

**TABLE 1: SUMMARY OF REPRESENTATIONS ON MAIN MODIFICATIONS AND CDC OFFICERS' ASSESSMENTS OF SOUNDNESS ISSUES RAISED**

Main Mod	Policy/ para <sup>1</sup>	Representor	Summary of Representation	CDC officers' opinion		CDC officers' comments
				No soundness issues raised	Possible soundness issues	
PM11	Map Inset 14	Blockley Environment Action Group	The map excludes the boundary of the site 16/03435/FUL, which was granted planning permission on 10/11/2016. The Development Boundary therefore does not accurately describe the existing built up area of the village.	✓		16/03435/FUL permits the construction of a single dwelling and detached garage. The proposed Blockley Development Boundary does not require an amendment.
02	6.1.1	Hallam Land Management Ltd	Deleting the text equating the 8,400 OAN figure to 420 dwellings per annum could be considered as a move further away from committing to a regular annual supply of housing in favour of a front-loaded trajectory.	✓		
02	6.1.1	Pegasus for Robert Hitchins Ltd	The word "at least" should appear before the figure of 8,400 dwellings to be consistent with Policy DS1.	✓		
02	6.1.1 and 6.1.2	Peter Brett Associates for Barwood Development Securities Ltd	The modification does not address the affordable housing need and the necessary level of certainty to ensure it is delivered during the plan period. The OAN should be uplifted to provide more affordable housing and additional sites selected to facilitate this.	✓		
02	New paragraph after 6.1.1	Fairford Town Council	The Plan does not make provision to accommodate unmet needs from other parts of the HMA.☐	✓		
03	New paragraph after 6.1.2	Fairford Town Council	Questions whether the GFirst SEP has adequately addressed the importance of local employment and business to ensure sustainability in most of the Principal Settlements in Cotswold District. The Local Plan policies alone will not be sufficient to achieve this.	✓		

<sup>1</sup> The paragraph referencing refers to *Consultation – Main Modifications to the Submitted Cotswold Local Plan 2011-31 (Feb 2018)*

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04	6.1.10, 11, 12 and 14, and new paragraphs	Savills for Bathurst Development Ltd	The supporting text should clarify that the Chesterton site has been allocated for up to 2,350 dwellings under Policy S2 and that any under supply in the plan period will roll over in to the next plan period beyond 2031. This would reinforce the Main Mod 13 text at para. 7.1.1.2.6 (now para.7.3.6).	✓		This is a fair point which could be incorporated in the supporting text of the Local Plan Strategy as suggested.
04	Table 1	<ul style="list-style-type: none"> <li>• Christopher Arnold</li> <li>• Eileen Grout</li> <li>• Save Our Cirencester</li> <li>• John Nicholas</li> </ul>	The Council has used a higher OAN (i.e. 8,400 rather than 8,100) and a lower housing delivery figure to justify the allocation of the Chesterton strategic site. The OAN can be delivered without the strategic site.	✓		
04	Table 1	Save Our Cirencester	Objects to the Local Plan over-delivering houses above the requirement. It is more appropriate to deliver 1,000 houses on the strategic site in the Plan period.	✓		
04	Table 1	Save Our Cirencester	Planned development in Cirencester is too high. Infrastructure is unable to cope.	✓		
04	Table 1	David Lock Associates for Hallam Land Management Ltd	The development strategy and the housing land supply are over-reliant on one large site.	✓		
04	Table 1	David Lock Associates for Hallam Land Management Ltd	A large proportion of the housing supply is small sites with planning permission. Many will not be delivered due to viability and deliverability issues.	✓		
04	Table 1	David Lock Associates for Hallam Land Management Ltd	The modification reduces the number of allocated houses to reflect the updated SHELAA. The heightened reliance on completions and extant planning permissions rather than taking the opportunity to make new housing land allocations is not positive planning.	✓		
04	Table 1	Peter Brett Associates for	The modification does not address the affordable housing need and the necessary level of certainty to ensure it is delivered	✓		

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				No soundness issues raised	Possible soundness issues	
		Barwood Development Securities Ltd	during the plan period. Additional sites should be selected to provide more affordable housing. The OAN should be uplifted to provide more affordable housing.			
04	Table 1	Save Our Cirencester	The Local Plan evidence base is out of date, has been overtaken by events, and does not provide justification for the modification.	✓		
04	Table 1	Save Our Cirencester	The housing figures aren't justified because the Plan is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.	✓		
04	Tables 1, 2 and 3	<ul style="list-style-type: none"> <li>David Lock Associates for Hallam Land Management Ltd</li> <li>Gladman Developments Ltd</li> <li>Pegasus for Robert Hitchins Ltd</li> </ul>	The assumption that Chesterton will deliver 1,800 dwellings by 2031 and 120 dwellings by 31 March 2022 is overoptimistic.	✓		
04	6.1.10	<ul style="list-style-type: none"> <li>David Lock Associates for Hallam Land Management Ltd</li> <li>Knight Frank for Spitfire Property Group LLP</li> </ul>	There is no justification for the windfall allowance increasing to 146 dwellings per annum from April 2017 to March 2020, before returning to 95 per annum thereafter.	✓		The 146 dwellings covers the three year period from April 2017 to March 2020, not per annum.
04	6.1.10, Tables 1	David Lock Associates for Hallam Land	Delivery from windfalls outnumbered that of land allocations, which is not justified.	✓		

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				No soundness issues raised	Possible soundness issues	
	and 3	Management Ltd				
04	6.1.10	John Nicholas	In 2017, the Housing Land Supply report was published in late summer after the Inspector specifically asked for it. Para 6.1.10 should state that it must be published by 31 <sup>st</sup> May each year.	✓		
04	6.1.11 and new paras after 6.1.11, Table 3 and Figure 1	David Lock Associates for Hallam Land Management Ltd; and Gladman Developments Ltd	Objects to residual requirement methodology. It is not consistent with national policy; it is not positive planning and does not significantly boost the supply of housing.	✓		
04	New paragraph after 6.1.11	Save Our Cirencester	The Council has a poor track record of publishing five year housing land supply reports on time, making the modification undeliverable.	✓		
04	New para after 6.1.11	Fairford Town Council	The NPPF consultation proposals require a 10% buffer on the five year supply where the five year supply is demonstrated through a recently adopted plan. This analysis is missing from the Local Plan.	✓		
04	Chesterton strategic site	John Nicholas	The Inspector's suggested modification from the original 2,350 to 1,800 units is unlikely to be achieved. Windfall figures continue to rise, meaning that fewer homes are needed at Chesterton. Much associated infrastructure will not be provided until a large number of houses are occupied.	✓		
06	New sub-section 6.4, DS4	<ul style="list-style-type: none"> <li>• Gladman Developments Ltd</li> <li>• Bellpark Ltd</li> <li>• Knight Frank for Spitfire Property Group</li> </ul>	New Policy DS4 is too restrictive towards new-build housing outside development boundaries, regardless of whether they are sustainable sites and the five year supply position, and thus does not accord with the NPPF. The use of development boundaries does not enable the plan to adapt to quick change or changes in circumstances and so will be ineffective, especially where a site for housing is adjacent to a development boundary and a range of facilities and services.	✓		

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				No soundness issues raised	Possible soundness issues	
			Objects to the use of the term 'speculative' in 6.4.4 – it should state 'unallocated'			
06	New sub-section 6.4, DS4	Fairford Town Council	It needs to be formally acknowledged that a Neighbourhood Plan may set a different Development Boundary in conjunction with allocating additional or alternative sites that are outside the Local Plan designated Development Boundaries.	✓		
07	7.0.1 and 7.0.2	David Lock Associates for Hallam Land Management Ltd	<p>The paragraph now reads 'the level of growth planned for each settlement will also help to address local affordable housing needs, sustain existing facilities and maintain each settlement's role as a service centre'. This is untrue given the limited amount of proposed development in Lechlade.</p> <p>Objects to 7.0.2, as the array of selected sites does not suggest that preference has been given to settlements outside the Cotswolds AONB in the site selection process. More allocations should be made on suitable sites in sustainable settlements and outside of the AONB.</p>	✓		The text quoted from 7.0.1 has essentially not changed, so it is arguable whether this really addresses the modification.
07	7.0.2	Fairford Town Council	This has not met the purpose of the Inspector's action, which was to consider whether policies S1, S3A-S3F, and S4-S19 include sufficient detail about the scale and nature of the developments that are proposed on the allocated sites.	✓		
08	7.0.12	Fairford Town Council	Question where the funding for allotments is to come from (in the required timescales) if the sites allocated in Fairford are not deliverable within the plan period.	✓		
11	All	Save Our Cirencester	There is an excess housing supply over the (8,100 dwelling) OAN of approximately 2,400 houses. This modification deletes or reduces the capacity on allocations at 14 sites. The	✓		

Main Mod	Policy/ para <sup>1</sup>	Representor	Summary of Representation	CDC officers' opinion		CDC officers' comments
				No soundness issues raised	Possible soundness issues	
			distribution of housing within the District is therefore unbalanced.			
11	S1	John Nicholas	Objects to deletion of C39 and reduction of C97 from 11 to 9 dwellings.	✓		
11	S5	Fairford Town Council	Object to F_35B and F_44 site allocations. The Town Council request that site allocations for Fairford are defined as non-strategic.	✓		
11	S7	Persimmon Homes Wessex	The reduction in capacity from 9 to 6 dwellings on the site L_19 is not evidence based or justified. There is conflicting landscape findings between EB002B, EB012 and EB0047. The site can deliver 9 dwellings.	✓		
11	S11	John Nicholas	Questions why Stow-on-the-Wold TC's evidence of urgent need for more housing, especially affordable, has not been addressed.	✓		
11	S15	RCA Regeneration for Bellpark Ltd	The number of dwellings allocated in Blockley has reduced to 22. Blockley is a sustainable settlement that is suitable for allocating more residential development.	✓		
11	S16	Chipping Campden Town Council	The housing numbers presented for CC_23B/C are misleading. Main Mod 11 states that the allocation is reduced from 114 to 36 dwellings. However, the 114 figure was the total for the whole original site, part of which now has planning permission for 40 dwellings and part is a proposed allocation for 36 dwellings (i.e. 76 in total). Maintains objection to this site.	✓		
13	S2 and 7.1.1.2.6	Pegasus for Robert Hitchins Ltd	The modification is inconsistent with policy S2. The proposed wording should also be included in S2. The Plan is therefore not effective or justified as the 2,350 dwellings in S2 are not deliverable in the Plan period.	✓		
13	7.1.1.2.6	Cirencester Town Council	Reducing the expectancy of housing delivery over the plan period from 2,350 to 1,800 will reduce the number of affordable, including social rented, homes from 705 to 540 over	✓		The overall estimate of houses that meet the identified affordable need

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			the Plan period.			would reduce to 1,556 homes (710 from committed developments; 761 from policy H2; 70 from policy H3; and 15-20 from other initiatives).
13	7.1.1.2.6	Knight Frank for Spitfire Property Group LLP	Further allocations are required to supplement the reduced delivery of the Chesterton strategic site from 2,350 dwellings to 1,800 by 2031.	✓		
13	7.1.1.2.6	Gladman Developments Ltd	Close monitoring of delivery of the Chesterton strategic site is needed.	✓		
13	7.1.1.2.6	<ul style="list-style-type: none"> <li>• Gladman Developments Ltd</li> <li>• Pegasus for Robert Hitchins Ltd</li> </ul>	The Chesterton strategic site delivering 1,800 dwellings by 2031 is overoptimistic.	✓		
14	7.1.1.2.9	Cirencester Town Council	The revised wording is more ambiguous than the previous text. This could have a detrimental impact and lead to minimal provision of services within the designated neighbourhood centre. No account is taken of the potential use of these facilities by off-site residents.	✓		
15	Sub-section 7.1.1.3	Cirencester Town Council	Concerned about contradictory statements: on one hand a holistic, partnership, approach is proposed for developing a town centre master plan, whilst on the other, the asset sale of off-street parking facilities for retail/mixed use development is pre-determined. The Local Plan should reference the need for the master plan to be mindful of/ incorporate key sites in the immediate outlying areas of the town centre.	✓		
15	Sub-section	John Nicholas	The car parking issue in Cirencester town centre is chronic and deteriorating. All of the necessary car parking should be	✓		

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	7.1.1.3		provided as soon as possible. There is a need for better bus services into the town centre at times needed by the public.			
15	Sub-section 7.1.1.3	Colesbourne Parish Meeting	It is not clear how many additional parking spaces the suggested decking of the Waterloo car park will generate. We are concerned that if this merely generates the same number of spaces as are lost by the subsequent redevelopment of the Forum or Brewery car parks, then the net impact on the overall parking provision will be minimal and hence ineffective.	✓		
15	Sub-section 7.1.1.3	Save Our Cirencester	The Old Station would seem a better location for a transport hub.	✓		
15	Sub-section 7.1.1.3	Cirencester Civic Society	No reference to Cirencester Town Council's Town Centre Design Code. Sustainability Appraisal does not address the strategic development of the town centre.	✓		
15	7.1.1.3.12	Mrs E.J.M. Grout	There is no clear strategy to alleviate town centre parking and access, together with a lack of clarity over implementation mechanisms, timing and funding.	✓		
15	7.1.1.3.21	Cirencester Town Council	The Local Plan should recognise the reduction in through traffic as a result of the town centre regeneration scheme.	✓		This text could be incorporated as suggested.
15	7.1.1.3.22	Cirencester Town Council	Whilst improvements to the public realm are acknowledged, the wider benefits such as relocating buses to South Way and the change in traffic flow have not. Therefore some of the text is dated and does not recognise the Town Centre Design Code, prepared by the Town Council, and which outlines the design standard and benchmark for future development.	✓		While the Town Centre Design Code has not been adopted by CDC, paragraph D.7 of the Cotswold Design Code does refer to information and guidance produced by 'other organisations'.
16	S4 – S16	David Lock Associates for Hallam Land	With or without the modified text, the objector reiterates that the quantum of development proposed in some settlements will generate insufficient developer contributions to fund the	✓		

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				No soundness issues raised	Possible soundness issues	
		Management Ltd	infrastructure requirements set out in policies S4 – S16. It is suggested that it would be sounder to retain the original text.			
17	7.1.4.7	Mr Luke Sherlock	There is scope in the Local Plan to provide further detail, as identified in the statement of Common Ground, regarding the location of housing on K_2 in association with LGS7.	✓		
23	H1 (Refers also to several other parts of the Local Plan)	Pegasus for Robert Hitchins	<p>Raise objections that Main Modifications do not resolve objections previously made. Amendment to policy suggested, which includes the deletion of H1(3). Commentary focusses on the following issues:</p> <ul style="list-style-type: none"> <li>• H1(1) Nationally Described Space Standards (Main Mod 24);</li> <li>• H1(2) Two Bedroom Affordable Houses vs Flats (Main Mod not identified);</li> <li>• H1(3) Self Build / Custom Build (Main Mods 23, 26 &amp; 27);</li> <li>• Para 8.1.5 Market Mix (Main Mod 25)</li> </ul> <p>Viability (reference made to draft NPPF and PPG consultation – Main Mods 23, 24, 25, 26 &amp; 27)</p>	✓		
23	H1	Gladman Developments Ltd	Further amendments are required and it is suggested alterations will provide the necessary flexibility and help to ensure that the required scale of housing is delivered.	✓		
23	H1	Savills for Bathurst Development Ltd	<p>1. It states that schemes will provide 5% but then goes on to say it should be whatever the demand is on the Register rendering no need for the 5% figure.</p> <p>2. There is no upper limit within the policy; as written proposals could have to provide 100% as Self Build or Custom Build. The intention of the policy should be to have a maximum of 5% of units on any site over 20 units as self-build or custom build units subject to demand. To do otherwise would be unreasonable and adversely affect smaller sites coming forward.</p>	✓		

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23	H1	Spitfire Property Group LLP	5% is arbitrary and is a blunt tool. Reference is made to the Council's Self Build Register statistic report (April to Oct 2016) to demonstrate preferred location of applicants. Amendment to policy suggested.	✓		
24	8.1.4	Pegasus for Robert Hitchins Ltd	See Robert Hitchins comments to main modification 23	✓		
25	8.1.5	Pegasus for Robert Hitchins Ltd	See Robert Hitchins comments to main modification 23	✓		
25	8.1.5	Bovis Homes Ltd	Request that the text be expanded to make it clear that there is other relevant market evidence that can be referred to in respect of the proposed housing mix.	✓		
25	8.1.5	Cirencester Town Council	Modification is not effective and positively prepared. Wording should be strengthened to support the delivery of affordable housing.	✓		
25	8.1.5	David Lock Associates for Hallam Land Management Ltd	Insufficient affordable housing provided, with particular reference to Lechlade and local needs evidence: e.g. 'Land at the Wern'.	✓		
26	8.1.7	Pegasus for Robert Hitchins Ltd	See Robert Hitchins comments to main modification 23	✓		
27	8.1.7	Pegasus for Robert Hitchins Ltd	See Robert Hitchins comments to main modification 23	✓		
27	8.1.7	Gladman Developments Ltd	Query why these plots should be offered to the Council and Registered Provider ahead of the developer already delivering the rest of the site.	✓		
28	8.2.3	<ul style="list-style-type: none"> <li>Save Our Cirencester</li> <li>John Nicholas</li> </ul>	This local plan does not provide a sufficient number of affordable homes needed by the District. Reduce the size of the strategic site and introduce smaller sites that will deliver the required higher percentage of affordable housing.	✓		Save Our Cirencester quoted 15 but ref to 28

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28	8.2.3	John Nicholas	This local plan does not provide a sufficient number of affordable homes needed by the District. Reduce the size of the strategic site and introduce smaller sites that will deliver the required higher percentage of affordable housing.	✓		
28	8.2.3	Peter Brett Associates for Barwood Development Securities	Objects. Raises concerns that the plan is not <i>Positively Prepared</i> in relation to the delivery of affordable housing and the plan's ability to achieve 157 affordable dwellings per annum. It is argued that the plan remains wholly inconsistent with the NPPF and that it should look towards identifying additional sources of supply.	✓		
28	8.2.3	Blockley Environmental Action Group	Objects. Raise concerns regarding the <i>effectiveness</i> of the wording and the plan. The representor questions how can anyone know whether the right number of affordable homes is being planned or provided for, if the 157 affordable homes per annum figure differs from, and is incompatible with, the OAN.	✓		
28	8.2.3	Bovis Homes Ltd	Argues there has been and continues to be a lack of affordable housing in Stow. The representor requests this should be addressed immediately and the Plan should make the relevant provision.	✓		
28	8.2.3	Eileen Grout	The Local Plan does not provide sufficient affordable homes across the District.	✓		
28	8.2.3	David Lock Associates for Hallam Land Management Ltd	See Hallam Land Management Ltd comments at Main Modification 25	✓		
28	8.2.3	Pegasus for Robert Hitchins Ltd	Council's viability evidence does not sufficiently support the housing proportions sought. The policy wording remains in conflict with the requirements of national planning policy and the emerging National Planning Policy and Guidance. Amendment to policy suggested.	✓		
29	H2	Pegasus for Robert	See Robert Hitchins Ltd comments at Main Modification	✓		

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		Hitchins Ltd	28			
32	H4d	Simply Planning Ltd for Mercian Developments Ltd	The policy is inconsistent with paragraph 65 of the draft NPPF consultation proposals.	✓		
32	H4d, 8.4.5 and new paras before 8.4.5	Gladman Developments Ltd	Self-containment of a residential unit is not a valid reason for determining whether a building falls within use class C2 or C3.	✓		The Portishead appeal decision appears to be mis-referenced. The correct reference is assumed to be APP/D0121/A/12/2168918.
32	H4d, 8.4.5 and new paras before 8.4.5	Simply Planning Ltd for Mercian Developments Ltd	Para 12.19 of EB055 states that " <i>In practice, extra care housing falls under the definition of residential institutions rather than dwelling houses so is not normally considered to be subject to the Council's affordable housing policies. We have not pursued this further.</i> " Therefore, the evidence does not consider whether Class C2 uses would be viable with an element of affordable housing. Amendment to policy suggested.	✓		Table 10.15 of EB055 provides the viability evidence. Full viability appraisals are provided in Appendix 8. EB055 deliberately does not use the C2 and C3 definitions to assess viability, as this is sometimes a grey area in planning.

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34	Sub-section 8.7	Michael Hargreaves for Norris Family	<p>The Council has diverged from the approach required by the Inspector's Actions, issued on 24<sup>th</sup> November 2017 following hearing session 11 (week 3).</p> <p>The Inspector's findings reflect a major weakness in ORS's methodology. They only interviewed occupants of 47% of occupied pitches.</p> <p>Councils use ORS to reduce estimates of need. Many gypsies and travellers are suspicious of ORS, which is one reason why many refuse to be interviewed.</p> <p>Sites at Four Acres, Shorncote; Oaksey Road, Culkerton; and Meadowview, Bourton-on-the-Water are contended to have lower capacities than are indicated in the Sites Update report (December 2017), the result of which means Cotswold does not have a five year supply of sites.</p>		✓	In the light of later information gleaned from the GCC website regarding waiting lists for all County Council owned sites, it is suggested that site GT_1 Oaksey Road, near Culkerton (1 pitch) be deleted from Policy H7.
35	EC4	Royal Agricultural University	Wording ' <i>required for the existing lawful use of the site</i> ' should be removed as it is ambiguous and does not provide clear and concise advice for decision making.	✓		
35	EC4	The Fire Service College	Reference should be made to ancillary development in the FSC Special Policy Area; the approach is inconsistent with the other SPAs. Southern part of the FSC should be removed from the SPA.	✓		Policy could be improved to make reference to ancillary uses.
45/ PM11	EN3	<ul style="list-style-type: none"> <li>• Sam Burke</li> <li>• Mr Paul Adams</li> <li>• Bellpark Ltd</li> <li>• Elizabeth Davies</li> <li>• Mrs Barbara Thomas</li> <li>• Nigel Moor</li> <li>• Blockley</li> </ul>	<p>The rationale for removal of LGS designation is insufficiently reasoned, and disproportionate in the balancing of stakeholder interests.</p> <p>Suggests that BK_1 would be able to provide housing after 2031.</p> <p>Gives unbalanced consideration to one national policy (NPPF 76) above others (NPPF 74 &amp; 77 and several paragraphs in NPPF Section 12).</p>	✓		

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		Environmental Action Group				
46	EN4	Pegasus Robert Hitchins Ltd	The inclusion of the setting of settlements in the policy could be perceived as restricting any development on the edge of a settlement. Other policies in the Local Plan will come into play regarding the impact of development on significant landscape features.	✓		
49	10.5.2	Cotswolds Conservation Board	The NPPF does not exempt allocated sites from meeting the requirements of paragraph 116, and neither should the Local Plan. Many of the Local Plan allocations in the AONB are likely to be categorised as major development. It is only at the development management stage that many of the criteria specified in NPPF paragraph 116, including the likely detrimental effect on the landscape, can be fully assessed. Exempting developers from the requirements of Clause 2 of Policy EN5 and paragraph 116 of the NPPF risks undermining the level of protection afforded to the AONB in Cotswold District and elsewhere. Whist the modification says that the allocated sites were assessed against the stipulated criteria during plan preparation, this is difficult to verify from the extant evidence.	✓		
55	INF2	Cirencester Town Council	Modification should also refer to the Cirencester Green Spaces strategy.	✓		See comment above re. Main Mod 15 in response to Cirencester Town Council.
58/ PM16	Map Inset 19	Commercial Estates Group	The area defined on Policies Map Inset 19 does not fully represent the land within CDC associated with Cotswold Airport.	✓		The area defined on the Policies Map covers areas that are both near / adjacent to the runways (airside) where employment-related uses should be compatible with the use of land as an

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						airport.
62	Appendix K - Glossary	Blockley Environmental Action Group	The amendment clarifying the definition of Major Development is sound.	✓		

**TABLE 2: REPRESENTATIONS SUPPORTING MAIN MODIFICATIONS**

<b>MAIN MOD</b>	<b>REPRESENTOR</b>
04	CPRE
05	CPRE
05	Gleeson Strategic Land
06	Blockley Environmental Action Group
06	CPRE
06	Gleeson Strategic Land
07	Blockley Environmental Action Group
08	Blockley Environmental Action Group
09	Gloucestershire County Council
11	Blockley Environmental Action Group
13	Bathurst Development Ltd
13	Gladman Developments Ltd
14	Bathurst Development Ltd
19	Environment Agency
20	Gloucestershire County Council
21	Environment Agency
22	Gloucestershire County Council
22	Spitfire Property Group LLP
23	Bovis Homes Limited
24	Blockley Environmental Action Group
25	Blockley Environmental Action Group
25	Gladman Developments Ltd
25	Spitfire Property Group LLP
27	Bathurst Development Ltd
28	CPRE
28	Spitfire Property Group LLP
34	Coberley Parish Council
34	Colesbourne Parish Meeting
41	Environment Agency
44	CPRE
45	The Parham Park Trust (1984)
46	Blockley Environmental Action Group
47	Blockley Environmental Action Group
47	CPRE
47	Spitfire Property Group LLP
48	CPRE
49	CPRE
50	CPRE
50	Spitfire Property Group LLP
51	CPRE
53	Blockley Environmental Action Group
54	Gloucestershire County Council
54	Spitfire Property Group LLP
55	Blockley Environmental Action Group
55	Sport England

**TABLE 3: REPRESENTATIONS WHICH, IN CDC OFFICERS' OPINION, DO NOT APPEAR TO ADDRESS THE MAIN MODIFICATIONS**

Main Mod quoted	Representor	Summary	CDC officers' assessment of relevance to Main Modifications
02	PBA for Lechlade CC (comment ID 85)	The Main Modifications and the resultant Local Plan barely considers Lechlade as an area for housing and it also does not acknowledge the important role LCC plays within the community, which is emphasised in the adopted Neighbourhood Plan. Whilst they are aware that the emerging plan identifies two small housing sites elsewhere in Lechlade, their development will do little to help LCC stay as a community resource. LCC's future at Lechlade is inextricably linked with the future of the adjacent land for development.	This reiterates representations that promoted an omission site – it does not relate to Modification 02.
02	Save Our Cirencester (comment ID 23)	The 8,400 dwellings requirement, proposed by the Council without justification, is not an objectively assessed figure. The Council has added - incorrectly - a 5% buffer to the whole period, that is $8,400 + 5\% = 8,820$ . We comment on this figure because it is used only to justify a single development/planning application at the strategic site.	This objects to the OAN figure of 8.400 dwellings, which has not been changed in this Modification.
04	Peter Brett Associates for Lechlade Cricket Club (comment ID 86)	The plan has too few housing allocations / new housing in Lechlade. The plan does not acknowledge the role of Lechlade cricket club. A housing allocation should be made on part of the cricket club site to secure its long-term future.	The representation is suggesting that further allocations should be made in Lechlade. Consideration of omission sites does not form part of this consultation.
04	M Jones (comment ID 82)	The 5 year housing supply diktat by central government basically condemns all areas to expand forever. This is clearly nonsensical and unsustainable. Why has this absurd doctrine never been severely challenged by CDC.	This does not relate to Main Modification 04.
11	David Lock Associates for Hallam Land Management Ltd (comment ID 55)	Several residential allocations have reduced in capacity or been deleted. No sites have increased in capacity or new allocations made. The windfall allowance has increased. Lechlade's total housing allocations have reduced from 18 to 15 dwellings. Lechlade needs more market and affordable homes.	The representation is suggesting that further allocations should be made in Lechlade. Consideration of omission sites does not form part of this consultation.
13	Save Our Cirencester (comment ID 31)	Modification should be amended to include protection of the approaches to Cirencester. The number of dwellings allocated to the strategic site should be modified to 1,000 within the plan period, and enforced. Suggested that the Main Modifications should be amended to clarify that sustainable transport policy applies to the strategic site and its connection,	This representation seeks to introduce additions to the plan and have been made on the pretext of a Modification that is unrelated to the proposed additions. The suggested changes, moreover, appear to be unrelated to the representation.

		albeit limited, to the main town.	
13	Pegasus for Robert Hitchins Ltd (comment ID 32)	The plan does not offer a wide choice of high quality homes, widen opportunities for home ownership, or create sustainable, inclusive and mixed communities. The plan does not include a range and choice of sites at the most sustainable settlement. A 5 year supply cannot be maintained throughout the plan period. Additional sites are needed to provide flexibility.	These parts of the representation do not relate to Main Modification 13
13	Cirencester Town Council (comment ID 10)	The SA addendum appears to have been drafted and signed off on 19th January 2018 which would indicate just 48 hours in preparation and therefore parallel to the outline planning application.	This does not relate to the Main Modifications.
15	M Jones (comment ID 83)	The 5 year housing supply diktat by central government basically condemns all areas to expand forever. This is clearly nonsensical and unsustainable. Why has this absurd doctrine never been severely challenged by CDC.	This does not relate to Main Modification 15.
28	Peter Brett Associates for Lechlade Cricket Club (comment ID 88)	The plan has too few housing allocations / new housing in Lechlade. The plan does not acknowledge the role of Lechlade cricket club. A housing allocation should be made on part of the cricket club site to secure its long-term future.	The representation is suggesting that further allocations should be made in Lechlade. Consideration of omission sites does not form part of this consultation.