

Comment ID: 9344

Location in consultation document: Indicative maps

Name: P Collison

Comment: Major investment to upgrade sewage and water supply infrastructure for Chipping Campden, together with increased capacity for doctors' surgery and addressing the existing poor car parking provision

Comment ID: 9345

Location in consultation document: Infrastructure needs

Name: P Collison

Comment: Major infrastructure investment will be required for chipping Campden to meet additional housing, particularly in sewage treatment and in services such as doctors' surgery which are already strained

Comment ID: 10348

Location in consultation document: Question 1

Name: Patricia

Comment: Reluctantly only Scenario 1. The others are imbalanced or simply not feasible in this generation and certainly not by 2043. Moreton cannot double in size with no chance of the infrastructure being more than double to cope. It already can't cope. Ask Thames Water or the NHS or the Education Dept. if they can more than double their capacity in 20 years. Ask the Highways agency where the traffic will be routed and park when it needs to visit an under resourced service centre or high street business.

I feel this whole process is being approached the wrong way round. People like me cannot realistically support or oppose any scenario when there is absolutely no context around how such an enormous new housing plan would be supported in every aspect which affects the lives of us all.

Comment ID: 10352

Location in consultation document: Question 2

Name: Patricia

Comment: Absolutely not. This Government has proven that it doesn't understand local issues (e.g. Farmers) or peoples concerns (e.g. Winter fuel allowance) and not even business (e.g. raising of taxes and NI leading to less employment) so why should the Council agree to an unsustainable target? Unsustainable – not feasible.

Comment ID: 10353

Location in consultation document: Question 3

Name: Patricia

Comment: To a very small extent. If a plot of land that could accommodate one property comfortably in a Principle Settlement could be designed to fit 3 or 4 apartments or similar that would still be in keeping with the Cotswold landscape and was no more than 2 (max 3) floors high, then this could contribute more towards the total for a given acreage.

Comment ID: 10356

Location in consultation document: Question 4

Name: Patricia

Comment: No, I don't think this level of growth is remotely sustainable.

I have lived in Broadwell for 25 years, 3 miles from Moreton-in-Marsh, and in 2000 the Fosse Way (A429) between here and Stow was stationary during busy times, and always during the summer.

No significant improvements in infrastructure have been made since then and it is now beyond breaking point and the potholes and constant breaking up of the road surface bear this out, as does the DfT data from 2017.

Moreton's aging railway station cannot cope today as it is at full capacity. Parking is just not possible unless you arrive a day in advance so it is not conceivable to ask more people to use this facility and the lines have been upgraded to their maximum capacity already.

Public transport via bus is already severely limited due to traffic congestion and journey times grow every year for the same distance, so the costs keep rising, forcing people not to travel and interact socially because it is too expensive and takes too long.

All developments will need huge levels of HGV traffic which will further crucify the broken state of local roads and they simply never get repaired. I know of 2 road traffic accidents locally that were caused by drivers swerving to avoid potholes.

Health services were stretched in 1996 and despite the addition of the North Cotswold Surgery / Hospital in Moreton-in-Marsh, appointments are at 8 weeks and there is no capacity to expand this facility. Staff are leaving already and recruitment is at zero because health care professionals don't want the hassle of travelling in such a congested area and the abuse that comes with understaffed medical practices.

In Moreton, new houses have already been built on flood plains. In 2007, we had one of the Country's worst floods and the whole town was underwater. Many businesses never came back. Hundreds of houses now sit on this once flooded land, and nothing has been done to prevent this from happening again. All of these new houses will flood again one day. That is certain.

But we are now planning more houses on land even more likely to flood, just to meet a made-up housing target. Who is thinking of the people whose lives will be wrecked by this mindless strategy? Not the Council if you back these plans.

I could continue but I feel my efforts are wasted on a feeble attempt to challenge this incompetent bunch of clueless career politicians who could not care less about others and will not be around if this ever comes to pass.

Comment ID: 10358

Location in consultation document: Question 5

Name: Patricia

Comment: Other matters that need considering are pretty much everything else other than the unrealistic target for new build homes.

It seems inconceivable to me that any Government could impose such a scale of house building without first considering targets for the things these new people coming into the area, well over 50,000 if the 18,650 was ever reached, will need to live.

Where are the targets for;

- School places, senior, junior, primary and infant
- Childcare facilities for pre school
- Nursing homes; state funded
- Employment; they can't all work in Aldi
- Traffic congestion; Moreton High St. & Stow can't cope currently and are at standstill daily and villages have become rat runs as a result with cars avoiding the jams. These villages are now dangerous to walk in because cars speed through them and have knocked over many pedestrians recently. This can only get worse without a major bypass which is not what the area wants. Therefore, increased traffic flow has to be avoided another in other ways, and 18,500 plus new houses is not one of them
- Parking; there is nowhere to park as it is for High Street businesses and no target or location for more parking
- Noise & air pollution; we are already breaking laws in Moreton and Stow because of stationary lorries running diesel engines and going nowhere
- Damage to the wildlife by removing huge parts of their habitat and poisoning the environment with construction fumes
- Irreversible impact on the natural landscape of ugly urban style townships built where they cannot sustain their inhabitants
- Crime; with the mass unemployment that would result in thousands of houses and no jobs for people, crime will certainly increase and local people would end up afraid to go out as they once did
- Healthcare; how many new Doctors & nurses are targeted to be employed in each area?

- Where will these Doctors & nurses work? There are no new hospitals or surgeries mentioned anywhere in this Plan
- Dentists; How many new NHS dentists will be targeted to cope with the influx of people who won't have jobs so cannot pay to go to a private dentist
- Community Centres; How many new community centre facilities will be built to create recreation for the influx of new younger people
- Sports Facilities; How many new playing fields, football/rugby pitches, gyms, sports centres will be built under this Plan and where is the target?
- Thames Water; how is going to help Thames Water double the size of it's water supply and drainage capability when it fails on a monthly basis already and is effectively a bankrupt business as it is, despite trebling the average water bill in the Cotswolds
- Sewage; How many new sewage plants will be built under this Plan? The Cotswold district sewage system is currently not fit for purpose and blockages are a regular occurrence
- National Grid; where is the target for new power stations to be built to power all these homes? We have monthly power cuts in Moreton & Stow, from 10 minutes to 3 days. They are a regular feature because the infrastructure carrying electricity is decaying and overloaded - it is always going down. Where are the numbers to show where 18,500 plus new homes will get their power from?
- Food; where will all these new homes go to buy weekly shopping? What is the target for new supermarkets with parking that is not always full as it currently is with the few we have

These are some of the matters that spring to mind, the detail of which is noticeably lacking in this Local Plan.

Whilst I understand all of the detail on numbers, facilities, amenities and employment cannot be determined at this stage, setting a specific number of 18,650 new homes in a largely ANOB seems perfectly fine to target, but without a single consideration of any numbers or even ideas around how these people will live, work, get healthcare, childcare, shop or engage in any social activity to keep fit. Not a mention of any of this.

Why not? How can we support any scenario without this information?

Is no one responsible for joined up thinking when it comes to new housing developments under a Labour Government?

This whole project is fundamentally flawed and doomed from the start if more basic homework and planning is not done before any final decisions are made.

Comment ID: 10362

Location in consultation document: Question 6

Name: Patricia

Comment: Whilst I agree that a Vision and Objectives are important and these words tick some boxes in this regard, they are rather too high level and therefore somewhat meaningless, given that the Government has demanded that you as a Council somehow accommodate 18,650 new homes without and consideration of the basic infrastructure that would be required to even begin a planning process.

Talk of Biodiversity, renewables, housing mix, zero carbon, sustainable transport and sustainable communities are laudable and what we ultimately want and need, you are faced with crude number as your sole target and no financial roadmap as to how these desirable elements of the Vision & Objectives could possibly form part of our future.

My concern is that this is not achievable without joined up thinking, then joined up planning and resourcing before numbers of new homes can possibly be committed to.

These are the reasons I think that, as I set out in my answer to Question 5;

Other matters that need considering are pretty much everything else other than the unrealistic target for new build homes.

It seems inconceivable to me that any Government could impose such a scale of house building without first considering targets for the things these new people coming into the area, well over 50,000 if the 18,650 was ever reached, will need to live.

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Is no one responsible for joined up thinking when it comes to new housing developments under a Labour Government?

This whole project is fundamentally flawed and doomed from the start if more basic homework and planning is not done before any final decisions are made.

Comment ID: 9696

Location in consultation document: Scenario 2

Name: Patricia Randall

Comment: There is a full and well constructed reply to this from Simon Collier Bristol representing Poulton Parish Council . The plan in its present form is totally unacceptable to the area. Too many words, not enough thought.

Comment ID: 9649

Location in consultation document: Question 4

Name: Patrick Mansell

Comment: I write from Poulton, a small village. There are many reasons why the Plan Proposal for 30 new houses to be built here is open to objection: lack of infrastructure and facilities, an inadequate sewage system, limited road and rail linkage, limited public transport, increasing flooding issues (the village has clay beneath the skim of brash). In short, it is a poor target for development.

Of course, targets underlie the Plan because that is where the national plan begins, as a central government objective handed down. The targets in Gloucestershire for or around some existing settlements come close to fantasy unmoored from reality. Neighbouring Driffield comes to mind here.

The area is full of small Cotswold villages. Where demonstrable, their populations have remained static over decades and even centuries. (Poulton is a verifiable example.) This is because there is, for most of the reasons above, limited scope for expansion: lack of jobs, transport, connections primary schooling, geography etc. There are in short manifold reasons small villages are realistically just that.

A more intelligent vision for the necessary housebuilding is required, more visibly based on inventory of what is available and careful assessment of what is sensible and practicable.

Comment ID: 9324

Location in consultation document: Table 4

Name: Paul

Comment: The expansion or doubling in size of Kemble by 587 new houses is unsustainable and out of proportion in terms of scale.

It extends the current village boundary and loses valuable farmland; there are insufficient facilities in the village and lack of proper, affordable transport links to employment centres. There are no employment opportunities in reasonable (and affordable) commuting distance;

The access roads into and surrounding the village are already dangerously busy, and this is before the planned Cirencester expansion.

Sewage, water and other services are already under strain in the village and there is little or no capacity to improve or extend them.

CDC should look again at building smaller estates in more villages (eg Coates), rather than mass building in unsustainable small settlements such as Kemble.

Comment ID: 10895

Location in consultation document: 5. Revised vision and objectives

Name: Paul

Comment: The vision claims to be "respecting the district's unique landscape, heritage, and character". I would argue that building large settlements on the outskirts of existing villages such as Ampney Crucis does the opposite. By increasing pressure on existing infrastructure and services, the addition of new infrastructure, light pollution, traffic increase on tiny roads, and the loss of greenfield wildlife habitats, the areas unique landscape and character will be lost for ever. The proposals for "strategic extensions" are therefore are in direct conflict with your vision

Comment ID: 9261

Location in consultation document: Indicative figures

Name: Paul Baker

Comment: Regarding the water supply and wastewater treatment infrastructure, you admit that Thames Water is unlikely to have the budget to make the improvements required, and there is no doubting that the existing services won't cope (they struggle now, with water cuts and flooding) and you are proposing to increase the number of houses by 300% so how on that basis is the Ampney Crucis development viable?

Comment ID: 9262

Location in consultation document: Question 4

Name: Paul Baker

Comment: Ref Ampney Crucis. No I don't think the propose development is sustainable. The village infrastructure can't be upgraded sufficiently due to the conservation area and historic nature of the buildings and architecture in the village.

Comment ID: 9260

Location in consultation document: Scenario 5

Name: Paul Baker

Comment: The Strategy Options Technical report admits that the settlements over 500 houses will rely on third parties to deliver the infrastructure changes required to support such large developments. Therefore you have no direct plans for this infrastructure. Ampney Crucis will as it stands not support a 660 house development - the access is insufficient, there are no amenities in the village, the school cannot cope with such numbers. I could go on. So how do you propose to build the infrastructure require without massively impacting the conservation area in the village, the listed properties in the village, and the rural cotswold beauty of the village?

Comment ID: 10683

Location in consultation document: How did the Council select locations?

Name: Paul Morcom

Comment: The selection methodology should include criteria that ensures the characteristic of the area/village/town is not impacted by the development. Infill should be prioritised. Changess to village entrances should be rejected.

Comment ID: 10676

Location in consultation document: Increasing density

Name: Paul Morcom

Comment: The CDC strategic plan should be limited to developing existing towns and not impact small villages, unless there is a very sympathetic development potential of an appropriate size within the village boundaries. Villages should not be extended outward, particularly along the access roads.

Comment ID: 10708

Location in consultation document: Indicative maps

Name: Paul Morcom

Comment: There are many villages, of similar size to Coln St Aldwyns, Haterop and Quenington) that have no allocation. For example Southrop, Eastleach, Aldsworth, Sherbourne - they should be included individually or should be included in the "Cluster". However, I am against clustering and the plan should be more specific about each village. The target being put on Coln St Aldwyns, Haterop and Quenington is significantly disproportionate to other villages in the immediate area (green shaded part of the indicative maps_.

Comment ID: 10678

Location in consultation document: Question 1

Name: Paul Morcom

Comment: Scenarion 4 - minimal impact on the countryside. The rural areas already have poor roads and public transport infrastucture, building in these area would just increase the issues. There is very little employment in the rural areas, so families would be forced to own multiple cars and drive everywhere.

Comment ID: 10680

Location in consultation document: Question 2

Name: Paul Morcom

Comment: No! The CDC should challenge the Government if it sees that the target given cannot be achieved through sensible and appropriate development. The government should reconsider its allocation to rural districts and focus development on urban areas, where the housing and employment needs are greatest.

Comment ID: 10681

Location in consultation document: Question 3

Name: Paul Morcom

Comment: The main question is who is the housing need for and then build the type of property to meet this requirement. Do not be driven by the profiteering of property developers.

Comment ID: 10704

Location in consultation document: Question 6

Name: Paul Morcom

Comment: This section does not provide significant viasion on the future protection of the nature of the Cotswold villages and towns. The viallges and towns as is, is why people live and visit the Cotswolds. It is significant to the diversity and beauty of the Cotswolds. Village structure and appraches need to be preserved.

Comment ID: 10673

Location in consultation document: Scenario 4

Name: Paul Morcom

Comment: This option would make sense. The roads are already poor in the rural areas and not supported by a good public transport system. Increasing the population in areas that have poor roads and no/little public transport would put an increase reliance on vehicle ownership often multiple vehicles with increased traffic and congestion and pollution in very sensitive areas.

Comment ID: 10675

Location in consultation document: Scenario 6

Name: Paul Morcom

Comment: If this option is selected then sites in rural villages should be kept within the village boundary and not change the sensitive entrances to villages which characterise the Cotswold villages

Comment ID: 10690

Location in consultation document: Table 2

Name: Paul Morcom

Comment: The target allocation for Coln St Aldwuns/Hatherop and Quenington is disproportionately high in relation to other villages area shared in light green on the maps. This may be for the potential redevelopment of the Xylem industrial site in Quenington. The development plans are not known yet and even if some of the target is achieved by this redevelopment of the industrial site in Quenington, it still leaves a significant number of sites to be found in the villages. This number should be reduced to zero, same as other villages in these areas and be a bonus if the Quenington industrial site redevelopment actually happens.

Comment ID: 10695

Location in consultation document: Table 2

Name: Paul Morcom

Comment: The Additional New Homes for Coln St Aldwyns, Haterop and Quenington should be zero and the discussion on the Quenington Industrial site redevelopment accelerated and a specific number of houses stated as Existing permissions and allocations.

Comment ID: 10697

Location in consultation document: Table 2

Name: Paul Morcom

Comment: It is not appropriate to "Cluster" Coln St Aldwyns, Hatherop and Quenington. They should be separated to clearly show the potential impact and target on each village. The villages each have different opportunities for development and should be treated separately.

Comment ID: 10677

Location in consultation document: The Council's preferred option

Name: Paul Morcom

Comment: Small rural villages should be exempt from any significant development, unless can be achieved within the village boundary

Comment ID: 8713

Location in consultation document: Increasing density

Name: Paul Morrish

Comment: There has to be increased density if we are to accomodate more housing without using rural land. But mistakes in the past tell us that it has to be desirable higher density accomodation.

Comment ID: 8714

Location in consultation document: Question 1

Name: Paul Morrish

Comment: Scenario 5 seems the best compromise.

Comment ID: 8715

Location in consultation document: Question 2

Name: Paul Morrish

Comment: The council should look at all possible sites. A lot depends on whether car dominance continues. If every home is to have a garage and parking space in the road then development rapidly becomes unsustainable.

Comment ID: 8716

Location in consultation document: Question 3

Name: Paul Morrish

Comment: Yes, higher density housing is the only way to accomodate more people without increasing the footprint.

Comment ID: 8717

Location in consultation document: Question 6

Name: Paul Morrish

Comment: It is not surprising that Moreton in Marsh residents are objecting, and a fairer distribution of new homes may be possible.

Comment ID: 9025

Location in consultation document: Question 6

Name: Paul Walker

Comment: While I support the concept of greater public transport and cycling, Stow-on-the-Wold is a dangerous and difficult place for cycling, with narrow and ever busier roads in the area. Traffic density has greatly increased in the last 20 years, including heavy lorries going through the Town. Increased housing will only exacerbate an already log jammed road system, with the noise and exhaust pollution that goes with it. Many houses lack off road parking, so EV ownership is not financially viable even if public chargers were increased.

Comment ID: 9026

Location in consultation document: Infrastructure needs

Name: Paul Walker

Comment: Many Grade 2 listed houses in the area are uninsulated and the listing prevents affordable effective improvements.

Comment ID: 9822

Location in consultation document: Question 1

Name: Paula Deeley

Comment: I object to Scenario 5. It will do more harm than benefit to a number of rural communities. It is contrary to the Vision objectives stated in Para 5.2. Siddington will be forced to grow disproportionately, destroying its unique identity. Siddington is not a Principal settlement. I support smaller developments with affordable energy-efficient homes, including some within the Cotswolds National Landscape.

Comment ID: 9828

Location in consultation document: Question 2

Name: Paula Deeley

Comment: No. The Government Housing target is based on a flawed algorithm - just like the disastrous one used to calculate A' level results during the Covid pandemic. I think the Council should develop a Local Plan based on sound local knowledge. That will be a positive legacy. Challenge the Government because that is the right thing to do to protect good planning. The overall risk of adhering to a flawed target is higher than refusing to accept it and providing good evidence to show why it is flawed.

Comment ID: 9831

Location in consultation document: Question 3

Name: Paula Deeley

Comment: I do not support increased housing density on new housing developments just to meet the flawed Government target. I support developments with affordable energy efficient homes which have gardens and good sized green spaces around them. That is far better for a community's wellbeing and in keeping with the character of the Cotswolds District.

Comment ID: 9832

Location in consultation document: Question 6

Name: Paula Deeley

Comment: I agree with the Vision and objectives but it appears Cotswolds District Council do not. Why else would the Council support Scenario 5 which clearly contradicts the stated objectives? Siddington and other communities are being told that the proposal is to impose disproportionate amounts of housing on them, which does not respect their current character, because of the restrictions on building within the National Landscape. The Vision and objectives are meaningless words if they are not followed in practice.

Comment ID: 10764

Location in consultation document: Scenario 5

Name: Penelope

Comment: Broadwell has already accommodated a significant amount of new housing over the past decade. The Local Plan appears to treat this previous delivery as justification for requiring the village to continue delivering housing at a faster and disproportionate rate compared with other settlements that have delivered little or no housing. This approach, described in the plan as “windfall” development, is fundamentally flawed.

Past development should not be used as a rationale for further accelerated growth. Doing so effectively penalises villages that have already contributed to district-wide housing supply, while allowing others to avoid comparable levels of growth. This is neither equitable nor consistent with the principles of sustainable development or spatial balance set out in national and local planning policy.

Broadwell is a small rural village with a sensitive historic character. Further housing development, particularly at the scale implied by the Local Plan and potential additional sites, risks materially harming the character, appearance and setting of the village. Incremental growth of this nature would undermine the settlement’s historic form and erode its rural identity.

Impact on infrastructure, access and highway safety

The existing road network in and around Broadwell is narrow and constrained, with limited capacity to safely accommodate additional traffic. Increased housing numbers would exacerbate traffic congestion, raise highway safety concerns for pedestrians and cyclists, and place further pressure on already limited infrastructure. These impacts have not been adequately addressed in the plan.

A significant proportion of the district is designated as National Landscape (formerly AONB), reflecting its exceptional sensitivity and importance. The Local Plan’s approach to meeting increased housing targets does not sufficiently acknowledge these constraints or demonstrate how development pressures will be avoided in villages such as Broadwell that lie within or adjacent to protected landscapes.

I am concerned that the consultation period has taken place over the Christmas holiday period, with an extremely tight deadline. This has limited the ability of local residents to fully engage with complex and extensive documentation, which undermines meaningful community participation.

Comment ID: 9824

Location in consultation document: Question 1

Name: Penny Lillie

Comment: I object to all scenarios. Even the lowest proposed density of about 100 dwelling/hectare is high density housing in the form of dense terraces, urban apartments. This level of density would be found closer to town centres such as inner London mansion blocks, some Bath, Bristol, Oxford or Cheltenham central sites. This is very dense for rural Cotswolds settings, but more normal near transport hubs or main service centres.

Comment ID: 9819

Location in consultation document: Question 2

Name: Penny Lillie

Comment: No, CDC should not be locating development in locations that are considered unsustainable just to meet government housing targets.

The government's standard method housing target, when applied to Cotswold District, produces perverse outcomes; it pressures the council to consider development in locations it itself defines as unsustainable, thereby undermining national objectives on climate change, sustainable transport and protection of valued landscapes.

Rather than promoting genuinely sustainable development , the current housing target risks forcing growth into unsuitable locations, increasing car dependency , infrastructure strain, and community opposition.

A housing target that can only be met by building in locations deemed unsustainable by the council itself, is not fit for purpose.

Comment ID: 9826

Location in consultation document: Question 3

Name: Penny Lillie

Comment: I support higher density development in the form of high rise condominiums , within the context of cities. This is successfully done in urban cities in North America. Build Up Not Out to support the housing need where there are jobs, sustainable transport and existing infrastructure.

Comment ID: 10041

Location in consultation document: Question 4

Name: Penny Lillie

Comment: The proposed level of development up to and beyond 2043 is NOT considered sustainable.

In terms of Fairford , the proposal to increase Fairford's housing stock by 70% with 1252 new dwellings at a density of 100 dwellings per hectare would result in an unprecedented density and scale of development , overwhelming the towns narrow streets, historic centre, local services and infrastructure and fundamentally altering the character of this small cotswold market town.

Growth at this level is more typical of a new settlement or large urban extension, not a historic market town. High density housing would mean apartment style development on edge of town greenfield sites. This urban style housing in a rural historic town would be visually incompatible with traditional Cotswold architecture.

Fairford's values lie in its historic core, its relationship to surrounding countryside and its scale and legibility as a small market town. Sustained traffic growth through narrow historic streets, conservation areas and Mill Bridge creates ongoing heritage harm .

The fundamental weakness is transport sustainability. There are single- file pinch points between listed medieval building in the historic town centre and at Mill Bridge. Both roads are constrained by heritage and the Coln River. There is no bypass or widening potential . This means additional traffic cannot disperse , therefore congestion, delay, and conflict are unavoidable and emergency access resilience is reduced.

There is a high dependancy on car use due to lack of buses, no local train station and no active travel corridors. Given the current employment opportunities in Fairford, more people are needing to travel out of Fairford for work than are travelling into Fairford for work.

For infrastructure sustainability, there will need to be :

- * significant new school capacity
- * expanded GP and health provision
- * major sewage and drainage upgrades
- * flood mitigation
- * improved water quality of the Coln River
- * active transport corridors
- * increased bus links and services

If these are not funded upfront or provided before development then sustainability is theoretical, not real .

Furthermore, due to the increase in housing from 2010-2025, the sewage network in Fairford is over capacity. With the lack of sewage infrastructure improvements, in advance of these developments, Thames Water has been outfalling sewage into the Coln River. Despite claiming it's due to high rainfall, they were outfalling sewage throughout the summer of 2025 during the hosepipe ban. Given their precarious financial situation, it is difficult to see how the sewage network can be upgraded.

The planned locations for development in Fairford are on green belt , currently used for farming. This level of development will have a significant environmental impact on biodiversity, landscape and agricultural land.

In conclusion, the proposed scale and density of development for Fairford up to 2043 and beyond, cannot reasonably be regarded as sustainable. A 70% increase in housing stock would represent a disproportionate step-change in the town's size , placing unsustainable pressure on a historic road network with single-file pinch points, harming heritage assets and relying on infrastructure and behavioural assumptions that are not deliverable in practice. The proposal risks locking Fairford into permanent congestion and cumulative harm, rather than supporting genuinely sustainable growth.

Comment ID: 10042

Location in consultation document: Question 4

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If these are not funded upfront or provided before development then sustainability is theoretical, not real .

Furthermore, due to the increase in housing from 2010-2025, the sewage network in Fairford is over capacity. With the lack of sewage infrastructure improvements, in advance of these developments, Thames Water has been outfalling sewage into the Coln River. Despite claiming it's due to high rainfall, they were outfalling sewage throughout the summer of 2025 during the hosepipe ban. Given their precarious financial situation, it is difficult to see how the sewage network can be upgraded.

The planned locations for development in Fairford are on green belt , currently used for farming. This level of development will have a significant environmental impact on biodiversity, landscape and agricultural land.

In conclusion, the proposed scale and density of development for Fairford up to 2043 and beyond, cannot reasonably be regarded as sustainable. A 70% increase in housing stock would represent a disproportionate step-change in the town's size , placing unsustainable pressure on a historic road network with single-file pinch points, harming heritage assets and relying on infrastructure and behavioural assumptions that are not deliverable in practice. The proposal risks locking Fairford into permanent congestion and cumulative harm, rather than supporting genuinely sustainable growth.

Comment ID: 9821

Location in consultation document: Table 1

Name: Penny Lillie

Comment: all scenarios present high density housing such as dense terraces, urban apartments. This level of density would be found closer to town centres such as inner London mansion blocks, some Bath, Bristol, Oxford or Cheltenham central sites.

Comment ID: 8694

Location in consultation document: Question 1

Name: Penny Pitt

Comment: Whilst I can see why you might feel that option 5 is fair in some ways, the facilities and transport from some of your designated settlements for expansion are completely inadequate and are already leading to long waits for doctors' appointments, lack of general facilities such as sewerage drainage and travel/traffic problems on roads that are not intended for the numbers now using them. The buses from Fairford have recently actually been reduced despite a large increase in housing, for example.

It is also very short-sighted of the government to insist on excessive building in villages and small towns in the Cotswolds as this is an area that is much visited by tourists for its rural nature. I feel that unless critical public transport and basic facilities are improved, then much of this additional building in the Cotswolds will cause harm and, even then, will be viewed in hindsight with huge regret by those involved. Surely there is a duty to preserve such a unique environment, as far as is possible.

Comment ID: 8700

Location in consultation document: Context

Name: Peta Louise Hammill

Comment: I writing to express my strong objection to the extreme development proposals to build 1,100 homes in Siddington which, if implemented, would lead to our lovely village losing its separate rural village identity.

There is a reason we all choose to live in a small village community - we choose rural life and to have all of these houses built would take this away and also overload demand on our local amenities - schools, doctors, dentists and roads etc.

The area can also be prone to flooding.

This proposal would have awful irreversible consequences and would be totally irresponsible.

Comment ID: 10204

Location in consultation document: 6. Call for sites

Name: Pete Davis

Comment: The 'Site Allocations Selection Methodology' will use the Integrated Impact Assessment as part of the staged assessment of all sites that come forward through the 'Call for Sites'. It will consider the performance of each site against 11 topics including landscape to identify likely significant effects of proposals. It is not a discriminator in itself, but it does provide information to the Council to inform a judgement on whether to take sites forward. The Council's methodology states that "landscape and visual considerations are embedded within the within this stage [of the assessment] rather than applied as a separate, sequential filter" (paragraph 7.7 of the Site Allocations Selection Methodology). This treatment of landscape in the assessment, and in particular, the consideration of the implications of the National Landscape designation is inconsistent with national planning policy which requires that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues....The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas". The embedded approach means that due weight cannot be given to the importance of the National landscape designation, and in consequence, it is possible that sites could come forward for development in the National Landscape area, whose scale and location is not compatible with the designation. It is requested that the approach is revised to ensure clear consistency with the national planning policy requirements (para. 189 of the NPPF 2024).

Comment ID: 10206

Location in consultation document: Employment and commercial development needs

Name: Pete Davis

Comment: Housing growth proposals are not balanced with employment proposals. The Council needs to identify employment land allocations to provide for future employment for those anticipated to live in the additional dwellings to provide for the sustainable growth of the district. Typically, a draft Local Plan presents a coherent response to the twin challenges of housing and economic growth; however, in the case of the Cotswold Local Plan, it is acknowledged that the "Housing and Employment Needs Assessment and Town Centres Study is not available" (paragraph 4.5 of the draft Local Plan). In consequence, the current strategic development locations and growth allocations are potentially premature as they do not take into account future employment provision. There is a risk that current allocations could create dormitory settlements, incompatible with the national planning policy to support strong and vibrant communities and the aspirations for sustainable growth.

Comment ID: 10208

Location in consultation document: Indicative figures

Name: Pete Davis

Comment: Moreton in Marsh inclusion as a potential location for strategic development is not well evidenced. Insufficient detail is provided for the additional services, community facilities and infrastructure that would be required if the scale of the growth proposals for Moreton in Marsh are to be realised. This is acknowledged in the draft Local Plan (paragraph 3.16); however, the proposals are not then well caveated at this stage.

Comment ID: 10202

Location in consultation document: Scenario 1

Name: Pete Davis

Comment: Bourton on the Hill should be recategorised as a 'Rural Settlement' in the Settlement Hierarchy. Its inclusion as a Non-Principal Settlement is incompatible with size, age profile, employment and economic activity (where it all scores lowest in the 'Settlement Role and Function Study'). The weight placed upon the interpretation of the GCC public and private accessibility information within the Study priorities some villages with clear capacity issues (such as Bourton on the Hill, as well as Bibury). No weight is given to the capacity of these services, or the consequences for them of existing growth proposals. Please review the methodology and its application to those communities currently included in the Non-Principal Settlement category as greater nuance is needed.

Comment ID: 8755

Location in consultation document: Infrastructure needs

Name: Peter

Comment: I can see that waling and cycling are being considered but not wheelchair access. Wheelchair users will just have to use a car or be isolated if their needs are not considered

Comment ID: 8756

Location in consultation document: Infrastructure needs

Name: Peter

Comment: By wheelchair access, I don't just mean into buildings but between them and to local services such as shops. Ideally between settlements too.

Comment ID: 8752

Location in consultation document: Question 1

Name: Peter

Comment: Scenario 7 to maximise housing

Comment ID: 8753

Location in consultation document: Question 2

Name: Peter

Comment: No, please make sure good walking and cycling and wheelchair infrastructure

Comment ID: 8754

Location in consultation document: Question 3

Name: Peter

Comment: I would support this provided the higher density was of good quality, with outdoor balcony space for flats and high quality public spaces and cycling, wheeling and walking proviso

Sion

Comment ID: 9982

Location in consultation document: Table 2

Name: Peter

Comment: From growing up in coln St Aldwyns, it has been an aging population settlement with little resident turnover which has resulted in a reduced funding for services and amenities in the area. I am very much for the development of new houses. This would provide funding for the primary school which is in significant need of money for the redevelopment. Also it will support infrastructure improvements and the village shops and pub which are integral to the community. I would also like to see fresh, new young faces come into the area and create a local vibe and avoid the increasing 'weekenders' taking up the village. Having affordable housing for locals grandchildren is something we would all love to see. This must be truly affordable

Comment ID: 10011

Location in consultation document: Infrastructure needs

Name: Peter

Comment: Will "looking at needs" result in action? Not just going through the motions to satisfy government and not locals.

Highways (roads adjoining towns and villages) still have considerable potholes. Many identified and reported 2 years or so ago still await repair. These need to be addressed and roads resurfaced if necessary prior to starting work and increasing heavy goods traffic.

Comment ID: 10012

Location in consultation document: Gypsy and traveller needs

Name: Peter

Comment: Why do we need to provide for these people. Just encourages more into the area without contributing financially to upkeep

Comment ID: 9716

Location in consultation document: Question 1

Name: Peter

Comment: Option 5 is the least worst option but still requires a density of dwellings that would a) be uncharacteristic of the Cotswolds and b) increase population beyond the capacity to provide basic services and c) beyond the capacity of the Cotswolds to provide employment within a sustainable distance of the new dwellings.

Comment ID: 9718

Location in consultation document: Question 2

Name: Peter

Comment: No. Of course not! Although the term 'sustainable' is open to many different interpretations depending on context, it is a principle that should not be sacrificed in pursuit of short term political objectives. Planning mistakes cannot be undone. Once housing is in the wrong place it is always in the wrong place. The government's policy, being wholly numbers driven, is one of forced plantation of populations into areas where there isn't the infrastructure, amenities or employment to sustain them. Housing isn't just about buildings, it is PRIMARILY about people, communities and economies. The government's plans are inherently unsustainable.

Comment ID: 9719

Location in consultation document: Question 2

Name: Peter

Comment: No. Of course not! Although the term 'sustainable' is open to many different interpretations depending on context, it is a principle that should not be sacrificed in pursuit of short term political objectives. Planning mistakes cannot be undone. Once housing is in the wrong place it is always in the wrong place. The government's policy, being wholly numbers driven, is one of forced plantation of populations into areas where there isn't the infrastructure, amenities or employment to sustain them. Housing isn't just about buildings, it is PRIMARILY about people, communities and economies. The government's plans are inherently unsustainable.

Comment ID: 9724

Location in consultation document: Question 3

Name: Peter

Comment: Houses are already too small with tiny gardens. Flats, yes but these need to be in areas with plenty of other amenities and open space for residents to recreate. Flats generally suit younger people who need to be close to their work to avoid having to own cars. It's important to remember that houses and flats are occupied by human beings not cattle - I can't believe that needs saying. The Parker Morris building standards were created after WW2 to address this very point, so that people were not housed like animals. Thatcher abolished them in the 80s. we must build homes that are fit for human habitation and not just to satisfy short term profits and political gain.

Comment ID: 9738

Location in consultation document: Question 4

Name: Peter

Comment: Basically, no. While a lot of the smaller settlements probably can absorb low levels of new housing, the larger proposals will overwhelm communities.

This is not just in terms of new space taken up but in terms of community cohesion, provision of basic services such as water, sewerage and electricity and then schools, medical services, fire & rescue, ambulance, leisure provision, social services, youth services, increased parking in central business districts, open spaces and traffic.

To put this in perspective, the population of Cotswold District increased by 10% between 2011 and 2021 with no significant increase in provision of any of the above. in tetbury we have had over 1000 new houses in the last 6 years, an increase of 40% of the pre 2015 housing stock. Our surgery is overwhelmed, our sewage treatment works, which used to be one of the cleanest in the country is now discharging raw sewage between 5% and 15% of the time.

The low estimate of housing to be built is 11,700, which at the average occupancy rate of 2.1 will produce 24,570 new people competing for the same amenities and services. That's an increase of 1 more person for every four people already in the Cotswolds.

The upper estimate for new houses is c.18,000, which would produce 37,000 new people in the Cotswolds, an increase of c.40%.

How, by any stretch of the definition, would that be 'sustainable'? Where would these people work? How long will we then have to wait for a doctor's appointment? Where will all those cars park? Where will people work? Where will all the poo go?!

Why would anyone even want to move here if we cannot provide them with what they need? What happens if we build houses that no one wants to buy? What happens if migration is stopped (it's going down fast) and our existing older population dies off in the 20 years of this plan without being replaced by a birth rate of c1.3 per couple (below replacement rate)?

Is it possible we are going to build homes that will be empty in 20-30 years time?

Comment ID: 9739

Location in consultation document: Question 4

Name: Peter

Comment: Basically, no. While a lot of the smaller settlements probably can absorb low levels of new housing, the larger proposals will overwhelm communities.

This is not just in terms of new space taken up but in terms of community cohesion, provision of basic services such as water, sewerage and electricity and then schools, medical services, fire & rescue, ambulance, leisure provision, social services, youth services, increased parking in central business districts, open spaces and traffic.

To put this in perspective, the population of Cotswold District increased by 10% between 2011 and 2021 with no significant increase in provision of any of the above. In Tetbury we have had over 1000 new houses in the last 6 years, an increase of 40% of the pre 2015 housing stock. Our surgery is overwhelmed, our sewage treatment works, which used to be one of the cleanest in the country, is now discharging raw sewage between 5% and 15% of the time.

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Why would anyone even want to move here if we cannot provide them with what they need? What happens if we build houses that no one wants to or can afford buy? What happens if migration slows to nothing (it's already going down fast) and our existing older population dies off in the 20 years of this plan, without being replaced by a birth rate of c1.3 per couple (below replacement rate)?

Is it possible we are going to build homes that will be empty in 20-30 years time?
Planning mistakes cannot be undone. Once the housing is there, it's there forever.

Comment ID: 9740

Location in consultation document: Question 4

Name: Peter

Comment: Basically, no. While a lot of the smaller settlements probably can absorb low levels of new housing, the larger proposals will overwhelm communities.

This is not just in terms of new space taken up but in terms of community cohesion, provision of basic services such as water, sewerage and electricity and then schools, medical services, fire & rescue, ambulance, leisure provision, social services, youth services, increased parking in central business districts, open spaces and traffic.

To put this in perspective, the population of Cotswold District increased by 10% between 2011 and 2021 with no significant increase in provision of any of the above. In Tetbury we have had over 1000 new houses in the last 6 years, an increase of 40% of the pre 2015 housing stock. Our surgery is overwhelmed, our sewage treatment works, which used to be one of the cleanest in the country, is now discharging raw sewage between 5% and 15% of the time.

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Why would anyone even want to move here if we cannot provide them with what they need? What happens if we build houses that no one wants or can afford to buy? What happens if migration slows to nothing (it's already going down fast) and our existing older population dies off in the 20 years of this plan, without being replaced by a birth rate of c1.3 per couple (below replacement rate)?

Is it possible we are going to build homes that will be empty in 20-30 years time?
Planning mistakes cannot be undone. Once the housing is there, it's there forever.

Comment ID: 9757

Location in consultation document: Question 5

Name: Peter

Comment: National housing needs policy dominates all planning decisions in a crude numerical way. It fails to recognise important granularities within the term 'needs' with regard to what kinds of housing are needed, for which kinds of people and in which locations. It is simply an exercise in political short term expediency that lacks the genuine foresight that the term 'planning' implies.

The term 'housing land supply' industrialises and commodifies the development of communities and their economies into a mere 'paper exercise' regardless of the actual people who make up both existing communities and the new communities that will be created. That is to say, the policy simply does not recognise that 'actual people' already live in these places and that 'actual people' will have to live in the new housing.

Given the long lead in times and the forward projection of the policy to 2046, no account is taken of demographic change (immigration, migration, birth and death rates). The assumption is for an infinite increase in housing provision into the future, or at least 20 years.

Nor does it account for changing needs as individual home occupiers age from young to middle age, to old age. This is completely irrational. Some account has to be made of the kinds of homes that are needed for which sections of the population that exist now, and will exist over time into the future.

Planning mistakes cannot be undone. That means that particular attention must be made to whether or not housing will exist in the future that is either no longer required or is maladapted for the future population. I have never seen any serious attempt to consider what may be required at the planning stage if the housing proposed later becomes redundant.

Despite it being 30 years since Simon Fairlie's seminal book on low impact housing and development, nothing - repeat nothing - has been done to address this issue. Nothing has been done to foster genuinely low cost, low environmental impact dwellings that can be easily moved or removed. Nothing.

The current proposals amount to demographic plantation. Who are the new houses going to be for? If they are developer led then they will be predominantly private homes for middle to upper income earners who will commute to work in the larger cities outside of Cotswold District. Basically, people who already have homes elsewhere will immigrate into the Cotswolds because of the perceived 'cachet' of living here. There is no shortage of housing for such people (myself included).

If housing provision is left to private landowners and developers, then no real housing needs will be met. There will just be a movement of people who can choose where to live at the expense of people who need to live here or who have existing ties to the Cotswolds.

There is no suggestion in the plan that would suggest directing all this new housing to people who need it. Nothing for young people, low income people or the low income elderly. These are the people for whom adequate housing provision is a 'need'.

What we will get instead is more traffic, more sewage, less parking, longer queues at the doctor's and an influx of people with no local connections who commute long distances to towns and cities outside of the Cotswolds. We will get acres and acres of cheaply built, architecturally mediocre houses carpet bombed into our precious countryside and happy, vibrant communities.

Comment ID: 9749

Location in consultation document: Question 1

Name: Peter Armitage

Comment: Down Ampney should be respected as a non-principal settlement. The character of the village would be irrevocably harmed. The proposal to increase the number of homes by 420 should be severely reduced.

Should these new houses be in the plan it could mean approximately 180 new children needing school places.

The water and sewage infrastructure is totally inadequate. The road network to and through the village relies on many unclassified roads which are already in poor condition from recent house building contractors lorries.

There are no GP or dental services in the village available to current residents.

There is no public transport through or to the village.

The plan does not identify any specific sites for any new developments.

Any local plan should provide certainty the current plan does not.

Comment ID: 11011

Location in consultation document: Question 2

Name: Peter Baillie

Comment: All development is unsustainable in that the supply of land is finite.

Comment ID: 10904

Location in consultation document: Table 1

Name: Peter Baillie

Comment: Your maths is wrong; 21 to 106 is a 400% increase, not 500%.

I hope the rest of your calculations are not so far off.

Comment ID: 10188

Location in consultation document: Scenario 1

Name: Peter Brickley

Comment: This would be my favourite option [scenario 1], since the area has limited work for new residents, the current infrastructure isnt up to the current population [roads/energy/flooding/ schools etc] and the eastern cotswolds is highly prone to flooding.

Comment ID: 10189

Location in consultation document: Scenario 2

Name: Peter Brickley

Comment: I still prefer option 1.

Comment ID: 10190

Location in consultation document: Scenario 5

Name: Peter Brickley

Comment: this is my second favorite option. my points remain that the existing infrastructure is hardly up to the needs of the current population. I also draw your attention to the flooding issues in and around the feeder rivers to the Thames. I specifically draw your attention to zone 8 [p77 of the appendix] and zone 10b [p123] which have very little opportunity for development for these specific reasons. In addition there is precious little employment in the area.

Comment ID: 9247

Location in consultation document: Infrastructure needs

Name: Peter Cairns

Comment: This comment refers to Moreton in Marsh where I live. This plan is all about providing more housing, only towards the end does it refer to a possible infrastructure plan. I believe that before any decision is taken about adding additional houses the following other decisions should be taken. The current healthcare provision is already vastly overstretched and should therefore be increased to cope with the additional numbers of patients. The junior school is already full and would be difficult to expand. Where is the provision for providing a new school. The sewage works fails at times to cope with the current load. When will that be extended as it must be before new housing not after. Lastly where are the jobs in the local area going to come from to employ all the new people or are we expecting everyone to commute thereby exacerbating an already overloaded road system. As none of the above appear to form part of this plan I object to its acceptance.

Comment ID: 10559

Location in consultation document: Infrastructure needs

Name: Peter Daniels

Comment: As Mickleton has been identified as an area that could accommodate further housing I have the following comments and suggestions to be considered in the local plan consultation. They are mainly about transport infrastructure although there are a few other related infrastructure items. These comments are written specifically about possible considerations for the Mickleton proposed developments. They fit most closely within section 4 of the Local Plan Consultation Review list of topics.

Currently the situation in Mickleton is that residents are highly reliant on use of cars because there is a significant lack of convenient alternate means of transport that is either regular (buses) or safe to use (cycling or walking). Thinking of developing more sustainable mobility then walking or cycling might be one way to do that if one wanted to reach locations that do have more regular public transport say at Meon Vale.

Current claims in planning applications that public transport is frequent and the current road network can be used for cycling and walking have clearly never had to use those methods of transport. Bus services are infrequent and offer late start and early finish times that are impractical for commuting. Cycling and walking to where there is more frequent service is not safe on the current road network.

Future developments in Mickleton should consider how existing and future populations can access and use sustainable transport methods. Evidence from the outline plans submitted to date do not demonstrate any of these and claim that current provisions are adequate. This is not the case and is objectionable. Claims are made that bus services are frequent at approximately 2 hourly but they are not compared to say Meon Vale where they are every 30 minutes to Stratford for example. Bus services start relatively late and finish relatively early such that they do not support commuting to locations that have employment not available in the locality. There is no consideration of provision of safe walking or cycling routes. Using the current rural roads in the area is not safe for cycling or walking especially at night. Most local footpaths are impassable in the colder wetter months due to deep mud that is the nature of the terrain.

It also seems that local planning for new developments is being done on a per development piecemeal basis rather than considering the whole area in combination

with other nearby local developments at Chipping Campden and in Warwickshire at Meon Vale and Long Marston. The local plan needs to consider these together including the cross authority boundary aspects.

Current public transport is provided by bus with a low frequency and the main scheduled routes are between Stratford upon Avon and Moreton in Marsh via Chipping Campden. Transport to Stratford takes between 30 and 40 minutes and Moreton takes between 40 and 60 minutes. This discourages use of public transport for onward commutes as driving to stations at these locations takes about 20 minutes from Mickleton. If further travel was required for commuting purposes it is possible to access more distant locations on the North Cotswold line including Oxford and London to the south and Worcester, Malvern and Herford to the north. On the Stratford line Leamington Spa, Solihull and Birmingham can be accessed. It should be noted that access to the south of the Cotswold district from Mickleton is particularly difficult without using car transportation.

For Mickleton it would be ideal if there was a rail station in the village - which might not be practical. Maybe however, more practically the reinstatement of a rail station at Chipping Campden with car parking would help to shorten and reduce the frequency of local car journeys to Moreton in Marsh or Honeybourne and build on the success of Worcestershire Parkway which now finds it does not have enough parking a common theme at Honeybourne and Moreton in Marsh stations on the North Cotswolds line.

A transport resource like this is likely to attract commuters from Meon Vale and Chipping Campden as well as Mickleton and could support more frequent, earlier and later running bus services. There is some precedent for this with Kingham station and bus services from Chipping Norton, Stow and Bourton aligned with train service times.

Liaison with Worcestershire, Oxfordshire authorities who have developed rail improvement plans either complete or in progress would help consolidate further improvements on the North Cotswold line including the potential to increase train frequency by dualling the remaining single line sections north of Hanborough through to Worcester.

Provision of dual use pavements along main roads that access the developments would aid safe walking and cycling transport options in Mickleton. However, to use these modes of transport further afield would require some alternate improved surfaces on possible routes. The main roads to Meon Vale and Quinton or to Chipping Campden are not safe to walk or cycle on especially when dark or in the colder wetter months. A

suggestion might be to develop an extension to the greenway from Meon Vale to Mickleton and potentially Chipping Campden.

All of the suggestions above are really around trying to break the dependency on cars and encourage more transport by sustainable methods including bus, rail, cycling and walking which are all poorly served for bus and rail and not safe over the current road network for cycling or walking.

Other areas to be included in the plan are access to sufficient locally deployed utilities that can fully service the demand. It's not clear for Mickleton that all Water, Electricity, Telephone and Gas services have capacity for the proposed development which might impose limits on execution timescales despite the given local housing quotas.

A related point to consider as a way of reducing car transport for work commuting is improving local broadband provision for new developments and the localities they are built in. Improving 5G infrastructure to support increased working from home where at present in Mickleton there is not a great coverage at this time.

An increase in availability of public EV charging points should be considered associated with increasing sustainability of car transport in the Mickleton and Chipping Campden districts.

Comment ID: 9410

Location in consultation document: 2. Spatial strategy options

Name: Peter Hinton

Comment: With such a huge number of houses planned for a small area, where communities make the area pleasant to live in, this plan over rules all these qualities in life. Designed by bureaucrats in London who haven't seen a farm animal (live) and never seen a deer, or badger, and dont really care.

with 18,650 homes that means at least 37,000 people or more with at least 20,000 or so needing jobs and various services such as medical facilities etc. Not to mention the road infrastructure which is only just coping with traffic at road junctions. This gets drivers annoyed and speeding occurs, with road speeding cameras there is additional danger.

Part of the 20,000 or so will drive through existing areas to get to a job causing additional chaos to locals walking to school or the shops. Not to mention delivery vans and trucks. Being in a farming area we see lots of tractors on the roads blocking traffic. But we know the government's attitude to farmers.

We then have the lack of schools for children in these areas which means transporting them on the roads ... more traffic and busses.

Clearly not thought out and is more ideological than practical.

A complete rethink has to take place and local opinion needs to be listened to and actioned.

The more I read this the more hopeless our view our planning and councillors who need to represent the communities in the Cotswolds not be bullied by a load of Bureaucrats in London.

Elections are coming and we need some leadership

Comment ID: 8903

Location in consultation document: Infrastructure needs

Name: Peter Hinton

Comment: Infrastructure needs;

Roads ...With increased traffic not only from new residents but deliver vans etc which do not necessarily obey speeding, parking restrictions, we need an improved road network.

1. Already the roundabout at RAU Cirencester is jammed in all directions at certain times of day
2. Towns such as Tetbury on a main route is waiting for an accident. Traffic far too fast on main road makes elderly and new families with children nervous about crossing.
3. Center of Tetbury have difficulties with deliveries and public parking impeding main traffic flow.
4. Being a country town large tractors and equipment has to be allowed for causing more issues for all concerned
5. Pavements on Cirencester road and London road are not fit for purpose in many places. I know one person who was knocked over by a vehicle with a large wing mirror whilst walking on the pavement.
6. That traffic is likely to increase considerably with developments in Tetbury and Kemble and the Cirencester developments.

These issues and more need to be addressed before development starts as contractors will add to the problems.

We then have the POTHLES which refuse to be filled. The only way is to resurface the road where these are. This has been started but has not covered issues along the Cirencester to Tetbury road.

New houses mean at least 2 per house on average. They need to work and towns such as Kemble and Tetbury do not have the job opportunities. So they will need to travel. Causing more disruption and the threat of an accident in time.

These issues do not appear to be of concern to the planners as they are not mentioned under the Infrastructure plan.

Comment ID: 8904

Location in consultation document: Infrastructure needs

Name: Peter Hinton

Comment: Healthcare provision.

The demographic in Tetbury as well as most small villages requires an efficient Healthcare system.

We used to have Cirencester Hospital offering a wide range of treatments. This is now being paired down with focus on Gloucester/Cheltenham/Swindon.

With such and increase in population planned then this needs urgent review. Result if not improved will increase traffic on the roads as well as potential threats to life saving incidents.

Comment ID: 9517

Location in consultation document: Scenario 5

Name: Peter Kavanagh

Comment: Villages are struggling with essential services and infrastructure. Ribbon developments are destroying village identities.

Railway stations are not connected by realistic rural bus routes or timetables to transport workers to their work places for start times.

Willesley is a fine example of where none of the above suggestions have been considered. It's a village that has satisfied its development plan for the 2030 (over subscribed the plan for 2030). It has resulted in the storm and sewage systems not coping when there is moderate rain fall on the North Cotswolds edge hills. If the rain fall repeats the 2007 event (with climate change is more likely these days) this village will have raw sewage floating in the streets which then drains into the Badsey brook before feeding into the river Avon. Thames water are struggling with supply problems now. Flooding is an issue recognised by the flood management team.

Transport issues have increased since the recent building of 110 properties, increased private cars commuting to their place of work. Buses that do not serve a useful replacement for private cars for work transportation. Buses that don't connect with Honeybourne or Morten in Marsh railway stations.

A heritage disused railway line which connects several villages lying derelict which could be a huge asset for sensible developments and a service villagers could use.

Over the years this village has lost its local shop (The CDC approved a change of use from a shop to residential), a hairdressers and a post office.

An area that nestles in the AONB but is overlooked by an ever expanding Farncombe estate. Light pollution is driving away our natural world with loss of many animals and birds.

Controlled expansion over a period of time is acceptable so people can integrate within the established community. What appears to be happening is that when a new development plan is agreed the developers try and build the quota within the first couple of years then push for more. Thank you for giving us the opportunity of voicing our concerns.

Comment ID: 9960

Location in consultation document: Question 1

Name: Peter Mathews

Comment: None of the scenarios supports the aim of the Local Plan to be sustainable and “green to the core”.

They all undermine the ethos of the Cotswolds, the preservation of which has been central to previous CDC Local Plans. The scenarios take little account of the policies contained in the Neighbourhood Plans in the district.

Scenario 5 destroys the rural and community attributes of a number of small villages and, in some cases transforms them into suburbs of larger towns thereby destroying their identity.

I do not support any scenario that allocates growth based on Siddington being treated as a Principal Settlement, because this designation does not reflect its true level of services or capacity.

Scenario 5 is only workable if strategic sites are placed where genuine infrastructure exists—not in Siddington. Allocating 1,100 homes to a village of 339 dwellings is wholly disproportionate and inconsistent with sustainable development.

Some alternatives to be given further consideration are:

- * Smaller, non-strategic developments throughout the Cotswold National Landscape.
- * Changing the designation of holiday homes in the Cotswold Lakes.
- * Allowing a larger expansion of the Steadings to the south of the existing plan.

The selection of Siddington for strategic development is inconsistent with the conclusions of the Assessment of Broad Strategic Development Locations.

Comment ID: 10919

Location in consultation document: Scenario 5

Name: Peter Mingins

Comment: Careful consideration should be given to the following wider infrastructure requirements, specifically in context to Preston Village.

Preston Village's Identity as a separate community will be eroded.

Drainage- The current highways drainage, waste water and rain water drainage is completely inadequate now. Evidence of this is that several properties in the village flood during heavy rain, inadequate drainage capacity and the total lack of maintenance over the previous 10 years demonstrates how fragile and unfit for purpose the existing infrastructure and asset management processes are. They are simply unfit to support the existing community and built environment of Preston let alone the addition of acres of hard surfaces and hundreds of homes. Significant evidence exists of requests to address drainage Our primary concern is that adding additional houses and hard surfaces to this poor infrastructure will exacerbate an already intolerable situation.

Roads are inadequate currently, public transport poor, paths and cycle provision non-existent . Reference the total lack of cycle provision in Cirencester and safe footpaths from Preston to Cirencester. This poor infrastructure will force residents to make even more car journeys.

Comment ID: 10932

Location in consultation document: Scenario 5

Name: Peter Mingins

Comment: We have serious concerns around the economic environment around the Cotswolds. Local employment is very scarce forcing many existing residents to make long commutes often by car to places of work. The Cotswolds is an area of outstanding natural beauty , this is in danger of being lost if there is a strategy to house people away from industrialised development areas. People and homes need to be close to where they work or at the very least have strong public transport links.

Comment ID: 10944

Location in consultation document: Employment and commercial development needs

Name: Peter Mingins

Comment: The local economy will not support home ownership, especially for young starter families. There are insignificant employment opportunities in the Cotswolds as a result we will have a further increase in retired couples, and second home ownership move into the area . Where will young people buy in the Cotswolds ?

Comment ID: 10551

Location in consultation document: 4. Beyond conventional housing

Name: Peter Richardson

Comment: It would be interesting to know what the standard method for calculating homes actually is - and what it takes into account. Currently I doubt it looks at the broader context of an area (e.g. the special nature of somewhere like the Cotswolds) and housing (and people's) needs for local jobs, services etc.

Comment ID: 10539

Location in consultation document: Development beyond 2043

Name: Peter Richardson

Comment: Growing at the rates being proposed upto and beyond 2043 really needs an understanding of what the settlements are likely to look like by each decade, what the quality of life of residents is, where they are working, how the infrastructure has developed alongside the development etc.

Comment ID: 10553

Location in consultation document: Employment and commercial development needs

Name: Peter Richardson

Comment: The question of what people moving into the new housing will do for a job and where they will work is absolutely key as there is no point in providing housing where there are no local jobs. But the housing locations also need to take into account people's quality of life, health and safety, local services etc.

Comment ID: 10537

Location in consultation document: How did the Council select locations?

Name: Peter Richardson

Comment: Please do not look at housing sites in isolation. They need to be considered in the context of quality of life, access to local jobs, local transport, local services, etc. Otherwise other problems will arise - environmental, traffic, health and safety, etc.

Comment ID: 10554

Location in consultation document: Infrastructure needs

Name: Peter Richardson

Comment: Very pleased to see that the infrastructure needs are being examined and worked on at the same time as the housing. Moreton's infrastructure has been stretched by the growth over the past 15 years and the proposal for even more housing in the next 15 years will break the infrastructure here unless it is addressed urgently.

Comment ID: 10528

Location in consultation document: Question 1

Name: Peter Richardson

Comment: I sympathise with CDC in trying to come up with a housing solution which addresses the housing targets being imposed top down by the government and I also support the communications CDC have had with central government about the allocated housing numbers for the district and pleading a special case.

While I understand the rationale for each of the scenarios listed, they would all cause problems not only for the towns and villages affected, but also for the district in general.

I can only speak for the town I live in, Moreton-in-Marsh, but suspect that the issues below would be fairly common for the rest of the district. The issues I see are:

1) Economy

The Cotswolds has a general appeal because it is a different and special place. A large part of the economy of the Cotswolds is based around tourism and if the special character of the area is adversely affected by development then this key part of the economy would be damaged. So we need to be very careful to understand what makes the Cotswolds special and protect or even enhance these aspects. In my view, housing development on the scale proposed over this relatively short time period would place this special character in jeopardy.

2) Housing Need

There seems to be a large discrepancy between what housing the local population needs and what the developers want to build. Many local residents are having to move away from the area because they cannot afford a home locally - and also they find it difficult to find jobs locally. So many housing developments are for expensive, executive style homes so that developers can maximise the profit they make on each house they build and this meets only a small section of the local need.

3) Second Homes

This means that there is a real danger that many of the new housing will not meet the perceived housing shortage, but rather it will fuel people's desire to own a second home - thereby denying locals in need of housing the chance to stay local and degrading the communities as second home ownership increases.

3) Infrastructure

In Moreton-in-Marsh the housing and population growth between the 2011 and 2021 censuses was very high with an almost 50% increase in both. The town is struggling to absorb this dramatic change and is in danger of losing its identity and culture. This growth of course has put the infrastructure under great strain. 3.1) Water Management. Thames Water already acknowledge that the water treatment plant is unable to cope with the existing population numbers and although it has plans to upgrade the plant, I can only think that this is in doubt due to the company's very poor financial position. It should be unthinkable to increase the town's housing and population numbers as things stand at the moment - as this would risk the health and safety of residents and the local environment.

3.2) Traffic - the rapid growth has seen a similar increase in traffic problems causing traffic jams and parking issues in the centre This too. has health and safety aspects with the associated air and noise pollution. Additional significant growth of housing, population and traffic would exacerbate the problem. This increase in traffic also impacts Moreton's attractiveness to tourists and endangers the towns tourist revenue. After all, who wants to sit having a coffee in amongst the noise and fumes of a lot of traffic?

3.3) Services - the normally expected services for a town, such as healthcare and education, are also under strain as they have been unable to grow as rapidly as the population. Further increases in the population could trigger a collapse of these services entirely - again risking the health and safety of residents.

4) Jobs

If the projected number of houses are built, where would the people living in them work? I know work patterns have changed particularly with more people working from home post COVID, however, a large number of people would still need to travel to work (on foot, by bike, by car, by public transport). I am told that currently,

(a) mainline trains are full and people struggle to find places to park.

(b) land allocated for employment in Moreton in the past 10 years has not been developed - so I am not sure what the expectation would be for any land to be developed to provide local employment

I understand the need to update the local plan (as a minimum so that 5 years of housing land is allocated) but we really do have to be careful about enabling growth to the extent that it affects the special character of the district and endanger a major sector of its economy.

The housing figures need to be integrated with other factors that impact people's quality of life - a local job (to be financially independent, have a purpose in life and to feel valued), access to local services, access to nature and the countryside and protection from various forms of pollution.

Moreton has seen a large growth in its population and urban area in recent years which has caused significant problems. The proposals in this plan go even further which gives me real concern for the town's future.

And this is only to 2043. You can understand I am sure why people are concerned for what comes next. What will the town look like and feel like beyond then?

On a final note, I know you can't argue the figures with central government, but people do struggle to understand why such a large increase in housing is thought to be necessary. The natural population figures (births minus deaths) are set to decline between now and at least 2050. So what is fuelling the need for this housing development? Immigration is part of this, but what other factors are there - second homes, derelict homes, unused buildings? It would be good to know.

Comment ID: 10532

Location in consultation document: Question 2

Name: Peter Richardson

Comment: No - this will only cause problems in the future.

Comment ID: 10535

Location in consultation document: Question 3

Name: Peter Richardson

Comment: Within reason, and where it would not adversely affect the character of an area, then I would support some higher density housing. However, care would have to be taken regarding people's quality of life (e.g. access to open space), access to local jobs, access to travel (e.g. car parking, public transport) and access to services (e.g. local shopping, healthcare, education)

Comment ID: 10549

Location in consultation document: Question 4

Name: Peter Richardson

Comment: The development does provide an opportunity to create a sustainable environment - but this will require comprehensive planning, funds and time which makes it very difficult to achieve.

Comment ID: 10555

Location in consultation document: Question 5

Name: Peter Richardson

Comment: It would be good to highlight sustainability and the environment in this section. With this level of development, the plan should be looking to demand net zero (carbon) housing, increase no/low travel, renewable energy for the town and the protection/enhancement of biodiversity.

Comment ID: 10557

Location in consultation document: Question 6

Name: Peter Richardson

Comment: All these are essential - but it would be good to examine the vision from residents' point of view. What is the impact on them? Does it improve their quality of life? If so, in what way? Examples might include easy, healthy access to the town away from air, water and noise pollution, easy access to local services, easy access to fulfilling local jobs, easy access to the countryside, and a properous and welcoming high street where people like to linger

Comment ID: 8683

Location in consultation document: 6. Call for sites

Name: Peter Sanderson

Comment: Here is my opening statement:

The legal requirement is for the submission of a 5 year plan. I accept that you have a backlog of supply that you are attempting to fill after the government's redirecive and you want to demonstrate some form of long term compliance. I get it that CDC is likely to merge into a single unitary authority and therefore you are all fighting for your jobs. However, that is something that you may win or lose but what remains in the meantime is looking after the ratepayers and the region. Delivery objectives are bound to change as we move forwards and backwards in our national concerns. No one can anticipate what directive any government might give in the future. It's likely, for instance, that the Labour Government, who made changes to the NPPF will not be in power in 18 years time (unless of course they match the record of the conservative party from 1979 to 1997)

Currently the ratepayer sees a planning department that is running ahead of itself, an authority for example that did its best to oppose national park status. Do you work for the ratepayer or yourselves?

You are the ones who can create ratepayer confidence but your vigours and errors at this time is a threat to us all. Will you rise to that challenge or are we to get drawn into the theatre of it. We are the ones that pay for it all both emotionally and physically. So with this planning situation: I suspect none of us require an 18 year building plan as the likelihood of getting there, for any of us, is a flick of a coin and lets be honest whatever plan you produce it will be changed multiple times throughout the 18 years. So therefore I say to you all, are we to live in a perpetual state that resembles groundhog day giving our objections and comments in playful dog-like obedience at each fundamental local planning change?

The madness you create must stop. Drastic action is required. I call upon the leader of the council "Councillor Mike Every". to exercise some directive and firmer control. I say that If the planning department has time to work on an 18 year plan for the next 13 months that's madness because in that distraction there's a real danger of approving

applications, so completely wrong that you will open yourself up for a significant loss of vote and create your long term demise.

All for now - more to follow!

Peter Sanderson

Comment ID: 8693

Location in consultation document: 6. Call for sites

Name: Peter Sanderson

Comment: I have perused the different scenarios and think that Scenario 3: Main Service Centre focus might be something to explore. Areas which sit within the National Landscape should always be preserved for the benefit of the nation and given protected Park status as it is a significant heritage asset known throughout the world for its beauty. However I also believe that the adjacent areas such as Moreton in marsh and Cirencester are at capacity. Both these towns are considered gateways into the National Landscape and deserve to be saved from further destruction. With the directive of having to provide 18,650 homes it's just not responsible to keep adding to existing towns and villages where services are either limited or at capacity. The only realistic solution is a new town development and I know of only one possible location. It has a station with a direct line to London Paddington, an airport nearby and a 52 hectare business park. Careful planning would deliver a town of the future that all existing residents could help to shape. It would of course mean a lot more engagement and planning by CDC. Thinking of schools, surgeries and cottage hospitals and facilities all in a style to be proud of - a new garden town. The gain for you is that it would preserve your own council jobs, at least during its development. So if you really care about the area you serve you would give it a go and leave us a great legacy in the town that you built. Of course the alternative is to leave all the development to bunny, the builder and his mates Bodge it and Scarper. And perhaps this is all you are able to do?

Comment ID: 8704

Location in consultation document: Scenario 4

Name: Peter Sanderson

Comment: You should note that there has been an inclusion of a vast swathe of beautiful agricultural land, over 5 miles of countryside, that stretches from Willersey to Mickleton. This area of Willersey, and all other areas in the vicinity that sit to the southern and eastern side of the B4632 fall within the Cotswolds National Landscape so therefore paragraph 189 chapter 15 of the NPPF applies to all planning applications.

This rule is particularly applicable to the proposed application of a current application in Willersey but should also be exercised in all considerations included in the LDP.

CDC will be aware that the NPPF rule requires applicants describe the significance of any heritage assets affected by a development, including the impact on their setting, and that the level of detail is proportionate to the asset's importance. The chamber will know that applicants must provide sufficient information for local authorities to make an informed decision on whether to approve the application, especially regarding the potential harm to the heritage asset. You will know that Local planning authorities must give great weight to the conservation of designated heritage when considering the impact of a development proposal.

On this fundamental principle I would argue that all applications fail to provide sufficient information when matters have been 'reserved' by the applicant. I would ask the chamber to issue and exercise this principle to all current and future applicants. Until there is compliance, application for any development within the National landscape should be automatically refused on all 'reserved' matter applications. Such applications must be seen as a potential harm to the heritage asset namely "The Cotswold National Landscape." until conclusively convinced otherwise.

Comment ID: 8708

Location in consultation document: Scenario 5

Name: Peter Sanderson

Comment: The figures presented for all scenarios are purely speculative, especially as the full extent of call for sites has yet to be concluded.

You have capitulated when you say Scenario 5 is the preferred or only viable option to move forward. I prefer to keep an open mind and am happy to be persuaded towards any solution.

If you close your minds to all other considerations there is no point in consultation, indeed there is little point in anyone offering up objection or alternative consideration because in this case we must accept that CDC is right. History is littered with examples why this ethos is ultimately self destructive.

Just please consider the area around Kemble - just by way of an example: (Excluding the Bathurst estate, and the pressure of 'owners influence'). I believe there is plenty of land that could accommodate the whole allocation. The area has an airport, a railway station with access to London Paddington, and a network of roads to Cirencester, Tetbury, Bristol and Oxford. The M4 is close by and there is already a 52 hectare business park perfectly positioned for expansion. I would suggest that there would be minimal objection to such a plan from residents. Would you seriously dismiss even this or any other solution in preference to scenario 5?

Comment ID: 8709

Location in consultation document: Scenario 4

Name: Peter Sanderson

Comment: You mention 2 railway stations namely Kemble and Moreton with 1070 homes to be positioned at Kemble and 3,970 at Moreton. Kemble has access to the M4 and is midway between Cirencester and Tetbury with additional service routes to Bristol and Oxford. It is in all senses better positioned than Moreton on March and should be the preferential site for development

Comment ID: 8710

Location in consultation document: Scenario 1

Name: Peter Sanderson

Comment: Your proposed development area in the Northern district includes a vast swathe of land from Willersey to Micleton. You should note that the national landscape line passes to the North of Willersey and then follows the B4632. Therefore any proposed parcel of land and all adjacent fields to the South east of the road are firmly sited inside the boundaries of the Cotswold National Landscape. Therefore paragraph 189 chapter 15 of the NPPF applies to all planning applications.

The council will know this rule as over the years it has kept large scale developments outside of this boundary line and should be respectful of this in the Local plan.

The council will know that applicants must describe the significance of any heritage assets affected by a development, including the impact on their setting, and that the level of detail is proportionate to the asset's importance. The council will know that applicants must provide sufficient information for local authorities to make an informed decision on whether to approve the application, especially regarding the potential harm to the heritage asset. The council will know that Local planning authorities must give great weight to the conservation of designated heritage when considering the impact of a development proposal.

On this fundamental principle I would argue that any application in the area must be proportionate and minimal. It's debatable whether this is the case as I see the pie charts that you have placed against towns and villages of the Cotswold in your plan!

Additionally within this area and in matters where an applicant reserves matters I believe that approval must be automatically dismissed and seen as a potential harm to the heritage asset unless conclusively proved otherwise.

In your defence against appeal it may be useful to emphasise that the government's role (and your own rightful responsibility) is to protect and manage national assets

to conserve their natural beauty, wildlife, and cultural heritage, while also promoting public understanding and enjoyment. It's the duty of the planning inspectorate to embrace this ruling.

So It's pretty obvious what the council must do to meet some level of planning comfort. Namely to set out clear and concise rules to applicants before they proceed on any planning action and to concentrate on pockets of land outside of designated zones of beauty where there is less of a likelihood of incurring emotional and financial difficulties.

Comment ID: 9372

Location in consultation document: Question 3

Name: Peter Stephenson

Comment: I would support increasing density if done in a way that provides flats with good insulation etc, have some personal outdoor space like a balcony, have safe streets and public areas and enable realistic car free living if desired by residents.

Use of car should be possible but secondary in the design. The design should make walking, wheeling and cycle use an attractive and safe option for all.

Comment ID: 9374

Location in consultation document: Question 4

Name: Peter Stephenson

Comment: They seem sustainable but conservative in number. Could you consider increasing the numbers in each area so that the total of dwellings required by central government are met?

Comment ID: 9378

Location in consultation document: Question 5

Name: Peter Stephenson

Comment: The list given is comprehensive apart from missing out wheelchair users (often coming under category of “wheeling “ in local transport discussions) I would ask for Wheeling to be included. Also, have all these needs been adequately met in the past, even when considered? Very few children walk or cycle to school compared to the potential.

Evidence from Rachel Aldred has shown that increasing walking and cycling in adults leads to fewer days off work, improved local business growth and better health (Written evidence submitted by Dr. Rachel Aldred, University of Westminster (DMGT) (ATR0096))

Comment ID: 10515

Location in consultation document: How did the Council select locations?

Name: Phil Fryer Ward

Comment: Section 3 identifies site suitability and the level of development an area can sustain as key factors in the selection of locations within the plan. Recent experience in Down Ampney clearly demonstrates that the village is already unable to accommodate the scale of development that has taken place to date. This strongly indicates that Down Ampney should not be considered a suitable location for any further development.

The local sewage and surface water drainage infrastructure is widely recognised as being wholly inadequate and in urgent need of complete replacement. No additional development should be contemplated unless and until the mains sewage and drainage systems are comprehensively renewed.

Recent housing developments have required floor levels to be raised significantly above those of the existing housing stock, with piling used in several cases due to the persistently wet ground conditions. This has placed additional pressure on surrounding properties, as land that previously acted as a natural soakaway has been replaced with impermeable surfaces. As a result, excess surface water is being displaced elsewhere, and older properties within the village are already experiencing increased surface water ingress as a direct consequence of recent building works.

Comment ID: 10521

Location in consultation document: Table 2

Name: Phil Fryer Ward

Comment: The proposed housing allocation for Down Ampney would more than double the size of the village's existing housing stock. In recent years, the village has already experienced a near doubling in size through developments at Broadway Farm, Rook Tree Farm, Dukes Field, and various infill sites. These developments have all required raised foundations and, in several cases, piling to address the persistently wet ground conditions. As a result, they have significantly exacerbated surface water issues in the surrounding areas.

Attenuation ponds associated with these developments have been designed solely to serve their individual sites and do not mitigate, or even address, the increased flood risk to neighbouring properties. Furthermore, the local drainage and sewage infrastructure is antiquated and demonstrably unfit for purpose, even prior to the addition of recent developments.

The village primary school is small and already constrained, with some classrooms in buildings that are long overdue for replacement. The scale of additional housing currently under consideration would generate demand equivalent to more than three times the school's existing pupil capacity. This pressure cannot be absorbed locally, as neighbouring village schools are already operating at or near full capacity.

Down Ampney also has significant historic and cultural importance, with strong associations to Operation Market Garden during the Second World War, The Flying Nightingales, and the composer Ralph Vaughan Williams. It is a village whose character merits protection from wholesale change. That character has already been materially altered by recent large-scale development, and the further scale of growth proposed would transform Down Ampney into a sprawling dormitory settlement, lacking the necessary infrastructure to adequately support or service its population.

Comment ID: 8926

Location in consultation document: Scenario 5

Name: Phillip Hodson

Comment: Strongly prefer scenario 5

Comment ID: 10750

Location in consultation document: Table 2

Name: Pippa Wilkinson

Comment: This increase in numbers will completely change the character of our village and is totally disproportionate to it's current size. Our infrastructure is not set up to manage this amount of houses and Kemble will no longer be a village. The school is already at capacity. We have horses kept in the village (for the last 34 years) and it is already very difficult to ride them through the village as the roads are so busy and there are masses of parked cars making passage tricky. This has changed significantly during the last 30 years and having more houses and increased traffic in the village will fundamentally change the character of the village.

Comment ID: 9801

Location in consultation document: Question 1

Name: PMOC

Comment: Preferred option: Scenario 4 – Focus growth around transport nodes

Scenario 4 is preferred because it most closely aligns with national planning policy, sustainability objectives, and realistic delivery considerations. National policy requires development to be directed to locations that minimise the need to travel by private car and make best use of existing public transport and infrastructure.

Within Cotswold District, Moreton-in-Marsh is uniquely capable of delivering this approach. It is the only Principal Settlement outside the Cotswolds National Landscape with a mainline railway station, providing direct services to Oxford, Worcester and London, alongside established healthcare, education, employment, retail provision and strategic road connections. Concentrating growth here avoids harm to nationally protected landscapes while maximising accessibility and delivery certainty.

Although Scenario 5 delivers a higher proportion of the housing target in headline terms, the Council's own evidence confirms that it relies heavily on multiple large strategic sites with long lead-in times, infrastructure constraints and a significant risk of delayed or reduced delivery within the plan period. A transport-led strategy focused on settlements with existing infrastructure, such as Moreton-in-Marsh, is therefore more effective and justified when tested against soundness criteria.

Comment ID: 9802

Location in consultation document: Question 2

Name: PMOC

Comment: No.

The Council should not locate development in locations it considers unsustainable simply to meet the government's housing target. National policy is clear that housing targets do not override the requirement to deliver development sustainably, nor do they justify harm to protected landscapes, increased car dependency, or development in locations with limited services and infrastructure.

The consultation confirms that Scenarios 6 and 7 are not viable because they conflict with national planning policy and sustainability principles. Extending development into other unsustainable locations would similarly weaken the Local Plan, increase reliance on speculative planning applications, and expose the Plan to a heightened risk of being found unsound at Examination in Public.

Where a shortfall remains, the appropriate response is to concentrate growth in the most sustainable locations and, where necessary, engage with neighbouring authorities under the duty to cooperate, rather than diluting sustainability criteria.

Comment ID: 9803

Location in consultation document: Question 3

Name: PMOC

Comment: A selective and location-specific increase in housing density is supported, but only in the most sustainable and accessible locations.

The consultation evidence demonstrates that achieving the full housing target through density increases alone would require densities far in excess of what is realistic or appropriate for Cotswold District. The Council's own analysis shows that densities comparable to inner London would be required in some scenarios, which it acknowledges would conflict with local character and infrastructure capacity.

However, modest increases in density are appropriate in locations with strong public transport accessibility, particularly around railway stations and town centres. In Moreton-in-Marsh, higher-density forms such as terraces, mansion blocks or well-designed apartments close to the station and town centre can be delivered without harm, while supporting public transport use and reducing car dependency.

This reinforces the case for Scenario 4, where density can be used intelligently in the right places, rather than imposed uniformly across rural edge sites or less sustainable settlements.

Comment ID: 9804

Location in consultation document: Question 4

Name: PMOC

Comment: The proposed level of development is only sustainable if growth is concentrated in settlements with existing infrastructure and strong public transport connections.

In Moreton-in-Marsh, significant growth can be accommodated sustainably provided it is supported by:

- a) Improvements to rail capacity and service provision on the North Cotswold Line;
- b) Highway and junction mitigation;
- c) Expanded healthcare and education provision;
- d) Employment land to reduce out-commuting;
- e) Green infrastructure, flood mitigation and active travel routes.

The Council already recognises Moreton-in-Marsh as a potential location for strategic growth and accepts that it may continue to grow beyond 2043.

Concentrating development here - particularly on land adjoining the settlement but outside the Cotswolds National Landscape - is materially more sustainable than creating new standalone settlements or dispersing growth to less accessible locations with limited infrastructure.

Comment ID: 9805

Location in consultation document: Question 5

Name: PMOC

Comment: Yes.

The Development Strategy should give greater weight to:

- a) Rail-led economic growth and employment linked to transport hubs;
- b) Digital infrastructure to support home-working and rural businesses;
- c) Workforce housing for key sectors such as healthcare, education, agriculture and tourism;
- d) The cumulative role of market towns, particularly Moreton-in-Marsh, in serving extensive rural hinterlands.

These matters are directly relevant to the spatial strategy and should be embedded within it rather than addressed solely through later evidence or delivery documents.

Comment ID: 9806

Location in consultation document: Question 6

Name: PMOC

Comment: The revised vision and objectives are broadly supported, particularly the emphasis on climate response, sustainable transport, affordable housing and protection of the Cotswolds National Landscape.

However, the vision would be strengthened by explicitly recognising the strategic role of transport hubs outside the Cotswolds National Landscape as the primary locations for accommodating growth. While the vision refers to transport-led development in general terms, it does not clearly distinguish between settlements with genuine strategic connectivity and those without.

Making this distinction explicit - particularly in relation to Moreton-in-Marsh - would provide clearer direction, improve alignment between the vision and the spatial strategy, and strengthen the Plan's prospects of being found sound at Examination in Public.

Comment ID: 11026

Location in consultation document: 1. Introduction

Name: Polly Eldridge

Comment:	Document Section	Paragraph / Topic	Summary of Council Text Proposed Comment / Objection
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Chapter 1 – Introduction	Purpose of the Local Plan Update	Explains the need to update the Local Plan in response to national policy changes	The need to update the Plan is acknowledged. However, the document does not explain why national policy changes must result in the scale of growth proposed in a district with exceptional environmental and infrastructure constraints. The purpose of the update should be to balance national objectives with local realities, which is not adequately demonstrated.
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Chapter 2 – National Policy Context	Meeting Housing Need	States that councils are expected to meet identified housing needs	This paragraph omits important national policy flexibility allowing lower housing figures where environmental constraints apply. The failure to acknowledge this creates a misleading interpretation of national policy and undermines the justification for the proposed housing requirement.
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Chapter 3 – Housing Requirement	Proposed Housing Target	Sets out the proposed housing requirement using the standard method	The proposed target is not justified by local evidence. It relies heavily on a national formula and does not adequately consider landscape constraints, infrastructure capacity, or market deliverability. As such, it fails the “justified” and “effective” tests of soundness.
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Chapter 3 – Housing Requirement	Risks of Under-Delivery	Highlights consequences of failing to meet the target	The Plan emphasises under-delivery risks while failing to address the equally significant risks of over-allocation, including speculative development, infrastructure overload, and long-term environmental harm.
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Chapter 4 – Spatial Strategy	Concentration of Growth	Proposes focusing growth on Cirencester and larger settlements	Concentrating growth in Cirencester risks cumulative harm to town character, transport networks, and service provision. The Plan does not demonstrate that infrastructure can support repeated large-scale expansion over successive plan periods.
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Chapter 4 – Spatial Strategy	Alternative Options	Briefly references alternative spatial approaches	Alternatives are not robustly tested. The Plan appears to dismiss other approaches without sufficient evidence or comparative assessment, undermining the justification for the preferred strategy.
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Chapter 5 – Settlement Hierarchy	Growth in Smaller Villages	Proposes limited or proportionate growth in villages	The concept of “proportionate growth” is undefined
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and ambiguous. In small historic villages such as Poulton, even modest growth can fundamentally alter character and sustainability. The lack of clarity invites speculative development.

Chapter 5 – Settlement Hierarchy Rural Sustainability Discusses sustainability of villages The paragraph overstates the sustainability of rural settlements and underplays car dependency, limited services, and weak public transport. Growth in such locations conflicts with climate and sustainable transport objectives.

Chapter 6 – Environment & Landscape Cotswolds National Landscape Acknowledges importance of protected landscape Acknowledgement alone is insufficient. The Plan does not demonstrate how the scale of growth proposed is compatible with the statutory duty to conserve and enhance the Cotswolds National Landscape.

Chapter 6 – Environment & Landscape Mitigation Measures Proposes mitigation of environmental impacts National policy prioritises avoidance of harm in protected landscapes. Reliance on mitigation risks cumulative degradation over time and does not provide sufficient long-term protection.

Chapter 7 – Land Supply Greenfield Development Indicates reliance on greenfield land The Plan has not demonstrated that all reasonable brownfield opportunities have been exhausted. Greenfield release is presented prematurely and without a transparent sequential or capacity-based assessment.

Chapter 7 – Land Supply Landscape Impact Discusses assessment of greenfield impacts The Plan underestimates the importance of greenfield land in preserving settlement setting, separation, and historic context, particularly around Cirencester and surrounding villages such as Poulton.

Chapter 8 – Infrastructure Developer Contributions Relies on developer-led infrastructure provision Developer contributions are uncertain, negotiable, and often delayed. The Plan lacks binding commitments, clear phasing, or secured funding mechanisms, undermining its effectiveness.

Chapter 8 – Infrastructure Transport Addresses transport implications There is insufficient evidence that existing transport infrastructure can accommodate the proposed growth. Public transport limitations will increase car dependency, contrary to sustainability objectives.

Chapter 9 – Climate & Flood Risk Flood Risk Addresses flood risk and climate change The Plan does not adequately demonstrate avoidance of flood risk areas or account for climate change projections. Managing risk is not a substitute for directing development away from vulnerable locations.

Overall Strategy Preferred Options Summary Summarises the overall preferred approach Taken together, the Preferred Options are not justified by proportionate evidence, rely on uncertain infrastructure delivery, and fail to adequately protect landscape and heritage assets. The Plan is therefore not currently sound and requires substantial revision.

Comment ID: 11014

Location in consultation document: 1. Introduction

Name: Polly Eldridge

Comment: While the need to update the Local Plan is acknowledged, the document does not explain why the response to national policy changes must result in such a significant scale of growth in a highly constrained district. The purpose of the update should be to balance national requirements with local environmental, infrastructure and landscape realities, which this Plan does not demonstrate.

Comment ID: 11030

Location in consultation document: 1. Introduction

Name: Polly Eldridge

Comment: And specific to Poulton, where I live (not to mention the impact on Poulton as a result of significant developments around Ampney Crucis and Down Ampney):

- Infrastructure Deficit: Poulton lacks essential services—public transport, schools, healthcare, shops—making it unsuitable for significant development.
- Transport Limitations: No viable public transport; reliance on cars increases congestion, emissions, and road safety risks.
- Flooding & Sewage Risks: Existing issues with flooding and inadequate sewage capacity; further development would worsen these problems.
- Scale of Proposed Growth: Adding 30 dwellings (17% increase) is unsustainable given current infrastructure and environmental constraints.
- Environmental & Heritage Impact: Development near conservation areas and open spaces would harm rural character and Cotswold landscape.
- Affordable Housing Concerns: New housing often unaffordable for locals; risk of properties being bought by outsiders or used for Airbnb.
- Planning Process Issues: Lack of meaningful early engagement with Parish Councils; local knowledge on flooding and infrastructure often ignored.
- Preference for Strategic Growth: Support for focusing development in main service centres or large strategic sites to enable infrastructure-led planning.
- Opposition to Dispersed Development: Small-scale allocations in villages seen as inefficient, environmentally damaging, and contrary to sustainability goals.

Comment ID: 11019

Location in consultation document: Employment and commercial development needs

Name: Polly Eldridge

Comment: The concentration of growth in Cirencester is not supported by robust infrastructure evidence. Repeated plan-period expansion risks cumulative harm to town character, congestion, and service provision. The Plan fails to assess the long-term implications of successive growth cycles.

Comment ID: 11020

Location in consultation document: Employment and commercial development needs

Name: Polly Eldridge

Comment: Further, whilst alternatives are mentioned, they are not genuinely tested. The Plan appears to dismiss dispersal - for instance closer to Cricklade or Swindon - which are already impacted by high growth development, have been transport access, better facilities and are more suited to development opportunity. It would be far better to invest in improving facilities and infrastructure around Swindon, than damaging smaller villages without critical infrastructure or transport networks.

Comment ID: 11021

Location in consultation document: Employment and commercial development needs

Name: Polly Eldridge

Comment: Cirencester does not need more low quality chain stores. It needs independents with high quality shopping opportunities to bring people in from further afield.

Comment ID: 11016

Location in consultation document: Indicative figures

Name: Polly Eldridge

Comment: The proposed housing requirement is not justified by local evidence and is derived primarily from the standard method. The Plan does not demonstrate that this figure is deliverable, environmentally acceptable, or supported by infrastructure capacity. As such, it fails the “justified” and “effective” tests of soundness.

Comment ID: 11018

Location in consultation document: Indicative figures

Name: Polly Eldridge

Comment: Further, the plan places disproportionate emphasis on the risks of under-delivery while failing to address the equally serious risks of over-allocation, including speculative development, infrastructure overload, and harm to landscape and heritage assets.

Comment ID: 11024

Location in consultation document: Infrastructure needs

Name: Polly Eldridge

Comment: None of the proposals include any clarity about the upgrades subject to investment to ensure that the infrastructure needs are met.

Comment ID: 11037

Location in consultation document: Question 6

Name: Polly Eldridge

Comment: Cotswold District Local Plan – Preferred Options Consultation Response

Respondent: Resident of Poulton, Cirencester

No, I object for the following reasons. Whilst I reside in Poulton, Cirencester, it is emphasised that the issues identified in this response are not unique to Poulton. Similar scales and forms of development proposed for nearby villages and rural settlements would have equally severe and, in many cases, catastrophic impacts on village character, landscape setting, infrastructure capacity, and environmental sustainability across the district.

Document Section	Paragraph / Topic	Summary of Council Text	Proposed Comment / Objection
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Chapter 1 – Introduction	Purpose of the Local Plan Update	Explains the need to update the Local Plan in response to national policy changes	The need to update the Plan is acknowledged. However, the document does not explain why national policy changes must result in the scale of growth proposed in a district with exceptional environmental and infrastructure constraints. The update should balance national objectives with local realities, which is not adequately demonstrated.
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Chapter 2 – National Policy Context	Meeting Housing Need	States that councils are expected to meet identified housing needs	This paragraph omits national policy flexibility allowing lower housing figures where environmental constraints apply. This creates a misleading interpretation of national policy and undermines justification for the proposed housing requirement.
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Chapter 3 – Housing Requirement	Proposed Housing Target	Sets out the proposed housing requirement using the standard method	The target is not justified by local evidence and relies heavily on a national formula. It fails to properly consider landscape constraints, infrastructure capacity, or deliverability, failing the justified and effective tests of soundness.
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Chapter 4 – Spatial Strategy	Concentration of Growth	Proposes focusing growth on Cirencester and larger settlements	Concentrating growth risks cumulative harm to character, transport networks, and services. Infrastructure capacity over successive plan periods has not been demonstrated.
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Chapter 5 – Settlement Hierarchy	Growth in Smaller Villages	Proposes limited or proportionate growth in villages	The term 'proportionate growth' is undefined. In
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villages such as Poulton and nearby settlements, even modest growth can fundamentally alter character and sustainability and invites speculative development.

Chapter 6 – Environment & Landscape Cotswolds National Landscape

Acknowledges importance of protected landscape Acknowledgement alone is insufficient. The Plan does not demonstrate compatibility with the statutory duty to conserve and enhance the Cotswolds National Landscape.

Chapter 7 – Land Supply Greenfield Development Indicates reliance on greenfield land The Plan has not demonstrated that all reasonable brownfield opportunities have been exhausted. Greenfield release is premature and insufficiently justified.

Chapter 8 – Infrastructure Developer Contributions Relies on developer-led infrastructure provision Developer contributions are uncertain and often delayed. The Plan lacks binding commitments and secured funding, undermining effectiveness.

Overall Strategy Preferred Options Summary Summarises the overall preferred approach Taken together, the Preferred Options are not justified, not effective, and do not adequately protect villages, landscape, or infrastructure capacity. Similar impacts would occur across Poulton and neighbouring villages alike.

The summary specific to Poulton is as follows:

- Infrastructure Deficit: Poulton lacks essential services—public transport, schools, healthcare, shops—making it unsuitable for significant development. There are already problems with heavy traffic and speeding on the main road.
- Transport Limitations: There is no viable public transport - none highlighted in the proposal; reliance on cars increases congestion, impact on the environment, increase in emissions, and road safety risks.
- Flooding & Sewage Risks: Existing issues with flooding and inadequate sewage capacity; further development would worsen these problems.
- Scale of Proposed Growth: Adding 30 dwellings (17% increase) is unsustainable given current infrastructure and environmental constraints.
- Environmental & Heritage Impact: Development near conservation areas and open spaces would harm rural character and Cotswold landscape.
- Affordable Housing Concerns: New housing often unaffordable for locals; risk of properties being bought by outsiders or used for Airbnb.
- Planning Process Issues: Lack of meaningful early engagement with Parish Councils; local knowledge on flooding and infrastructure often ignored.
- Preference for Strategic Growth: Support for focusing development in main service centres or large strategic sites to enable infrastructure-led planning.

- Opposition to Dispersed Development: Small-scale allocations in villages seen as inefficient, environmentally damaging, and contrary to sustainability goals.

Comment ID: 11015

Location in consultation document: The different scenarios

Name: Polly Eldridge

Comment: National policy requires housing need to be met where it is reasonable to do so. This paragraph fails to acknowledge that national policy also allows flexibility where environmental constraints, including protected landscapes such as being within the AONB significantly restrict capacity. The omission creates a misleading impression that the housing target is mandatory regardless of local constraints.

Comment ID: 8803

Location in consultation document: 2. Spatial strategy options

Name: Preston Parish Council

Comment: 2.2 Housing targets - The calculation using the standard method for housing targets is skewed because of the vast (80%) National Landscape (NL) area within Cotswold District. In this case it is unfair and should be weighted to reflect unavailable areas. Alternatively the standard method should be robustly challenged.

Development land is extremely scarce within the NL, meaning sites must be concentrated in the remaining portion of the Cotswolds district which is not designated NL. Additionally, house prices in the National Landscape tend to be higher than average, impacting the affordability factor in the standard method algorithm. The end result is unfair pressure on land and communities outside the NL and the high likelihood of further social and environmental polarisation between the areas in and outside the NL.

2.4 Insufficient sites - CDC must implement at the earliest opportunity the Duty to Co-operate by neighbouring local authorities. When a local authority is unable to meet its development needs due to the requirement to prevent harm to the National Landscape, it can invoke a Duty to Co-operate in sharing development needs. This must reflect not only the 21% shortfall under Scenario 5, but also the fact that 80% of the district is within the National Landscape and therefore largely out of bounds for development.

Comment ID: 8805

Location in consultation document: Increasing density

Name: Preston Parish Council

Comment: Although higher density development may be appropriate in urban settings, the Parish Council considers it unsuitable for Preston. It is essential to ensure the rural and historic character and scenic beauty of Preston is retained. Any development in the parish should have a lower density and plenty of open space and trees and also include a substantial green buffer to firmly separate the village from new development. We refer you to the Design in Preston statement which was adopted by Cotswold District Council in 2017 and also to Preston's Neighbourhood Development Plan 2013-2031.

<https://www.cotswold.gov.uk/media/kmal4kk5/preston-neighbourhood-development-plan-2018-2031.pdf>

Comment ID: 8806

Location in consultation document: Question 1

Name: Preston Parish Council

Comment: Every scenario negatively impacts Preston, the village and surrounding countryside.

The parish of Preston is composed mainly of countryside with scattered dwellings and small businesses. Part of the village is designated Conservation Area, defined in part by its rural setting and its separation from nearby Cirencester. Residents highly value village life and the existing rural buffer between Cirencester and Preston.

The proposed scenarios engulf Preston Village with suburban sprawl from Cirencester, harmfully eroding its distinct setting and predominantly rural character. Additionally they raise serious concerns about the impact on traffic, road congestion and safety, particularly adding further pressure to already congested points on the road network, including Kingshill Lane, the Tesco roundabout and Preston Toll Bar.

Significant infrastructure investment will be required to support the proposed scale of growth, including major upgrades to transport, utilities, schools and healthcare.

If any of these scenarios go ahead, it must be with due notice of the Preston Neighbourhood Development Plan and with full consideration for the long-term wellbeing, identity and safety of the village and its residents.

Ameliorating measures must include:

- A robust and substantial green buffer between new housing and Preston Village to preserve rural separation and identity. This is essential.
- Safe, continuous walking and cycling routes extending between Cirencester and Preston, including new off-road paths linking to schools and other facilities.
- Steps to prevent rat-running through Preston Village, protecting its quiet character and safety. Access to any new development be via the major A-roads and should not cut through the village.

- Crossing solutions where Kingshill Lane meets the A419 at Preston Toll Bar.
- Addressing flooding on the A419 at Preston Toll Bar and along adjacent Cricklade Road.
- Traffic and pedestrian safety measures at Preston Toll Bar and along Kingshill Lane.
- Provision for emergency services - The recent fatal accidents at the roundabout on the tollbar required the field where development is proposed to be used as a landing spot for helicopter ambulances.
- Improved community facilities and car parking within Preston village.
- Better public transport provision for both the village and new developments.
- Improved provision of schooling, doctor and dental surgeries, shopping etc.

Infrastructure - transport upgrades, utilities, healthcare and schools must be put in place before development is complete.

Comment ID: 8807

Location in consultation document: Question 3

Name: Preston Parish Council

Comment: Although higher density development may be appropriate in urban settings, the Parish Council considers it unsuitable for Preston. It is essential to ensure the rural and historic character and scenic beauty of Preston is retained. Any development in the parish should have a lower density and plenty of open space and trees and also include a substantial green buffer to firmly separate the village from new development. We refer you to the Design in Preston statement which was adopted by Cotswold District Council in 2017 and also to Preston's Neighbourhood Development Plan 2013-2031.

<https://www.cotswold.gov.uk/media/kmal4kk5/preston-neighbourhood-development-plan-2018-2031.pdf>

Comment ID: 8804

Location in consultation document: Scenario 5

Name: Preston Parish Council

Comment: Every scenario negatively impacts Preston, the village and surrounding countryside.

The parish of Preston is composed mainly of countryside with scattered dwellings and small businesses. Part of the village is designated Conservation Area, defined in part by its rural setting and its separation from nearby Cirencester. Residents highly value village life and the existing rural buffer between Cirencester and Preston.

The proposed scenarios engulf Preston Village with suburban sprawl from Cirencester, harmfully eroding its distinct setting and predominantly rural character. Additionally they raise serious concerns about the impact on traffic, road congestion and safety, particularly adding further pressure to already congested points on the road network, including Kingshill Lane, the Tesco roundabout and Preston Toll Bar.

Significant infrastructure investment will be required to support the proposed scale of growth, including major upgrades to transport, utilities, schools and healthcare.

If any of these scenarios go ahead, it must be with due notice of the Preston Neighbourhood Development Plan and with full consideration for the long-term wellbeing, identity and safety of the village and its residents.

Ameliorating measures must include:

- A robust and substantial green buffer between new housing and Preston Village to preserve rural separation and identity. This is essential.
- Safe, continuous walking and cycling routes extending between Cirencester and Preston, including new off-road paths linking to schools and other facilities.
- Steps to prevent rat-running through Preston Village, protecting its quiet character and safety. Access to any new development be via the major A-roads and should not cut through the village.

- Crossing solutions where Kingshill Lane meets the A419 at Preston Toll Bar.
- Addressing flooding on the A419 at Preston Toll Bar and along adjacent Cricklade Road.
- Traffic and pedestrian safety measures at Preston Toll Bar and along Kingshill Lane.
- Provision for emergency services - The recent fatal accidents at the roundabout on the tollbar required the field where development is proposed to be used as a landing spot for helicopter ambulances.
- Improved community facilities and car parking within Preston village.
- Better public transport provision for both the village and new developments.
- Improved provision of schooling, doctor and dental surgeries, shopping etc.

Infrastructure - transport upgrades, utilities, healthcare and schools must be put in place before development is complete.

Comment ID: 9745

Location in consultation document: Context

Name: Pulhams Coaches - Nick Small

Comment: Pulhams notes and welcomes the re-calibration of the plan period to 2043. This is necessary to meet the expectations of NPPF set at paragraph 60, that require at least a 15-year horizon from the date of adoption. Conformity with NPPF, is a key test of soundness.

Obviously, this elevates the plan's housing requirement by two years' worth of supply. This materially elevates the challenge of accommodating housing need.

However, another test of soundness is that the plan is "positively prepared" to meet housing needs over the period. NPPF is clear that Local Planning Authorities must seek to meet their housing needs in full and that the Standard Methodology is the mandatory starting point to assess these needs, as acknowledged at paragraph 2.3.

We note that based on a forward committed supply identifiable as 6,150 dwellings.

Where unbuilt permissions are concerned, of the 3,350 homes identified, a very large proportion of this is at The Steadings, Cirencester, where almost all the consented quantum bar 75 plots remains to be delivered. This makes the entire trajectory and the first five years of the plan, exceptionally dependent on this one development. It is plain that development is starting to move forward on the main body of the site, which will credibly lift development rates. However, to date it is very apparent that even with this in view, it will not be delivered at any great pace.

This includes an allowance for "windfalls" that are of their essence unpredictable. There is no transparency on the level of contribution this is expected to make to the land supply within the main consultation document. This information is found in the separate Development Strategy Options Report at section 4.8, page 8, where a figure of 2,350 is set out, over the period 2025 to 2043, being 18 years. Generally, such a figure cannot be applied from the start date of the plan, to avoid double counting with identified permissions that have arisen as windfalls outside the plan-led system. Discounting the first three years of the plan following adoption, over a 15-year period, this would imply a 166/annum windfall rate; and irrespective, the windfall category accounts for 13.5% of the total supply needed to be identified by the plan. Given this is a rural authority, largely covered by National Landscape that suppresses strongly the permissioning of significant development within it outside the plan-led system, and with very little identified previously-developed land, this figure seems improbably high.

Adopting the Standard Methodology outcome as the basis for the Local Housing Requirement, unadjusted, gives rise to a residual requirement demanding new allocations, for 12,500 dwellings.

The consultation does not give any consideration for the need to apply a 5% buffer to create a degree of flexibility and robustness to the plan, including a degree of choice in the market for housing land, as NPPF separately expects.

Comment ID: 9750

Location in consultation document: Indicative figures

Name: Pulhams Coaches - Nick Small

Comment: This is discussed in paragraph 3.17 ff of the consultation. Given the challenges of meeting development needs over the plan period, which the Council concludes is impossible while complying with national policy, that substantial additional capacity is identified at the stage by the Council is highly pertinent.

In most cases, a greater capacity is identifiable as deliverable after 2043 than within the development plan period. This begs very important questions about the development trajectory within the plan period, as well as the degree to which the plan is demonstrably positively prepared. If it is in fact the case, that much more of this developable capacity is deliverable prior to 2043, then many of the dichotomies at the heart of the discussion in the consultation document are likely to fall away, at least to a considerable extent.

Table 3 at page 24 outlines the total capacities of 8 identified potential strategic sites. We note and accept that these may be subject to change, and we agree that there are substantial difficulties with the fundamental sustainability of a few of these options. However, the quanta involved are indeed substantial. We reproduce the table in a modified form below:

TOTAL Estimated					
Capacity	Deliverable prior to 2043		Deliverable after 2043		
Strategic extension north of Ampney Crucis	660	660	NIL		
Strategic extension south of The Steadings, Cirencester	1290	400	890		
New settlement west of Driffield	2100	840	1260		
Strategic extension north-east of Fairford	1400	780	620		
Strategic extension south-west of Kemble	1070	590	480		
Strategic extension north, south and east of Moreton-in-Marsh	3970	1710	2260		
Strategic extension south of Preston	2510	960	1550		
Strategic extension north, south and west of Siddington	1100	880	220		
TOTAL	14100	6820	7280		

The following becomes very apparent:

- The total quantum deliverable from these sites alone could in theory meet the vast majority of the residual requirement from new allocations in the plan area. In fact, an extra 50 dwellings per annum deliverable from each over the plan period from 2033-2043, at 3,700 additional deliverable dwellings, comes close to fully addressing the deficit between the preferred Option 5 quantum and the total assessed housing need.
- Having regard to other non-strategic options of less than 500 units, and current commitments, it is therefore clear that the objectively-assessed housing need might be met, if the housing trajectory is prudently calibrated to allow for faster delivery on these sites.
- The trajectory is not published. However, assuming that none of the Options above commences delivery before 2033, which is quite conservative, over the remaining 10 years of the plan the Council is assuming a typical rate of annual supply of each of these sites that is well under 100 dwellings per annum. This is exceptionally sedate. Moreover, given the need to recoup very substantial up-front investment in planning, preparation, servicing and infrastructure, there is every commercial incentive on most developers to secure a much faster rate of development than those apparently assumed.
- These sites, if they deliver policy-compliant affordable housing, are much less dependent on the housing market. Higher rates of delivery are thus supportable, that are less cyclically sensitive.
- For these sites to rapidly reach a level of population that achieves internal self-containment, supporting new on-site services and amenities as well as improved public transport, it will also be necessary to secure a much more rapid build-out, at least 200/annum. Without this these developments risk being utterly car-dependent for many years, to the point of this become entrenched. Whatever the ultimate vision and wider logic supporting allocation, this is unsustainable.

The assumptions about how these sites contribute to the development trajectory is not immediately obvious. It is found within the consultation material in the Development Strategy Options Technical Report at Section 5.31 ff. We discuss this in the following section.

Irrespective of the basis for these assumptions, the points above still stand.

Comment ID: 9756

Location in consultation document: Infrastructure needs

Name: Pulhams Coaches - Nick Small

Comment: To supplement our answers to question 4, we comment on the broad implications for provision of effective public transport, that would provide a “genuine choice”, as NPPF expects, below of each of these. The order of consideration is the same as in table 3 of the consultation document. This narrative offers our perspective on strategic bus service enhancement opportunities that reflect the potential scale of development realisable not only at each, but as far as possible, in combination, especially where an entirely new corridor to BSIP “Express Bus” is potentially identifiable.

7.1. Strategic extension north of Ampney Crucis

This Option has a total indicative identified capacity of 660 dwellings, all deliverable by 2043.

The site adjoins an existing linear settlement to the north with a total combined size of 906 dwellings. The existing village has virtually no facilities, has no peak time bus service, and lies some distance from the A417 on which any reinforced bus corridor would be expected to operate. Diverting this far off-line of the direct route between Fairford and Cirencester would be extremely unattractive, serving more to hinder development of a high level of bus use from the much larger settlements upstream.

The total developable quantum is far below what would typically be expected to support a reasonable level of local self-containment, which in our understanding, based on known commercial thresholds set by mainstream convenience store operators, is about 1400 dwellings. In the absence of a clear identifiable wider hinterland or any passing trade on a major road, we do not see that the concept proposed is either sustainably located or can be made sustainable, as is necessary to comply with NPPF paragraphs 110 and 115.

We have strong fundamental concerns about this option. It is not supported by Pulhams.

A new or expanded village directly on the A417 between Fairford and Cirencester could, however, be a much more supportable option.

7.2. Strategic extension south of The Steadings, Cirencester

Typically, consolidating an existing major development, making best use of installed infrastructure and helping support a richer diversity and quality of local services through a larger population, is inherently attractive as a strategy.

However, realising such potential depends greatly on the degree to which master planning can facilitate proper integration of the commitment with any extension. It also depends on the overall pace of development being one that allows the additional population to be in place such that these services can be established and sustained suitably propitiously.

It seems clear that the designated Scheduled Ancient Monument and its setting, that already acts as a serious constraint on the committed master plan, will also affect any extension, dividing it into two lobes. Second, the planned spine road runs somewhat to the north and it seems highly likely, if not certain, that no bus penetration will be feasible closer to or through the developable area. That said, the planned road, that under this scenario would lie centrally between the existing Cranhams Lane neighbourhood and the extension of the new one, would benefit from a very much larger catchment within about 600m, and with appropriate urban design that maximises pedestrian and cycling feed into the existing development, this could justify substantial reinforcement of bus frequency and, potentially connectivity, through The Steadings.

A bigger concern is that the pace of development on the current consent is so slow, that none of the extension is realistically deliverable within the plan period.

Depending on the evidence presented by initial master planning exercises, and concerning achievable rates of delivery on the existing consent, this Option is nevertheless likely to be supportable.

7.3. New settlement west of Driffield

This Option has a total indicative identified capacity of 2,100 dwellings, 840 assumed to be deliverable by 2043.

The site lies entirely east of the A419 Expressway. The position and nature of existing structures to effect access suggests that one or more new over-bridges will be required to access the site. The degree to which this Option simply will present easy options for car-borne commuting using the A417/A419 trunk road should be flagged as a major concern. The costs of accessing the site, then servicing it, will involve extraordinary up-front development costs.

The experience with a near- identically sized strategic allocation north-east of Swindon at Kingsdown, offers some relevant lessons. It has yet to commence delivery. Issues related to the interface with the SRN, as well as development viability, largely explain this.

The site lies entirely separate to and distant from existing regular bus services. Unlike options at Preston and a non-strategic one at Down Ampney also identified in the consultation, it does not lie on a readily identifiable new Express Bus corridor either.

It is hard to see how this site can easily be served by public transport. The key would be a direct efficient bus spine running from a northern access point off the Cirencester Road at or just north of the Cirencester South interchange linking as directly as possible to a point at or close to the Cotswold Water Park Spine Road Interchange. This would facilitate and allow the site to synergise with the development Option south of Preston to effect a new direct Cirencester-Swindon service. It might also be served by a variant of a much-improved Cirencester-Fairford route that also served Down Ampney (q.v.). This would need to be in place at a quite early stage, and its cost would be very considerable. Phasing the site from south to north, assuming the development reached towards Latton, might represent the optimal approach.

Measures to mitigate congestion within and on the approaches to Cirencester, where possible achieving material bus priority, are likely to be necessary and should be carefully evaluated.

We have substantial concerns about this Option. However, it may be supportable with further investigation and evidence. We are keen to constructively engage with the promoter and their client team as we can see how there may be potential to address our concerns. The aim should be to secure a high level of bus service provision to the site, benefiting the wider corridor between Cirencester, Cricklade and Swindon.

7.4. Strategic extension north-east of Fairford

This Option has a total indicative identified capacity of 1400 dwellings, 780 assumed to be deliverable by 2043.

We recognise that this site, believed to be under a single controlling interest, is relatively unconstrained. It consolidates a small town that is already one of the most sustainable in the plan area. The presence of Farmor's School is a substantial contributing factor.

Bus operators in the area have long considered that the opportunities exist to leverage this situation with the important objective, among others, to address a serious public transport deficit at Fairford, and, potentially, in a wider corridor east of Cirencester towards Lechlade and, indeed, possibly beyond towards Witney.

The site extends a considerable distance north of the A417 London Road, which is the current and logical existing bus route towards Lechlade. However, we urge that master planning takes place in such a way that as much of the development quantum is oriented towards the west and south of the site; and that an efficient bus route is effected through it that would allow the developable area to be served without a long and circuitous diversion.

The development is of a potential scale to allow for a degree of internal self-containment though the town is quite compact, and it clearly makes sense to consolidate demand for existing services, and offer new complementary facilities that benefit the whole town, rather than split additional demand between duplicative provision. We are confident that the locally-based promoter is already well advanced in considering this matter.

We believe that there is plenty of evidence available to suggest that most if not all the development quantum is deliverable within the plan period, and the contribution of this highly sustainable site to meeting short as well as longer-term housing needs in our view needs to be maximised.

Proportionate contributions towards strategic bus service enhancements between Fairford and Cirencester should be sought. This might synergise with development at Down Ampney, and longer-term, South of Preston and at a Drifffield New Settlement. A half-hourly frequency, on this basis, in this enhanced corridor would not appear to be fanciful.

This Option for strategic allocation is very strongly supported. We conclude that it is one of the best of those proposed in the consultation, contributing strongly to strategic objectives, and conforming very well to national policy set out in NPPF, especially at Chapter 9.

7.5. Strategic extension south-west of Kemble

This Option has a total indicative identified capacity of 1070 dwellings, 590 assumed to be deliverable by 2043. 388 existing dwellings are identifiable in the village and thus the total size of the expanded settlement looks highly likely to support a good level of local self-containment – especially in view of the major employment available at the airport, the ability to benefit from passing trade on the A429, and the further potential to create an activity hub that directly relates to the rail station itself.

We have separately highlighted in this response the fundamental benefit of this location, which will strongly align with the specific new national policy that sets a presumption in favour of consent on otherwise unconstrained sites within 800m of “well-connected” rail stations.

This Option also would help to catalyse a greatly improved direct bus link between Cirencester and Kemble Station, thence on to Tetbury; building on improvements which we consider likely to be deliverable in the relatively short term. Therefore, proportional contributions towards strategic bus service enhancement are considered to be

justifiable in our evaluation. We would hope that this service level, supported by greatly higher levels of patronage in the corridor as a whole, would be commercially self-sustaining in time.

The developable capacity of the Option clear ought to be maximised consistent with the constraints identifiable and the desired character of the settlement. If a higher developable quantum is demonstrably achievable, then it should be pursued.

Likewise, it is logical to seek to maximise the contribution of this highly sustainable Option towards short and longer-term housing supply. We see no reason why a rate of output nearer 150 dwellings per annum would not be achievable, thus, delivery of the entire potential quantum within the plan period ought to be credibly achievable.

Measures to mitigate congestion within and on the approaches to Cirencester, where possible achieving material bus priority, are likely to be necessary and should be carefully evaluated.

7.6. Strategic extension north, south and east of Moreton-in-Marsh

This Option has a total indicative identified capacity of 3970 dwellings, 1710 assumed to be deliverable by 2043.

We note and welcome that a Study has been commissioned by the Council on the potential for strategic development at Moreton. We made comprehensive comments on the material published for consultation in 2024, that looked in some depth at the issues at Moreton, including traffic congestion and the potential for a relief road to the east. We strongly supported the broad thrust of the Council's thinking expressed at that time.

Substantial land adjacent to the town to the north outside the National Landscape, lies within 800m of the railway station, and this would benefit from an explicit positive presumption under new policy likely to be inserted in NPPF.

The opportunities to reinforce bus network frequency and connectivity should be pursued. They are many, especially with development broadly of the scale envisaged. This would support the sustainability of all the surrounding towns, strongly so, including those such as Chipping Campden where sustainable mobility is quite seriously challenged by the lack of frequency. This also includes wider cross-boundary bus service connectivity including to Stratford-on-Avon, via both Shipston on Stour or Chipping Camden/Meon Vale. We thus hope to see a comprehensive agreed strategy emerge to this end, to which proportionate developer contributions towards strategic bus service enhancement would be applicable.

We have already strongly supported the broad thrust of this strategic option, and we wish to express our continued ongoing support, subject to suitable mitigation for existing transport challenges, especially congestion in and around the town centre, being identified and defined.

7.7. Strategic extension south of Preston

This Option has a total indicative identified capacity of 2510 dwellings, 960 assumed to be deliverable by 2043.

We note that this Option lies between the Cirencester Road (A419) and the A417 Expressway to the east. The existing village of Preston lies to the north and is a Conservation area. We assume the development will stand off from the existing village. The total developable quantum seems to be rather high relative to the likely footprint of the development, though land west of Cirencester Road might potentially assist with this. However, even a rather smaller quantum of 1400-1600 dwellings would be of a scale that should secure a good level of internal self-containment.

As we mention elsewhere, it is essential that achievable delivery rates are assumed at a higher level than the consultation appears to anticipate. The promoter is highly experienced one, with a very strong track record of delivery in the County and beyond. Their technical and financial capacity to service large and complex sites, to bring them forward, is very well proven. We believe that the entire development quantum is credibly likely to be deliverable within the plan period. One need only consider the achieved rate of delivery at Great Oldbury, Stonehouse, and at Fiddington, near Ashchurch, to evidence this.

The site does not lie on any existing public transport corridor. However, it lies within cycling distance of a number of nearby amenities and employment in the south of Cirencester, including Kings Hill School, the commercial activity around Tesco, and the major employment a little further distant. This potential we would naturally expect to be identified and maximised.

It also lies on a potential direct fast bus service between Cirencester and Swindon via the A419. Depending on the feasibility of effective master planning at the proposed New Settlement northwest of Driffield, it could strongly synergise with that; though we would stress that no dependency exists, and this site is much more obviously able to both catalyse and benefit from such a service. To do so, the development footprint either should relate as far as possible to the existing main road or alternatively provide an efficient, seamless and direct bus diversion route into the site, minimising additional journey time, on what would be a high quality inter-urban provision. We consider it likely that the former will prove to be a more expedient and deliverable approach.

It may also be the case that an enhanced service to Fairford and beyond, via Down Ampney, runs along the Cirencester Road, as we mention elsewhere in this response.

Measures to mitigate congestion within and on the approaches to Cirencester, where possible achieving material bus priority, are likely to be necessary and should be carefully evaluated.

Subject to effective master planning to realise these opportunities, we consider this Option is likely to be very supportable.

7.8. Strategic extension north, south and west of Siddington

This Option has a total indicative identified capacity of 1100 dwellings, 880 assumed to be deliverable by 2043. The site appears to lie adjacent not only the village but to recent development to the northwest. It is not clear if the intention is for this to function as a southern urban extension to Cirencester, in some ways consolidating The Steadings, or as an extension to and consolidation of Siddington.

Irrespective, it is of a scale that with adjoining development and nearby existing facilities, will offer a good level of internal self-containment. Its direct proximity to facilities and employment south of Cirencester including at Love Lane, is a very notable benefit establishing its potential sustainability credentials very strongly.

The area is directly served by the existing Stagecoach 51 service between Cirencester, South Cerney, Cricklade and Swindon. This forms part of the currently identified Express Bus network in the BSIP. It is the only strategic Option apart from Moreton, that so benefits. How far master planning can or should seek to secure a diversion of the service from the existing village west towards Spratgate Lane, possibly via Park Way, should be discussed with Stagecoach. If the development is closely related to the existing village as seems possible, then the current routing should be retained, which would probably be preferable.

Measures to mitigate congestion within and on the approaches to Cirencester, where possible achieving material bus priority, are likely to be necessary and should be carefully evaluated.

We consider that this Option is likely to be highly supportable.

Comment ID: 9746

Location in consultation document: Question 1

Name: Pulhams Coaches - Nick Small

Comment: The Consultation revolves around seven strategy Options, derived from a Development Strategy Options Technical Report published alongside the consultation.

Option 4, one that focuses development on public transport hubs and corridors, is naturally one that we would urge the Council to pursue. This would both support and be highly compatible with the achievement of a great many strategic objectives of the plan, as well as NPPF and local transport policy.

Since this consultation was drafted and published, the Government has stated its intention to insert a new policy into NPPF that establishes a presumption in favour of development within 800m of “well-connected” rail stations. A draft of this policy is anticipated on 18th December. While clearly any such policy would be circumscribed in the same way as is the presumption at paragraph 11, the plan area has just two mainline rail stations within it, at Moreton-in-Marsh and at Kemble. Both have significant amounts of broadly unconstrained land lying within 800m.

With this in view, the Council’s identification of Strategic Development Location Options at both is likely to even more strongly justified by national policy. We note that the current consultation mentions that the Council is separately progressing a study to look at growth potential at Moreton. Notwithstanding a nominal additional capacity of approaching 4,000 dwellings is identifiable at the stage. We separately note that a strategic expansion of about 1000 dwellings is indicated southwest of Kemble (see Table 3). We recognise that the scope of these opportunities is likely to change over the remaining plan preparation period, and possibly beyond as further, more detailed evidence comes to light. We discuss the phasing and delivery trajectory of these opportunities elsewhere.

Beyond the two rail stations, the difficulty with this Option is that, firstly, the number of regular bus corridors is very few, and secondly, that the greatest extent of the regular bus network as operated today lies within the National Landscape, especially between Moreton and Cheltenham (Pulhams 801), Moreton and Cirencester (Pulhams 855) and along the A419 and A40 served by Stagecoach 51 (Cheltenham- Cirencester) and S2

(Cheltenham-Northleach-Oxford) respectively. Other physical and topographic constraints obviously bind heavily on many parts of these corridors.

This immediately begs the question of how far expansion of Principal settlements outwith the National Landscape alongside the location of new or expanded villages along identifiable potential new regular bus corridors, would mutually support one another, in pursuit of a sustainable pattern of development that as far as possible avoids the need for major development in the National Landscape. Such a strategy would also serve to potentially transform accessibility and connectivity by non-car modes across an area in which much of the existing plan area's population already lives; the southern flank along the Upper Thames Valley; and the far north, which looks more to Stratford-on-Avon and Worcestershire.

We have already signalled this strongly in previous consultation rounds.

This strategy would support new and expanded villages on the line of the identified corridors. Each should be of a scale that securely sustains local internalisation for primary education and convenience retail and services in particular. We would suggest that a total of about 1,400 dwellings is likely to represent a realistic target scale (including existing properties within safe and convenient walking or cycling distance).

We note that the preferred option identifies several stand-alone new settlements, as well as urban extensions to Cirencester and Fairford. None is anticipated to reach this threshold within the plan period by the Council, though the available capacity at most approaches if not exceeds this level. Only one at Siddington, relates well to an existing regular bus service (Stagecoach 51).

As we state below, much of Option 4 aligns with Option 3, a focus on the largest and most sustainable settlements and service centres. Where Moreton-in-Marsh is concerned, as was highlighted in the 2024 consultation, there is a clear need to look at the potential to restore secondary education provision, through the focusing of strategic growth there, to greatly improve the overall sustainability of the town, where its lack is already anomalous. As we have previously said in formal representations, we recognise that the growth of Cirencester is approaching its natural limits.

Given the nature of both the settlement hierarchy and the coarseness of the classification, it is exceedingly difficult to see a very great distinction between the Options 1 and 2 in particular, which are all couched in very vague terms. From our discussion above, it is also actually hard, in terms of evidential base, to make a distinction between a new category of “Main Service Centres” (Option 3) that are nowhere mentioned in the Settlement Role and Function Study, and (public) transport nodes (Option 4), since the latter are almost perfectly aligned with the former, with the exception of Kemble Station.

Both Options 1 and 2 appear to involve a high level of dispersal to very small settlements. This plainly cannot be anything other than highly car-dependent, seriously exacerbating existing issues in the district. It may also risk threatening, more broadly, the rural character of the District. Finally, we would stress that the need for this plan to deliver a high proportion of affordable housing, including a high proportion of “truly affordable” tenures including social rent, means that a dispersal strategy risks confining tenants to locations where they are isolated, either cut off from social networks and economic opportunity/training, or alternatively spending large sums of money on owning and running a car to participate meaningfully in society. This is in every sense obviously unsustainable.

Option 5 then posits the potential for new and expanded settlements – but makes no comment on how these would be sited to take advantage of sustainable transport – in the context of Cotswold, public transport corridors. In talking about expanded settlements it is completely unclear if this includes, or excludes, development at the largest and most sustainable settlements; or if the Option involves expansion of selected strategically located smaller settlements, whether the “Non-Principal” or “Rural Settlement” categories. In any case, these categories are never used to describe the Options, making it almost impossible to directly relate them to the evidence. This meets 79% of the assessed need: 14,660 homes.

Scenario 6 is the only one that presents the question of “major development in the national landscape”. Para 2.6.22 explains that “National Landscapes have the highest status of national policy protection. Major development within them should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.” (our emphasis). The consultation immediately continues to say “Given this option is contrary to national planning policy, Scenario 6 is not considered to be a viable option”.

Discounted potential in the National Landscape would offer potential to an additional 4,660 homes, subtracting the Option 5 total from Option 6. However, 4% of the figure exceeds the assessed housing need; this is 746 “surplus” dwellings, so in fact, crudely speaking, the plan could be considered positively prepared with the release of 3,914 dwellings in the national landscape, based on the Council’s evidence and site assessment methodology.

This assumes that the Council has both fully considered all reasonable alternatives outside the NL, and their deliverable capacity within the plan period; and that it is properly discounted the unsuitable ones. As we will explain later in the response, we are not convinced that either of these propositions are true.

In particular, we struggle to understand how at Kemble - outside the National Landscape - the opportunities for larger-scale development appear to have been ruled out.

However, several of the largest and most sustainable settlements are either entirely within, or bounded by National Landscape. This includes all the towns on the core Pulhams 801 and 855 services through the heart of the District. A strategy that properly evaluates how far development might appropriately be accommodated at these settlements on a scale reflecting national policy, would in fact conform to both Options 3 and 4, reflecting the very strong logic that the plan should have due and very great regard to wider principles of locational sustainability to define the development strategy.

Scenario 6 is the only one set out by the Council that satisfies another key tenet of national policy at NPPF paragraph 11 b) that the plan should seek as a minimum to provide for the assessed development needs fully. This mandate is also circumscribed immediately afterwards which acknowledges that constraints, including National Landscape may exist that “provide a strong reason to restrict, among other things, the overall scale, type or distribution of development in the plan area”. The two stand in stark opposition. This dilemma is at the heart of the challenge for the Council in making this plan.

Sustainable development is defined in NPPF paragraph 8 as having three dimensions – in line with most accepted mainstream definitions including the UN Resolution and the document referenced at footnotes 4 and 5 therein. This places economic and social objectives alongside environmental ones. The consultation sweeps this aside, in concluding that there is no apparent justification to examine this tension in the light of the “public interest” of securing the social or economic objectives of sustainable development. Paragraph 11b) i. does not void Paragraph 8, or indeed, Paragraph 11a) that requires plans to arrive at a sustainable pattern of development, that has due regard to all the 3 tenets of sustainable development – not just one.

In fact, there are many examples of local plans that have succeeded in demonstrating the very special circumstances that justify major development in the National Landscape. Significantly this includes the world-famous exemplar development at Poundbury, outside Dorchester, promoted at the time by no lesser than the then-Prince Charles, one of the UK’s leading and pioneering exponents of sustainability. Much of which lies in the Dorset National Landscape.

Securing a sustainable pattern of development in and of itself, should protect the environment and mitigate damaging effects – for example on climate – as far as possible.

This issue goes beyond simple housing supply arithmetic. From first principles, it may demonstrable that sufficient over-riding constraints exist that mean that housing needs as assessed cannot be met in full in Cotswold District, but equally at the same time, that a sustainable pattern of development, that among other things greatly mitigates transport-related emissions, reduces need to travel and supports socio-economic inclusion as far as possible, cannot avoid a certain amount of development within the National Landscape. Properly testing these circumstances and exploring the evidence as to where the balance should sit, is not something that the Council appears to have a strong appetite for. In failing to robustly grapple with this conflict it appears to us possible that the draft plan risks failing on the fundamental ground that it is improperly justified, as well as not positively prepared – two of the basic tests of soundness.

We nevertheless agree with the contention expressed that new settlements or large-scale urban extensions are unlikely to be justifiable in the National Landscape. As we point out, above, while unlikely, this is far from being entirely unprecedented – including

at Littlemoor in Weymouth, where a substantial urban extension was allocated entirely in the National Landscape.

Comment ID: 9747

Location in consultation document: Question 2

Name: Pulhams Coaches - Nick Small

Comment: Probably not. However, this assumes the basis on which sites have been discounted is evidentially robust.

Scenario 7 seeks to maximise development potential outside the National Landscape. It includes sites assessed as “unsuitable for development” (para 2.6.24) – a rather serious admission. The implication is that any site however unsuitable or otherwise problematic, is justified inasmuch as it means that the National Landscape can be treated as sacrosanct. We see nothing in national policy that justifies discounting policy on all other planning themes to a so great an extent, in order to have regard to just one. This includes the need to mitigate carbon emissions – including those arising from local transport and mobility - and the wider transport and accessibility objectives set out in paragraph 110 of NPPF. This meets only 87% of the housing need assessment, in any case. It is also discounted. We would suggest that the grounds for this are much stronger than they are for Option 6. However, it adds only 8% of the assessed need figure, thus only 1492 additional homes would be delivered by such “unsuitable” sites. Across so extensive a District, even those areas outwith the NL designation, it is hard to imagine that other suitable sites or means of achieving this could not be found.

We also separately note that the total capacity of the identified Strategic Development Options well exceeds that which is allocated for delivery in the plan period. This being the case, the need to look at fundamentally flawed land for allocation seems even more unjustifiable.

Comment ID: 9754

Location in consultation document: Question 4

Name: Pulhams Coaches - Nick Small

Comment: We cover the answer to this largely in our responses to specific Strategic Options.

Broadly we consider that the plan can arrive at a positively-prepared approach and should seek to do so.

We note infrastructural constraints, notably water supply and treatment in many settlements, that clearly need to be better understood in terms of timescales for remedy.

We would say that identified levels of growth in the preferred Option – which we suggest is highly amenable to modification – is achievable sustainable subject to the following investments:

- Bourton-on-the-Water: reinforcement of bus service to Moreton to at least every 30 minutes (northwards extension of 855 or equivalent)
- Cirencester: New bus hub/interchange, in line at minimum with BSIP aspirations, in a suitable location. Bus priority on key approaches, especially to support strategic growth Option to south and southeast. Optimised bus stop and crossing arrangements to serve the Hospital directly in both directions. Optimised master planning including review of bus service circulation in unbuilt portions of The Steadings, to facilitate longer-term extended allocation. Substantial reinforcement of frequency on existing regular Express Bus Corridors. New regular bus service corridors to Express Bus specification (q.v. other service centres) to:
 - o Stroud
 - o Fairford-Lechlade
 - o Gloucester – fast via Brockworth
 - o Kemble-Tetbury
 - o Swindon - fast via A419

- Fairford: substantial reinforcement of the Cirencester-Fairford bus service, likely to extend on some journeys to Lechlade. A route diverting via Down Ampney might feasibly allow synergy with strategic options, making higher frequencies possible.
- Kemble: primary school and retail to effect improved self-containment. Potential employment hub at or near station. Better bus interchange at Station. Minimum hourly Express Bus link to Tetbury and Cirencester, with rail connections optimised as far as possible.
- Lechlade: ideally should see an hourly bus link to Cirencester – but the very limited scale of development achievable may tend to limit the scope for this. See NE Fairford.
- Moreton-in-the-Marsh: In line with our previous consultation response, a full eastern relief road seems essential, to secure the opportunities for active travel and greatly improved public transport to and within the town. A new secondary school is also essential. This will avoid, among other things, a substantial statutory cost to the LEA in providing for large volumes of entitled secondary phase home-to-school transport. Substantial further improvement of the bus rail interchange.
 - o Reinforcement of existing Express Bus frequencies especially to Stow and Bourton to minimum every 30 minutes.
 - o Enhanced new service to Express Bus specification to Stratford on Avon via Chipping Campden, Mickleton and Meon Vale.
 - o Enhanced new service to Express Bus specification to Stratford on Avon via Shipston on Stour.
- Siddington: likely need to enhance bus reliability into Cirencester, through bus priority measures (mode filter?). Possible enhancement of existing frequency on Stagecoach 51.
- South Cerney: as above
- Stow-on-the-Wold: reinforcement of bus service to Moreton to at least every 30 minutes (northwards extension of 855 or equivalent).
- Tetbury: Minimum hourly Express Bus link to Kemble Station and Cirencester, with rail connections optimised as far as possible. Consideration of the scope to enhance frequency on the 69 service to Stroud via Avening to every hour.
- Down Ampney – the only non-Principal settlement identified for strategic growth – requires a reinforced convenience retail provision and ultimate diversion of a Fairford-Cirencester bus service to provide an Express Bus specification offer.

The above assumes the very constrained levels of growth identified for the Principal Settlements in the National Landscape. Higher levels of growth are technically identifiable as being developable/deliverable, according to table 7 in the Report. Strategic scale opportunities are identifiable at Chipping Campden (3830 dwellings) Northleach (870 dwellings), Stow-on-the-Wold (1320 dwellings) and Tetbury (1410 dwellings).

The capacities set out in table 7 do not read across at all with those indicated in the Preferred Option descriptions. To start with, Moreton is considered to have a capacity of only 760 dwellings whereas up to about 4000 is identified elsewhere within the consultation as part of the preferred option – though less within the plan period. Likewise, Fairford is indicated to have a deliverable capacity of 470 – whereas a north east urban extension is considered to have scope to accommodate up to 1400 dwellings as one of the Strategic Development Options. Other settlements by contrast are set out as having greater deliverable capacity within table 7 than appears in the rest of the consultation – presumably because some sites have been excluded or otherwise discounted. We can only assume that the SDO quanta are assessed and presented separately from other sites related to the settlements concerned. This makes it extremely hard to fully and properly evaluate the Options set out for consultation.

Comment ID: 305

Email/Letter Representation

Name: P. G. Buchanan

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Name: Pamela Corringham

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Name: Patricia Alexander

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Name: Paul & Hilary Antingham

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Name: Poppy Stopford

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Name: Poulton Parish Council

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Name: Prue Wootton

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