement the Secretary of State confirmed on 19 December 2023 that such over delivery is not to be taken into account when preparing new plans, stating: "The Government also considered allowing authorities to take account of past 'over-delivery' when preparing new plans. Having considered responses to the consultation, which raised questions over needing to also consider 'under-delivery' and the risk of double counting homes via the standard method, we are not proceeding with this change at this time." As such, the housing figures to 2041 should take account of the Plans past provision, as is being proposed.</p> <p>3.43 In addition, as set out above, given that the requirement to 2031 is being reviewed, it would be appropriate to remove the past oversupply from the stepped trajectory and for the Plan to make full provision to meet its annual requirement of 504 dwellings per annum or 4,032 dwellings over the next 8 years.</p> <p>3.44 It is considered that given the government's decision to not include over delivery in the housing requirement, provides a further justification for a full review of the Local Plan to be undertaken.</p> <p>3.45 This approach also aligns with Paragraph 60 of the NPPF which sets out the government's objective of significantly boosting the supply of homes and the Council's own view that the requirement figure is a minimum not a maximum.</p>
<p>David Hindle</p>	<p>Agreed. i have also made comments earlier relevant to this section,</p>
<p>james</p>	<p>Fully agree</p>
<p>Wolfords Joint Parish Cpouncil</p>	<p>If the projected need is only for 493 houses annually why are they all landing in Moreton</p>

Richard Grant	<p>Development Needs</p> <p>2.43 Paragraph 3.7 of the DSVO Document sets out the approach currently being taken by the Council to understand what local housing need should be planned for. It confirms that the housing need has been calculated using the Standard Method, and equates to 493 homes per year or 7,396 homes over the extended plan period from 2026 – 2041.</p> <p>2.44 We would reiterate the points made above regarding the calculation of local housing need. As set out, our calculation using the correct and latest affordability ratio for Cotswold District suggests a local housing need of 512 homes per year. On this basis, the local housing need figure covering the extended plan period from 2026 – 2031 should be 7,680 new homes. If, as suggested above the Council were to choose a more robust 20 year local plan period, the local housing need for this period would be 10,240 new homes.</p> <p>2.45 The DSVO Document sets out in paragraph 3.10 that the Government has “indicated in a recent consultation that it intends to confirm that past over-delivery of housing from the previous Local Plan can be deducted from what needs to be provided in the new plan.” The footnote to this paragraph confirms that the Government consultation to which this refers is the “Levelling-up and Regeneration Bill: reforms to national planning policy” which took place between December 2022 and March 2023, and which was updated in December 2023 to set out the Government’s response to the consultation at the time that the new NPPF was published. The relevant part of the Consultation was paragraph 9 third bullet point, which set out the point about past over-delivery as part of a wider set of points regarding the calculation of housing need using the standard method, and of how needs should be met.</p> <p>2.46 It is notable that the consultation referred to set out a range of changes that the Government intended to make at that time to the NPPF. The consultation closed over a year ago, and it was only in December 2023 that a new NPPF was published which took on board some of the proposed changes that were outlined in the consultation. Of the three key changes to the NPPF set out in paragraph 9 of the NPPF, the first two (concerned with the Standard Method and with the requirement for local authorities to conduct Green Belt Reviews to meet housing needs) were carried forwards, but the third point regarding past over-delivery, was not.</p> <p>2.47 Although it is certainly possible that the Government may decide to bring this change regarding over-delivery forwards through another policy instrument sometime in 2024, this is by no means certain. The</p>
Chris Marsh (Pegasus Group) 334	<p>Housing Numbers</p> <p>4.2. Paragraphs 3.33 – 3.39 have considered the district’s housing need and requirements over the current plan period, to 2031. This has already established that there are no exceptional circumstances which apply to Cotswold District, and therefore housing need must be calculated using the Standard Method, in line with Paragraph 61 of the NPPF. Based on the current Standard Method calculation of 493 dpa, the Vision, Objectives and Development Strategy Options Topic Paper identifies a need of 7,400 dwellings between the next plan period of 2026 - 2041.</p> <p>4.3. However, as stated in Paragraph 67 and established above, this is only a starting point, and the requirement may, in fact, be higher. Due to inward migration, economic growth rates, and an increasingly high affordability ratio, it is contended that this is the case in Cotswold District. Taking this into account, a revised figure of at least 522 dpa was earlier suggested as a more appropriate requirement for the district to work towards. Over the fifteen-year plan period, this equates to a requirement of 7,830 dwellings. If a 14% degree of flexibility is added, as suggested in the Topic Paper as an option at paragraph 3.21, this figure would increase to 8,926 dwellings on the basis of 522 dpa.</p>

<p>Chris Marsh (Pegasus) 365</p>	<p>Housing Numbers</p> <p>4.2. Paragraphs 3.33 – 3.39 have considered the district’s housing need and requirements over the current plan period, to 2031. This has already established that there are no exceptional circumstances which apply to Cotswold District, and therefore housing need must be calculated using the Standard Method, in line with Paragraph 61 of the NPPF. Based on the current Standard Method calculation of 493 dpa, the Vision, Objectives and Development Strategy Options Topic Paper identifies a need of 7,400 dwellings between the next plan period of 2026 - 2041.</p> <p>4.3. However, as stated in Paragraph 67 and established above, this is only a starting point, and the requirement may, in fact, be higher. Due to inward migration, economic growth rates, and an increasingly high affordability ratio, it is contended that this is the case in Cotswold District. Taking this into account, a revised figure of at least 522 dpa was earlier suggested as a more appropriate requirement for the district to work towards. Over the fifteen-year plan period, this equates to a requirement of 7,830 dwellings. If a 14% degree of flexibility is added, as suggested in the Topic Paper as an option at paragraph 3.21, this figure would increase to 8,926 dwellings on the basis of 522 dpa.</p>
<p>David Hindle</p>	<p>Agreed. I have also made comments earlier relevant to this section.</p>
<p>David Hindle</p>	<p>Already covered, and agreed.</p>
<p>Richard Grant</p>	<p>Land Supply</p> <p>2.49 Paragraph 3.18 sets out the initial estimate of land supply covering extended plan period 2026 – 2041. We note that this assessment is based upon the Council’s Housing Land Supply Report dated August 2023, which sets out the Council’s land supply position in relation to the current Local Plan period to 2031. Some of the homes completed from extant consents and from existing allocations therefore seem certain to be delivered years between 2023 and 2026. Completions at the Chesterton Strategic site at Cirencester now include the total number of new homes which could come forwards by 2041, which considering that the Council assesses the site could be completed by 2038 would seem reasonable. The windfall allowance simply rolls forwards the current yearly assessment, giving a total of 2,070 dwellings expected to be completed over the plan period. This assessment seems a particularly high figure and we would suggest that relying upon windfalls to deliver over 25% of the land supply required to meet the need for new homes over the plan period is a risky approach.</p> <p>2.50 Given the lack of a detailed analysis of the potential land supply specifically relating to the plan period 2026 – 2041, we would reserve our position to comment in more detail on the housing land supply once such data is published. However, we would note that the DSVO document suggests a land supply of around 5,150 dwellings (noting that over a third of this supply is from unidentified windfall sites).</p> <p>2.51 Against this figure, using a local housing need of 512 homes per year, we would therefore assess that sites to deliver at least a further 2,530 homes need to be identified to meet housing needs in full if the plan period is extended from 2026 to 2041, and at least a further 5,090 homes need to be identified to meet housing needs in full if the plan period is extended from 2026 to 2046.</p> <p>2.52 Furthermore, the DSVO Document sets out at 3.22 and 3.23 that as with the adopted plan, it would be “necessary to identify additional homes to provide flexibility within the housing land supply to accommodate fluctuations in the wider economic and housing market over the plan period.”</p> <p>2.53 If the level of over-supply of 14% that was used in the adopted Local Plan is applied, this would result in a need to identify an additional 1,075 homes over a 15 year plan period from 2026 to 2041, suggesting a need to identify land for 8,755 new homes.</p> <p>2.54 Over a 20 year plan period, it would be necessary to identify land for a further 1,433 new homes, and therefore a land supply for 11,674 new homes in total.</p>

Fairford Town Council	<p>"2,070 dwellings are expected as windfalls (13)." – This seems a large number. On what assumptions is it based as to where these additional sites can be found?</p>
Bloor Homes Western (Ridge and Partners)	<p>Housing Need</p> <p>This includes an assessment of housing need. Based on the current standard method, the need for the extended plan period puts the need between 2026 and 2041 at around 7,400 dwellings. Although it is noted that the Council suggest this could be reduced to 6,330 dwellings if over-delivery is deducted. There are significant concerns about using a reduced housing figure to take into account over-delivery. The NPPF is clear at paragraph 61 that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance" (our emphasis). As a result, the starting point for calculating housing supply should be for around 7,400 dwellings.</p> <p>As has been set out in the Emery Planning Note which accompanies this submission past delivery is accounted for in the standard method and this results in a local housing need of 493 dwellings per annum from 1st April 2023 based on affordability ratios dated 2022 and published in March 2023. Using the latest data inputs i.e. the annual average household growth over the period 2024-34 and the most recent median workplace-based affordability ratios published on 25th March 2024, the local housing need for Cotswold is 504 dwellings per annum from 1st April 2024. This increase in need shows that affordability is continuing to worsen in the district despite an oversupply against the adopted housing requirement.</p> <p>Over the remainder of the plan period to 2031, the local housing need using the standard method is therefore 3,944 dwellings (i.e. 493 X 8 years = 3,944). This is significantly greater (i.e. by 1,821 dwellings) than the proposed residual requirement of 2,123 dwellings. Any document looking beyond the plan period must use the Standard Method and cannot include over-delivery. As a result, the starting point for the period 2026-2041 should be based on the current standard method which requires around 7,400 dwellings to be delivered.</p> <p>Cotswold District Council have acknowledged that there is a housing affordability crisis in the Cotswolds and recently consulted on the 'Cotswold Housing Strategy 2024-2029'. This document clearly sets out that there are not enough affordable homes within the district, and a number of top actions which are:</p> <ol style="list-style-type: none"> 1. "Working with like-minded partners 2.
Chris Marsh (Pegasus Group) 334	<p>Housing Supply to 2041</p> <p>4.4. Paragraph 3.20 of the Topic Paper suggests that a supply of 5,150 dwellings has already been identified for the 2026-2041 period, as set out within Appendix 1 and 3 of the Housing Land Supply Report (August 2023). Against the 7,400-dwelling requirement without the flexibility, they identify a shortfall of 2,250 dwellings or 1,180 dwellings if over-delivery is deducted from this. However, with our recommended revised need figure of 7,830 dwellings, we identify a shortfall of at least 2,680 dwellings or 1,610 dwellings deducting over-delivery. With the 14% flexibility, the shortfall is as great as 3,476 dwellings. However, in reality, the shortfalls may be more severe than this, as outlined below. These shortfalls must be addressed to ensure a plan which is positively prepared and consistent with national policy, as Paragraph 8 of the NPPF states that a sufficient number of homes to meet the needs of present and future generations should be provided.</p> <p>4.6. The Council have rounded the figures up within the Topic Paper, and the two sites added in the December 2023 addendum to Housing Land Supply report would only "likely" provide 130 dwellings, as acknowledged in paragraph 3.19. This figure may be lower in reality; indeed, we note that planning permission has only been granted for 87 dwellings (ref: 22/03770/OUT) on one of the sites to date, with the other, in Tetbury, having issues with access which has affected its deliverability.</p> <p>4.7. In addition, the Council assume that 2,070 windfall dwellings will be delivered, based on data in Appendix 1 of the Housing Land Supply Report. At 40%, this constitutes a significant proportion of the identified supply. Appendix 1 reveals that the windfall allowance will be 138 from 2026/2027 onwards. The Council suggest that this will remain at 138 per year to 2041, providing the 2,070 total.</p> <p>4.8. However, in practice, this figure is highly unlikely to remain constant; indeed, a high-level analysis of recent monitoring reports indicates that this already varies year-to-year. Table 1 of the Housing Land Supply Report reveals that windfall delivery over the past decade has ranged from 76 to 208 dwellings. It is considered that there is an over-reliance on windfall sites. If significantly fewer windfall dwellings are provided, the shortfall will be more severe. Sufficient land needs to be allocated for housing to provide flexibility in this respect.</p> <p>4.9. The largest proportion of new housing in the supply, at 43%, is to be provided at Chesterton Farm, Cirencester, which is a strategic allocation in the adopted plan. Planning permission for 2,350 dwellings on this site was granted in April 2019, (ref. 16/00054/OUT), and the scheme is currently being built out. With</p>

<p>Chris Marsh (Pegasus) 365</p>	<p>Housing Supply to 2041</p> <p>4.4. Paragraph 3.20 of the Topic Paper suggests that a supply of 5,150 dwellings has already been identified for the 2026-2041 period, as set out within Appendix 1 and 3 of the Housing Land Supply Report (August 2023). Against the 7,400-dwelling requirement without the flexibility, they identify a shortfall of 2,250 dwellings or 1,180 dwellings if over-delivery is deducted from this. However, with our recommended revised need figure of 7,830 dwellings, we identify a shortfall of at least 2,680 dwellings or 1,610 dwellings deducting over-delivery. With the 14% flexibility, the shortfall is as great as 3,476 dwellings. However, in reality, the shortfalls may be more severe than this, as outlined below. These shortfalls must be addressed to ensure a plan which is positively prepared and consistent with national policy, as Paragraph 8 of the NPPF states that a sufficient number of homes to meet the needs of present and future generations should be provided.</p> <p>4.6. The Council have rounded the figures up within the Topic Paper, and the two sites added in the December 2023 addendum to Housing Land Supply report would only “likely” provide 130 dwellings, as acknowledged in paragraph 3.19. This figure may be lower in reality; indeed, we note that planning permission has only been granted for 87 dwellings (ref: 22/03770/OUT) on one of the sites to date, with the other, in Tetbury, having issues with access which has affected its deliverability.</p> <p>4.7. In addition, the Council assume that 2,070 windfall dwellings will be delivered, based on data in Appendix 1 of the Housing Land Supply Report. At 40%, this constitutes a significant proportion of the identified supply. Appendix 1 reveals that the windfall allowance will be 138 from 2026/2027 onwards. The Council suggest that this will remain at 138 per year to 2041, providing the 2,070 total. However, in practice, this is figure highly unlikely to remain constant; indeed, a high-level analysis of recent monitoring reports indicates that this already varies year-to-year. Table 1 of the Housing Land Supply Report reveals that windfall delivery over the past decade has ranged from 76 to 208 dwellings. It is considered that there is an over-reliance on windfall sites. If significantly fewer windfall dwellings are provided, the shortfall will be more severe.</p>
<p>David Hindle</p>	<p>All fine</p>
<p>David Hindle</p>	<p>Agreed, as earlier.</p>
<p>Wolfords Joint Parish Cpouncil</p>	<p>If you are going to concentrate on MiM the existing transport is at capacity and will need major investment. To cover both East west and North South a ring road is required. Although there is a station this is only relevant to Oxford or Worcester. The main areas of employment are Warwick, Banbury, Cheltenham and Gloucester so this would need to be covered</p>

<p>Frances Lennon 179</p>	<p>VISION, OBJECTIVES AND DEVELOPMENT STRATEGY OPTIONS TOPIC PAPER</p> <p>Vision and Objectives</p> <p>The Topic Paper sets out the updates to the Council’s vision at Section 4. We do not have any critical concerns with the proposed amendments to the ‘vision’ in principle. In particular, we support the updates to the plan period to 2041, reflecting the need to accommodate future growth and accommodate local needs. It is noted this would cover a period of 15 years, with a base date of 2026. It is considered that if there are delays in the plan making process, and the adoption date exceeds 2026, the plan period should be extended to allow for a 15-year period.</p> <p>This would ensure accordance with Paragraph 22 of the NPPF requires that “strategic policies should look ahead over a minimum 15-year period from adoption”.</p> <p>We support the continued reference to the planned, positive change occurring in the most sustainable towns and larger villages (beyond Cirencester). As set out above, this approach recognises that improving and growing the health and vitality of settlements across the Cotswold District is important in meeting local community needs.</p>
<p>Sworders 248</p>	<p>We note the development strategy options set out in the topic paper. We support scenario 1, which proposes additional, non-strategic site allocations, allocating some sites outside development boundaries, and focusing growth at Principal Settlements.</p> <p>We support the commentary in the Topic Paper which notes that the principal settlements offer a good range of services and employment opportunities. One of the criteria for development under this scenario is: ‘Would continue to ensure the scale and extent of development within the Cotswolds National Landscape remains limited’.</p> <p>We do not agree with the inclusion of this criteria. Development in the Cotswolds National Landscape is not precluded by the NPPF. We consider that exceptional circumstances exist which would support the allocation of Site M74, despite its location within the Cotswolds National Landscape area (formerly AONB). These are that there has been significant recent development in the area around site M74, which has changed the character of the area so that it is no longer open countryside, but is now edge of settlement development. The recent development of the North Cotswolds Hospital, ALDI supermarket and the expansion of the Fosseway Garden Centre provide a context of built development to the south, east and north of the site.</p> <p>Further potential development on SHELAA sites M19C and 28B, which have been identified as sites suitable for further consideration, would provide additional built development in proximity to the site.</p> <p>The site’s sustainable location, within walking and cycling distance of a wide range of shops and services in close proximity to Moreton in Marsh town centre should also be considered. The site</p> <p>Paragraph 5.5 of the Topic Paper notes that:</p> <p>‘It is currently uncertain whether this option (Scenario 1) can deliver the indicative target number of additional homes.’</p> <p>We would urge the LPA to reconsider their assessment of site M74, which could make a contribution of 100 new homes to the housing requirement, as well as offering land for a primary school.</p> <p>We also support Scenario 7, which proposes that future growth is focused along key public transport corridors and around public transport hubs (e.g. rail stations).</p> <p>Paragraph 6.7 of the Topic Paper notes that:</p> <p>‘Moreton-in-Marsh is a transport hub, which includes a railway station. There are various sites located to the</p>

<p>Chris Marsh (Pegasus Group) 334</p>	<p>Vision and Objectives</p> <p>3.5. Rosconn are broadly supportive of the vision and objectives as drafted. The proposed revisions are set out within the Council's Vision, Objectives and Development Strategy Options Topic Paper. The vision as drafted will include reference to responding to the climate crisis and taking account of nature recovery, which aligns with Paragraph 158 of the NPPF. The plan's objectives expand on this, with additions making reference to delivering biodiversity net gains, climate adaptation and mitigation, providing affordable homes, a greater emphasis on supporting positive health outcomes, and supporting sustainable travel. It is considered that this all aligns with national policy, including Paragraphs 8, 20, 96, 157, and 158 of the NPPF.</p> <p>3.6. Notwithstanding, the inclusion of an obligation for development to be zero carbon is not justified and is inconsistent with national policy which does not set such a requirement. It is important that the Development Plan's response to climate change is realistic and consistent with national legislation and policy provisions, setting standards within a timetable which is collectively understood and deliverable across the development industry. As such, net zero development should be a longer-term aspiration as in practice schemes will not be able to universally achieve this from the point of adoption (expected in around two years). This is discussed in more detail below.</p> <p>3.7. The wider vision and objectives have already been found sound as part of the Local Plan's examination, and it is not considered that these additions would otherwise change this given that they are consistent with national policy.</p> <p>Summary of the amendments required</p> <p>3.8. The stipulation that new development needs to be zero carbon is not justified as this is not referenced in national planning policy and is unlikely to be achievable from the point of adoption.</p>
<p>Chris Marsh (Pegasus) 335</p>	<p>Vision and Objectives</p> <p>3.5. Rosconn are broadly supportive of the vision and objectives as drafted. The proposed revisions are set out within the Council's Vision, Objectives and Development Strategy Options Topic Paper. The vision as drafted will include reference to responding to the climate crisis and taking account of nature recovery, which aligns with Paragraph 158 of the NPPF. The plan's objectives expand on this, with additions making reference to delivering biodiversity net gains, climate adaptation and mitigation, providing affordable homes, a greater emphasis on supporting positive health outcomes, and supporting sustainable travel. It is considered that this all aligns with national policy, including Paragraphs 8, 20, 96, 157, and 158 of the NPPF.</p> <p>3.6. Notwithstanding, the inclusion of an obligation for development to be zero carbon is not justified and is inconsistent with national policy which does not set such a requirement. It is important that the Development Plan's response to climate change is realistic and consistent with national legislation and policy provisions, setting standards within a timetable which is collectively understood and deliverable across the development industry. As such, net zero development should be a longer-term aspiration as in practice schemes will not be able to universally achieve this from the point of adoption (expected in around two years). This is discussed in more detail below.</p> <p>3.7. The wider vision and objectives have already been found sound as part of the Local Plan's examination, and it is not considered that these additions would otherwise change this given that they are consistent with national policy. Summary of the amendments required</p> <p>3.8. The stipulation that new development needs to be zero carbon is not justified as this is not referenced in national planning policy and is unlikely to be achievable from the point of adoption.</p>
<p>David Hindle</p>	<p>Agreed.</p>

Fiona Perry	Agree with your priorities but am puzzled that Moreton-in-Marsh is included with a proposal of 1,500 plus new houses - The local plan's vision is to "Respond to the Climate Crisis" . In 2007 Moreton in Marsh experienced significant flooding. The rainfall in the last month has seen large areas of land along the river Evenlode Flood; can the area cope with more housing and the additional water run off?. There is a real urgency to safeguard the land surrounding Moreton in Marsh. Over development of this area will destroy the natural habitat. I agree and understand that additional housing is needed (especially affordable / low cost) but feel the focus on the "transport hub" in Moreton is directing the eye away from the risk of flooding and an outdated sewerage system that is not able to cope with the additional development Moreton in Marsh has already experienced.
Fairford Town Council	Vision (pp 7-8) – We support the inclusion of response to Climate Change and reference to nature recovery.
David Hindle	Agree to changes
David Hindle	all fine
David Hindle	All fine
David Hindle	Agreed.
Clare Charlton	5d: amend supporting to ensuring
Richard Gunner	Under 5. Sustainable Travel, the Local Plan should include reference to reducing car use by encouraging development of rail where possible and viable. This will improve health by reducing pollution, boost the local economy and broaden employment opportunities.
Wolfords Joint Parish Council	When adding additional businesses some such as storage or transport hubs should be controlled as probable transport links may well be inadequate
Lisa Davies	Under 6F - this seems completely counter to the proposal to significantly develop Moreton, an area already prone to flooding.

Fairford Town Council	<p>3 c – It is hard to see how Fairford is going to be an effective ‘active transport hub’, except at a very local level, without a much better level of public transport connections with Cirencester and other Neighbouring towns.</p> <p>4 – The IDP needs to include items that actually help to meet the strategy and needs of the local community (rather than e.g. a new roundabout related to an Eastern Spine Road that is no longer part of the area Plan) and to be funded.</p> <p>6 (Climate Adaptation and Mitigation) -</p> <p>a – ‘zero carbon’ sounds good, but does it actually mean what it says?</p> <p>f – Also need to ensure that the design of developments does not increase the risk of flooding to others (including surface water flooding)</p>
Frances Lennon 179	<p>With regards to the objectives relating to population, housing and health, we note the Council has specifically identified social rented housing as a priority in providing an adequate supply of quality housing, of appropriate types and tenures. We have no objections to this approach in principle recognising that the provision of affordable homes is crucial in ensuring balanced, mixed communities. Future stages of the Local Plan Review should ensure that robust and up to date evidence on housing needs, including the need for affordable housing, are available in order to support sound policy in this regard. This would ensure the emerging Local Plan would meet the soundness tests set out in paragraph 35 of the NPPF.</p> <p>In relation to the sustainable travel objectives, it is noted the Council has included specific reference to the implementation of the Local Transport Plan, Gloucestershire Transport, Decarbonisation Plan and Cotswold Transport Decarbonisation Strategy. It is assumed these reports have been published and endorsed by the Council, however it is not clear if they would form part of the evidence base for the updated Local Plan. It is requested that this is clarified in order for them to be reviewed as part of any future consultation.</p> <p>It is considered the proposed development at the Longfurlong Lane site accords with the vision and objectives set out in the Topic Paper. In particular, it would contribute to delivering growth that provides more socially rented homes, supports health and wellbeing and enable a vibrant economy. Indeed, allocating the site represents sustainable development and would bring a number of social, environmental and economic benefits to Tetbury.</p> <p>These benefits are provided at the Land at Longfurlong Lane Section. [uploaded document].</p>

<p>Clerk Bourton on the Hill PC (Bledington) 154</p>	<p>3. Environment</p> <ul style="list-style-type: none"> Bledington would wish to contribute positively to the CDC's objectives around environmental enhancement and resilience. Bledington has recognised the Government guidance published in May 2023 clarifying DEFRA's 2021 Environment Act. The Parish Council has formally discussed its objectives around conserving and enhancing biodiversity and will be incorporating outputs from an Environmental Sub-group as part of its Parish Plan. <p>Coordination across the district with these initiatives will be an important component of the CDC Local Plan.</p> <ul style="list-style-type: none"> Bledington recognises the importance of tourism to the region and the need to maintain the attractiveness through protection of the Cotswold National Landscape (AONB) and the resilience of village communities.
<p>David Hindle</p>	<p>All relevant potential scenarios covered..</p>
<p>Stow on the Wold Town Council</p>	<p>Dev Strategy Q5: Do you agree with the proposed development strategy (scenario combination)? A: No.</p> <p>Dev Strategy Q6: Tell us more about why you agree or disagree. A: The concentration of development of 1500 dwellings in Moreton in Marsh would result in overdevelopment of that community which has already been subject to very appreciable development in recent years. If carried out - even with a relief road - it would place unsustainable pressure on the Fosseyway particularly on the choke point at Stow on the Wold. It is not plausible that the £50 million or more cost of such a road scheme would command sufficient priority at national or highway authority level in the foreseeable future - consider how long it took to get finance for the much more strategic Missing Link scheme. Nor is it likely that Thames Water would prioritise the needed sewage treatment works.</p> <p>Dev Strategy Q7: Are there any other scenarios that should be considered? A: Yes.</p> <p>Dev Strategy Q8: If you answered Yes to the above question, please tell us what other scenarios you think should be considered. A: Greater consideration should be given to the sustainability of communities within the National Landscape (formerly the AONB) where the problems created by extremely high property values, unaffordable rents and diminishing opportunities for long term rentals need to be addressed by the provision of social rented dwellings. This could be pursued by a combination of Scenarios 1, 2 and 4. Failure to follow such an approach will result in further hollowing out of those communities as has already been seen, for example, in the Lake District and Cornwall.</p> <p>Dev Strategy Q9: Do you agree with the proposed Development Strategy? A: No</p> <p>Dev Strategy Q10: Tell us more about why you agree or disagree with the proposed development strategy.</p>

Lucy White	<p>1.1 These representations are prepared on behalf of Mr Robert Oughton in consultation with Spitfire Homes.</p> <p>1.2 Mr Oughton welcomes the consultation on proposals for a new Local Plan to 2041. It is noted that, based on the standard methodology, the Council anticipates a housing requirement of around 7,400 new dwellings over the plan period, of which up to around 3,290 dwellings would need to be identified through the new Local Plan (subject to Government clarification on over-delivery).</p> <p>1.3 We support the Council's preferred strategy for meeting most of the housing requirement to 2041, namely through a combination of non-strategic site allocations, a focus on main service centres, new strategic sites and a focus on growth around transport nodes. Moreton-in-Marsh as a Principal Settlement, Main Service Centre and transport hub with capacity for significant development outside the Cotswold National Landscape, is ideally placed to support the Council in delivering its preferred strategy and we support the Council's acknowledgement of Moreton's role through this options paper to deliver over 1,500 new dwellings by 2041 and additional development to support infrastructure, including a possible secondary school, in the longer term.</p> <p>1.4 We support the ongoing classification of Moreton-in-Marsh as a Principal Settlement (paragraph 2.3).</p> <p>1.5 Land south of Moreton, identified as MOR7 in the Integrated Impact Assessment, is owned by Mr Oughton. The site lies outside the National Landscape and immediately adjoins M19A and M19B which are allocated for residential development through the adopted Local Plan and benefits from full planning permission for 250 dwellings. Site MOR7 (M19C) is ideally located to support further residential development at Moreton. With the exception of land at the southern boundary which lies in flood zone 3, there are no insurmountable constraints to development. The site is relatively flat, agricultural land, defined by mature hedgerows and tree planting which provides an enclosure to any future development. Vehicular access is already established from the A429 into the landholding. The recently approved scheme for 250 dwellings includes a new vehicular T junction access with a right hand turn filter lane. The internal road is designed to accommodate a bus route which could be extended to serve into MOR7. An additional access via the A429 into MOR7 would be capable of facilitating a connection to further new development and a future new road from the A429 to the east of the town, if deemed necessary.</p> <p>1.6 Although the site is understood to comprise grade 2 agricultural land, this is subject to further</p>
Highways England 133	<p>Cotswold District Local Plan Update Consultation Vision, Objectives and Development Strategy Options Topic Paper</p> <p>Local Plan Horizon Year</p> <p>The 2018 adopted Local Plan is for the period 2011 to 2031 and will be superseded when the new Local Plan is adopted. The 2024 consultation on the emerging CDC Local Plan partial update sets out a spatial vision for the period 2011 to 2031.</p> <p>However in, "Cotswold District Local Plan Update Consultation Vision, Objectives and Development Strategy Options Topic Paper," we note that chapter 3 discusses the implications of extending the Local Plan horizon year until 2041. The extended plan period would align the Cotswold District Local Plan with the plan periods of other Gloucestershire Local Planning Authorities (except for Stroud District Council who are planning up to 2040). CDC state that this has strategic planning benefits, such as the joint commissioning of evidence studies. We support the coherence across horizon years and joint working across neighbouring Districts to provide a suitable transport evidence base for the extended Local Plan horizon year to 2040.</p> <p>1 Strategic road network and the delivery of sustainable development - GOV.UK (www.gov.uk)</p> <p>4</p> <p>Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ National Highways Limited registered in England and Wales number 09346363</p> <p>The topic paper states that in terms of the housing need calculated by the government's 'standard methodology' for the extended plan period, this is currently around 7,400 dwellings, of which 5,150 dwellings have already been identified. Cotswold District Council have stated that they have identified eight potential development strategy options to accommodate the additional growth required to deliver the identified housing needs until 2041. However, they favour a combination of the following approaches:</p> <p>Scenario 1: Additional non-strategic site allocations;</p> <p>Scenario 2: Main service centre focus;</p> <p>Scenario 6: New strategic site(s); and</p> <p>Scenario 7: Focus growth around transport nodes.</p> <p>In the absence a transport evidence base, Infrastructure Delivery Plan (IDP) or sustainability appraisal to support the topic paper and the extended horizon year until 2041, we are unable to provide detailed</p>

<p>Frances Lennon 179</p>	<p>Housing Growth</p> <p>Section 5 of the Topic Paper sets out the Council’s different development strategy options and scenarios to accommodate additional growth. We strongly support the principle of the Council considering development strategies to accommodate growth and meet increasing housing needs. This is reflective of the current housing crisis and need to provide sufficient affordable homes. It aligns with Current National Planning Policy which reflects the Government’s stated objective of “significantly boosting the supply of homes”, and on this basis it is stated that</p> <p>“The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.” All political parties state support for the delivery of new housing including the provision of affordable housing to meet identified needs.</p> <p>With regards to housing requirement, the Topic Paper confirms that for a plan period up to 2041, around 3,290 additional dwellings would be needed or 2,070 additional dwellings if past over-delivery is deducted. It is considered that the previous over delivery should not be deducted from future housing needs. The standard methodology should be used as a starting point for calculating housing need and does not represent a maximum figure that cannot be exceeded. It would also allow for a range of sites in terms of size and scale to be brought forward to meet different needs within the District, supporting social and economic wellbeing. This would ensure the Council is not reliant on large strategic sites that can take a significant period of time to come forward and will ensure that the diverse needs of the different parts of Cotswold District can be met. Any reduction from the standard method would be unlikely to be justified and would not be found sound.</p> <p>When assessing the different scenarios for growth, the Council concludes a blended approach to growth</p>
<p>Amartya Deb (Gloucestershire County Council)</p>	<p>CDC proposes a combination of Scenarios 1, 2, 6 and 7 to accommodate additional development needs up to 2041. The GCC Transport Planning team agrees that these scenarios seem the most favourable, but would like to make the following comments:</p>

<p>Susie Stephen (Stantec)</p>	<p>As part of the Council's update to the Local Plan, consideration is also being given to the potential additional development needs for the period 2026 to 2041. It is understood that this element of the consultation is at a much earlier stage of development relative to the Local Plan Update.</p> <p>The identification of Moreton-in-Marsh as a broad location for strategic scale growth (Scenario 6) is supported and would be considered a sound approach in combination with Scenarios 1, 2 and 7 as set out under the Preferred Development Strategy and Broad Location for Growth (Section 6).</p> <p>Having regard to the Council's evidence of housing supply³, it is estimated that 9,671 dwellings will be delivered within the District by 2031 and over the extended period to 2041, the Council have identified a potential requirement to accommodate around 3,290 additional dwellings.</p> <p>Clearly the development of land at the FSC Site has the potential to make a meaningful contribution towards meeting housing needs in a manner which is consistent with the Preferred Development Strategy whilst also delivering on other Local Plan objectives, including support for the local economy and helping to create healthy, sustainable and mixed communities. The proposed allocation of land at the FSC Site should be recognised in this respect within the Council's assessment of land supply moving forwards.</p>
<p>Bloor Homes Western (Ridge and Partners)</p>	<p>[see also comments in attached pdf from Emery Planning enclosed with Ridge and Partners' submissions].</p> <p>The Development Strategy sets out a number of options and suggests that the preferred approach is a combination of scenarios 1 (additional non-strategic site allocations), 2 (main service centre focus), 6 (new strategic sites) and 7 (focus around transport nodes).</p> <p>The aim to focus development on principal settlements is supported and it is pleasing to see that there is an acknowledgment of the benefits that new strategic site within the district can bring.</p> <p>Paragraph 1.9 of the Topic Paper suggests that "given that Moreton-in-Marsh is a transport hub, which has a railway station; good provision of services, facilities and employment; and has various sites outside the Cotswold National Landscape, the town would become a focus for strategic-scale growth of over 1,500 additional dwellings and additional land for employment development. A longer-term vision, including additional development, may be required to deliver some infrastructure items such as a secondary school". It is agreed and supported that there should be a long-term vision for Moreton as a whole to ensure that these ambitions can be met.</p> <p>The supporting text further sets out at 6.7 that "There are various sites located to the south, east and north of the town that are available for development and that are located outside the Cotswolds National Landscape and areas at higher risk of flooding. These sites would likely have access to the level of services, facilities and employment opportunities of a Main Service Centre. It is estimated that a combination of these development plots could deliver over 1,500 additional homes by 2041. Moreton-in-Marsh would therefore be identified as a broad location for strategic scale growth (Scenario 6). This approach would enable further development in the town to be planned comprehensively (e.g. transport, water / wastewater, education, etc.). In addition, unlike single large strategic sites of 500+ dwellings (15), which typically have long development lead-in times, the combination of the smaller development parcels on offer would enable shorter lead-in times".</p> <p>As you will be aware, Bloor Homes have actively been promoting land to the South of London Road, Moreton-in-Marsh (Phase 1) and have carried out extensive technical work to demonstrate the suitability of this site for development. This culminated in a pre-application submission (ref: 23/01915/PAYPRE), which addressed the 'Key Actions Required' in the SHELAA. Whilst it was concluded by Officers at the time that the proposal would conflict with the Council's current development strategy due to the site's location outside the</p>

Bathurst Estate 175	<p>In summary BE supports the combination of Scenarios 1, 2, 6 and 7 to accommodate the additional development needs up until 2041. However, there are a few points on the scenarios outlined below:</p> <ol style="list-style-type: none"> 1. Scenario 1 – it is noted that the list of Principal Settlements is yet to be set out and therefore it is impossible to accurately comment on this Scenario at this time. Defining settlement boundaries restricts the ability of the most sustainable settlements from expanding in a sustainable manner, apart from through site allocations. BE would encourage the removal of settlement boundaries or the need to have looser fitting boundaries to allow for development to come forward. The comment that larger settlements only offer the range of services to support growth is contested as some smaller Principal Settlements have extensive services. Kemble is a smaller Principal Settlement which has a train station, bus routes, and includes the A429 which is a key service route in the District. Settlements such as Kemble with surrounding greenfield have opportunity for sustainable residential development as it can be supported by its extensive public transport infrastructure. This point is emphasised within Scenario 1 where it states that approach to development should encourage less car use and utilise services and facilities 2. Scenario 2 – this follows the sustainable settlement hierarchy set out in the current Local Plan. It is suggested that Scenario 1 and 2 should be combined with a natural weighting to the most sustainable settlements. There is no need to differentiate between the two. 3. Scenario 3 and 4 – there is not much difference between these two scenarios. Allowing some small scale growth at smaller villages would support services and facilities and at the same time boost delivery by smaller housebuilders. This is supported by the NPPF and can bolster the longer term growth potential of larger scale development. 4. Scenario 5 – there is no need for a new settlement proposal in the Cotswolds given the relatively low level of growth proposed. 5. Scenario 6 – The site at Chesterton Farm, south of Cirencester is already being delivered. This will continue to deliver for most of the proposed plan period. Such a site provides significant funds for strategic infrastructure and can help the District meet its five year housing land supply. However, they do take time to go through planning and get on site. They are useful as part of a range of sizes and
Newland Homes 241	<p>Development Strategy Options</p> <p>The Development Strategy sets out a number of options and suggests that the preferred approach is a combination of scenarios 1 (additional non-strategic site allocations), 2 (main service centre focus), 6 (new strategic sites) and 7 (focus around transport nodes).</p> <p>The proposed Development Strategy presents a number of uncertainties particularly around scenarios 1 and 2. This suggests that a review of principal settlements is likely to take place, without knowing, the methodology for assessing these settlements it is not possible to provide a detailed comment on this policy. It is acknowledged in the current Local Plan that some settlements such as Willersey are some of the smaller principal settlements. However, it is also acknowledged that as part of a cluster of settlements, they have an important role to play in serving residents in the northernmost part of the district. As such, settlements should not just be discounted based on size alone.</p> <p>Overall, Newland Homes consider there are a number of uncertainties with the proposed development strategy, and the potential review of principal settlements. There is a real risk that settlements particularly those in the Cotswold National Landscape may not be allocated additional development, which may have a wider impact on the sustainability of the settlement in the longer term.</p> <p>Please set out any alternatives or changes you are seeking, using a continuation sheet if necessary. None at present, but Newland Homes will look to comment further as the strategy evolves.</p>

<p>Bloor Homes Western 244</p>	<p>The Development Strategy sets out a number of options and suggests that the preferred approach is a combination of scenarios 1 (additional non-strategic site allocations), 2 (main service centre focus), 6 (new strategic sites) and 7 (focus around transport nodes).</p> <p>The proposed Development Strategy presents a number of uncertainties particularly around scenario 2 relating to a Main Service Centre Focus. As it currently stands there is no indication of the settlements which are proposed to be identified as Main Service Centres. Identification of main service centres would effectively result in two tiers of principal settlements. Without knowing, the methodology for assessing these settlements it is not possible to provide a detailed comment on this policy.</p> <p>It has become clear during development of the Stow on the Wold and The Swells NDP that the lack of proposed housing allocations within Stow has actually had a detrimental impact on the town in particular and the wider Parish as a whole. Within the supporting text for the Neighbourhood Plan at 2.8, it is recognised that “Failure to provide an appropriate mix of housing has led to more economically active people, particularly the young, being forced to look elsewhere for somewhere to live. There is little unemployment in the North Cotswolds and local employers have difficulty in recruiting. This poses a significant risk to Stow’s sustainability and raises its carbon footprint as many of those who work in Stow commute from the wider area”.</p> <p>It is therefore important to ensure that principal settlements including those within the AONB have sites allocated for additional dwellings. The draft Neighbourhood Plan proposes to allocate land to the North East of Stow for around 170 dwellings, including the provision of a new community hub and visitor car park. Bloor Homes have worked proactively with the Town Council throughout the NDP preparation process to ensure that this emerging allocation meets the ambitions of the Neighbourhood Plan. There is however an opportunity to further increase this proposed allocation by incorporating additional, adjoining land to the north east of the site (within neighbouring Broadwell Parish) to create a truly comprehensive development. A Call for Sites submission has, therefore, been made in respect of both the NDP Draft allocation site for 170 dwellings, and an expanded site which could accommodate up to 240 dwellings.</p> <p>Overall, Bloor Homes consider there are a number of uncertainties with the proposed development strategy, particularly in relation to the methodology associated with the identification of Main Service Centres. There is currently a risk that settlements such as Stow-on-the-Wold, may not be allocated additional housing</p>
<p>RGP 259</p>	<p>In order to support Cotswold District Council’s Climate Pledge, development should be located in or at the edge of well connected, accessible settlements. Our client’s land interest provides an opportunity to not only meet this locational criteria but also provide a form of development which meets relevant sustainability aspirations.</p> <p>As part of the Local Plan Reg 18 Consultation Draft Policies Document, Moreton-in-Marsh is identified as one of the 17 ‘Principal Settlements’. Our clients welcome this presence in Policy DS1.</p> <p>Regarding the proposed development strategy options, our clients support the development strategy option “Scenario 1: Additional non-strategic site allocations” whereby Principal Settlements (such as Moreton-in-Marsh) are the focus for growth in the District.</p> <p>Furthermore, “Scenario 2: Main service centre focus” is also supported as it is envisaged that Moreton-in-Marsh (as a transport hub) would also be the focus for development under this scenario. This is supported by the NPPF (2023) Paragraph 11a, whereby plans should promote a sustainable pattern of development.</p> <p>Our client’s site at Land to the west of the A429 at Moreton in Marsh provides a clear opportunity to market dwellings towards meeting housing needs for older people, in the form of bungalows, in a sustainable location close to bus services that would serve the remainder of the town and wider area. This site further provides an opportunity to deliver homes close to essential healthcare services and a food store. In line with Cotswold District Council’s approach, to reduce car dependence, this site will allow for new residents to be connected to the wider area without relying on the car. The synergy with key support services, including the hospital sets the site apart from many other options.</p> <p>Taking this approach into account, in addition to supporting the development strategy options, our clients contend that the Council should go further to allow development to be focused on the most sustainable settlements. To do so the development boundary should be further amended to include site M28B which would allow the strategies (outlined above) to be realised. Further, amending the settlement boundary would allow the site to be developed to meet the needs of older people in the District, which is discussed further in this letter. This would allow for existing, well-placed services to support new homes and residents, whilst also gaining the critical investment that they require for future sustainability and enhanced service provision, in line with the preferred options outlined in the Local Plan.</p>

<p>Walsingham Planning 260</p>	<p>In respect of the growth scenarios presented as part of this consultation, it is considered that individually none of the scenarios will deliver suitable growth to support and sustain existing communities across the District. It is important to ensure the overarching growth strategy for the new local plan includes sufficient flexibility to adapt to changes during the plan period. Individually the proposed approaches are considered too restrictive, potentially preventing sustainable development coming forward and undermining the Council's ability to demonstrate a robust housing supply and sustain existing communities. This is acknowledged by the Council which promotes a mix of scenarios 1, 2, 6 and 7 to deliver an appropriate growth strategy up to 2041. The scenarios supported by the Council include:</p> <ul style="list-style-type: none"> • Scenario 1: Additional non-strategic site allocations, • Scenario 2: Main Service Centre Focus • Scenario 6: New strategic site(s), • Scenario 7: Focus growth around transport nodes. <p>This approach is broadly supported noting that Mickleton would be considered an appropriate location for growth under the emerging preferred strategy.</p> <p>Mickleton is a settlement identified within the current adopted Local Plan as a 'Principal Settlement'. The need identified in the Role and Function of Settlements Study 2012 to boost Mickleton's 'economically active population to help support the current employment role and maintain and support the community services function' is still considered to be relevant and necessary. Additional market and affordable housing which provides a mix of housing types will help bring economically active people to the settlement, further supporting its role as a 'Principal Settlement'.</p> <p>Therefore, Mickleton as a settlement, represents a sustainable location which provides services and facilities able to support future development as part of the emerging local plan to meet future housing needs.</p>
<p>Dan Washington (BBA Architects/Stantonbury Building and Dev)</p>	<p>Stantonbury Building and Development Company (Stantonbury) support the proposals for further housing allocations to help meet the housing requirement to 2041. The number of dwellings to be allocated in the plan should be expressed as minimum figures. This is to help ensure a continuous supply of both market and affordable housing and in the context of the NPPF requirement for Local Plans to be positively prepared (Paragraph 35, NPPF). The adopted Local Plan includes 14% more housing over the housing requirement to provide flexibility and the continuation of this sensible approach to housing delivery is supported.</p> <p>The Local Plan consultation sets out 8 different development scenarios. It is recognised that the preferred strategy is a combination of Scenario 1 (additional non strategic site allocations) Scenario 2 (main service centre focus) Scenario 6: (New Strategic Site) Scenario 7 (Focus growth around transport nodes). Whilst this approach to the development strategy keeps many options open to identifying sites to deliver the allocations, it is not clear what the mix of scenarios would be and what the priorities would be. For example, it is not clear what constitutes a strategic site (i.e what size) and what the intention is for the mix of strategic and non strategic sites. The next stage in the process is key to understanding this and Stantonbury reserve the right to comment further.</p> <p>Whilst a relatively large number of Principal Settlements have been identified, Cotswold District does not have cities or a number of very large towns which would ordinarily be the location for large strategic sites. The adopted Local Plan's development strategy principally allocates development on non-strategic site allocations at Principal Settlements. There are no changes in circumstances since the Local Plan was adopted (in 2018) which would suggest a need to change this approach. Indeed, as this is a local plan update, rather than a new local plan, it would suggest that the existing strategy should be followed, with new allocations defined which accord with that.</p> <p>The approach to focusing allocations at Principal Settlements is supported. Principal Settlements have been recognised as the most sustainable locations within the district and are thus suitable for development. Proportional percentage increases to settlements (subject to suitability of sites), as per the adopted strategy, would seem to be a logical starting point for allocations. However, in the interests of increasing sustainability of settlements and identifying the most appropriate sites for development, further allocations within or adjacent to a settlement where the proportional percentage increase is exceeded should not be dismissed if the opportunity exists to deliver sustainable development.</p>

Chris Marsh (Pegasus Group) 334	<p>Development Strategy Options</p> <p>4.14. The Vision, Objectives and Development Strategy Options Topic Paper goes on to consider the various growth options within the district and the ways in which additional housing can be delivered. Eight development strategy options are being considered for the district:</p> <ul style="list-style-type: none"> • Scenario 1: Additional non-strategic site allocations in Principal Settlements • Scenario 2: Main Service Centre focus • Scenario 3: Dispersed growth • Scenario 4: Village clusters • Scenario 5: New settlement(s) • Scenario 6: New strategic site(s) • Scenario 7: Focus growth around transport nodes • Scenario 8: Request neighbouring authority to deliver some of the housing need <p>4.15. The Council have indicated that, at this stage, a combination of the some of the above approaches is preferred, namely Scenarios 1 (Principal Settlements), 2 (Main Service Centres), 6 (New strategic site(s), and 7 (transport nodes). Comments on each of the options and their suitability are provided below.</p>
Chris Marsh (Pegasus) 334	<p>Summary</p> <p>4.38. To summarise, Rosconn support a development strategy which focusses on dispersed growth across the Principal Settlements (Scenario 1) for the reasons identified above. It was noted above that strategic allocations may also be needed, although there should not be an overreliance on these, as this would represent a high-risk approach, particularly given the Chesterton experience. Sufficient sites need to be allocated in sustainable locations in all Principal Settlements to complement any strategic allocations.</p>
Chris Marsh (Pegasus) 365	<p>Summary</p> <p>4.38. To summarise, Rosconn support a development strategy which focusses on dispersed growth across the Principal Settlements (Scenario 1) for the reasons identified above. It was noted above that strategic allocations are also likely to be needed, although there should not be an overreliance on these, as this would represent a high-risk approach, particularly given the Chesterton experience. Sufficient sites need to be allocated in sustainable locations in all Principal Settlements to complement any strategic allocations.</p>

<p>Morgan Elliot Planning 340</p>	<p>call for sites. The allocation of this site provides opportunity for residential growth in Didmarton. The following outlines why the Site is suitable to provide approximately 10 dwellings in this rural location. The development of this Site aligns with the Council's proposed development scenarios 3 and 4, which are being considered by the Council to form part of their preferred development strategy.</p> <p>Location of Development and Proposed Use</p> <p>The site comprises approximately 0.65 hectares of agricultural land, of which is being promoted for residential use. We consider that a proportionate number of units can be delivered onsite. The anticipated number to be delivered is subject to technical work that will be undertaken to ensure all other relevant planning policies are considered. However, we consider up to 10 dwellings could comfortably sit on site in the context of the site's edge of settlement location and the Landscape Technical Note that accompanies this representation.</p> <p>Whilst we acknowledge that the site is within open countryside, it is felt that this is a location that offers a logical rounding off to Didmarton which in turn offers a sustainable opportunity for housing growth within a rural area, particularly as it borders the existing built form from Arild's Road.</p> <p>The site's redevelopment benefits from the services and facilities that lie within the village of Didmarton, ensuring the vitality of those services and facilities are protected and enhanced. Notwithstanding the site's proximity to Tetbury, Upton Hawkesbury, the M4, and the M5.</p> <p>Further, the site offers the ability to meet local housing needs, including the need for affordable homes, within this rural location of this part of the district that also sits within the AONB. The ability to deliver such development is considered to help retain and attract the younger population, further adding to the ability that existing settlements and their services are more likely to be sustained and enhanced, securing the sustainability and vitality of rural areas.</p>
<p>Deborah Guy 435</p>	<p>Development strategy options</p> <p>Moreton-in-Marsh has been selected as a 'principle settlement' yet it has already see the largest increase in housing across the Cotswold District in the last 20 years (census date)</p>

David Lock 164	<p>Q5: Do you agree with the proposed development strategy (scenario combination)? No Q6: Tell us more about why you agree or disagree. Please see next section</p> <p>Hallam acknowledges that a combination of scenarios is likely required to meet local housing needs in the district. However, some of the Council’s preferred options are flawed and should not form part of the overall development strategy. This section provides Hallam’s response to each of the eight development scenarios.</p> <p>COUNCIL’S PREFERRED OPTIONS</p> <p>Scenario 1 (Additional Non-Strategic Site Allocations)</p> <p>Hallam strongly supports Scenario 1, which seeks to focus the majority of additional growth in Principal Settlements, including allocating new sites outside existing development boundaries. This approach has already been tested through the examination process of the adopted Local Plan and also aligns with the Council’s ambition to be ‘green to the core’ by locating new development in areas with good access to transport, services and facilities.</p> <p>Principal Settlements benefit from existing facilities and services that can accommodate new development, with additional provision secured through development where required. The New Local Plan process also provides an opportunity to review existing Principal Settlement boundaries to ensure that sufficient land is allocated to meet housing needs within the district. These new allocations provide the most sustainable locations for development as they are already well-served by sustainable transport and infrastructure.</p> <p>Research undertaken by Planning and Development Consultancy Lichfields (Start to Finish, March 2024) indicates non-strategic sites have a significantly shorter planning approval period and planning to delivery period than larger strategic sites. For example, non-strategic sites of 50-99 homes typically obtain planning consent in less than 2 years, while protracted discussions on larger strategic sites mean that the planning approval period typically lasts for over 5 years (in some cases closer to 8 years).</p> <p>It is therefore estimated that non-strategic sites can be expected to deliver their first dwelling within 4 years of validation, while larger strategic sites can take over 8 years. Indeed, the research concludes that “only sites below 100 dwellings on average begin to deliver within a five-year period from validation of an outline application”. This highlights the importance of allocating non-strategic sites to facilitate the delivery of local housing need within the Local Plan period.</p>
Kelly Prosser	<p>This topic paper has been produced alongside the policy updates. The paper discusses the amount of additional development that may be needed up until 2041 and proposes preferred development strategy options and areas for growth.</p> <p>1.42. The paper proposes that a blend of Scenarios 1 (Additional non-strategic site allocations), 2 (main service centre focus), 6 (new strategic sites) and 7 (focus growth around transport modes) are believed to be the most appropriate way to accommodate the bulk of additional development needs up to 2041.</p> <p>1.43. While a combination of development scenarios will lead to the most balanced delivery of homes, CO consider the incorporation of dispersed growth (Scenario 3) and village clusters (Scenario 4) to be necessary. These scenarios, particularly Scenario 4, whereby growth is dispersed across small groups of villages based in the services, facilities and infrastructure they offer, reflects the distinct nature in which the villages in the Cotswolds are visited and used. It would allow for a sustainable level of growth and new development to enhance the vitality of these settlements. It would also reflect the objectives of paragraph 83 of the NPPF. These development scenarios are also appropriate for small and medium scale sites</p> <p>and would assist the Council with meeting the requirement of paragraph 70 of the NPPF to identify 10% of their housing requirement on sites no larger than a hectare. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Indeed this would assist the Council with maintaining a rolling supply of deliverable housing land going forward.</p> <p>1.45. As previously explained, growth through non-principal settlements would welcome the opportunity for a wider range of housing types and tenure to be built, along with improving affordability of the area. It would also aid in the retention of the local facilities and services within the village; development within these rural areas would increase expenditure within the local area.</p> <p>1.46. Small-scale development at small settlements is necessary in the vitality of</p>

David Hindle	Agree this should be one, as it has served well in the past, but where the Principal Settlements are in the Natural Landscape, there may be issues, with a compromise being needed. In addition some of the settlements have grown % wise more than others. As Cirencester is the most accessible place with more services, I think that whilst it is already accommodating Strategic growth, a substantial part of the additional need from Principle Settlements should be there,
David Hindle	Approach has served well too date, and it is sensible to include this scenario. It will relate growth to where services exist and avoid a far more scattered model, that would be bad for climate change, and the environment
Richard Grant	<p>Scenario 1: Additional Non-Strategic Site Allocations</p> <p>2.58 This scenario rolls forwards the current development strategy set out in the adopted Local Plan, and would involve the identification of additional allocations at the Principal Settlements.</p> <p>2.59 We support this approach and believe as a tried and tested strategy it would be likely to provide sufficient numbers of homes to make a significant contribution to meeting housing needs in full. We note that reference is made to updating evidence relating to those settlements included as Principal Settlements. Although we would support the need to ensure that up to date evidence is provided to support the new Local Plan, we would simply note that if some settlements are dropped from the list of Principal Settlements, the ability of this scenario to contribute to meeting needs would be reduced. We would urge the Council to retain all existing previous Principal Settlements. We would also note that Willersey has a good range of local facilities, access to nearby employment areas and is also close to the larger settlement of Evesham in Wychavon District with its commensurate higher-level facilities, and therefore should remain as a Principal Settlement.</p>
Fairford Town Council	Scenario 1: Additional non-strategic allocations – This [may be] less complicated than allocating through Neighbourhood Plans, although it may be necessary to include conditions in the allocation policies to address constraints and specific needs.

Angus Jenkinson	<p>You are right about development in Moreton. I came to live here some five years ago because my wife and I liked the town and the location we still do. But we soon became aware of problems in the town and it was with this in mind that I agreed to volunteer to stand as a district councillor. During 20/22/23, I knocked on thousands of doors speaking with many people across the town.</p> <p>This became clear about many things that are valued locally such as community and its heritage as a market town in the Cotswolds. Neighbours do not want to lose this. It also made me clear about multiple problems, reinforced since I was elected. I canvassed on the basis that future development must lead to a resolution of significant problems while at the same time preserving important values. It must lead to a better town. I will defend this outcome.</p> <p>Much of the development took place while no plan existed. So this should be clarified. Developers built without due regard or compensation. Thus, the CDC administration until the Plan was adopted fully - at times let houses be developed in ways that led to imbalance in Moreton.</p>
Coates Parish Council	5.2 We do not support this
Lechlade Town Council 135	<p>Response from Lechlade Town Council to CDC Local Plan Update Consultation with a focus on responding to Scenario 1 of the Vision, Objectives and Development Strategy Options Paper</p> <p>1. The CDC Local Plan Update Consultation comprises a number of documents published for consultation, as follows:</p> <ul style="list-style-type: none"> • Executive Summary, Consultation Instructions and Questions • Local Plan Reg. 18 Consultation Draft Policies Tracked Changes (and a version with changes accepted) • Vision, Objectives and Development Strategy Options Topic Paper • Towards a Framework Masterplan SPD for Cirencester Town Centre (Draft) • Integrated Impact Assessment (IIA) Cotswold LPU Interim IIA Report 2024 • Integrated Impact Assessment (IIA) Points of Compass Appraisal • Strategic Flood Risk Assessment Level 1 Draft Report 2023 with updated mapping (2023 update) <p>2. Lechlade Town Council previously responded to consultation on CDC SHELAA Lechlade Site Assessments in January 2022. Its response made clear that the Lechlade Neighbourhood Plan was fully supportive of existing local plan allocations to 2031. It sought the opportunity to more fully consider the sustainability of making significant allocations for the period beyond in relation to an update to the Local Plan.</p> <p>3. This response focuses on the opportunity to start to review the position of Lechlade as a Principal Settlement, within the context of Scenario 1 of the Vision, Objectives and Development Strategy Options Topic Paper, which considers meeting future housing needs through allocations in Principal Settlements.</p>

<p>Frances Lennon 179</p>	<p>When assessing the different scenarios for growth, the Council concludes a blended approach to growth strategies should be taken. We strongly agree with this approach in principle. In particular, we support the implementation of Scenario 1: additional non-strategic site allocations. This would entail the continuation of the adopted development strategy of identifying Principal Settlements as locations where the principle of development would be supported.</p> <p>As the Topic Paper sets out, this would allow for a variety of sites to be brought forward within the most sustainable settlements of the District. This would support and improve the health and vitality of settlements across the Cotswold District, meeting local community needs.</p>
<p>Amartya Deb (Gloucestershire County Council)</p>	<p>Scenario 1: In transport terms, the sustainability of this scenario will depend on the detail of the proposed update to the supporting evidence for identifying Principal Settlements.</p>
<p>Lucy White Planning</p>	<p>We support Scenario 1 as a means of delivering additional new housing and employment development in a sustainable manner, focussed growth at the Principal Settlements, including Moreton-in-Marsh. It is acknowledged that this approach is unlikely to be appropriate to meet the housing requirement in full, however, a comprehensive strategy for growth at Moreton-in-Marsh is supported and could make a significant contribution towards the district's housing needs over the plan period and beyond.</p> <p>The delivery of new housing and employment growth, coupled with new infrastructure, would improve the self-containment of Moreton and improve the viability of public transport services. A critical mass of development will be necessary to deliver the infrastructure requirements, which may include a new road to provide relief to the town centre and a primary and secondary school.</p>

Bathurst Estate 175	<p>Scenario 1 – it is noted that the list of Principal Settlements is yet to be set out and therefore it is impossible to accurately comment on this Scenario at this time.</p> <p>Defining settlement boundaries restricts the ability of the most sustainable settlements from expanding in a sustainable manner, apart from through site allocations. BE would encourage the removal of settlement boundaries or the need to have looser fitting boundaries to allow for development to come forward.</p> <p>The comment that larger settlements only offer the range of services to support growth is contested as some smaller Principal Settlements have extensive services. Kemble is a smaller Principal Settlement which has a train station, bus routes, and includes the A429 which is a key service route in the District.</p> <p>3</p> <p>Settlements such as Kemble with surrounding greenfield have opportunity for sustainable residential development as it can be supported by its extensive public transport infrastructure. This point is emphasised within Scenario 1 where it states that approach to development should encourage less car use and utilise services and facilities</p>
Chris Marsh (Pegasus Group) 334	<p>Scenario 1: Additional non-strategic site allocations in Principal Settlements</p> <p>4.16. Rosconn are supportive of this development strategy. It forms Cotswold District’s existing approach in the adopted Local Plan, which means that it has already been found sound at examination. The evidence set out elsewhere in these representations (paragraph 3.37) also suggests it has been effective to a degree. The existing Principal Settlements comprise towns such as Moreton in Marsh and Stow on the Wold and larger villages including Bourton on the Water and Mickleton. Notwithstanding, it is noted that the Council will be reviewing the list of Principal Settlements as part of the next review, which means that some may have their status rescinded, whilst others may be added (see paragraph 1.8 of the Topic Paper). Notwithstanding, it is considered that all the existing Principal Settlements should retain their status, as the largest settlements which remain sustainable locations for further growth.</p> <p>4.17. Indeed, this scenario performs exceptionally well against all the themes within the framework set out in the Integrated Impact Assessment (IIA) (February 2024), which is essentially the sustainability appraisal produced for the current round of consultation. There are significant positive effects associated with focusing growth at these settlements, as they offer a wide range of services (Healthy and Vital Communities); have high levels of accessibility, with better public transport provision, which could encourage lower car use (Housing, Transport, and Climate Change); and they often offer a wide range of employment opportunities (Economy and Employment). New development can support service provision within Principal Settlements. Paragraph 97 of the NPPF encourages an integrated approach to delivering housing and economic uses, as well as community facilities and services. A focus on Scenario 1, in locating new housing in the areas where there are greater employment opportunities, would therefore be consistent with national policy.</p> <p>4.18. Crucially, a focus on Principal Settlements across the district will allow for a somewhat dispersed approach to growth across seventeen settlements which are sustainable and capable of accommodating more housing, as established throughout the IIA. This approach would at least lessen the amount of development which the larger settlements, such as Cirencester, Tetbury, and Moreton in Marsh, need to absorb, minimising potential impacts on the historic environment and the Cotswolds National Landscape, which may otherwise occur here.</p> <p>4.19. The Council are therefore urged to allocate sufficient non-strategic sites across all Principal Settlements, with the list of 17 to remain unchanged. This strategy is already tried and tested, and has proved effective,</p>

<p>Chris Marsh (Pegasus) 365</p>	<p>Scenario 1: Additional non-strategic site allocations in Principal Settlements</p> <p>4.16. Rosconn are supportive of this development strategy. It forms Cotswold District’s existing approach in the adopted Local Plan, which means that it has already been found sound at examination. The evidence set out elsewhere in these representations (paragraph 3.37) also suggests it has been effective to a degree. The existing Principal Settlements comprise towns such as Moreton in Marsh and Stow on the Wold and larger villages including Bourton on the Water and Mickleton. Notwithstanding, it is noted that the Council will be reviewing the list of Principal Settlements as part of the next review, which means that some may have their status rescinded, whilst others may be added (see paragraph 1.8 of the Topic Paper). Notwithstanding, it is considered that all the existing Principal Settlements should retain their status, as the largest settlements which remain sustainable locations for further growth. Indeed, this scenario performs exceptionally well against all the themes within the framework set out in the Integrated Impact Assessment (IIA) (February 2024), which is essentially the sustainability appraisal produced for the current round of consultation. There are significant positive effects associated with focusing growth at these settlements, as they offer a wide range of services (Healthy and Vital Communities); have high levels of accessibility, with better public transport provision, which could encourage lower car use (Housing, Transport, and Climate Change); and they often offer a wide range of employment opportunities (Economy and Employment). New development can support service provision within Principal Settlements. Paragraph 97 of the NPPF encourages an integrated approach to delivering housing and economic uses, as well as community facilities and services. A focus on Scenario 1, in locating new housing in the areas where there are greater employment opportunities, would therefore be consistent with national policy.</p> <p>4.18. Crucially, a focus on Principal Settlements across the district will allow for a somewhat dispersed approach to growth across seventeen settlements which are sustainable and capable of accommodating more housing, as established throughout the IIA. This approach would at least lessen the amount of development which the larger settlements, such as Cirencester, Tetbury, and Moreton in Marsh, need to absorb, minimising potential impacts on</p>
<p>David Hindle</p>	<p>Agree this is a logical one to include, as the Main Service Centres have the greatest services,</p>
<p>David Hindle</p>	<p>Scenario will make best use of the key Town centres, with the greatest services, and is very much linked to the reasons why scenario is good for residential that is part of additional non-strategic allocations . Having different levels of Key Town centres, should give an indication of where the greatest increase in such growth should be accommodated, subject to Landscape and flooding considerations. Scenario needs to be included, for climate change and environmental reasons. It will also will avoid dispersed approach.</p>

David Hindle	<p>This is a logical refiner on Principal Settlements, as it would concentrate growth that needs to be satisfied, beyond that which is logically concentrated in Morton. As the Town Centres have the greatest services, using Town Centres is logical.</p> <p>Please do however recognise that places like Tetbury, that is within the Natural Landscape, have already received most of their growth between 2011 and 2031, due to historical appeal decisions. By 2031, Tetbury (including peripheral that are Tetbury Upton areas will probably have grown by 30 -35%. In comparison Cirencester has only grown by 5%, as of 2021 census. And even by 2031, the growth will only be 15 - 20%. Even with completion of Steedings by 2036, the growth in Cirencester will only be around 27%.</p> <p>It is clear that within a Plan lasting from 2026 - 2041, Cirencester, in order to 'catch up' on a fair allocation, must take a disproportionately higher % fresh allocation. That is subject in particular to flooding issues, that are present in Cirencester. The Natural Landscape will also remain a consideration.</p> <p>However, Tetbury for example is all within the Natural Landscape, whereas not all Cirencester, and its surrounds are. Furthermore, the Landscape around Tetbury is better than that edging around Cirencester.</p> <p>With new PD rights, there will automatically be an increase, in residential within Cirencester. In addition the Town Centre Masterplan suggests more. Being sure that can be delivered by 2041, will be a difficult 'call' to make.</p> <p>As noted before given changing density trends, Steedings assumptions should be revisited, in order to see if numbers of units permitted are still right, taking account of the dwelling mix that may or may not have been established. In addition the approach to overall design, as terraces, and semi-detached result in more units, on the same land as detached, and flats, and student accommodation even more so.</p> <p>Finally, I am assuming that the extent of Steedings had an actual barrier. if memory serves me rightly it may be Pylons. If I am wrong it gives scope to also consider the extent of Steedings.</p>
Richard Noble	<p>5.6 Scenario 2 would need to be pursued with great caution to make sure that sufficient infrastructure and service improvements are provided within the chosen main service area to support any proposed nearby developments. It should also be noted that in practical terms, unless a new housing development is within max 20mins walking distance to the existing infrastructure and services within the main service area, the majority of people will still drive into the main service area, resulting in increased traffic and detrimental excess demand on existing roads and parking provision. Achieving a max 20mins walking time from a large new development of this type into the associated service centre is likely to prove impossible in most locations and only increase traffic and the demand on the existing centre and the roads around it. This negates any desired/anticipated benefit of focusing the development "near" to existing public transport hubs and infrastructure.</p>

Richard Grant	<p>should remain as a Principal Settlement.</p> <p>Scenario 2: Main Service Centre Focus</p> <p>2.60 Given that the DSVO Document does not identify any settlements as Main Service Centres, it is difficult to comment in detail on this scenario. However, we note that the document implies that the residual Principal Settlements would not receive any allocations in the new Local Plan, and that opportunities for development would be limited beyond the Main Service Centres.</p> <p>2.61 We do not support this option. Although the identification of a new tier in the settlement hierarchy may provide opportunities for a more nuanced and sustainable distribution of development, as described in the DSVO document, we feel that this approach could lead to an over concentration of development in a small number of settlements, and could conversely lead to a lack of opportunities to provide homes and affordable housing for communities in other parts of the district. Given the affordability issues in Cotswold and the resulting difficulties in accessing suitable housing, this would not be a desirable outcome.</p>
Fairford Town Council	<p>Scenario 2: Main Service Centres focus – Which are considered to be the ‘Main Service Centres’? We assume that Fairford is not considered to be one of these, although there could still be a case for certain new sites which may offer specific sustainability benefits.</p>
Angus Jenkinson	<p>Better public transport connections in Moreton and North Cotswold are needed to connect to the main Gloucestershire cities and also to the north (Stratford, Warwick, Birmingham) to expand employment.</p>
Coates Parish Council	<p>5.6 We support Scenario 2</p>
Amartya Deb (Gloucestershire County Council)	<p>Scenario 2: Together with scenario 7, this seems the most sustainable scenario from a transport perspective, subject to the actual main services centres that will be determined.</p>
Lucy White Planning	<p>We support Scenario 2 as an appropriate strategy for meeting future development needs. Moreton-in-Marsh is identified as a Main Service Centre serving the north Cotswolds and it performs an important role providing employment and higher order facilities and services for the town and the wider area. As highlighted at paragraph 5.10, the main service centres are well placed to accommodate future growth, with the widest range of services and facilities and employment opportunities available to meet the needs arising, in a sustainable manner.</p> <p>We support the recognition that growth directed to Moreton-in-Marsh would facilitate a comprehensive transport strategy for Moreton-in-Marsh which could ease existing transport congestion issues within the town centre.</p>

Bathurst Estate 175	<p>Scenario 2 – this follows the sustainable settlement hierarchy set out in the current Local Plan. It is suggested that Scenario 1 and 2 should be combined with a natural weighting to the most sustainable settlements. There is no need to differentiate between the two.</p>
Chris Marsh (Pegasus Group) 334	<p>Scenario 2: Main Service Centre focus</p> <p>4.20. The Main Service Centres are yet to be established, but the IIA suggests that they could comprise the likes of Cirencester, Bourton on the Water, and Moreton in Marsh. As existing Principal Settlements, they are already established as optimal towns/villages for additional development, as argued above. Main Service Centres likewise score highly in the IIA, given that they share a lot of the same characteristics. It is acknowledged that they have the greatest range of services and employment opportunities, and are often more accessible (for example, Moreton in Marsh has a train station).</p> <p>4.21. Whilst Rosconn agree that the Main Service Centres should be focal points for development, it should not be restricted solely to these locations; whilst the majority may take place here, allocations and housing delivery should be provided across all Principal Settlements, ensuring a distributed spread across the district to meet local need in different parishes and to support the retention of services in smaller settlements. To reiterate, this will lessen impacts, such as on built heritage and landscape, in and around the Main Service Centres which may be more acute if they absorb a greater amount of development which could otherwise have occurred in comparatively smaller Principal Settlements.</p> <p>4.22. By identifying Main Service Centres, this will risk discouraging a more dispersed approach to growth in sustainable Principal Settlements which are able to accommodate more housing. At the very least, the new plan should make clear that growth should still be focused in Principal Settlements as well, with site(s) allocated in each accordingly.</p>

<p>Chris Marsh (Pegasus) 365</p>	<p>Scenario 2: Main Service Centre focus</p> <p>4.20. The Main Service Centres are yet to be established, but the IIA suggests that they could comprise the likes of Cirencester, Bourton on the Water, and Moreton in Marsh. As existing Principal Settlements, they are already established as optimal towns/villages for additional development, as argued above. Main Service Centres likewise score highly in the IIA, given that they share a lot of the same characteristics. It is acknowledged that they have the greatest range of services and employment opportunities, and are often more accessible (for example, Moreton in Marsh has a train station).</p> <p>4.21. Whilst Rosconn agree that the Main Service Centres should be focal points for development, it should not be restricted solely to these locations; whilst the majority may take place here, allocations and housing delivery should be provided across all Principal Settlements, ensuring a distributed spread across the district to meet local need in different parishes and to support the retention of services in smaller settlements. To reiterate, this will lessen impacts, such as on built heritage and landscape, in and around the Main Service Centres which may be more acute if they absorb a greater amount of development which could otherwise have occurred in comparatively smaller Principal Settlements.</p> <p>4.22. By identifying Main Service Centres, this will risk discouraging a more dispersed approach to growth in sustainable Principal Settlements which are able to accommodate more housing. At the very least, the new plan should make clear that growth should still be focused on Principal Settlements as well, with site(s) allocated in each accordingly.</p>
<p>David Hindle</p>	<p>Definitely no. Runs totally counter to reducing carbon emissions, and most likely to impact substantially on the Natural Landscape area, and other sensitive landscape.</p>
<p>David Hindle</p>	<p>Counter to climate change and the environmental issues. Definitely not to be pursued.</p>
<p>Fiona Perry</p>	<p>Agree - Pursue - if transport options could be improved</p>
<p>Richard Noble</p>	<p>Scenario 3 must form at least part of the solution to avoid overburdening of existing service centres/principal settlements. This would allow great opportunities to improve existing bus routes and infrastructure in decline by making them viable again due to new increased demand. Therefore encouraging use of public transport and reducing the need for driving. This could also be an opportunity to revive and connect existing rural areas with better connections to public transport and services to enhance the lives of those already in those areas. It is important that all areas of the district take on some of the burden for the demand for increased housing provision and that it is not entirely placed upon existing principal settlements/service centres. Some of which have already seen fast paced development with little or no infrastructure improvements in recent years.</p>
<p>Wolfords Joint Parish Cpouncil</p>	<p>Not our favoured option</p>

Richard Grant	<p>Scenario 3: Dispersed Growth</p> <p>2.62 Although this option would provide opportunities even in smaller communities to provide homes to address access to housing and affordability, it would also potentially create unsustainable travel patterns and place strain on local facilities unless sites were carefully considered. Therefore, we do not support this option, although we would support an approach which did not rule out smaller scale housing sites being located in smaller settlements through a careful site selection process.</p>
Fairford Town Council	<p>Scenario 3: Dispersed growth – The suggestion of maybe allocating some sites in smaller settlements through Neighbourhood Plans is a good one, since this is more likely to get community support and also deliver local community benefits.</p>
Coates Parish Council	<p>5.11 We do not support Scenario 3</p>
Lucy White Planning	<p>We express strong concerns regarding scenario 3. The dispersal of growth across the District, to relatively unsustainable settlements would run counter to the Council's overarching objectives for sustainable development, resulting an overreliance on the private car, increased journey lengths, increased commuting and unsustainable stress on local services.</p>
Bathurst Estate 175	<p>Scenario 3 and 4 – there is not much difference between these two scenarios. Allowing some small scale growth at smaller villages would support services and facilities and at the same time boost delivery by smaller housebuilders. This is supported by the NPPF and can bolster the longer term growth potential of larger scale development.</p>

<p>Chris Marsh (Pegasus) 334</p>	<p>Scenario 3: Dispersed Growth</p> <p>4.23. Despite its name, this strategy would seek to steer growth away from Principal Settlements to smaller villages, enabling a more even spread of development across the district. Rosconn support dispersed growth across Principal Settlements, rather than every village in the district. The appraisal findings in the IIA suggest that this is the arguably worst of the growth scenarios in terms of the themes and objectives identified. There is poor public transport and less infrastructure in smaller settlements (Healthy and Vital Communities), restrictions on the amount of housing which could be delivered, not least due to the Cotswold National Landscape.</p> <p>4.24. Major development is unlikely to come forward within the National Landscape, in line with Paragraph 183 of the NPPF and Policy CE11 of the Cotswolds National Landscape Management Plan 2023-25, unless exceptional circumstances could be demonstrated, and the development would be in the public interest. With only low numbers of dwellings and no affordable homes potentially being provided on each site, it could be challenging to meet housing need and address the shortfall for the plan period. As a result, this scenario, if selected, would need to be accompanied by others.</p> <p>4.25. Rosconn support dispersed growth but across the Principal Settlements rather than all the district's smaller villages. Notwithstanding, Rosconn would not expect to object to any allocations in these villages, nor windfall development, as this would still help to meet the district's need and would align with principle of dispersed development. For the strategy in the new Local Plan, however, dispersed growth across the Principal Settlements should be the preferred strategy.</p>
<p>Chris Marsh (Pegasus) 365</p>	<p>Scenario 3: Dispersed Growth</p> <p>4.23. Despite its name, this strategy would seek to steer growth away from Principal Settlements to smaller villages, enabling a more even spread of development across the district. Rosconn support dispersed growth across Principal Settlements, rather than every village in the district. The appraisal findings in the IIA suggest that this is the arguably worst of the growth scenarios in terms of the themes and objectives identified. There is poor public transport and less infrastructure in smaller settlements (Healthy and Vital Communities), restrictions on the amount of housing which could be delivered, not least due to the Cotswold National Landscape.</p> <p>4.24. Major development is unlikely to come forward within the National Landscape, in line with Paragraph 183 of the NPPF and Policy CE11 of the Cotswolds National Landscape Management Plan 2023-25, unless exceptional circumstances could be demonstrated, and the development would be in the public interest. With only low numbers of dwellings and no affordable homes potentially being provided on each site, it could be challenging to meet housing need and address the shortfall for the plan period. As a result, this scenario if selected, would need to be accompanied by others.</p> <p>4.25. Rosconn support dispersed growth but across the Principal Settlements rather than all the district's smaller villages. Notwithstanding, Rosconn would not expect to object to any allocations in these villages, nor windfall development, as this would still help to meet the district's need and would align with principle of dispersed development. For the strategy in the new Local Plan, however, dispersed growth across the Principal Settlements should be the preferred strategy.</p>

David Hindle	Given the poor public transport within the rural parts of the District I have severe doubts about this option. I will only make a comment related to Tebury, where the villages and hamlets located within surrounding area do not have services, so I see this of no relevance to the area that I know best. I would however add that driving through villages and hamlet, from Cirencester south I cannot think of any logical clusters given the absence of services.
David Hindle	With poor public transport, and need to travel to get collection of services, I cannot see this as working. Highly unlikely that the villages would be linked by a common bus route. The model would still run counter to climate change and the environmental issues. It would involve an element of dispersal that runs counter to other scenarios. Please do not pursue.
Clare Charlton	Villages are invariably small enough for many walking and cycling trips to replace car travel, any new developments in villages should include a significant review of how walking and cycling can be enabled and this implemented alongside a behaviour change programme for all residents.
Fiona Perry	Agree - but only if public transport could be improved along with appropriate infrastructure. Village life has suffered with the increase of 2nd homes and holiday rentals in the area ."Potential to increase community cohesion and inclusivity"
Richard Noble	5.17 This is great alternative to overdevelopment of existing main service centres/principle settlements and would present an excellent opportunity to improve existing ailing bus routes by making them viable again due to increased demand. Therefore encouraging use of public transport and reducing the need for driving. This could also be an opportunity to revive and connect existing rural areas with better connections to public transport and services to enhance the lives of those already in the existing villages. Meanwhile, the existing village providing a head start for the facilities needed for the new proposed housing developments.
Wolfords Joint Parish Cpouncil	Not our favoured option
Richard Grant	Scenario 4: Village Clusters 2.63 This Scenario is similar to Scenario 3 in that it implies sites being identified in more remote locations but with a careful approach to site selection. If used alongside the approach detailed in Scenario 1 of focusing new development at Principal Settlements, this approach could provide a positive response to the rural character of Cotswold District. We support this scenario, as part of development strategy which includes elements from a number of the suggested scenarios.
David Eglise	Given the poor public transport within the rural parts of the Down Ampney and area I have serious doubts about this option.

Lisa Davies	I believe that there could be merit to this option with improved public transport. Villages are increasingly populated with holiday homes, so creating opportunities for villages to thrive so services and facilities remain viable would be positive. However bus connectivity is key. The railways take people into or out of the locality for work or leisure, they do not solve the issues of intra locality travel. This applies to all options - people will not get out of their cars unless there are frequent, easy and affordable options to get from one end of a larger settlement to the other, or from one village to another.
Fairford Town Council	Scenario 4: Village clusters – How do the villages think this might work in practice? A big issue is likely to be poor local public transport connections.
Coates Parish Council	5.17 We do not support Scenario 4
Clerk Bourton on the Hill PC (Bledington) 154	<p>2. Village Clusters</p> <p>We note reference to the concept of village clusters in discussions of the draft Local Plan and would be interested in exploring this further.</p> <ul style="list-style-type: none"> • Bledington already sees itself as sharing resources with adjacent villages. It provides facilities such as such as the primary school, the community shop and pub, and recognises the provision of other facilities, such as small business units, in adjacent areas. A Local Plan that provides catalysts for such cooperation would be welcome. • The integration of villages in the Cotswolds relies on the provision of adequate public transport.
Lucy White Planning	Scenario 4 would represent an unsustainable strategy to meet the District's housing needs in full, for the reasons set out in response to Scenario 3. Whilst some small-scale development at the villages, to meet locally identified needs, could be appropriate, the majority of new development should be located at the larger settlements, namely the Principal Settlements and Main Service Centres.
Bathurst Estate 175	Scenario 3 and 4 – there is not much difference between these two scenarios. Allowing some small scale growth at smaller villages would support services and facilities and at the same time boost delivery by smaller housebuilders. This is supported by the NPPF and can bolster the longer term growth potential of larger scale development.

<p>Chris Marsh (Pegasus) 334</p>	<p>Scenario 4: Village clusters</p> <p>4.26. This approach would cluster small villages together. It would contribute towards meeting the aspirations of Paragraph 83 of the NPPF, which sets out that policies should identify opportunities for villages to grow and thrive. However, given its similarities to Scenario 3, in encouraging dispersed growth but in clusters of smaller settlements, many of the same points raised above apply. This option likewise scores poorly in the IIA for similar reasons, with mixed to negative effects against the themes and objectives.</p> <p>4.27. In practice, the approach does not reflect human nature and how residents would likely behave. For example, even if some services and amenities are provided locally within the clusters, people are still likely to travel further afield to larger centres where more choice is available.</p> <p>4.28. It is unclear, within both the consultation material and the IIA, which villages would be clustered together and how. This suggests that the strategy has not been adequately thought through at this early stage. We contend that settlements should continue to be treated in isolation, with growth focused in the most sustainable locations.</p>
<p>Chris Marsh (Pegasus) 365</p>	<p>Scenario 4: Village clusters</p> <p>4.26. This approach would cluster small villages together. It would contribute towards meeting the aspirations of Paragraph 83 of the NPPF, which sets out that policies should identify opportunities for villages to grow and thrive. However, given its similarities to Scenario 3, in encouraging dispersed growth but in clusters of smaller settlements, many of the same points raised above apply. This option likewise scores poorly in the IIA for similar reasons, with mixed to negative effects against the themes and objectives.</p> <p>4.27. In practice, the approach does not reflect human nature and how residents would likely behave. For example, even if some services and amenities are provided locally within the clusters, people are still likely to travel further afield to larger centres where more choice is available.</p> <p>4.28. It is unclear, within both the consultation material and the IIA, which villages would be clustered together and how. This suggests that the strategy has not been adequately thought through at this early stage. We contend that settlements should continue to be treated in isolation, with growth focused in the most sustainable locations.</p>
<p>David Hindle</p>	<p>Hard to plan and identify a site. Slow to develop, over the time period. The overall scale of additional residential also does not justify this approach. In addition very hard to find any site not within the Natural landscape Area. Judging by the speed of Chestertons delivery, large sites are very hard to deliver at a reasonable pace. So do not pursue</p>

David Hindle	With the level of growth needed, it is not justified. Hard to find an appropriate site as 80% of CDC is National Landscape. Also very slow and hard to develop, so it would only be relevant, if growth for more like 20 - 25 years was being planned for. Do not pursue.
Fiona Perry	Disagree with Scenario 5: It would be hard to find a suitable site without compromising the effects on the area within the CDC remit - i.e. availability of appropriate infrastructure, over development, character of the area/countryside, effects on hedgerows and existing trees/woodlands and goes against "Green to the Core"
Richard Noble	Scenario 5 should be considered as part of the overall solution and not dismissed. This option gives the greatest opportunity to have the best possible environmental, social and economic impact without adding strain to current existing service centres/principal settlements. This option could help to provide a thriving new community, inclusive of infrastructure and employment, having a positive impact on the wider district.
Richard Grant	Scenario 5: New Settlement 2.64 We do not support this option. A new settlement would likely accommodate much of the housing need in Cotswold, but would provide the new homes in one location which could take several years to commence and deliver new homes. It would therefore mean that comparatively few new homes would be provided in the majority of other settlements in Cotswold District, meaning that the needs of communities would not be met.
Fairford Town Council	Scenario 5: New settlements – Funding and building the necessary supporting infrastructure is likely to be a significant challenge. Where? Will this divert funding from improvement of existing infrastructure elsewhere, e.g. roads to make other communities more viable for economic growth?
Angus Jenkinson	I believe an option exists to allow a new Garden Village to the south that could alleviate the need for Moreton development. That is an option to be properly considered. It could also enable Cirencester and S Cotswolds to get better connection east west to the rest of Gloucestershire and to the Kemble rail network.

Lucy White Planning	<p>We agree with the Council's assessment that a new settlement would have a long lead in time and could only make a modest contribution towards the housing requirement, towards the end of the plan period. Indeed, timescales for delivery of such large-scale developments are often unreliable and could result in a shortfall in housing supply which could leave the Council open to speculative planning application for unplanned housing in less sustainable locations.</p> <p>Priority should be given to directing new housing and employment to the Principal Settlements and Main Service Centres. This paper provides confidence that sufficient land is available at these settlements to meet its housing requirement without the need to identify a new settlement.</p>
Bathurst Estate 175	<p>Scenario 5 – there is no need for a new settlement proposal in the Cotswolds given the relatively low level of growth proposed.</p>
Chris Marsh (Pegasus) 334	<p>Scenario 5: New settlement(s) & Scenario 6: New strategic site(s)</p> <p>4.29. Both these scenarios are similar in that they would introduce new large-scale development in the district, in line with Paragraph 110(c) of the NPPF which states that opportunities for this should be realised. However, relying on larger sites on a high-risk approach. Firstly, they have a longer lead-in time, which means that their contribution towards the housing supply would likely be in the latter part of the plan period, and possibly into the next. This is acknowledged by the Council in Paragraph 5.27 of the Vision, Objectives and Development Strategy Options Topic Paper, which also notes that they can be more complex to assemble and deliver. In addition, large amounts of new infrastructure must be provided for these types of development.</p> <p>4.30. These issues have been experienced in the case of the Chesterton site, the strategic allocation in the current Local Plan. As discussed below, it has experienced slippages, and is continuing to do so, affecting the district's housing land supply as a result. If too much of the supply depends on sites like this, and they experience delays, the Council risks underdelivering housing. Rosconn therefore contend that it is imperative for dispersed development in settlements across the district to form the majority of the housing supply.</p> <p>4.31. Notwithstanding, given the shortfall in housing need for the 2026-2041 period identified above, the allocation of a large-scale development site would clearly make a significant contribution towards addressing this.</p> <p>4.32. It would be challenging to identify a suitable location for a new settlement which would not have adverse impacts on the Cotswold National Landscape, as well as other potential environmental, social, and economic consequences which could bring it in conflict with Paragraph 8 of the NPPF. Due to the uncertainty surrounding this option, the IIA does not score it, and it appears that the Council have already discarded the idea since it is not identified as one of their preferred options. Rosconn agree that a new settlement would not be an appropriate or effective approach in Cotswold given the circumstances and landscape sensitivities which exist in this district.</p> <p>4.33. Any new strategic site(s) should complement allocations dispersed across Principal Settlements which should form a greater proportion of the supply as the primary development strategy for the district.</p>

<p>Chris Marsh (Pegasus) 365</p>	<p>Scenario 5: New settlement(s) & Scenario 6: New strategic site(s)</p> <p>4.29. Both these scenarios are similar in that they would introduce new large-scale development in the district, in line with Paragraph 110(c) of the NPPF which states that opportunities for this should be realised. However, relying heavily on larger sites is a high-risk approach. Firstly, they have a longer lead-in time, which means that their contribution towards the housing supply would likely be in the latter part of the plan period, and possibly into the next. This is acknowledged by the Council in Paragraph 5.27 of the Vision, Objectives and Development Strategy Options Topic Paper, which also notes that they can be more complex to assemble and deliver. In addition, large amounts of new infrastructure must be provided for these types of development.</p> <p>4.30. These issues have been experienced in the case of the Chesterton site, the strategic allocation in the current Local Plan. As discussed below, it has experienced slippages, and is continuing to do so, affecting the district's housing land supply as a result. If too much of the supply depends on sites like this, and they experience delays, the Council risks underdelivering housing. Rosconn therefore contend that it is imperative for dispersed development in settlements across the district to form the majority of the housing supply.</p> <p>4.31. Notwithstanding, given the shortfall in housing need for the 2026-2041 period identified above, the allocation of a large-scale development site would clearly make a significant contribution towards addressing this.</p> <p>4.32. It would be challenging to identify a suitable location for a new settlement which would not have adverse impacts on the Cotswold National Landscape, as well as other potential environmental, social, and economic consequences which could bring it in conflict with Paragraph 8 of the NPPF. Due to the uncertainty surrounding this option, the IIA does not score it, and it appears that the Council have already discarded the idea since it is not identified as one of their preferred options. Rosconn agree that a new settlement would not be an appropriate or effective approach in Cotswold given the circumstances and landscape sensitivities which exist in this district.</p> <p>4.33. Any new strategic site(s) should complement allocations dispersed across Principal</p>
<p>David Hindle</p>	<p>Very logical, particularly if whilst in one area, the developments are a series of individual sites, but working to a common Plan, that has has been agreed by CDC, and has evolved via community and key stakeholder participation.-----I agree that Morton is the right place for such development, as it covers the other scenarios that I have noted as worthy of pursuing, and it also covers the next one, and is not within the area covered by Natural Landscape designation.</p>
<p>David Hindle</p>	<p>Very logical to have a strategic level growth to take a good proportion of new need. For the last Plan it worked well at Cirencester, which would of course continue to completion during the new Plan period. A new allocation elsewhere, not within the Natural Landscape makes sense, and with good public transport links do exist and can be improved is logical. The level of services would also need to be able to built up to the level needed. I note that Morton is being identified as the possible location, which makes planning sense, when viewing the whole of CDC, and the residential needs up to 2041.</p>

David Hindle	<p>Morton would be the logical place for this growth.</p> <p>As it may well also be a focus for further growth in a future Local Plan 2041 - 20X, the 2026 - 2041, should also 'reserve' even more land, in order to bring growth up to the level of a Town, that would accommodate a Secondary School. a Masterplan approach should be taken to a Town of that size allocating, land for not only the already proposed primary school, but also for a Secondary School, and expanded Healthcare provision. In addition, thought needs to be given to allocation of land for a larger Supermarket than currently exists. It may well be logical at that stage to envisage new Supermarket, and the redevelopment of the existing one to alternative use.-----The point is that if it emerges through the general call for sites, more than 1,500 come forward, those extra sites if seeming to be appropriate, are placed in a reserve list for a post 2041 Plan, raising the number of total units from a projected 3,500 units to eventually more like 5000 units, but that being that would be for the Plan period post 2041.</p>
Richard Noble	<p>Scenario 6 would need to be pursued with great caution to make sure that sufficient infrastructure and service improvements are provided within the chosen main service area to support any proposed nearby developments. It is vital that infrastructure leads the way in this situation and is improved before the development of new dwellings is complete. It should also be noted that in practical terms, unless a new housing development is within max 20mins walking distance to the existing infrastructure and services within the main service area, the majority of people will still drive into the main service area, resulting in increased traffic and detrimental excess demand on existing roads and parking provision. Achieving a max 20mins walking time from a large new development of this type into the associated service centre is likely to prove impossible in most locations and only increase traffic and the demand on the existing centre and the roads around it. This negates any desired/anticipated benefit of focusing the development "near" to existing public transport hubs and infrastructure.</p>
Richard Grant	<p>Scenario 6: New Strategic Site(s)</p> <p>2.65 We do not support this option. A new strategic site has the same drawbacks as a new settlement, except that such a location would need to be found at one of the larger Principal Settlements. A variant of this scenario could be to look for larger scale urban extensions which would not have the same drawbacks as a new settlement, and which could be complementary to the approach described in Scenario 1 – which is similar to the approach set out in the adopted Local Plan. If this were to be the suggested approach, we would support the scenario.</p>

Fairford Town Council	Scenario 6: New strategic sites – Where? Will this divert funding from improvement of existing infrastructure elsewhere?
Angus Jenkinson	<p>I came to live here some five years ago because my wife and I liked the town and the location we still do. But we soon became aware of problems in the town and it was with this in mind that I agreed to volunteer to stand as a district councillor. During 20/22/23, I knocked on thousands of doors speaking with many people across the town.</p> <p>This became clear about many things that are valued locally such as community and its heritage as a market town in the Cotswolds. Neighbours do not want to lose this. It also made me clear about multiple problems, reinforced since I was elected. I canvassed on the basis that future development must lead to a resolution of significant problems while at the same time preserving important values. It must lead to a better town. I will defend this outcome.</p> <p>Much of the development took place while no plan existed. So this should be clarified. Developers built without due regard or compensation. Thus, the CDC administration until the Plan was adopted fully - at times let houses be developed in ways that led to imbalance in Moreton.</p>
Coates Parish Council	5.28 We support Scenario 6
Amartya Deb (Gloucestershire County Council)	Scenario 6: The transport sustainability of new strategic site(s) depends on their exact location, size and master planning.
Lucy White Planning	<p>For reasons similar to Scenario 5, reliance on a strategic site to meet housing needs would leave the Council vulnerable to delays in delivery of development and over-reliance on a single site, with no alternative options available to maintain housing supply.</p> <p>The identification of a series of non-strategic allocations at the Principal Settlements and Main Service Centres ensures a flexible and deliverable housing supply can be maintained through the plan period, spreading the risk of delays across a number of development sites.</p>
Bathurst Estate 175	Scenario 6 – The site at Chesterton Farm, south of Cirencester is already being delivered. This will continue to deliver for most of the proposed plan period. Such a site provides significant funds for strategic infrastructure and can help the District meet its five year housing land supply. However, they do take time to go through planning and get on site. They are useful as part of a range of sizes and scales of development sites.

<p>Chris Marsh (Pegasus) 334</p>	<p>Scenario 5: New settlement(s) & Scenario 6: New strategic site(s)</p> <p>4.29. Both these scenarios are similar in that they would introduce new large-scale development in the district, in line with Paragraph 110(c) of the NPPF which states that opportunities for this should be realised. However, relying on larger sites on a high-risk approach. Firstly, they have a longer lead-in time, which means that their contribution towards the housing supply would likely be in the latter part of the plan period, and possibly into the next. This is acknowledged by the Council in Paragraph 5.27 of the Vision, Objectives and Development Strategy Options Topic Paper, which also notes that they can be more complex to assemble and deliver. In addition, large amounts of new infrastructure must be provided for these types of development.</p> <p>4.30. These issues have been experienced in the case of the Chesterton site, the strategic allocation in the current Local Plan. As discussed below, it has experienced slippages, and is continuing to do so, affecting the district's housing land supply as a result. If too much of the supply depends on sites like this, and they experience delays, the Council risks underdelivering housing. Rosconn therefore contend that it is imperative for dispersed development in settlements across the district to form the majority of the housing supply.</p> <p>4.31. Notwithstanding, given the shortfall in housing need for the 2026-2041 period identified above, the allocation of a large-scale development site would clearly make a significant contribution towards addressing this.</p> <p>4.32. It would be challenging to identify a suitable location for a new settlement which would not have adverse impacts on the Cotswold National Landscape, as well as other potential environmental, social, and economic consequences which could bring it in conflict with Paragraph 8 of the NPPF. Due to the uncertainty surrounding this option, the IIA does not score it, and it appears that the Council have already discarded the idea since it is not identified as one of their preferred options. Rosconn agree that a new settlement would not be an appropriate or effective approach in Cotswold given the circumstances and landscape sensitivities which exist in this district.</p> <p>4.33. Any new strategic site(s) should complement allocations dispersed across Principal Settlements which should form a greater proportion of the supply as the primary development strategy for the district.</p>
<p>David Hindle</p>	<p>Wholly agree, as good planning, and best for climate change. Morton with its Railway station is the obvious choose to focus as much of the growth as possible, as it also fits in with the strategic level development above, and fits in with the two other scenarios that I have identified. Crucially also not within Natural Landsape area</p>
<p>David Hindle</p>	<p>Good planning and very logical. Morton with its railway station is the logical location, which fits in with scenarios, 1, 2, 6 and 7. In addition it is crucially not within the Natural Landscape. Please include this option.</p>
<p>John Holmes</p>	<p>I support the idea of encouraging more use of public transport but I am not convinced that putting more housing in Moreton because there is a station there is well founded. The rail line is limited in where it goes and most people will continue to use cars because they will be going to destinations not served by the railway. It is also unclear to say the least whether more jobs can be created in Moreton to absorb a new population there. So the result will be more commuting by car in and out of the town, making the traffic problems, already bad enough, significantly worse.</p>
<p>John Holmes</p>	<p>The distinction between the National Landscape and the SLA is a false one, in the case of Moreton and environs at least. Both are equally blessed with lovely countryside and assets of the built environment in local villages. The reasons why one place is in the National Landscape and another is not is arbitrary and to do with past machinations by local landowners and farmers, not objective factors.</p>

Richard Noble	<p>Moreton-in-Marsh has already seen significant development in recent years and already suffers from heavy traffic congestion and is starting to suffer from a lack of adequate facilities to support the hundreds of new homes that have already been built in recent years. I don't think this makes Moreton a viable area for large numbers of new homes. There needs to be significant improvements to infrastructure and local facilities in Moreton as it is, just to support the homes already built.</p>
Richard Noble	<p>It should be noted that in practical terms, a new housing development "close" to a transport hub does not always result in a reduction in the use of private cars. With the amount of development that Moreton-in-Marsh has seen in recent years there will be few or no viable sites available for development within a 20min walk of the station. To access the station and existing infrastructure and services within Moreton-in-Marsh, the majority of people based on any new development will still drive, resulting in increased traffic and detrimental excess demand on existing roads and parking provision. Achieving a max 20mins walking time from a large new development of this type into Moreton-in-Marsh is likely to prove impossible and only increase traffic and the demand on the existing centre and the roads around it. This negates any desired/anticipated benefit, both practically and environmentally of focusing the development "near" to existing public transport hubs and infrastructure.</p>
Jerome Cook	<p>Paragraph 5.38 compares Moreton-in-Marsh (MiM) and Kemble, stating that at Kemble "development opportunities are more constrained by the sensitive landscape that surrounds the village." The land around MiM is also Special Landscape area made up of agricultural land and provides accessible local green space from the town with public footpaths. For example, the area south of the Ellenbrook development has public rights of way/footpaths which provide immediate opportunity to access the countryside from the town, with views of the Cotswolds escarpment towards Sezincote and Bourton-on-Hill. The accessible and immediate access to countryside is beneficial to residents' wellbeing and health.</p>
Jerome Cook	<p>Paragraph 5.40 notes Moreton-in-Marsh (MiM) as a location with "good current and potential future opportunities to use public transport." The current public transport / bus services down the A429 corridor are currently limited, only providing services towards Stratford-upon-Avon and Cheltenham, with just 20 services per day and none on Sundays. Car use will remain critical to residents. Given the Government's policy is to increase usage of electric vehicles (e.g. by banning the sale of new diesel/petrol cars from 2035) means a development plan that is based solely around public transport and does not consider private vehicles and addresses congestion, risks increasing congestion in and around MiM.</p>

Jerome Cook	<p>Paragraph 5.40, with the reference to the "A429 corridor" is the closest the Development Strategy comes to acknowledging that running through the centre of Moreton-in-Marsh (MiM) are the A429 and A44, with junctions at two small roundabouts. Both the A429 and A44 are main thoroughfares (the former being a major one traversing the District) used by lorries, agricultural vehicles and tourists (including coach tours and caravans) in addition to residents' vehicles. There is significant congestion, especially in the summer, due to the volume of traffic using these roads and junctions. These thoroughfares should be considered more in the Development Strategy; an independent highways impact and/or transport assessment should be done, as well as an infrastructure assessment, to consider the impact on congestion and pollution of the increased vehicles from development in MiM.</p>
Wolfords Joint Parish Council	<p>Good idea but unlikely to be practical in a reasonable timescale</p>
Richard Grant	<p>Scenario 7: Focus Growth around Transport Nodes</p> <p>2.66 Although this scenario appears attractive, there are several potential drawbacks:</p> <ul style="list-style-type: none"> a. Movement by rail is limited to very few stations and tends to only enable travel directly to a limited number of destinations, using infrequent services compared to urban areas. b. Movement by bus is similarly limited in terms of bus routes, frequency of services, reliability of services, and the potential for services to be changed or cancelled at short notice without any influence from the Council. c. Movement by walking and cycling is clearly possible, but given distances, topography and the need to use rural roads is unlikely to be a substitute for the car. <p>2.67 The result of these issues is that opportunities for finding locations which provide a real opportunity for people to travel by public transport or active travel are very limited, and unlikely to provide sufficient opportunities to ensure that the need for new homes are met in full or that needs of communities in locations which do not satisfy the definition of a transport hub are met at all.</p> <p>2.68 Therefore, we do not support this scenario as an option for the development strategy, but we would support the consideration of the accessibility and transport options presented at Principal Settlements as being a consideration when looking at the settlement hierarchy and undertaking a site selection exercise. We also support the Council's recognition of the value of transport facilities which may be in neighbouring authorities – for example the railway station at Kingham in West Oxfordshire. We would note that Willersey is close to Evesham, which although in Wychavon District has a railway station connecting to the same Cotswold Line rail services, providing trains to Worcester, Oxford and London Paddington, and therefore providing an opportunity for current and future residents to travel further afield by public transport.</p>

Fairford Town Council	Scenario 7: Focus growth around transport nodes – This does nothing for the sustainability of settlements such as Fairford which currently have very poor public transport connections and seems to assume that it is a good thing to continue supporting longer-distance commuting between centres, which is presumably contrary to the Council's CE policies. What proportion of people will actually travel by public transport? Will this divert funding from improvement of existing infrastructure elsewhere, e.g. roads to make other communities more viable for economic growth?
Angus Jenkinson	Re Moreton: A railway that takes people away and hollows out the town is not wanted. So development near the station must develop local life and infrastructure.
Angus Jenkinson	a new Transport Strategy for Moreton-in-Marsh is needed
Coates Parish Council	5.33 We support Scenario 7
Amartya Deb (Gloucestershire County Council)	Scenario 7: Together with scenario 7, this seems the most sustainable scenario from a transport perspective, subject to the outcomes of network and highway capacity assessments.
Lucy White Planning	Scenario 7 aligns closely with the Local Plan's objectives for sustainable development directing development to locations well served by public transport, particularly rail services, offering the opportunity improve the viability of the existing services and funding the delivery of additional bus services through increased patronage and developer funding, where appropriate. The landowner supports this scenario, in particular its potential to bring forward a new Transport Strategy for Moreton-in-Marsh to support future growth.
Bathurst Estate 175	Scenario 7 – concentrating development around transport nodes is a highly sustainable approach to the settlement hierarchy. Most of the transport hubs are also Main Service Centres and/or Principal Settlements, especially Kemble. The Integrated Impact Assessment identifies Kemble alongside Moreton-in-Marsh as suitable settlements to delivery a higher proportion of growth under this Scenario.

<p>Chris Marsh (Pegasus) 334</p>	<p>Scenario 7: Focus growth around transport nodes</p> <p>4.34. This strategy would concentrate growth in those parts of the district which are most accessible, with the best public transport links. The consultation document essentially suggests that this would mean focusing growth in Moreton in Marsh, as it has a train station. As a Principal Settlement, Rosconn do not object to further development in the town, and the IIA scores this option positively in terms of Healthy and Vital Communities, Housing, Economy, Equalities, Transport, and Climate Change.</p> <p>4.35. However, the need for a strategy specifically focused on transport is questionable and may reduce the impetus to deliver public transport improvements across the whole district, in other Principal Settlements. In addition, this strategy would place increased pressure on Moreton to provide an even greater number of homes, when it has already experienced substantial growth relative to other Principal Settlements in recent years. It should also be noted that good transport links alone do not necessarily mean that a settlement is a more appropriate place for housing than another one, as there are other important factors to consider, not least access to employment and services, which are available in other Principal Settlements.</p> <p>4.36. Whilst the objective is sustainable development, focusing a strategy on just one mode of transport, namely rail travel, cannot be correct. Therefore, Rosconn would object to a development scenario which places such as a strong emphasis on transport nodes, which would increase pressure on one specific town, rather than distributing this across the district.</p>
<p>David Hindle</p>	<p>Agree 1,2, 6, and 7. Severe doubts about village clusters, so would not favour that, Agree Morton right place to concentrate strategic level growth, with Cirencester finishing off its own Strategic level growth> Given that Cirencester is in a position on its own as the principle Town in the area with more services than other Towns, and greater connectivity by bus, when it comes to distributing residential beyond what Morton will accommodate, Cirencester should receive the highest % increase. That will of course be subject to Natural Landscape and flooding considerations. It may also be worth considering if the 2350 limit on Chestertons is 'a product of its times', as attitudes to density are changing, and in reality will also be dependent on mix. when the allocations stage in reached the theoretical basis of the density should be revisited, and looked at again. Then it should be discussed with the landowners. In my consultation to the Local Plan I have already suggested up to an additional 50 units (approx 2%), for reasons of trying to find a way to fund the building of a new Healthcare Centre by the Landowners, with an enlarged space, or for that to be built elsewhere within agreed perimeters..</p>

David Hindle	<p>Agree 1,2,6 and 7. Do not look at clustering villages. A high proportion of new need should be at Morton. Cirencester, would complete its own strategic level growth during the Plan period. _____As the largest Town in the Cotswolds with a good level of services and transport links, additional growth to accommodate new need should also be considered there (as what would then be considered non strategic growth). That would be after Morton allocations, for the location for the new strategic level growth. That would provide around 50% of the new need within CDC, or higher if the previous over provision in the past is included. or more sites are identified than the anticipated 1500 new residential units. _____Cirencester would be considered ahead of other Town Centres, other than Morton which would provide the Strategic level growth.</p>
Timothy Phillips	<p>6.3 Is very necessary. Mickleton at the northern edge of the area is affected by the loss of a Post Office, no GP surgery, increase in housing over the years with no improvement in transport services or infrastructure. It also has the traffic effects of the large developments in Meon Vale and recently the increase in heavy commercial traffic in the area created by Worcestershire CC 's approval of a large increase in recycling , together with a housing development agreed by Wychavon District Council all at the existing area on the border.</p>
Jamie Ball	<p>Scenario (7) suggests more development along transport hubs and names Moreton In Marsh because of its railway link and 429 Fosseyway road connection. This is far too simplistic. A MAJOR problem that must be recognised about Moreton In Marsh (the word Marsh in its name is a very large clue), is that much of the area is Environment Agency's Grade 3 Floodplain, both in and immediately, surrounding Moreton In Marsh. Existing housing development in the 2011-2031 Plan is already causing greater flooding in the Evenlode River tributaries that surround Moreton in Marsh and extend into surrounding small villages like Evenlode, Chastleton, Broadwell and others immediately adjacent. Residents in these villages have seen more flood water backing up into their villages and across the agricultural land that surrounds them. Note too that some of these villages, eg: Chastleton are located in WODC and so CDC would be passing on problems to another District Council and so should really take residents views into account there as well.</p> <p>Another consideration weighing against Moreton In Marsh is the lack of sewage infrastructure, groundwater waste removal and water pressure required for any further significant development. Although the Plan suggests that these would happen if building were to take place, surely they need to be in place before building is considered. This infrastructure is a MUST in order to prevent what is already happening with the new builds which are part of the 2011-31 Plan.</p> <p>Understanding what the landscape can sustain, and not ignoring the significant number of the water courses in and around Moreton in Marsh is one of the most "Green to the Core" things this new plan should consider.</p> <p>Development must be "limited and targeted" to prevent more Flooding. Therefore a Local Plan for 2026-41 that aims to build new housing should be shared out as appropriate among a greater number of CDC towns and villages. A Strategy in keeping with either (5) A New Settlement site/s or (3) Dispersed Growth.</p>

<p>Jamie Ball</p>	<p>Preferred Development Growth of Moreton In Marsh needs to consider existing flooding issues as well as very probably increasing flooding issues caused by climate change.</p> <p>Some relevant photos of recurrent flooding of the Evenlode river on the Evenlode Road at Heath End Bridge, less than a 1/4 of a mile from where AECOM have currently ended the mapping of the flood areas on the "Points of the Compass Appraisal" for Moreton in Marsh. The photos below are not one off events, the flooding at this point occurs regularly. And when the road floods only very large 4x4 cars are able to pass through, effectively cutting Evenlode off. I only attach a few photos of varying dates to demonstrate current levels of flooding as of today; this is all ongoing history, what will future climate change bring?. The wooden bridge photos are incorporated to show the point the flooding shifts from CDC land on to WODC land in villages next to Moreton In Marsh.</p> <p>I have also attached a copy of the UK Gov map of known flooding areas. It appears to show more than your 'Compass' map includes. Also the UK Gov map I've attached shows you how close the Stratford District Council and West Oxon District Council's boundaries are to Moreton in Marsh (see key at bottom of the page). Further, you can see that significant dark blue watercourses are identified in each Council that have the potential to be directly impacted by any additional housing proposed in Moreton in Marsh. As I understand it a number of these areas are zone 3b floodplains. Zone 3b floodplains are defined: "Planning law splits the country up into three zones with regard to flooding: zone one is low risk and two is medium risk. Zone 3 is split into 'a', which is a high risk area but one you can 'potentially' build houses on and b, which is a functional floodplain, where you cannot." If additional housing continues to be added surely the residents in the 2 councils that border Moreton in Marsh need to have a say as they will experience the backlash of additional flooding issues (& potential sewage issues) when floodplains that have traditionally held these waters in check are built on. Experience shows developers merely push flooding from their developments onward without due regard for those further along the watercourse. (Not being sarcastic or cynical- just know this from experience).</p> <p>There is deep concern about the ongoing and over active use of these Moreton in Marsh floodplains and the Environmental damage this causes. These floodplains soak up known flooding by the Evenlode river, not just in Moreton but in the surrounding agricultural villages. Excessive building rather than building in moderation with appropriate infrastructure installed will no be ecologically sustainable.</p>
<p>John Holmes</p>	<p>The proposals for Moreton seem ill-conceived. Existing infrastructure shortcomings, especially in sewage, are bad enough and unlikely to be fixed any time soon by Thames Water. The area is highly prone to flooding and building housing and roads on known flood plain areas seems unwise and contrary to declared policies. Claims that because Moreton is a transport hub, this will somehow help the environment also seem far-fetched. Existing serious traffic problems on the Fosse way between Moreton and Stowe are more likely to be made worse, with all the resulting inconvenience and extra pollution. A bypass, even if the money existed to build it, which seems highly unlikely, might help Moreton centre, but would not relieve east-west traffic and would cut across a lot of highly valuable natural and built environment assets,, including affecting local villages such as Evenlode. Moreover, it is unclear how a new development in Moreton could really qualify as a New Garden Village. It would just be an extension of Moreton, adding to the pressure on existing facilities, with no guarantee that new facilities or more jobs would actually ever be provided.</p>

James Mackie	<p>1. CDC have asked for opinions regarding the options for how future development could be distributed, including a new settlement, growth of an existing settlement (such as Moreton), growing multiple settlements or scattering development around the district. In my view CDC should fight to maintain the rural character of the Cotswolds and simply not allow our small market towns or villages to be expanded to any significant degree. I support the idea of new settlements in areas of the country with better road/rail connections and better employment and training opportunities.</p> <p>2. Regarding the proposals for Moreton, dressing up the over-development of a small traditional market town as a 'Garden Village' does not disguise what is really proposed. This will change the character of the town and the whole of the surrounding area.</p> <p>3. You have asked for comments regarding required infrastructure, should the development go ahead. There has been much discussion regarding this and all points which I endorse will have already been noted. The only aspect I would mention specifically is the question of sewage because we are informed that the existing (Moreton) sewage treatment plant will not be upgraded until at least 2035. In the meantime the existing housing developments have overwhelmed the inadequate old system and the river Evenlode has become a brown, sludgy, silted-up brook. The river is already essentially dead.</p> <p>4. This is not just a question of nimbysism; it is critical to maintain the beauty and character of the Cotswolds just as it is to maintain parks in cities.</p> <p>As Hilaire Belloc famously wrote in <i>The Evenlode</i>: A lovely river, all alone, / She lingers in the hills and holds / A hundred little towns of stone, / Forgotten in the western wolds.</p>
Stow on the Wold Town Council	<p>The existing Local Plan shows little understanding of the exceptional problems Stow faces. For years and years Stow has suffered from the unintended consequences of well meant but repressive policies aimed at preserving Stow's beauty and that of the surrounding countryside.</p> <p>Those consequences have been bleak leaving Stow with a starkly aging and declining population and crises in housing and parking. Against this all the Existing Plan offers is platitudes and support in principle for a Town Museum and a new community facility without any indication as to how they might be created.</p> <p>We might have hoped that the drafts now before us might have taken on board the evidence and policies of our Neighbourhood Plan.</p> <p>Far from it. The draft policies section of the update does nothing substantive to address Stow's needs and confines S13 policy to a simple regurgitation of the wording of the Existing Local Plan's support in principle for a Town Museum and a new community facility.</p> <p>If this is all CDC can offer Stow then we face a further sixteen years of benign neglect and further decline in our community's sustainability. CDC needs to rethink and accept that our town is more than a piece of cultural heritage set in a National Landscape and develop positive policies that address the needs of our population.</p> <p>CDC also needs to recognise that the proposition that small rural exemption sites would cater for Stow's needs is fallacious. There is an acute scarcity of such sites and little reason to assume that any further ones will come forward.</p> <p>Stow badly needs a significant provision of socially rented accommodation to counteract the declining numbers of children, young people, working families and key workers who cannot afford to live here given the present housing market. The spoilation of one of the finest market squares in the country used as a giant parking lot must be addressed by the provision of substantial off-street parking as must the need for a community building that caters for modern requirements.</p>

Jerome Cook	Paragraph 6.7 says Moreton-in-Marsh could become a location for "over 1,500 additional homes." This should be changed to "around 1,500" which is what CDC councillors and officials have been telling residents in the recent Q&A (21 March) and other communications. There is a difference between "over" and "around".
Jerome Cook	Paragraph 6.7 suggests that Moreton-in-Marsh has areas for development outside "areas of higher risk of flooding." Given that MiM does include areas that are at low, medium and high risk of flooding - including in the central part of town and along the A429 and the railway - extensive development in areas with little or no risk could nonetheless have an impact on the rest of the town or become medium or higher risk themselves (e.g. through surface run-off). An independent environmental assessment should be undertaken to assess the impact of potential development around MiM on the future risk of flooding (e.g. will areas that are currently low or medium risk of flooding increase to medium to high risk).
Jerome Cook	Paragraph 6.7 mentions waste and wastewater. The Guardian recently reported (27 March 2024) that Thames Water sewage spills into the Evenlode River at the Moreton-in-Marsh (MiM) plant doubled between 2022 and 2023 (2022: 64 spills; 2023: 128 spills). Water and sewage infrastructure currently needs improvement and over 1,500 additional homes would present a significant strain on the current infrastructure. It will undermine policy EN1 to "improve...water quality" and, regarding policy EN15, "result in unacceptable risk to public health... [and] the natural environment." An independent environmental and infrastructure assessment should be undertaken on the water, wastewater and sewage infrastructure in MiM.
Jerome Cook	Paragraph 6.9 notes the potential for "Village Clusters." This is more in keeping with the settlement pattern of the Cotswold District, which is made up of small villages and towns. According to current figures Moreton-in-Marsh (MiM) would be the focus for 45% of the District's additional homes despite just 5% of the District's population (according to 2021 census data). Focussing development, including affordable housing, in sites of strategic growth risks exacerbating and increasing a division in the District between villages (affordable only to wealthy residents) and elsewhere (the location of more affordable housing). One resident at the MiM Q&A (21 March) said how he could not afford to live where he grew up and be closer to family; getting to that village from MiM is not possible by public transport.

Richard Noble	Moreton-in-Marsh has already seen significant development in recent years and already suffers from heavy traffic congestion and is starting to suffer from a lack of adequate facilities to support the hundreds of new homes that have already been built in recent years. I don't think this makes Moreton a viable area for large numbers of new homes. There needs to be significant improvements to infrastructure and local facilities in Moreton as it is, just to support the homes already built.
Janet Heady	Where is the evidence that sites to the south, east and north of Moreton in Marsh are not at higher risk of flooding. That's simply wishful thinking.
Matthew Bevan	Paragraph 6.7 - New development to the north, east and south of Moreton in Marsh will have to be sensitively placed and great consideration taken with regard to flooding, both pluvial and fluvial, and the very high water table. Recent development at the Spitfire homes site to the south is already causing flooding of local footpaths close to existing housing, but the District Council seems tone-deaf to flooding concerns in Moreton in proposing to allocate so much new housing in the town.
Richard Grant	<p>Preferred Development Strategy and Broad Locations for Growth</p> <p>2.70 Section 6 begins to set out a preferred approach to setting out a development strategy. Paragraph 6.8 suggests that an approach which blends the options set out in Scenarios 1, 2, 6 and 7 could be taken, with an option to use Scenario 4: Village Clusters as appropriate. We would support this approach, as it resembles our own assessment of the merits of each scenario set out above.</p> <p>2.71 We note that paragraph 6.3 again notes the need to review the settlement hierarchy and to update the assessment of which settlements should be designated as Principal Settlements. We support this approach, but would note again the provisos we set out under Scenario 1 for undertaking this refresh of the evidence base.</p> <p>2.72 Finally, we note that paragraph 6.5 recognises that the adopted Local Plan attempted to balance growth across all the Principal Settlements, but that the Cotswold National Landscape presented a constraint to being able to achieve this aim. We recognise the need to sensitively plan for development in relation to the National Landscape, but also note that the location of a Principal Settlement within or adjoining the National Landscape should not be a reason for deciding that it should no longer be a Principal Settlement. Willersey, for example has site options which could be brought forwards within the National Landscape, but which would have limited impacts on the character of the National Landscape and which could accommodate a form of development capitalising on the services, facilities and employment available in the village and in nearby towns, while also conserving and enhancing the National Landscape. Such a site is the Land West of Field Lane.</p>

Jerome Cook	<p>Paragraph 6.7 notes Moreton-in-Marsh (MiM) is a "transport hub" and CDC officers, at the Q&A event on 21 March, noted the buses that passed through the town. However, in May 2023 Cllr Michael Vann noted, in a profile of the Cotswold constituency that "bus services run to and from the main towns but overall are poor". While buses do through MiM (and other towns), these have limitations and the Local Plan and other documents do not contain actual data to support the assertion of MiM as a 'transport hub' (while it may offer public transport these could be used lower than private vehicles). A proper assessment of transport use in MiM should be undertaken before committing to numbers of additional houses, because working on an assumption - rather than data - of actual public transport use (or lack thereof) compared to private vehicles could result in increasing congestion in the town if residents don't actually make use of the 'transport hub' because they remain dependent on private vehicles for employment and using other services/facilities not provided in the town (or too far on the other side of town).</p>
Lisa Davies	<p>Moreton-in-Marsh has had significant development already, and experiences frequent traffic congestion, exacerbated in the tourist season on which much on the employment opportunities rely. The existing facilities and infrastructure are already in adequate to support the number of new homes built in recent years. This does not makes Moreton a viable area for large numbers of new homes. There must be significant improvements to infrastructure and local facilities in Moreton to support the current population and housing, and an even bigger set of improvements to future proof for additional housing. I do not support this option</p>
Fairford Town Council	<p>The 'preferred' strategy seems to be basically a continuation of the old, nuanced by a preference for new non strategic site allocations located near 'transport hubs' and a generous allowance for 'windfall' sites. What is lacking is a clear economic strategy for the District to go with this, which leaves many medium sized settlements 'out in the cold'.</p>
john shelton	<p>Ref 6.7....Discussions have already been entered into between CDC and Capita owner of the Fire Service site. 310 new homes are proposed already and talks of a Garden Village of a min1500 homes and in all probability many more theoretically up to 10,000. Opaque negotiations have been hinted at where the Fire College gets new or refurbished buildings as part of the making land available for development. Moreton residents have a right to know all elements of any existing or potential agreements or contracts entered into. Surely a potential development of this size should be examined as part of a Moreton-wide Master or Local Plan (like that commissioned for Cirencester).</p>

<p>Angus Jenkinson</p>	<p>If the plan assures delivery of a better, healthier, more vibrant and enjoyable Moreton (in line with my vision above), then I would support it. Otherwise, I would not support it.</p> <p>The needs of Moreton must be addressed. I have advised the county planning leadership, the district planning team, CDC cabinet, and the council that I would not be able to support the proposed strategy scenario focused on Moreton as the key “strategic development” site unless it comes with multiple associated benefits, directed to you separately.</p> <p>As further information comes to light, I could be willing to support this plan if the right designs, care, attention, and sensitivity to local needs are specifically and rigorously included. I'm glad to see that in the additional consultation description of the situation in Moreton, many of these are specifically outlined. I'm also aware from project work in various areas, specifically that of sewage, that paradoxically the commitment to further development may well be the best solution to achieving the outcomes needed to get to an ecologically clean water system for the town and local river network.</p> <p>The size of the town is (within limits) not the main issue: the issues are pace of change, timing of infrastructure, adequacy to restore, regenerate, and maintain the town as a notable attractive Cotswold centre.</p> <p>Finally, there are two aspects that need to be addressed, both related to strategic development sites. 1) What other options exist? Why have they/it not been selected? 2) What benefits or damage follow from being the one chosen?</p>
<p>Angus Jenkinson</p>	<p>I note that for the same reason that my ward, Moreton East, attracted such a huge slice of the development over the last 23 years (some 6x the average of the District), it continues to look to planners and developers as a good logical option. The rationale lies in the town itself and its situation. (I do take the point that developers will only invest if they can sell at a good price, which means that it must continue to look like a good option.) But planning must now take hold of the future and not let it emerge higgledy-piggledy.</p>
<p>Angus Jenkinson</p>	<p>In the separate guide, you assert the need for Moreton-in-Marsh to get a master plan if development is to take place. This is needed to rectify past problems too. I appreciate that the plan cannot focus on rectification, but it can focus on what the town should be like in the future and that will go some way to achieve rectification.</p> <p>It would be a disaster to just add houses, obviously. What is needed is a clear vision and town design that allows progressive managed growth that is non-disruptive so far as possible. How much of this growth takes place here is a factor I will consider in relation to other options and to the commitment to ensuring Moreton remains a fine Cotswold market town.</p>

Jason Seaward	<p>Ref 6.7. It is not practicable to link a new settlement at the Fire Service College (FSC) and services built there with a reduction in car use by a shift to train transport at Moreton-in-Marsh railway station. The distance and route between the two is such the train users from the new settlement at the FSC are almost certain to use car to get to the station, thus increasing overall congestion in the town centre, which is constrained by two major A roads crossing North-South and East-West. The land closest to the railway station, which would promote a shift away from car use is in the Cotswold protected area (formerly AONB) - the land outside the protected area but close to the railway station is already developed. To support a shift to greater use of non-car transport onto rail by using housing in Moreton-in-Marsh requires building housing to the west, where there is close proximity to the station.</p>
Jamie Ball 116	<p>As we discussed yesterday, below are some relevant photos of recurrent flooding on the Evenlode Road at Heath End Bridge, less than a 1/4 of a mile from where AECOM have currently ended the mapping of the flood areas on the "Points of the Compass Appraisal" for Moreton in Marsh. Let me say these are not one off events, the flooding at this point occurs regularly. And when the road floods only very large 4x4 cars are able to pass through, effectively cutting Evenlode off. I only attach a few photos of varying dates to demonstrate current levels of flooding as of today; this is all ongoing history. The wooden bridge photos are incorporated to show the point the flooding shifts from CDC land on to WODC land.</p> <p>I have also attached a copy of the UK Gov map of known flooding areas. It appears to show more than your 'Compass' map includes. Also the UK Gov map I've attached shows you how close the Stratford District Council and West Oxon District Council's boundaries are to Moreton in Marsh (see key at bottom of the page). Further, you can see that significant dark blue watercourses are identified in each Council that have the potential to be directly impacted by any additional housing proposed in Moreton in Marsh. As I understand it a number of these areas are zone 3b floodplains. Zone 3b floodplains are defined: "Planning law splits the country up into three zones with regard to flooding: zone one is low risk and two is medium risk. Zone 3 is split into 'a', which is a high risk area but one you can 'potentially' build houses on and b, which is a functional floodplain, where you cannot." If additional housing continues to be added surely the residents in the 2 councils that border Moreton in Marsh need to have a say as they will experience the backlash of additional flooding issues (& potential sewage issues) when floodplains that have traditionally held these waters in check are built on. Experience shows developers merely push flooding from their developments onward without due regard for those further along the watercourse. (Not being sarcastic or cynical- just know this from experience).</p> <p>There is deep concern about the ongoing and over active use of these Moreton in Marsh floodplains (as I said yesterday there is a big clue in the word Marsh in the name) and the knock on effect this has on the smaller agricultural villages that surround it. Scenario 7 in the New Cotswold Plan to 2041, suggests another 1,500 houses be added to Moreton In Marsh because of its railway station link. On the Moreton Town Council website as of today they state there are 2,500 houses in Moreton (this is before the additional 600+ currently</p>
Jamie Ball 116	Additional document (map) uploaded as mentioned in comment.

<p>Frances Lennon 179</p>	<p>We consider that the Longfurlong Lane site represents a logical and sound option for meeting some development needs at Tetbury on the following basis:</p> <ul style="list-style-type: none"> • The Council’s Local Plan Vision and Objectives Topic Paper confirms that circa 3,290 additional dwellings would be needed when considering a Local Plan Period of up to 2041. The Council has identified different strategy options to accommodate this additional growth, concluding that a blended approach (combining scenarios 1, 2, 6 and 7) is likely to be the most appropriate way forward. We agree with this approach although further testing and refinement of the approach will be required to ensure a sound strategy. The Topic Paper confirms this would entail the continuation of the adopted development strategy of identifying Principal Settlements as locations where the principle of development would be supported. The Longfurlong Lane site is well located on the edge of Tetbury, a defined Principal Settlement in the currently adopted Local Plan, and acting as a key focus for services and activity in the South West of the District. Bringing forward well-located sites at Principle Settlements (such as Tetbury) would clearly align with the Council’s preferred option for delivering additional growth and the vision for delivering more affordable homes, responding to the climate crisis (primarily through the location of new development), and supporting health and vibrant local economies. • The above ‘blended’ approach to accommodating housing growth would support the health and vitality of settlements across the Cotswold District, meeting local community needs. Bringing the site forward would support the wider investment in Tetbury and provide wide ranging local community benefits.
<p>Amartya Deb (Gloucestershire County Council)</p>	<p>Cotswold District’s Local Plan proposes that “Moreton-in-Marsh would become a focus for strategic-scale growth of over 1,500 additional dwellings up to 2041.” While GCC officers support the allocation of growth near railway stations, GCC officers also have significant concerns about the ability of the highway network in and around Moreton-in-Marsh to accommodate the additional trips that would be generated by an additional 1,500 dwellings. GCC officers would like to see detailed transport assessments, including modelling, and fully funded transport / highway mitigation proposals.</p> <p>Dev. Strategy Q1: NPPF para. 109 does state that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. There is an argument that requiring all development to be within 400 metres would be more akin to an urban setting and not all rural areas, as characterises most of Cotswolds. However, Inclusive Mobility and ‘planning for walking’ (CIHT 2015) both make reference to bus stops being 400 metres from residential dwellings, so GCC officers broadly welcome the approach in principle.</p> <p>Dev. Strategy Q13: Moreton-in-Marsh is being considered as a potential location to meet future housing and economic needs. Transport Planning team officers believe all of the transport and integrative infrastructure proposed by this question is essential and would need to be provided alongside the proposed new growth.</p> <p>Dev. Strategy Q14: The GCC Transport Planning team would also like additional infrastructure and support for buses to be included. This should include:</p> <ul style="list-style-type: none"> • Support for bus services from Moreton-in-Marsh to key destinations on all days of the week and evenings; • Investment in interchange hubs (at Moreton-in-Marsh rail station, on the high street, and as part of new development) as a minimum; and • Bus priority on key bus corridors from Moreton to key destinations, if required (e.g. Unicorn junction). <p>Dev. Strategy Q15: The GCC Transport Planning / Highways Development Management teams would need to</p>

<p>Clerk Bourton on the Hill PC (Bledington) 154</p>	<p>Bledington Parish Council is pleased to respond to the consultation on the Cotswold District Council (CDC) Local Plan. Bledington Parish Council is in the process of developing a Parish Plan, due for completion in early 2025. Bledington has a strong record in community developments, including a community shop, a community-led flood group, and a local Care Committee.</p> <p>Bledington would wish the following to be considered in the production of the Local Plan.</p> <p>1. Housing and Facilities</p> <p>We note and understand the target for additional homes in the Cotswolds and the identification of suitable settlements for development which already have some infrastructure in place, and in particular note that Cirencester and Moreton-in- Marsh are the most likely sites for substantial development. In planning such developments we would wish the following to be taken into account.</p> <ul style="list-style-type: none"> • We share the concerns of others in the North Cotswolds area, in particular Moreton-in- Marsh, about the lack of breadth and capacity in existing infrastructure. This includes flood resilience, drainage, and sewage treatment; traffic congestion; public transport; secondary school capacity; and the need for universal fast broadband coverage. • It is critical that increases in housing stock should be preceded by or be developed concurrently with the provision of adequate infrastructure. • New developments and infrastructure need to clearly take into account the impact of such development on neighbouring and more distant communities, through Integrated Impact Assessments. Examples include the impact on flooding and sewage management in communities such as Bledington, which is downstream of the Evenlode from Moreton-in- Marsh; and for all local communities, regularly occurring traffic congestion, eg on the Fosse Way. • The provision of high quality and sufficient educational facilities, including secondary school provision and
<p>Nigel Moor 162</p>	<p>Let's start at the beginning. Back in 1974 the then Prime Minister Sir Edward Heath shelved a report recommending a new single (unitary) local authority structure for England. A two -tier system instead of counties and district councils was introduced, which the Prime Minister thought would preserve Tory hegemony in the shires. That system persists in Gloucestershire where we have a county council and six district councils. The county looks after minerals and waste planning, but the six district councils prepare their own local plans, and there is no agreed strategic plan for Gloucestershire.</p> <p>When people look to rent or buy a new or second - hand house, they are not particularly bothered by local authority boundaries. Because of this the planning system identifies what are called Housing Market Areas, which better reflect where people will want to live and work. Gloucestershire is regarded as such an area. The Cotswolds is part of that market area. It is also a major part of the Cotswold Natural Landscape Area (formerly known as an area of Outstanding Natural Beauty), which stretches across a large part of the county. This makes it an attractive place to live and housing demand is high. Planning should be a means of balancing these competing forces but is not happening in Gloucestershire. Cotswold District does not make provision to accommodate the unmet housing needs of other districts in the county, and neither do they. But it does in assessing housing needs accept that the level of in-migration (people moving into the area) will continue at the rate experienced in the last ten years. In reviewing the local plan which has a base date of 2011 and looks forward to 2031 a need for 8400 additional houses has been calculated which includes this in-migration.</p> <p>To meet part of the need, the plan proposes an additional 310 houses on the Fire Service College site in Moreton in Marsh together with a new neighbourhood centre, employment land and a two - form primary school. This would be on land to the west and east of the main entrance extending to and including the leisure centre which is to be replaced.</p> <p>No new housing sites are proposed at Blockley other than those already identified in the existing local plan: land at Sheaf House Farm (13 dwelling) and at the Limes, Station Road (9 dwellings). Surprisingly there is no reference in the plan to the car parking problems experienced in the village or the surface water flooding, which these wet months, has shown to be still an issue in the village. The plan does propose as an infrastructure priority a flood alleviation bund and channel to the north- west and south of Moreton. This plan needs to be expanded to include Blockley.</p>

Lucy White Planning	<p>The landowner supports the Council's preferred development strategy to continue the adopted strategy of focussing new development at identified Principal Settlements, with a greater focus on additional growth around key public transport corridors and public transport hubs, whilst limiting development in the Cotswold National Landscape.</p> <p>We support the specific recognition of Moreton-in-Marsh as a transport hub and the availability of land beyond the existing built up area, including to the south of the town, which is available for development of over 1,500 new homes and a possible relief road. In this regard, the figure of 1,500 dwellings should represent the minimum expectation for the town, with a higher quantum delivered if possible. We support the Council's strategy for comprehensive development, through the identification of a broad location for strategic scale growth, delivered through a series of non-strategic sites. We also support the Council's long term vision for the town to deliver further development to support delivery of additional infrastructure, including the possibility of a primary and secondary school. The new Local Plan should not be limited in its vision and proposals to the plan period of 2041. To plan comprehensively for the future of Moreton, the plan should include land and proposals for development beyond 2041 and increase the quantum of planned growth accordingly.</p>
Avril Maxwell-Smith	<p>To dump an excessive number of houses at the entrance to the North Cotswolds (having left all the redbrick houses) in Warwickshire it is madness and total suburbanisation to a very appealing natural stone Old Market Town and where the were animals kept on land behind the doors on the street. This town is in uproar.</p>

<p>Christopher Kenney-Herbert</p>	<p>To build over 1,500 additional dwellings in Moreton-in-Marsh (M-i-M), with no commitment, plans or evidence to provide infrastructure to support it, is irresponsible. M-i-M has a history of infrastructure failure, flooding (despite EA advising that its probability is once in 100 years), and an unprecedented growth in the last 10 years which does not appear to have been considered.</p> <p>1. Moreton Growth 43% in the last 10 years</p> <p>2. The WYG A429/A433 Corridor Study (2018) Page 56, section 3 states:-</p> <p>3.2 BOTTLENECKS IDENTIFIED IN THE HIGHWAYS CAPACITY ASSESSMENT</p> <p>3.2.1 The Highways Capacity Assessment report produced as part of the Emerging CDC Local Plan in October 2017, identifies which junctions along the A429/ A433 corridor will reach their capacity after the committed development proposed in the Emerging Local Plan comes forward and proposes appropriate mitigation measures. Table 8 gives a summary of the capacity assessment results included in the report.</p> <p>Table 8, which I have been unable to reproduce in this document, shows the following:- A429/A44 Oxford street and A429/A44 Bouton Road forecast to be above capacity during peak hours by 2031 when including the committed developments. Since then, Aldi and Fosseyway Garden centre have been developed or expanded, Dunstall Farm (250 dwellings) and Evenlode Road (67 dwellings) permitted plus the neighbouring developments in Stow and Shipston. No mitigation has been provided to offset these developments.</p> <p>Page 59, Paragraph 3.2.10, table 9, shows the same junctions after the proposed mitigation, which hasn't been completed, but still forecasts it to be above the Reserved Flow Capacity (RFC) for 08:00 to 09:00 and 17:00 – 18:00.</p> <p>Junction location</p>
<p>Hugh A. V. Wainwright 225</p>	<p>[Moreton development in relation to Policy CC6] Moreton had the longest discharge of sewage through the town into the local water course than any other settlement in the U.K.</p> <p>The Local Plan Update does not solve the existing sewage capacity issues. It places all the responsibility of resolving the sewage problem on Thames Water, a failing business that has missed two previous commitments for local capacity increases and is unlikely to meet future upgrades whilst their finances are in the current state, or they go bust.</p> <p>The simple solution is to build NO MORE HOUSES. The 310 houses proposed on Fire College land will place an unwelcome and unavoidable strain on the already broken system and the 1500 to 10000 proposed houses set out in 'The Garden Village' proposal would be overwhelming.</p>

<p>Hugh A.V. Wainwright 226 227 228</p>	<p>[Moreton development and also Policy S18]</p> <p>The Fire Service College, owned since 2013 by Capita a company in a poor financial situation, only has a 12 year contract from the MOD. There is no guarantee this will be renewed or that the company will survive that long. Therefore, there could be the opportunity to develop a brownfield site in the 2030-41 period, rather than destroy and pave over current agricultural land.</p> <p>As housing requirements have been met for Moreton until 2030 wait until the future of the Fire College site has been determined and act accordingly.</p> <p>A bypass might alleviate the traffic problem in Moreton that has increased dramatically over the last twelve years. The problems with a bypass are taking over greenfield sites to build a bypass, infilling between the current borders if Moreton and the new bypass and would any proposed bypass solve the congestion and air pollution in Moreton.</p> <p>There are currently no major employers in Moreton and many people commute to other more major towns for work. The parking in Moreton has long been a problem and the increase in housing will only worsen the situation as even more people will drive to the centre of Moreton and park for the day or even the week. The new cycle hub at the station is barely used. What is going to be done to tackle this problem and assist parking for current residents in Moreton?</p> <p>Many parking spaces are taken up all day by train commuters and on numerous occasions by weekly commuters leaving their vehicle all week.</p> <p>A well planned and positioned car park away from the centre of the town with time limited parking in the centre of town that is monitored, for people who want to do a quick shop, and a sensible residents' parking scheme. In addition, a pedestrianised area from behind the Redesdale Hall to the war Memorial to include the slip road would enhance the centre of the town.</p>
<p>Sheila Timmins 230</p>	<p>[Moreton development in relation to SD4 Heath and Wellbeing (1a) readily walkable, inclusive, safe.]</p> <p>Excessive houses bring at least 2 extra cars per household. People will not cycle because of the traffic. Buses wont run often enough to enable use for work. This will impact on air pollution and will-being. Tourism relies on 'quaint towns'. The train station can only provide travel to Oxford (London) or Evesham. Cars need to be kept at a minimum therefore fewer houses being built. Retain the market town feel to Moreton to keep tourism interest. Add more parking.</p>
<p>Sheila Timmins 231</p>	<p>[Moreton development in relation to SD2 Climate and ecological (8) development in areas of potential flooding.] No excessive housebuilding in Moreton. The potential harm to Moreton due to overdevelopment is increased with this plan. Moreton is in danger of increased flooding if building more than 600 houses. Wastewater is a huge problem. Polluting the Evenlode river. Lower the quantity of houses being built proposed. Moreton is not a large town and shouldn't become one just to accommodate more housing.</p>

<p>Broadwell Parish Council 232</p>	<p>BROADWELL PARISH COUNCIL'S RESPONSE TO THE PARTIAL AND FULL UPDATES OF THE CDC LOCAL PLAN</p> <p>Broadwell Parish Council (BPC) believe that the size of the proposed development of Moreton-in-Marsh is out of proportion with the town. Adding 1,500 new homes (in addition to the 250 new homes currently being constructed at the Spitfire Homes site) will have a devastating impact on local infrastructure and will be damaging to the historic character of Moreton-in-Marsh.</p> <p>At the average housing density of 2.4 people per dwelling, the proposed new development will add 4,200 people to Moreton-in-Marsh's existing population of 5,015 (2021 census), an increase of 84%. There has been little development of infrastructure in Moreton-in-Marsh over the last 20 years when the population was just 3,199 (2001 census) and most significantly, no increase in the capacity of road and drainage infrastructure. These new developments will triple the size of Moreton-in-Marsh over this period.</p> <p>Moreton-in-Marsh is a small market town in a rural area. Paragraph 89 of the National Planning Policy Framework (NPPF) says that development should be sensitive to its surroundings and should not have an unacceptable impact on local roads. The A429 ("The Fosse") is already at full capacity.</p> <p>In 2016, GCC's A429 Fosse Way Scrutiny Task Group unanimously supported the proposal that the A429 should be reclassified as a trunk road, enabling future works to aid investment and long term development management plans. A key factor throughout the review was the need to actively raise the profile and accentuate the importance of this strategic transport route through Gloucestershire. However, since this date, no improvements to the Fosse Way and its capacity have been made.</p> <p>The proposed "link road" would provide limited help to Moreton but none to Stow-on-the-Wold and other communities north and south along the Fosse. Indeed, these developments would add a significant amount of traffic to a route that is already at full capacity.</p> <p>BPC recognizes that CDC is required to find sites for strategic growth. However, it strongly feels that Moreton is not the correct site for development of this size. Moreton has been chosen by CDC because of its transport facilities, over-ridingly because it has a railway station. This station encompasses a provincial track that serves Oxford, London and the Malverns. It does not connect with the local towns that provide employment, for example, Birmingham, Cheltenham, Banbury, Cirencester and Bristol.</p> <p>Traffic is a major concern for BPC. Most residents will use car transport and this will have a devastating</p>
<p>Sir Geoffrey Clifton-Brown MP</p>	<p>I am writing in relation to the Local Plan Update Consultation to express my concern about the proposals for Moreton-in-Marsh and would like to formally object. I will outline the key issues of concern in this email.</p> <p>Cotswold District Council's local plan for the town has earmarked a minimum of 1500 houses before infrastructure has been properly discussed, in a town that has already experienced a disproportionate amount of development for its size. Over the last decade, Moreton has seen more development than any other town in the district. Why does the District Council seem to have discounted other places while Moreton is taking the brunt of housing? For example, places such as Fairford and Cirencester have seen far fewer housing developments relative to their size.</p> <p>The Town Council states that the number of houses is due to increase by 50 percent. The population rose from 3493 in the 2011 census to 5015 in the 2021 census, representing a 43 percent increase in those years. Since 2011, there have been several large developments in Moreton, amounting to 900 extra houses. I understand that the Moreton-in-Marsh population growth potential within this plan is 184 percent.</p> <p>In terms of infrastructure, the sewage treatment works is already at capacity and not scheduled to be upgraded by Thames Water until 2028. There also remains the problem of the open flood alleviation area in Primrose Court where storm water is discharged, effectively creating an open sewer. I have been complaining profusely about this issue for about 10 years at numerous past meetings with the Environment Agency and Thames Water. It is totally unacceptable, and I really do not think there should be any new houses until this problem has been satisfactorily addressed.</p> <p>There is already excess discharge into the River Evenlode and until the capacity of the sewage treatment works in the town is considerably upgraded, the pollution of the river is bound to get worse. Furthermore, I understand that the initial local plan did not even mention the River Evenlode, which calls into question the familiarity of those involved with plans for the town.</p> <p>Regarding traffic, the A429 (Fosse Way) is already a bottleneck in Moreton and gridlocked regularly during busy periods, particularly on bank holidays and weekends during the summer months. With this amount of proposed housing, delays could become even worse than those experienced by Stow-on-the-Wold. It is not on the government's upgrade list and is not part of the strategic road network, so central government is unlikely to ever fund improvements, and Gloucestershire County Council with ongoing cost pressures would find funding even a portion of a relief road, a huge challenge.</p>

<p>Nina Kapur 238</p>	<p>Like many other residents of Moreton, I have been unable to navigate your website to comment on the local plan update consultation so I have resorted to emailing you instead.</p> <p>I am writing to object strongly to the proposals put forward for Moreton-in-Marsh. It is wholly inappropriate and huge over-development to consider building another 1,500 homes here on top of the number of houses already being built. This effectively amounts to 45% of the total number of 3,300 additional homes you are required to build across the whole of the district, and Moreton has already had to endure more development than anywhere else. The infrastructure here is already crumbling and cannot support the existing population, let alone thousands more residents. There are no secondary schools, no employment opportunities and only one road through the town which is more often than not at a standstill.</p> <p>Moreton already suffers from a high risk of flooding and you only have to look at what is happening with the current Spitfire development to see the flood problems which arise from over-development in this area.</p> <p>It is absolutely imperative that before any more houses are built, a full feasibility study is carried out which looks at the infrastructure required to support the proposed increased population, as well as the impact on the environment, traffic flow and sewage distribution. The required infrastructure needs to be put in place BEFORE any more houses are built.</p> <p>There are several other areas in the district which are already much better served in terms of amenities, schools, roads, employment and public transport - these include Cirencester and Kemble. Both of these would be much better placed for large-scale development as the infrastructure is already in place and can support an increase in the local population.</p> <p>Whilst I do not object to development per se and completely understand that CDC is required by government to build an additional 3,300 homes across the whole district, I DO object to almost half of those homes being built around Moreton. It is unacceptable over-development of a small market town and will change the character of the town irrevocably.</p>
<p>Louise Derrington 239</p>	<p>I would like to state that I feel the website which supposedly allows me to comment on future developments in Moreton in Marsh is almost totally unfit for purpose. If you make participants unable to comment effectively how can what you do possibly reflect public opinion?</p> <p>My comments, has I been able to actually input them , would have asked what if any consultation is being done to reflect the impact on local villages in the Moreton in Marsh area? The impact will be felt by us just as much as people in Moreton. It seems as if we are being ignored by the consultation process. The bridge into Moreton in Marsh is already a danger and the volume of traffic ,lack of parking, and pressure on local services by an already much increased housing stock means that Moreton is becoming inaccessible for those of us for whom Moreton has always been our local place to shop.</p> <p>I appreciate that Government Policy dictates the need for a plan but surely we need a plan which endeavours to provide affordable housing without actually destroying the reason people want to live here in the first place. Most people work in hospitality but if you make a house housing estate it won't do anything to enhance opportunities .</p>

<p>Morgan Jones LPC (Trull) Ltd 289</p>	<p>Proposed New Development Strategy</p> <p>The Vision, Objectives and Development Strategy Options Topic Paper explains that eight development strategy options have been identified to accommodate additional development up to 2041, but a hybrid of several of the development strategy scenarios is proposed (i.e. Scenarios 1, 2, 6 and 7). The preferred development strategy would continue the adopted strategy of identifying Principal Settlements and allocating land for different types of development in these locations. However, the Topic Paper goes on to state that it anticipated that the remaining need for additional development up to 2041 (beyond existing commitments and windfalls) could be delivered by additional non-strategic site allocations in accordance with Scenarios 1, 2, 6 and 7.</p> <p>It is agreed that the proposed combination of development scenarios, which would include the allocation of non-strategic sites outside existing development boundaries of Principal Settlements, would result in a sustainable development strategy, which the land at South Cerney could contribute towards. The site [call for site submission] is therefore considered suitable for residential development due to its location and ability to positively contribute towards the Development Strategy of the Local Plan.</p>
<p>Nicholas Dummett (CPRE) 186</p>	<p>We fundamentally disagree with the underlying approach to the need for residential development and the calculation of the number of sites which need to be allocated in the future plan 2026 to 2041. We believe that the strategy for house building in Cotswold District in the period 2026 to 2041 should be one of restraint. To do otherwise would be unsustainable.</p> <p>Because it is very attractive, people will pay premium prices to live here and commute out of the area to work. Conversely the difficulty in building sufficient affordable houses means that people who work in the area cannot afford to live in the area resulting in commuting into the area. These commuting patterns are directly contrary to the spirit and provisions of the new proposed new plan policies on Sustainable Development in particular SD1(h), SD2 (4), SD4 note 5a.4.6 and Climate Change Mitigation CC8 on sustainable transport. Were the Council to restrict the number of free market houses then it would be easier to leverage high proportions of affordable housing without increasing the total number of houses beyond the assessed need. In addition it is clear both from the plan and residents' the reactions, such as at the open meeting at Moreton in the Marsh, that the area is running out of space for significant further development. The limitations of the National Landscape on the one hand and the propensity to flooding both near Morton and in the south of the district mean that there are limited opportunities for any major strategic sites. We therefore urge the Council to adopt the number required to only meet local need and to ensure that the plan policies set stringent criteria to be met.</p> <p>However far from painting a picture of restraint, the numbers in Local Plan Update show that the rate of permitting and building up to 2023 has been far too high leading to an excess of some 1000 dwellings over assessed need by end 2031. This excess is all for the commuter market. In effect the Cotswold District has been meeting the needs of neighbouring authorities. It is essential that this overbuilding be deducted from calculations of future housing need and, if possible, negotiate with neighbouring districts to take a corresponding increase in their housing requirements.</p> <p>Further, in the strategy the number of dwellings to be approved has been increased by 14% to allow for allocated sites dropping out. This allowance is around 1150 dwellings. In practice the demand for housing in</p>

<p>Sarah Hart (Moreton in Marsh Town Council) 156</p>	<p>Extract Point 6.7</p> <p>Moreton-in-Marsh is a transport hub, which includes a railway station. There are various sites located to the south, east and north of the town that are available for development and that are located outside the Cotswolds National Landscape and areas at higher risk of flooding. These sites would likely have access to the level of services, facilities and employment opportunities of a Main Service Centre. It is estimated that a combination of these development plots could deliver over 1,500 additional homes by 2041. Moreton-in-Marsh would therefore be identified as a broad location for strategic scale growth (Scenario 6). This approach would enable further development in the town to be planned comprehensively (e.g. transport, water / wastewater, education, etc.). In addition, unlike single large strategic sites of 500+ dwellings(15), which typically have long development lead-in times, the combination of the smaller development parcels on offer would enable shorter lead-in times. A longer-term vision, including additional development, may be required to deliver some infrastructure items such as a secondary school.</p> <p>MTC looks forward to the establishment of a Transport Hub at its Railway Station.</p> <p>As previously stated, half of the Town is situated in the Cotswold National Landscape, the other half in the Special Landscape Area. To suggest that land within a single parish boundary can be subject to separate policy would probably fail an equalities impact assessment. The Special Landscape Area (SLA), designation provides protection for locally significant and attractive landscapes that are of comparable quality to Areas of Outstanding Natural Beauty (AONB). They should be protected and enhanced, particularly through the planning process. All the SLAs in the district border the Cotswolds AONB.</p> <p>Suggesting that one location in Cotswold District takes half of the District’s housing requirement over a ten-year period is a poor option unless the residents of Moreton see such development in the context of both District and County Council plans. If access to education, employment, highways, and public transport opportunities are to be delivered in support of strategic scale growth, the public will need to be convinced otherwise Moreton in Marsh will simply be subject to more of the same incremental development.</p>
<p>David Hindle</p>	<p>Not needed</p>
<p>David Hindle</p>	<p>Out of CDC not needed, as the level of growth can accommodated within CDC.</p>
<p>Clare Charlton</p>	<p>Please be mindful of the significant developments occurring just outside the district and the potential transport impact eg Meon Vale and the Long Marsden airfield development in SUA District.</p>
<p>Fiona Perry</p>	<p>Agree with the comments posted by Clare Charlton and David Hindle</p>
<p>Richard Grant</p>	<p>Scenario 8: Request a neighbouring authority to deliver some of the housing need.</p> <p>2.69 We do not support this scenario. It would seem unlikely that Cotswold would find itself in a position where it is unable to accommodate its housing need, particularly given that it is clear that there has been over-delivery against need in the past.</p>
<p>Fairford Town Council</p>	<p>Scenario 8: Request neighbouring authority to deliver part of needs – This also seems to assume that it is a good thing to continue supporting longer-distance commuting between centres, which is presumably contrary to CE policies. We would question whether the Cotswolds (as part of Gloucestershire) really has a sufficiently positive economic strategy to justify this?</p>

Mrs Suzanna Berry	One of the visions of this plan is to deliver more social rented accommodation. There are over 30 people applying to access each available socially rented house in Cheltenham many more than those trying to access available accommodation in Moreton-in-Marsh. This would suggest building more housing where people want to live would be a better strategy.
Coates Parish Council	5.42 We support Scenario 8
Lucy White Planning	Based on the information available, the relatively limited housing requirement and the availability of land at the Principal Settlements, there is no evidence that Cotswold District Council would be incapable of meeting its needs within its administrative boundary.
Bathurst Estate 175	<p>Scenario 8 - there is no justifiable reason for accommodating any growth in neighbouring authority areas. Cotswold District has sufficient land to accommodate all of its requirement. In contrast, through the Duty to Cooperate, should Cotswold District look to accommodate any unmet need for outside the District?</p> <p>As such a mix of the above scenarios is the most appropriate. The list of Principal Settlements does need to be defined and consulted on and BE reserves its right to amend its comments set out above until the list is fixed.</p> <p>Delivery of any remaining housing after any strategic scale sites using non-strategic site allocations is supported. This will require a flexible approach to settlement boundaries and the planning balance between providing growth at sustainable locations versus landscape impact, It is not possible to allocate sites without some landscape impact, the key is to minimise harm and maximise public benefits.</p> <p>Call for Sites</p> <p>There are a number of locations which are appropriate for housing development but have been unable to come forward due to a quirk of the Local Plan, for example at Church Farm Siddington, which is a brownfield site that is part of Siddington, but current policy prohibits development.</p> <p>Another site is that at Kemble. Separate call for sites forms will be submitted for each site in due course.</p>
Chris Marsh (Pegasus) 334	Scenario 8: Request neighbouring authority to deliver some of the housing need 4.37. This option is not supported by Rosconn and should only be used as a last resort, and there is no evidence that other districts would agree to accommodate it. It is contended that, in part through sufficient allocations in Principal Settlements, the housing need over the 2026-2041 period can be met within the district.

Chris Marsh (Pegasus) 365	Scenario 8: Request neighbouring authority to deliver some of the housing need 4.37. This option is not supported by Rosconn and should only be used as a last resort, and there is no evidence that other districts would agree to accommodate it. It is contended that, in part through sufficient allocations in Principal Settlements, the housing need over the 2026-2041 period can be met within the district.
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