



COTSWOLD

District Council

Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET MEMBER FOR HOUSING AND PLANNING DECISION MEETING, 30 JUNE 2026
Subject	MORETON, CIRENCESTER AND CHIPPING CAMPDEN NEIGHBOURHOOD PLANS
Wards affected	Moreton-in-Marsh: Moreton East, Moreton West Cirencester: Abbey, Chesterton, Four Acres, New Mills, St. Michael's, Stratton, The Beeches, Watermoor Chipping Campden: Campden & Vale
Accountable member	Juliet Layton, Deputy Leader and Cabinet Member for Housing and Planning Email: juliet.layton@cotswold.gov.uk
Accountable officer	Mark Harrison, Senior Local and Neighbourhood Planning Policy Officer Email: mark.harrison@cotswold.gov.uk
Report author	Mark Harrison, Senior Local and Neighbourhood Planning Policy Officer Email: mark.harrison@cotswold.gov.uk
Summary/Purpose	Moreton 1. To decide on the CDC response (Annex A) to the Reg. 16 Moreton NP consultation. 2. To decide that CDC will procure through a bid process an Independent Examiner to undertake examination of the Moreton NP (Reg. 17). The appointment must be consented by the qualifying body (Moreton-in-Marsh Town Council). 3. Confirm that the comments agreed at part 1 (Annex A) and those submitted by other stakeholders (Annex H; collated and redacted), and the submission documents for Moreton (Annexes B-G), will be sent to the IE once appointed.



	Cirencester 4. To decide on the CDC response (Annex I) to the Reg. 16 Moreton NP consultation. 5. To decide that CDC will procure through a bid process an Independent Examiner to undertake examination of the Cirencester NP (Reg. 17). The appointment must be consented by the qualifying body (Cirencester Town Council). 6. Confirm that the comments agreed at part 1 (Annex I) and those submitted by other stakeholders (Annex O; collated and redacted), and the submission documents for Cirencester (Annexes J-N), will be sent to the IE once appointed. Chipping Campden 7. To decide on the response (see para 25) to the Examiner's recommended modifications (Annex R) to the Chipping Campden Neighbourhood Plan, to ensure it meets the basic conditions. 8. To approve a Referendum on the Chipping Campden Neighbourhood Plan (with accepted modifications), on Thursday 13 August 2016.
Annexes	Annex A – Moreton Reg 16 Consultation CDC Comments Annex B – Moreton NP Reg 16 Plan Document Annex C – Moreton NP Basic Conditions Statement Annex D – Moreton Consultation Statement Annex E – Moreton Equalities Impact Assessment Annex F – Moreton HRA Screening Annex G – Moreton SEA Screening Annex H – Moreton Reg 16 Consultation Reps Annex I – Cirencester Reg 16 Consultation CDC Comments Annex J – Cirencester NP Reg 16 Plan Document Annex K – Cirencester Basic Conditions Statement Annex L – Cirencester Consultation Statement



	Annex M – Cirencester HRA Screening Annex N – Cirencester SEA Screening Annex O – Cirencester Reg 16 Consultation Reps Annex P – Chipping Campden NP Reg 16 Plan Document Annex Q – Chipping Campden Examiner Fact Check Report Annex R – Chipping Campden Examiner Final Report (replaces Annex Q)
Recommendation(s)	That the Cabinet Member for Housing and Planning resolves: Moreton 1. To approve the CDC response (Annex A) to the Reg. 16 Moreton NP consultation. 2. To confirm that CDC will procure through a bid process an Independent Examiner to undertake examination of the Moreton NP (Reg. 17). The appointment must be consented by the qualifying body (Moreton-in-Marsh Town Council). 3. To confirm that the comments agreed at part 1 (Annex A) and those submitted by other stakeholders (Annex H; collated and redacted), and the submission documents for Moreton (Annexes B-G), will be sent to the IE once appointed. Cirencester 4. To approve the CDC response (Annex I) to the Reg. 16 Cirencester NP consultation. 5. To confirm that CDC will procure through a bid process an Independent Examiner to undertake examination of the Cirencester NP (Reg. 17). The appointment must be consented by the qualifying body (Cirencester Town Council). 6. To confirm that the comments agreed at part 1 (Annex I) and those submitted by other stakeholders (Annex O; collated and redacted), and the submission documents for Cirencester (Annexes J-N), will be sent to the IE once appointed.



	Chipping Campden 7. To consider (see para 25 below) the Examiner's recommended modifications (Annex Q) to the Chipping Campden Neighbourhood Plan, to ensure it meets the basic conditions. 8. To approve a Referendum on the Chipping Campden Neighbourhood Plan (with accepted modifications), on Thursday 13th August 2016.
Corporate priorities	All of the corporate priorities are captured by the draft Neighbourhood Plan: • Delivering Good Services • Responding to the Climate Emergency • Delivering Housing • Supporting Communities • Supporting the Economy
Key Decision	NO Whilst a Neighbourhood Plan could have a significant impact in regards part 2, in their current guises the proposed plans are not deemed to have a significant impact on the planning framework, particularly as none contain housing allocations.
Exempt	NO



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Consultees/ Consultation	The responses (Annex A/I) are specific to Cotswold District Council. We have consulted internally with officers who have specialist expertise in specific planning topics, as listed in the annexes. A comprehensive list of local, national and statutory consultees was prepared, by CDC, and informed of the Reg. 16 consultations for Moreton and Cirencester. Electoral Services have been consulted on the proposed Referendum Date for Chipping Campden.
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Moreton

1. EXECUTIVE SUMMARY

- 1.1 The Council should provide a response to the Moreton-in-Marsh draft Neighbourhood Plan (Reg. 16). A draft response for approval is at Annex A.

2. BACKGROUND

- 2.1 Moreton Town Council have prepared a draft Neighbourhood Plan 2018-2043. There is currently a public consultation from Thursday 16 April until Friday 29 May 2026.
- 2.2 This Reg. 16 consultation is the responsibility of CDC, and we have consulted other relevant stakeholders, statutory consultees, and people with local interests identified from Reg. 14.
- 2.3 Comments will be collated and redacted by CDC. Once an Independent Examiner is procured, the comments will be passed on to the IE who will consider them, along with the contents of the plan, and evidence provided, to determine whether the plan meets (with or without modifications) the basic conditions.

3. MAIN POINTS

Process

- 3.1 Once a draft neighbourhood plan has gone through its Reg 16 consultation, CDC should source an Examiner. The Examiner will consider the submitted documents and any comments made during the consultation period on the submitted plan.
- 3.2 The Independent Examiner will examine whether the plan meets the 'Basic Conditions' and other relevant legal requirements (e.g. consultation).
- 3.3 The Independent Examiner may recommend that the plan proceed to the referendum stage (i.e. that it meets all the legal requirements) or may suggest that modifications are needed to the plan before it can proceed to the referendum.
- 3.4 Following receipt of the recommendations, the next steps will be for another Cabinet Member Decision Meeting to decide on the following:
- Reg 18: Publication of the Examination Report and CDC Decision Statement;



- Arrange a Referendum for Moreton parish to vote on adopting the Neighbourhood Plan;
- Making (or adoption) of the Plan if a majority (>50%) support its adoption (this decision could be deferred to a later meeting).

Procurement

- 3.5 The Officer will instruct Legal Services (Publica) for procurement, and a tender document will be prepared with details of the bidding process and how bids will be assessed and decided by the Officer.
- 3.6 A tender document will be advertised on a relevant page of the CDC website, and shared with known planning consultancies offering this service incl. Intelligent Plans and Examinations Ltd who have completed examination of six previous plans for CDC.
- 3.7 The Officer will also use the NPIERS service (operated by RICS) which is an Examiner finder service. However, the Officer will have to complete their application form rather than share a tender document. Any examiners offering their services through NPIERS will still be assessed on the same basis as any consultants, except NPIERS examiners have a set daily rate. An NPIERS examiner will still have to agree to CDC's T&Cs.
- 3.8 In deciding on an Examiner, Paragraph 7 of Schedule 4B of the Town and Country Planning Act 1990 applies, particularly that the person appointed:
- a) Is independent of the qualifying body and the authority;
 - b) Does not have an interest in any land that may be affected; and
 - c) Has appropriate qualifications and experience.
- 3.9 As the qualifying body, Moreton Town Council must consent to the appointment. As such, the Officer can share all bids and/ or make recommendations with the Town Council.

4. ALTERNATIVE OPTIONS

- 4.1 The Council does not have to respond to the Reg. 16 consultation. However, an Examiner of the plan could rightly question this approach, and would likely insist on CDC providing comments, which would slow the examination process.



- 4.2 The Council could take a different approach to the bid process, e.g. only inviting bids from planning consultancies, or only using the NPIERS Examiner finder service. A hybrid approach is deemed fairest and likely to receive the most bids to give choice.

5. CONCLUSIONS

- 5.1 The response aims to provide supportive comments or queries to support Moreton Town Council in preparing a Neighbourhood Plan that meets the basic and legal requirements, whilst reflecting the objectives of their community.
- 5.2 It is recommended that the Cabinet Member for Housing and Planning resolves that CDC will procure through a bid process an independent examiner, suitably qualified and experienced, to undertake examination of the Moreton Neighbourhood Plan. The appointment must be consented by the qualifying body (Moreton Town Council).

6. FINANCIAL IMPLICATIONS

- 6.1 None direct.
- 6.2 The Council already have financial obligations towards the procedural elements of Neighbourhood Planning following Reg. 15. Some or all of this can be reclaimed from the Government (MHCLG).
- 6.3 Officer support towards Neighbourhood Planning is already budgeted for.

7. LEGAL IMPLICATIONS

- 7.1 None direct.
- 7.2 Once adopted the Neighbourhood Plan must be considered as part of relevant planning applications, and planning is a statutory function for Cotswold District Council.

8. RISK ASSESSMENT

- 8.1 As there are no legal nor financial responsibilities in the Council providing this response, the sole risk at this stage would be reputational as the comments can be made public through the Consultation Statement and publication of Neighbourhood Plan documents for examination.



9. EQUALITIES IMPACT

9.1 Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to eliminate discrimination and promote equality in relation to:

- Race
- Disability
- Gender, including gender reassignment
- Age
- Sexual Orientation
- Pregnancy and maternity
- Religion or belief

9.2 The response would indicate where the draft Neighbourhood Plan could discriminate against any of the above; there are none identified at this stage.

10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

10.1 Policy 1 is focused on Climate Adaptation, and Policy 2 is focused on Managing Flood Risk; both are considered in the response (Annex B).

10.2 Throughout preparation of the plan, and in the responses provided, consideration is given to the sustainable balance of development in line with national policy and guidance, including climate change/ adaptation.

11. BACKGROUND PAPERS

Annex A – Moreton Reg 16 Consultation CDC Comments

Annex B – Moreton NP Reg 16 Plan Document

Annex C – Moreton NP Basic Conditions Statement

Annex D – Moreton Consultation Statement

Annex E – Moreton Equalities Impact Assessment

Annex F – Moreton HRA Screening

Annex G – Moreton SEA Screening

Annex H – Moreton Reg 16 Consultation Reps



Cirencester

12. EXECUTIVE SUMMARY

- 12.1 The Council should provide a response to the Cirencester draft Neighbourhood Plan (Reg. 16). A draft response for approval is at Annex H.

13. BACKGROUND

- 13.1 Cirencester Town Council have prepared a draft Neighbourhood Plan (2041). There is currently a public consultation from Thursday 16 April until Friday 29 May 2026.
- 13.2 This Reg. 16 consultation is the responsibility of CDC, and we have consulted other relevant stakeholders, statutory consultees, and people with local interests identified from Reg. 14.
- 13.3 Comments will be collated and redacted by CDC. Once an Independent Examiner is procured, the comments will be passed on to the IE who will consider them, along with the contents of the plan, and evidence provided, to determine whether the plan meets (with or without modifications) the basic conditions.

14. MAIN POINTS

Process

- 14.1 Once a draft neighbourhood plan has gone through its Reg 16 consultation, CDC should source an Examiner. The Examiner will consider the submitted documents and any comments made during the consultation period on the submitted plan.
- 14.2 The Independent Examiner will examine whether the plan meets the 'Basic Conditions' and other relevant legal requirements (e.g. consultation).
- 14.3 The Independent Examiner may recommend that the plan proceed to the referendum stage (i.e. that it meets all the legal requirements) or may suggest that modifications are needed to the plan before it can proceed to the referendum.
- 14.4 Following receipt of the recommendations, the next step will be for another Cabinet Member Decision Meeting to decide on the following:
- Reg 18: Publication of the Examination Report and CDC Decision Statement;



- Arrange a Referendum for Cirencester parish to vote on adopting the Neighbourhood Plan;
- Making (or adoption) of the Plan if a majority (>50%) support its adoption (this decision could be deferred to a later meeting).

Procurement

- 14.5 The Officer will instruct Legal Services (Publica) for procurement, and a tender document will be prepared with details of the bidding process and how bids will be assessed and decided by the Officer.
- 14.6 A tender document will be advertised on a relevant page of the CDC website, and shared with known planning consultancies offering this service incl. Intelligent Plans and Examinations Ltd who have completed examination of six previous plans for CDC.
- 14.7 The Officer will also use the NPIERS service (operated by RICS) which is an Examiner finder service. However, the Officer will have to complete their application form rather than share a tender document. Any examiners offering their services through NPIERS will still be assessed on the same basis as any consultants, except NPIERS examiners have a set daily rate. An NPIERS examiner will still have to agree to CDC's T&Cs.
- 14.8 In deciding on an Examiner, Paragraph 7 of Schedule 4B of the Town and Country Planning Act 1990 applies, particularly that the person appointed:
- a) Is independent of the qualifying body and the authority;
 - b) Does not have an interest in any land that may be affected; and
 - c) Has appropriate qualifications and experience.
- 14.9 As the qualifying body, Cirencester Town Council must consent to the appointment. As such, the Officer can share all bids and/ or make recommendations with the Town Council.

15. ALTERNATIVE OPTIONS

- 15.1 The Council does not have to respond to this consultation. However, an Examiner of the plan could rightly question this approach, and would likely insist on CDC providing comments, which would slow the examination process.



- 15.2 The Council could take a different approach to the bid process, e.g. only inviting bids from planning consultancies, or only using the NPIERS Examiner finder service. A hybrid approach is deemed fairest and likely to receive the most bids to give choice.

16. CONCLUSIONS

- 16.1 The response aims to provide supportive comments or queries to support Cirencester Town Council in preparing a Neighbourhood Plan that meets the basic and legal requirements, whilst reflecting the objectives of their community.
- 16.2 It is recommended that the Cabinet Member for Housing and Planning resolves that CDC will procure through a bid process an independent examiner, suitably qualified and experienced, to undertake examination of the Cirencester Neighbourhood Plan. The appointment must be consented by the qualifying body (Cirencester Town Council).

17. FINANCIAL IMPLICATIONS

- 17.1 None direct.
- 17.2 The Council already have financial obligations towards the procedural elements of Neighbourhood Planning following Reg. 15. Some or all of this can be reclaimed from the Government (MHCLG).
- 17.3 Officer support towards Neighbourhood Planning is already budgeted for.

18. LEGAL IMPLICATIONS

- 18.1 None direct.
- 18.2 Once adopted the Neighbourhood Plan must be considered as part of relevant planning applications, and planning is a statutory function for Cotswold District Council.

19. RISK ASSESSMENT

- 19.1 As there are no legal nor financial responsibilities in the Council providing this response, the sole risk at this stage would be reputational as the comments can be made public through the Consultation Statement and publication of Neighbourhood Plan documents for examination.

20. EQUALITIES IMPACT

- 20.1 Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to eliminate discrimination and promote equality in relation to:
- Race
 - Disability
 - Gender, including gender reassignment
 - Age



- Sexual Orientation
- Pregnancy and maternity
- Religion or belief

20.2 The response would indicate where the draft Neighbourhood Plan could discriminate against any of the above; there are none identified at this stage.

21. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

21.1 Throughout preparation of the plan, and in the responses provided, consideration is given to the sustainable balance of development in line with national policy and guidance, including climate change/ adaptation.

22. BACKGROUND PAPERS

Annex I – Cirencester Reg 16 Consultation CDC Comments

Annex J – Cirencester NP Reg 16 Plan Document

Annex K – Cirencester Basic Conditions Statement

Annex L – Cirencester Consultation Statement

Annex M – Cirencester HRA Screening

Annex N – Cirencester SEA Screening

Annex O – Cirencester Reg 16 Consultation Reps



Chipping Campden

23. EXECUTIVE SUMMARY

- 23.1 The Council must decide on the Examiner's Recommendations and arrange a referendum on the Chipping Campden Neighbourhood Plan.

24. BACKGROUND

- 24.1 CDC approved a Regulation 16 consultation on the Chipping Campden Neighbourhood Plan, which was undertaken and ended on 15th August 2025.
- 24.2 The responses have been received, collated and redacted. These along with the submission documents of the Neighbourhood Plan were passed to an Independent Examiner (once procured) to make recommendations.
- 24.3 The examination (including a hearing) has now concluded, and on 12th June 2026, CDC received the Examiner's Report, with recommended modifications to make in order for the Neighbourhood Plan to meet the basic conditions.

25. MAIN POINTS

Recommended Modifications

Policy 1 – see para 7.19 of Annex Q

- 25.1 Support this recommendation, which provides greater clarity in supporting sustainable development, relevant to Chipping Campden's town centre.

Policy 2 – see para 7.28 of Annex Q

- 25.2 Agree with the rationale to remove retail aspects of the community facilities policy. Support the important safeguard of residential amenity in regards land for human burial purposes.

Policy 3 – see para 7.35 of Annex Q

- 25.3 Agree with the further clarity provided by this recommendation, in order to achieve good design and sustainable development.

Policy 4 – see para 7.39 of Annex Q

- 25.4 Do not agree with this recommendation, and propose to partially dismiss it.



25.5 The Examiner supports the identification of all the non-designated heritage assets proposed by Chipping Campden Town Council. The IE has proposed the following wording modification to the policy:

‘The following features are designated as non-designated heritage assets:’

to

‘The Plan identifies the following features as non-designated heritage assets for the purpose of the application of Policy EN12 of the Local Plan’.

25.6 The first part of the policy: *The Plan identifies the following features as non-designated heritage assets* can be supported. Particularly the change of the term ‘designated’ to ‘identifies’; as the original term conflicts with the fact they are non-designated heritage assets (i.e. not listed).

25.7 However, the second part of the recommended modification should be dismissed: *for the purpose of the application of Policy EN12 of the Local Plan.*

25.8 Heritage assets are covered thoroughly by Chapter 16 of the NPPF, and in the glossary refers to heritage assets as those that are designated or identified by a local planning authority (which would include through adoption of a Neighbourhood Plan).

25.9 One of the basic conditions is:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;

25.10As proposed, this restricts the identification of these NDHAs only to circumstances where Policy EN12 can be applied, and potentially not in circumstances described in Chapter 16 of the NPPF. Policy EN12 would apply anyway even if not specifically referenced, and will soon be replaced/ retitled.



25.11 Considered that the second part of the modification is not necessary in order to meet the basic conditions, and would better meet the basic condition highlighted above, and continue to contribute to sustainable development, without this part.

25.12 Consulted Justin Ayton (Senior Conservation and Design Officer at CDC) who stated:

25.13 'Non-designated heritage assets' are a type of 'Heritage asset' as defined in the Glossary of the N.P.P.F.:

*"Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and **assets identified by the local planning authority (including local listing)**"*

25.14 Locally-listed assets are non-designated heritage assets, as is confirmed in Historic England's advice note 7, Local Heritage Listing: Identifying and Conserving Local Heritage:

"Local heritage lists are lists of non-designated heritage assets (NDHAs) which, due to their local heritage significance, have been identified as being of value to a particular place and the community who live and work there. All NDHAs (not just those included in local heritage lists) are afforded a degree of protection through the planning system, although this is less than the protection given to designated heritage assets' (paragraph 1).

25.15 Consequently, non-designated heritage assets are a type of heritage asset for the purposes of the NPPF, the Local Plan, and any and all relevant national & local policy & guidance; not merely Policy EN12 alone.

25.16 On this basis, and for clarity, Policy 4 should start with this wording:

The Plan identifies the following features as non-designated heritage assets:

[followed by the list of NDHAs]



Policy 5 – see para 7.49 of Annex Q

25.17 Agree with the need to modify this policy, particularly deleting part 1 as explained by the Examiner in para 7.47. Also agree with rationalising the criteria of part two.

25.18 However, the re-written policy is not clear whether there is a sequentially preferential order of:

- Campden Local Nature Recovery Areas
- Elsewhere in CC Parish
- Locations contributing to Gloucs LNRS

Or if any of these are equally as acceptable as each other. Confusion arises through the term “first option”, but then the use of “or” thereafter.

25.19 The IE has been asked to clarify this wording through the fact-checking process.

Policy 6 – see para 7.96 of Annex Q

25.20 Understand the rationale for the deletion of LGS19 (Hoo West) and LGS20 (Hoo East). As mentioned in the hearing, multiple fields and arbitrary boundaries (not following natural features or field boundaries) has probably lead to the Examiner determining it is not local in character.

25.21 The recommendation to delete LGS21 (The Cley) is more tenuous. However, believe the Examiner recognises this, and explains clearly culminating in the conclusion at para 7.83.

25.22 The Examiner recommends to retain LGS22 (The Craves) at para 7.94.

25.23 Can support the additional criteria to the policy.

26. ALTERNATIVE OPTIONS

26.1 CDC could accept or reject any/all recommendation modifications if they feel it is not necessary in order for the Plan to meet the Basic Conditions. CDC have procured an experienced Independent Examiner to make these recommendations.

27. CONCLUSIONS

27.1 It is recommended that the modifications of Policies 1-3, 5 and 6 are accepted by CDC, and integrated into the Neighbourhood Plan.

27.2 It is recommended that modification 4 is partially accepted and partially dismissed.

Referendum

27.3 Upon making this decision, it triggers a 56 day window in which to hold a referendum. This is dictated by Regulation 2A in the Neighbourhood Planning (Referendums) Regulations 2012. CDC should also provide 28 days' notice of a referendum. Therefore, in consultation with Electoral Services, Thursday 13th August is the optimal date. This should also avoid a Local Plan consultation to follow.



28. FINANCIAL IMPLICATIONS

- 28.1 The Council already have financial obligations towards the procedural elements of Neighbourhood Planning following Reg. 15, including a referendum. Some or all of this can be reclaimed from the Government (MHCLG).
- 28.2 Officer support towards Neighbourhood Planning is already budgeted for.

29. LEGAL IMPLICATIONS

- 29.1 Once adopted the Neighbourhood Plan must be considered as part of relevant planning applications, and planning is a statutory function for Cotswold District Council.

30. RISK ASSESSMENT

- 30.1 CDC could fund the referendum, and other elements of the Plan process, only for the Plan to be withdrawn or voted 'NO', meaning some or all of the funds would not be able to be claimed back from the Government.

31. EQUALITIES IMPACT

- 31.1 Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to eliminate discrimination and promote equality in relation to:
- Race
 - Disability
 - Gender, including gender reassignment
 - Age
 - Sexual Orientation
 - Pregnancy and maternity
 - Religion or belief
- 31.2 The Examiner has ensured the Plan meets this legal duty, and make recommendations if it appears to discriminate.

32. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 32.1 The Plan contains policies on Nature Recovery Areas and Local Green Spaces (some of which are proposed for their rich wildlife) (see Annex A).
- 32.2 The Examiner has ensured the Plan does not contradict the sustainable balance of development in line with national policy and guidance, including climate change/adaptation.

33. BACKGROUND PAPERS

Annex P – Chipping Campden NP Reg 16 Plan Document
(Full library of NP evidence documents can be found [here](#)).

Annex Q – Chipping Campden NP Examiner's Fact Check Report

Annex R - Chipping Campden NP Examiner's Final Report (replaces Annex Q).