

Homes, landscape, livelihoods - a legacy we build together.

Cotswold District Local Plan Statement of Consultation November 2025 Update

Town and Country Planning (Local Planning) Regulations 2012

Regulation 18 consultation/participation



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1. Introduction

- 1.1 This Statement of Consultation explains how Cotswold District Council ('the Council') has involved residents and key stakeholders in the various consultations on the new Cotswold District Local Plan.
- 1.2 This Statement of Consultation has been prepared in line with the <u>Town and Country Planning Act (Local Planning) (England) Regulations 2012</u> (TCPA) in accordance with paragraph (c)(i-iv) of the 'proposed submission documents' in Regulation 17 which sets out:
 - which bodies and persons were invited to make representations under Regulation 18;
 - how those bodies and persons were invited to make such representations;
 - a summary of the main issues raised by those representations; and
 - how any representations made pursuant to regulation 18 have been taken into account.

Please note that any reference to 'Regulation' used in this document refers to the relevant regulation in the TCPA.

- 1.3 This Statement of Consultation will be updated under Regulation 22(1)(c)(v) following publication of the plan and set out:
 - the number of representations received or that no such representations were made; and
 - a summary of the main issues raised.
- 1.4 It is confirmed that the consultation and engagement that has been undertaken has also conformed with the council's <u>Statement of Community Involvement</u> (SCI).
- 1.5 The Statement of Consultation forms part of the evidence for demonstrating legal compliance and soundness of the Local Plan and is formally submitted alongside the Local Plan for independent Examination. It ensures the Local Plan meets the requirements in the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (December 2024) by showing evidence of participation and effective engagement of all interested parties as well as the Council's response to the representations made. In other words, it shows how consultation has shaped the Plan.

2. Local Plan Consultation carried out under Regulation 18, 2022

Introduction

- 2.1 This section provides an overview of the process that was undertaken for the Issues and Options consultation undertaken between 4 February until 20 March 2022 and how it has informed the next stage of the Local Plan update.
- 2.2 The Issues and Options consultation was the first stage of the process of updating the Local Plan. The consultation included eighteen Topic Papers that put forward the issues as the council currently sees them, and in light of the Climate Change and Ecological Emergency declarations, proposed options for how to tackle them through the Local Plan Partial Update. The council took consideration of the responses to the Issues and Options consultation in draft policy updates.

Who was invited to make representation?

- 2.3 All interested parties were invited to make comments, these included:
 - specific consultation bodies that the council considered to have an interest in the Local Plan;
 - general consultation bodies that the council considered appropriate; and
 - such residents or other persons carrying on business in the district which the council considered appropriate to invite comment from.
- 2.4 The Council maintains a database of all individual persons and organisations who have expressed an interest to be kept informed of consultations by the Council on planning policy documents. These persons and organisations were all notified of the consultation by letter or email. All statutory consultees (including town and parish councils), and district councillors were also notified.
- 2.5 The consultation attracted around **2,900 comments or representations from over 750 people or respondents**. The consultation platform reported that some 7% of the local population visited and/or commented on the consultation, although some visitors using different devices may be counted more than once.
- 2.6 For comparison, the two previous 'Issues and Options' Regulation 18 consultations that the council undertook on the adopted Local Plan recorded some 1,946 comments in total from 188 consultees in 2007 and 2010 combined.

Table 1 – Number of comments and consultees at Regulation 18 stage

Consultation Stage	Respondents	Comments
'Issues and Options' Reg 18 (February 2022)	755	2,924

How were they invited to make representations?

- 2.7 The Local Plan Issues and Options consultation accorded with the protocol set out within the Council's <u>Statement of Community Involvement</u>.
- 2.8 The following consultations methods were used. Appendix A provides further detail and examples of the publicity and some of the consultation methods used through, and after, the consultation period.
 - E-newsletter,
 - Council website (downloadable copies of documents, FAQs, etc.)
 - Social media (incl. Facebook, Twitter, Nextdoor, Instagram),
 - A flyer to all residents (some 48,000 households),
 - Posters / banners,
 - Use of QR codes on all above communications
 - Simple infographics summarising each topic,
 - Video message,
 - Animated short film (the animation performed very strongly and was the highest performing social media post, in terms of reach, during the campaign),
 - Emails/letters to interested parties (email sent directly from the Forward Planning team to respondents, and outperformed any other channel, in getting a response),
 - Targeted events for town and parish councils and district councillors and
 13- to 18-year-olds
 - Deposit points for hard copies at district council offices and libraries
 - Press release in traditional media
 - Public drop-in sessions. In total, around 80 people visited the public drop-in sessions.

Summary of the main issues raised and how they have been addressed

- 2.9 The Council's <u>Statement of Community Involvement</u> states that people should be involved early in the local planning process to ensure 'a better understanding of the issues and needs that are important to the community. A Local Plan can then evolve which reflects those views as far as possible and adequately mitigate the effects of new development'. These interests are 'front loaded' and result in more active involvement earlier in the plan process.
- 2.10 Representations and responses can be viewed in full online on the Council's website or directly via the below links:
 - <u>Summary Consultation Report Annex A, Cabinet Meeting 4th July 2022</u>
 - Reg 18 'Issues and Options' Council Reponses

Table 2 – Local Plan Partial Update: 'Issues and Options' (February 2022)

Table 2	Local Flair Fai	tiai opuate.	133acs arra	Орионз	(i Cordary	2022,
Main Po	oints Raised by	, Represent	tations			

Responding to the Climate Crisis

The Council has declared a Climate Emergency and has committed to make the Local Plan green to the core. There was strong support for the principle of a strategic policy providing a 'green thread' through the updated Local Plan. Many broadly accepted the need, driven by the climate crisis, to move faster than building regulations, and these responses are consistent with often-repeated comments made during drop-in sessions, to the effect "why aren't all new houses required by law to have solar panels. Some concerns were raised about practical difficulties and prohibitive costs, and the potential for unintended consequences.

Over half of respondents either supported or strongly supported wind turbines in the Cotswolds National Landscape (formerly known as the Area of Outstanding Natural Beauty), and less than a third either objected or strongly objected.

objected or strongly objected. Accessibility of new housing development

There was broad support for locating development within reach of important services and facilities without the need to drive.

We received many responses on the types of services and facilities that were most important to people. There was strong support for an accessibility test forming part of Local Plan Policy DS2 and that beginning

were most important to people. There was strong support for an accessibility test forming part of Local Plan Policy DS3 and that housing development should be located in fewer locations with better access to services and facilities.

How the Main Points Were Addressed

A new chapter has been created in the Local Plan called 'Responding to Climate Change and Nature Recovery'. New overarching policies have been drafted that confirm the council's support for development proposals that deliver various climate objectives. Several new policies have also been created, including Retrofitting Existing Buildings; Renewable Energy; Sustainable Construction of New Build Developments; and District Heating.

A viability assessment will be undertaken on the Local Plan policies to ensure policy proposals are costed and are deliverable.

A new accessibility test is proposed to be introduced to Policy DS3. The list of core and primary services has been influenced by the consultation responses. The consultation responses have also helped to define the draft Local Plan development strategy options and the draft preferred option. This will help to ensure new housing developments have reasonable access to services, facilities and employment to reduce social isolation, vehicle dependence / cost of living issues and transport CO2 emissions.

Biodiversity

Main Points Raised by Representations

Opinion was divided on whether CDC should request more than 10% Biodiversity Net Gain. The Environment Act sets a 10% minimum with the option of developers contributing more. Therefore, careful consideration should be given to what would be required in terms of evidence to enable CDC to request a higher percentage.

How the Main Points Were Addressed

Four key updates are proposed to Policy EN8 (Biodiversity and Geodiversity: Features, Habitats and Species). These include need to provide at least 10 % Biodiversity Net Gain (BNG) in line with the expected mandatory figure required by government via the Environment Act 2021. Ten Biodiversity Net Gain Good practice principles have also been included in the policy.

A new clause has also been added to the policy to ensure all new housing developments provide swift bricks and opportunities for bat roosts.

Design

People had mixed views on the extent to which tackling climate change should influence the design of new places and building. Concerns over the need to respect the character and historic buildings and these important assets should not be placed to one side in the pursuit of a zero-carbon future.

Former Policy EN2 (Design of the Built and Natural Environment) is substantially updated and relocated within the Sustainable Development chapter. The Council has commissioned LDA consultants to prepare an updated Design Code. The updated policy sets out key design principles that will be required of developments, including the reuse of existing buildings and encouraging active travel.

Economy and employment

There is a good level of support for encouraging live/work units, new housing developments providing spaces and infrastructure home working and community-based hubs where local people can work close to home in an office-like environment. There was also strong support for the use of legal agreements to require employment development on mixed use schemes to be provided at the same time as the housing element. People strongly agreed that extant policies should be revised / amended and that new policy should be introduced to: (a) ensure that

Minor textual amendments have been made to bring the economy policies and supporting text up to date with legislative and related changes. Policy EC7 retail is deleted.

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

Main Points Raised by Representations

the employment element of mixed- use schemes is developed conterminously with the housing element; (b) introduce a presumption in favour of viable employment development that demonstrably is part of the "green" economy; (c) identify areas considered to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses; (d) explore the feasibility of using Article 4 Directions to control the ability of Class E development to change to Class C3 (dwelling houses) in specific parts of the district, including safeguarded employment sites that may feature a significant proportion of Class E uses; and (e) for larger development sites, require that the proposal is accompanied by an Employment and Skills Plan that shows how the development will materially contribute to helping the local economy be more self- sufficient and sustainable.

How the Main Points Were Addressed

Further consideration of representations (live work units, flexible spaces in new builds for home working, 'village hubs' etc), evidence or legislative changes can be taken into account in the Reg.19 draft Local Plan.

Green Infrastructure (GI)

Respondents told us what GI is most important for them and would deliver the most benefits for people and the environment. There was support for the allocation of a new country park in the Local Plan. The vote was split between whether people wanted a bigger garden or better access to shared open spaces, such as parks, allotments, playgrounds, etc. – people wanted both. Respondents wanted a new Local Plan policy for the long-term management of parks and gardens, with town or parish councils managing open spaces from the outset.

Given the broad support for the policy options, we will seek to update the Local Plan to incorporate them, including an update to the Draft Green Infrastructure Strategy to reflect the consultation comments, where appropriate. This policy has been updated to take account of the new guidance in the NPPF, including the new definition of Green Infrastructure, and best practice. A new policy has been created to address the issue of the long-term management of new accessible green spaces.

We also undertook a call for sites for a new country park but none have come forward.

Health, social and cultural wellbeing

Main Points Raised by	Representations
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Key reasons for the support included that the policies would help mental health across all ages and improve age-related design, increase physical exercise, tackle fuel poverty and improve accessibility to services, facilities and employment.

How the Main Points Were Addressed

New policy to reflect this. The Council will support development proposals that promote health and well-being and maximise opportunities to ensure healthy and inclusive communities for all, by creating environments that encourage healthy lifestyles and appropriate health infrastructure.

Historic environment

There was broad support for the proposed measures to ensure that our designated buildings are safeguarded as we mitigate and adapt to the effects of climate change. There were concerns about the adaptation of historic buildings to make them better able to contribute to the mitigation of climate change impacts without falling foul of what some consider to be overly restrictive rules.

We have made amendments to bring the policy and supporting text up to date with legislative and related changes. We are also introducing a new retrofit policy, which will largely cover historic buildings, as well as a new Design Code.

Housing affordability

Most respondents agreed with the proposed suggested policy changes. There were several other policy suggestions. There was support for introducing restrictions on second home ownership in new developments.

We have updated Policies H1 and H2 to include the various policy proposals to improve housing affordability. The government has consulted on several policy proposals for second home ownership and, having looked further into what can be done in the Local Plan, a Local Plan policy is not proposed on this issue at the present time.

Housing need, requirement, supply and delivery

Various exceptional circumstances were suggested for using an alternative to the government's standard method for calculating the housing need. There was strong support for reviewing and updating the Local Plan housing requirement for the remainder of the Local Plan period and, if required, allocating additional sites to maintain a five-year housing land supply and pass the Housing Delivery Test. Various sites were submitted, and issues raised on the Strategic

We have reviewed the adopted Local Plan housing requirement. The review found that the adopted housing requirement does not currently require updating. We are updating the SHELAA to take consideration of the consultation feedback. We also took proactive action on accommodating development needs up to 2041 by commencing the preparation of a Development Strategy and Site Allocations Plan (2026-2041). We also updated Policies H1 and H4 to

Main Points Raised by Representations	How the Main Points Were Addressed
Housing and Economic Land Availability Assessment (SHELAA). People requested more affordable specialist accommodation for the elderly and that these homes need to be accessible and be lifetime homes. Requests were also made for more smaller house types that are suitable for elderly people.	include various measures to provide more lifetime homes, accessible housing and house sizes that are suitable for elderly people. We have updated our Gypsy and Traveller Accommodation Assessment and will be updating our Gypsy and Traveller Sites Assessment.
Infrastructure	
The key issue here is whether renewable energy infrastructure should be located in the Cotswolds National Landscape with strongly held views on both sides. People also told us the infrastructure that was most needed in their area and could make the Local Plan green to the core, which included public transport, electric vehicles and renewable energy.	A revised Renewable Energy Strategy and policy (CC2) will address the Cotswolds National Landscape issue. An update of the Infrastructure Delivery Plan will be undertaken to assess the strategic infrastructure requirements of any additional planned growth (e.g., health care, education, water and wastewater, transport, flood risk, libraries, etc.). Additional required infrastructure items will be specified in the next iteration of the Local Plan.
Landscape	
A key issue of uncertainty is how renewable energy proposals / climate change mitigation and adaptation can be achieved in the landscape whilst remaining in accordance with national policy to conserve and enhance the Cotswolds National Landscape. There was support for identifying broad locations in the Local Plan where renewable energy development would be suitable, including within the Cotswolds National Landscape and Special Landscape Areas.	We have reviewed the landscape policies of the Local Plan (e.g., EN4, EN5 and EN6) to identify and implement any opportunities to make them 'green to the core'. However, we have needed to retain most aspects of the landscape policies to 'balance' other more climate-led policies elsewhere in the plan We have provided a renewable energy Local Plan policy. We are also producing a renewable energy strategy. Both have strong links to landscape policies.
Natural capital and ecoservice systems	
These are accepted to be one of the key methods to evaluate the	We have included a new policy on Climate and Ecological

environment and the services it provides. Comments received

wider audience.

highlighted the need for work to be done to open these concepts to a

Emergencies, which includes natural capital and ecoservice systems.

There are several matters yet to be agreed upon at a national level including the metric used to measure Natural Capital. The Local Plan

Main Points Raised by Representations	How the Main Points Were Addressed
	policy will be updated when this is confirmed. The partial update of
	the Local Plan will be aligned with the emerging Green Infrastructure
	Strategy to reflect the consultation comments, where appropriate.
Neighbourhood planning	
There was broad support for the proposed options, i.e.:	We have provided a new annex to the Local Plan, which specifies
1. making clear which Local Plan policies are strategic.	strategic and non-strategic policies. We have not introduced a new
2. creating a new Neighbourhood Plan policy and /or updating existing	neighbourhood planning policy, as this was not considered to be
policies to further clarify how neighbourhood plans can be in general	necessary. However, the Local Plan policy on town centres now
conformity with the local plan; and	encourages those preparing or revising neighbourhood plans to
3. place a duty within the local plan for neighbourhood plan to respond	consider preparing strategies for their town centres to make them
to climate change and biodiversity issues.	more resilient to change. The Council also helps and guides all groups
	wishing to prepare a neighbourhood plan through the various stages
Responses identified that preparing neighbourhood plans is	of the process.
complicated, costly and time consuming. However, there appears to be	
overall support for the process.	
Retail and town centres	
People agreed with diversification of the town centre in general.	EC8 "Town Centres" (formerly "Main Town Centre Uses") is a
However, there was significant concern about the impact of	significant revision. It incorporates elements of EC7 retail. The policy is
uncontrolled changes of use through permitted development rights of	intended to strike a more even balance between retail and other main
town centre uses to, for example, residential and the impact this would	town centre uses.
have.	
Respondents told us what they would like to see more of in town	
centres.	
All town centres are facing significant and rapid change because of	
various factors, primarily internet-based retailing.	
Sustainable tourism	

Main Points Raised by Representations

Respondents told us what 'sustainable tourism' means to them, what new facilities they would like to see and how the all-year offer could be improved. They also told us ideas of how visitors in 'honeypot' tourist spots could be spread more evenly around the district. People also strongly agreed with the preferred option to: i. Locate most developments in sustainable locations where there is better access to jobs, services and facilities and public transport; and ii. Support improvements in public transport, walking/cycling networks. Suggestions include that the transport elements of tourism are integrated with the Sustainable Transport Strategy and ensuring that recreational facilities can be shared by local residents as well as visitors.

How the Main Points Were Addressed

Tourism policy EC11 has been substantially redrafted for clarity and to follow more closely national policy (NPPF). The changes include identifying hotels as "main town centre" uses subject to the sequential test. The need to encourage modal shift in transport means that concentrating uses of this type in centres may reduce the need for car journeys.

Sustainable transport and air quality

Respondents told us how we could reduce the use of petrol- and diesel-powered cars in the district and the extent this is possible at the moment. They also told us the things that would help them to drive less often. Respondents told us that walking, cycling and public transport networks were insufficient in the district. Various barriers to walking, cycling and public transport use were identified, with unsafe routes and infrequency of services being top of the list. People agreed that we should prioritise safe and convenient space for vulnerable road users, such as pedestrians, cyclists and horse riders. We provided different variables to test the extent of peoples' willingness to reduce space for driving or parking to make sure there was enough space for people to walk, cycle and scoot comfortably. People were generally willing to accept some level of compromise. Most respondents also

The Sustainable Transport policy has been comprehensively updated taking account of the comments and further evidence. Amongst the many policy proposals, the policy links to the Gloucestershire Transport Decarbonisation Plan and Cotswold Transport Decarbonisation Strategy and includes targets from both documents. It includes a requirement for the early delivery of sustainable transport infrastructure. It also provides a hierarchy of road users for the design and layout of sites.

Main Points Raised by Representations	How the Main Points Were Addressed
indicated their intention to switch to electric vehicle and a smaller, but	
still significant, number interested in joining a car club.	
Water quality, water resources and flooding	
Concerns were raised over rainwater in sewers / sewage pollution of rivers and flooding; and development being built before water infrastructure capacity can cope with the new development. People were also concerned about flooding generally and especially from sewer overflow. Flooding is a big 'local' issue and 95% of respondents supported more restrictive planning measures on development in areas at risk of flooding. Respondents also told us about the types of flood prevention measures they would like to see used more, including tree and hedgerow planting, attenuation ponds and installing leaky dams. The Water Companies agree on preventing surface water entering public sewers and a water requirement of 110 litres per head per day. This ties in with people's concerns over flooding generally and especially from sewer overflow. There was strong support for the preferred option of amending and supplementing the existing water management policies as an integral	Water policies were amended to take this into account, and they are now part of the new chapter on Responding to Climate Change and Nature Recovery. The water infrastructure policy requires the use of conditions to ensure that new homes are not occupied until there is sufficient water/wastewater infrastructure capacity; and development that results in a new residential dwelling will be required to incorporate water conservation measures to achieve a maximum water consumption of 110 litres per person per day. The existing flood risk policy is also updated to promote investigation into natural methods of flood mitigation, such as targeted woodland planting; and consideration of flood risk from all sources of flooding including that from surface water; a new clause to safeguard (in policy) two areas with the potential for flood storage near Cirencester; and to take into account the multi- functional benefits of Sustainable Urban Drainage Systems (SuDS).
part of the wider need for climate change adaptation and mitigation.	Further evidence from Strategic Flood Risk Assessment Level 1 and the Water Cycle Study will inform the next stage of Local Plan process.

3. Local Plan Consultation carried out under Regulation 18, 2024

Introduction

- 3.1 Between 1 February until 7 April 2024, consultation was undertaken on different aspects of the Local Plan Update under Regulation 18 (including a Call for Sites):
 - Local Plan (2011-31) Partial Update Consultation: Draft Policies ('Preferred Options' – follows on from previous consultation in 2022)
 - Local Plan (2026-41) Vision, Objectives and Development Strategy Options Topic Paper ('Issues and Options')
 - Local Plan: Cirencester Central Area Framework Masterplan (informal consultation)
- 3.2 The adopted Local Plan covers a period from 2011 to 2031. The <u>Local Plan Partial Update</u> consultation primarily considered updates the development management policies of the adopted Local Plan to make it "Green to the Core". It did not extend the plan period or alter the development strategy.
- 3.3 At the same time, the council was also considering development needs up to 2041 and options for how these may be delivered as part of a future **Development Strategy and Site Allocations Plan** (2026-41). This was because the council needed to ensure that the Local Plan development strategy continued to deliver sufficient housing and other requirements to serve the district when the current Local Plan expires and is replaced, or its policies became out of date. Consideration in a topic paper was therefore provided for development needs for the period 2026 to 2041 with options for how these needs could be delivered.
- 3.4 The <u>Cirencester Town Centre Framework Masterplan</u> consultation considered 'initial ideas' to start the process for developing a Framework Masterplan for Cirencester Town Centre. The idea being that the Masterplan would build upon and provide more detailed advice and guidance on policies in the Cotswold District Local Plan and the Cirencester Neighbourhood Plan.

Who was invited to make representation?

3.5 Throughout the consultation process, statutory stakeholders (such as the Environment Agency, Natural England and Historic England) and interested parties (such as town and parish councils, residents, businesses and landowners) were consulted through a variety of methods to ensure the Council complies with

the requirements in the Regulations and its Statement of Community Involvement.

- 3.6 All interested parties as set out in Regulation 18(2)(a-c) were invited to make comments, these included:
 - Specific consultation bodies that the council considered to have an interest in the proposed Local Plan;
 - General consultation bodies that the council considered appropriate; and
 - Such residents or other persons carrying on business in the district which the council considered appropriate to invite comment from.
- 3.7 The Council set up and maintains a <u>database</u> on its website of all individual persons and organisations who have expressed an interest to be kept informed of consultations by the Council on planning policy documents. These persons and organisations were all notified of the consultation by letter or email. All statutory consultees (including town and parish councils), and district councillors were also notified.
- 3.8 The consultation attracted nearly 8,000 comments, with almost 6,000 comments on the Partial Local Plan Update, and over 1,000 comments on the Development Strategy and Site Allocations Plan, from nearly 800 participants in total.

Table 3 – Number of comments and consultees at Regulation 18 stage

Consultation	Participants	Comments
Local Plan Partial Update (Preferred Options)	441	5,834
Development Strategy to 2041 (Issues and Options)	164	1,106
Cirencester Town Centre Masterplan (informal)	172	1,048
	777	7,988

- 3.9 For comparison, the preceding Local Plan Regulation 18 Consultation in 2022 (Issues and Options on the Partial Update) attracted around 2,900 comments from over 750 people or participants.
- 3.10 A total of 172 responses to the survey were received together with 34 responses to the Framework Masterplan consultation document. In addition, consultation on the Local Plan Update yielded 5 representations relating to revised policies

for Cirencester Town Centre. These polices go hand in hand with the Framework Masterplan.

How were they invited to make representations?

- 3.11 Local Plan consultations must meet the protocol set out within the Council's Statement of Community Involvement.
- 3.12 The following consultations methods were used. Appendix A provides a further detail and examples of the publicity and some of the consultation methods used through, and after, the consultation period.
 - Letters/ emails to interested parties
 - E-newsletters engagement with businesses through 'Business Matters' and households in Cotswold 'Round-Up'
 - Posters / Banners / QR Code
 - Public Drop-in Sessions
 - Deposit Points hard copies at district Council offices (Cirencester and Moreton-in-Marsh) and all libraries
 - Promotion via Council Website (downloadable copies of documents, FAQs, comment form, evidence, news updates, key messages etc)
 - Use of social media (incl. Facebook, Twitter/X, Next-door and Instagram)
 - Media (press release)
 - Video message
 - Targeted support and event(s)

3.13 Other engagement, included:

- A Call for Sites (as part of the Reg 18 consultation) this invited people to indicate available land that can deliver development needs up to 2041. This included land for housing, employment, renewable energy, green spaces, nature, etc.
- Design Code an informal consultation led by consultants for the Council, 15th January to 24th March 2024¹; and invitee-only technical workshops in April 2024 were held to update previous design guidance, especially in terms of the declared climate change and ecological emergencies. The Code also forms part of the current Local Plan Update (Policy SD3) and will eventually supersede and replace this guidance in the currently adopted Local Plan.

¹ On-line consultation, 16 sites were picked from across the district that demonstrated the types of development that have been delivered across the Cotswolds over the last 20 years, and local residents were asked to respond to a survey on these developments.

• 'Planning for Real' workshop (October 2024) – a community event to explore the current challenges facing Moreton-in-Marsh and potential solutions that can be delivered through additional development; and followed by a feedback session (February 2025), Moreton-in-Marsh.

Summary of the main issues raised and how they have been addressed

- 3.14 The tables on the next pages set out the main issues raised by the different parts of the consultation and how the Council has addressed these.
- 3.15 The Council has also produced summary reports of all representations:
 - Development Strategy and Site Allocations Plan (2026-41) Summary of Consultation Representations (CDC, October 2024)
 - Local Plan (2011-31) Partial Update Consultation: Draft Policies Summary of Consultation Representations (CDC, October 2024)

Table 4 – Local Plan Partial Update Consultation: Draft Policies ('Preferred Options')

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
General Observations		
Missing policy and a point of evidence	Additional weeks for consultation – The Local Plan consultation was extended to 7 th April 2025 to allow people sufficient time to respond. Notification (via website, emails, including deposit points, FAQs, Front of House, members, other documentation amended) was issued and the consultation documents were re-published with the correction and the new policy made available to view.	N/A
Consultation Process: Criticism of the complexity and length of consultation documents, suggesting they may deter broad community engagement. Importance of early and effective engagement with communities and stakeholders.	This was noted. The Council has combined the two Local Plan projects into a single comprehensive Local Plan, which will help to address this issue. Issues were discussed with the Digital Engagement Lead at wash-up sessions, with lessons to learn for the next consultation. Technical issues forwarded to consultation system provider for enduser suggestions/ improvements.	N/A
Development Strategy (DS1-DS4)		
Housing Requirements : Concerns about outdated housing need figures and the method used to calculate them.	Since the consultation, the government has introduced a new 'standard method' for calculating the number of homes needed, which has been incorporated into the next stage of the Local Plan consultation.	DS1
Climate and Development : Need for strategies that address climate change and sustainable transport.	Various evidence base documents have been produced in this regard. For example, in late 2023, the council published a Transport Decarbonisation Study (City	Various

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
	Science, October 2023). In early 2025, the council published a Renewable Energy Study (LUC, January 2025). These have been used to inform the next stage of plan making.	
Employment and Local Economy: Importance of aligning housing growth with local employment opportunities.	The council is undertaking a further public consultation in late 2025 on development strategy options, and aligning housing and employment growth will be a key consideration of the chosen development strategy. Sites will be allocated in the Local Plan Update in accordance with the development strategy.	DS1, DS2, DS3, DS4, S1- S19, EC1, EC2
Infrastructure and Sustainability: Ensuring new developments align with existing infrastructure capacity.	The Council is producing various evidence base documents that consider infrastructure and sustainability, including an Infrastructure Delivery Plan (IDP) and a Water Cycle Study to reflect the scale and distribution of growth proposed in the preferred strategy. The IDP will identify required improvements to transport, utilities, education, health, and community facilities, and will set out delivery mechanisms to ensure infrastructure keeps pace with development. Similarly, the Water Cycle Study will assess water supply and wastewater infrastructure requirements.	INF1, INF2
Sustainable Development (SD1-SD4)		
Energy Efficiency: Support for policies promoting energy efficiency and sustainable building practices.	Comments were supportive, no changes made.	SD1, SD2

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
Biodiversity Net Gain: Calls for mandatory biodiversity net gain and protection of habitats.	Comments were supportive, no changes made.	SD1
Health and Wellbeing: Emphasis on integrating health and wellbeing considerations into all types of development.	Amendments have been made Policy SD4 on Health and Wellbeing – including the supporting text and policy itself – for clarity and in light of some comments received. The changes included stronger reference to air quality. There has been no change to policy requirement for defibrillators, as proposed wording is considered to strengthen the likelihood of their delivery.	SD4
Climate Mitigation and Adaptation (CC1-CC	(8)	
Renewable Energy: Balancing renewable energy development with landscape preservation. Lack of public availability of the Renewable Energy Strategy underpinning the policy was criticised by some respondents.	The Renewable Energy Study which further explains the Council's approach to this balancing and other relevant matters has now been published.	CC2
Flood Risk Management: Importance of sustainable urban drainage systems (SuDS) and natural flood management techniques.	Additional wording has been added and the policy and supporting text have been re-structured to reflect comments received, including advice from the Environment Agency. A Strategic Flood Risk Assessment and a Water Cycle Study have been commissioned to provide up-to-date evidence documents to support the Local Plan.	CC5

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
Water Infrastructure: Concerns about the capacity of existing water and wastewater infrastructure to support new developments.	Policy CC6 has not been changed significantly, but some re-wording has been done to respond to comments received, including advice from the Environment Agency. For example, additional text to support higher water efficiency standards. A Water Cycle Study has also been commissioned to provide evidence of the impact of planned growth on water infrastructure. The supporting text of the policy will be amended accordingly once available.	CC6
Green Infrastructure (GI): General support of the policy wording. Amendment sought to ensure development proposals are only permitted if they contribute meaningfully to GI. Concern is raised about the impact of new developments on existing GI.	Both issues are noted and adjustments have been made to the policy wording and supporting text accordingly.	CC7
Principal Settlements (S1-S19)		
Cirencester Central Area: Comments received relating to supporting text. Additional residential units and other incentives to fund the development of a new Healthcare Centre suggested together with a need for policy amendments to address changes in the Use Classes order. Housing provision beyond 2031 encouraged.	The representations related to supporting text were considered but were found to be either not directly relevant to the policy or did not warrant amendments.	S2

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
Infrastructure Needs : Highlighting the need for infrastructure improvements to support new housing developments.	An Infrastructure Delivery Plan has been commissioned to assess the infrastructure requirements of planned developments. Similarly, a Water Cycle Study has been commissioned to assess the water infrastructure requirements of planned developments. These evidence base documents will be used to justify the infrastructure policies in the Local Plan and to demonstrate the deliverability of site allocations.	INF1, INF2
Environmental Impact : Concerns about the impact of development on local landscapes and ecosystems.	The site allocation selection process has been set up to avoid areas of highest environmental sensitivity, and landscape sensitivity assessments are being undertaken for all potential site allocations to ensure development respects local character. An Integrated Impact Assessment (IIA) will also inform the site selection process by assessing environmental, social, and economic effects, ensuring that growth aligns with sustainability objectives and minimises harm to valued landscapes and habitats.	EN1 to EN9
Community Engagement: Calls for more transparent and inclusive planning processes. Housing Policies (H1-H11)	In response, the Council has strengthened its approach to engagement by providing clearer information on development options, publishing supporting evidence, and offering multiple channels for participation, including online consultations, public events, and targeted stakeholder meetings.	N/A

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
Affordable Housing : Increasing the percentage of affordable housing required in new developments.	Various changes have been made to the emerging Policy H2 to increase affordable housing delivery. The policy proposals will be subject to viability assessment.	H2
Specialist Accommodation : Need for housing that meets the needs of older people and those with disabilities.	A Housing and Economic Needs Assessment has been commissioned, which will assess the need for different types of specialist housing accommodation. This includes housing that meets the needs of older people and those with disabilities. This will be used to justify the requirements for these types of accommodation in Policy H4.	H4
Traveller Sites : Addressing the need for Traveller sites within new developments.	A Gypsy and Traveller Accommodation Assessment has been commissioned. This will assess the need for different types of Gypsy and Traveller accommodation in the district. The Council is also assessing sites to identify a supply of sites to deliver the need identified in the Gypsy and Traveller Accommodation Assessment. This will be reflected in an updated Policy H7.	H7
Economy, Retail, and Tourism (EC1-EC12)		
Employment Sites : Safeguarding existing employment sites and supporting local business growth.	This is a challenging policy area considering Class E and Permitted Development rights. The Local Plan policies already seek to achieve both objectives. The consultation responses were considered but it was determined that no amendments to the policies in this regard were required.	EC2, EC1-EC6

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
Tourism Development : Balancing tourism development with the preservation of local character and environment.	The need to balance the economic benefits of tourism against its environmental impacts is (and has long been) recognised in relevant policies. No amendments required.	EC10, EC11
Built, Natural, and Historic Environment (El	N1-EN18)	
Landscape Protection: Ensuring development does not harm the natural and historic landscape.	The responses were considered but no significant changes to the policy were required. The policies are considered to essentially support these protective aspects. Amendments were made to include updates, such as name change Cotswolds Area of Outstanding Natural Beauty to the Cotswolds National Landscape. A change was made in response to a comment to strengthen air quality references (Policy EN15).	EN3, EN4, EN5, EN15
Trees: Focus on clearer wording, stronger habitat protection, and detailed compensatory planting requirements.	The responses were considered but no significant changes to the policy were required.	EN7
Biodiversity: Ensuring the landscape-scale biodiversity to support the delivery of the Gloucestershire Local Nature Recovery Strategy and the Gloucestershire Nature Recovery Network.	Environment Agency (EA) comment to strengthen policy EN8. In response a new policy has been added. EN8 remains as before. EN21 has been added specifically cover Biodiversity Net Gain.	EN8, EN9
Soils: Natural England is concerned that there is no polices specifically that address soil protection or loss of best and most versatile agricultural land. We would advise adding in a policy for soil protection that	A new Soils policy added (Policy EN19).	EN8, EN19

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
includes best and most versatile agricultural land, in line with paragraph 174 a) and b) of the National Planning Policy Framework and the government's 25 Year Environment Plan		
Waterbodies: Ensuring development does not harm waterbodies, in addition to enhancement. EA comment to strengthen policy regarding water bodies.	A new Watercourses policy added (Policy EN20).	EN8, EN20
Biodiversity & Geodiversity: Designated Sites	No comments received.	EN9
Dark Skies: Protecting dark skies from light pollution.	No significant changes. Some minor amendments have been made to reflect feedback suggested by Environment Agency, which include reference to the impact from light spill on water bodies. New policy added on Watercourses to reflect this (Policy EN20).	EN16, EN20
Management of Accessible Open Green Spaces: concern regarding the onerous requirements which mandates developers to provide costings for the design and long- term management of open spaces. General support for policy. Effective enforcement to ensure spaces are maintained in an adoptable condition and clarity in management agreements, particularly regarding the option for reviewing and	Further guidance has been added to the policy to provide clarity including reference to Spon's External Works and Landscape Price Book.	EN17

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
potentially changing service providers to prevent escalating charges.		
Sherborne Park Estate Masterplan: Concerns about increased traffic and parking issues, potential for negative impacts on village character and community, and negative impact on natural environment and wildlife. Lack of engagement by/with National Trust. Need for infrastructure improvements.	Amendments made to include references to local concerns, and additional text for consistency with other 'masterplan' policies within the Local Plan. Explanation of the strategic nature and need for the policy itself. Comments not directly relevant to the policy forwarded to National Trust.	EN18
Infrastructure Delivery (INF1-INF6)		
Strategic Infrastructure : Merging strategic infrastructure policies and addressing high-priority infrastructure needs.	No change to the current policy, however, the Council is updating its Infrastructure Delivery Plan, which will inform the revised version of this policy.	INF1
Highway Safety : Optimizing highway safety in new developments.	The Council has looked at strengthening Local Plan policies to require safe and efficient access arrangements, integration with sustainable transport networks, and compliance with national design standards. An Infrastructure Delivery Plan has also been commissioned, which will consider measures for junction improvements, pedestrian and cycle connectivity, and traffic management where growth is proposed. Site assessments of potential site allocations will also consider highway capacity and safety, ensuring that development locations can	INF4

Main Points Raised by Representations	How the Main Points Were Addressed	Key Policies
	accommodate planned improvements without compromising road safety.	
Parking Provision : Updating parking standards to include provisions for electric vehicles and bicycles.	The Council is in the process of updating the Local Plan parking standards.	INF5
Other Spatial Issues (SP1-SP6)		
The Thames and Severn Canal No issues raised	General support, and no changes required.	SP3
River Thames No issues raised	General support, and no changes required.	SP4

Table 5 – Local Plan Vision, Objectives and Development Strategy Options Topic Paper

Main Points Raised	How the Main Points Were Addressed
Opposition to possible development option at Moreton-in-Marsh.	 Additional informal consultation events and engagement opportunities were provided (following the Reg 18 drop-in session at Redesdale Hall, Moreton-in-Marsh) included: A Question-and-Answer session at the Fire Service College, (March 2024) Moreton-in-Marsh - questions and answers published on website. Fact sheet to help clarify. Invitation-only 'active participation' workshop at St David's Centre, Moreton-in-Marsh, (October 2024) led by consultants 'Planning for Real. Summary report published online. In person feedback session at St David's Centre, Moreton-in-Marsh (February 2025). Link to a 'Moreton-in-Marsh' consultation tile (page) for targeted updates. Attendance at one event or more by: the Chief Executive, the Leader of the Council, the Head of Planning Services, Moreton-in-Marsh Ward Members and/or the Council Portfolio Holder for Planning Policy.
Vision and Objectives	
Infrastructure Concerns: Many respondents are worried about the strain on existing infrastructure, such as roads, sewage, healthcare, and parking, especially with new housing developments.	An Infrastructure Delivery Plan and a Water Cycle Study have been commissioned, which will assess the infrastructure requirements of all proposed developments, and the cost of this infrastructure and how it can be delivered. Whilst new development cannot be required to fix existing infrastructure issues, developments may provide opportunities to make some improvements.

Main Points Raised	How the Main Points Were Addressed
Environmental Protection: There is a strong emphasis on protecting the rural character and environment of the Cotswolds, with concerns about overdevelopment and its impact on wildlife and green spaces.	The Council has reviewed the representations on and acknowledges the concerns raised. In developing the next stage of the Local Plan, additional evidence has been gathered to assess issues such as landscape impact, infrastructure requirements, etc., and the development strategy options have been refined to ensure that proposed development is located where improvements can be delivered. This approach seeks to balance growth with infrastructure provision, aligning with sustainability objectives and statutory requirements.
Housing Diversity: The need for a diverse range of housing, including affordable homes and specialist accommodation, is highlighted.	The Council has reflected this through the retention and refinement of Policies H1, H2, and H4. Policy H1 ensures that future development proposals provide an appropriate mix of housing types and sizes to meet identified local needs, while Policy H2 sets clear expectations for affordable housing provision across qualifying sites. Policy H4 continues to address the need for specialist accommodation, including housing for older people and those with disabilities. Although specific site allocations have not yet been identified, the development strategy options have been shaped to ensure that strategic locations can support these policy objectives, informed by updated evidence on housing need and demographic trends.
Balanced Development: Respondents call for a balanced approach that addresses infrastructure needs, protects the rural character, and ensures sustainable development.	Amongst other things, an Infrastructure Delivery Plan (IDP) and Water Cycle Study are being prepared to ensure that growth is aligned with the timely provision of transport, utilities, and community facilities. The Local Plan is predicated on delivering sustainable development, guiding growth to locations that minimize environmental impact and promote accessibility. Sites will be assessed against key constraints, including heritage, landscape, and ecological considerations, to ensure that only suitable and deliverable sites are proposed for allocation.
Development Strategy Options	

Main Points Raised	How the Main Points Were Addressed
Infrastructure and Services: Concerns about the capacity of infrastructure and services to support new developments, particularly in Moreton-in-Marsh.	Amongst other things, an Infrastructure Delivery Plan (IDP) and Water Cycle Study are being prepared to ensure that growth is aligned with the timely provision of transport, utilities, and community facilities. The Local Plan is predicated on delivering sustainable development, guiding growth to locations that minimize environmental impact and promote accessibility. Sites will be assessed against key constraints, including heritage, landscape, and ecological considerations, to ensure that only suitable and deliverable sites are proposed for allocation. In addition, the Council is undertaking a feasibility study in Moreton-in-Marsh to consider the potential for strategic-scale growth in this location, informed by infrastructure capacity and environmental constraints.
Environmental and Flooding Concerns: Apprehensions about the environmental impact of proposed developments, including flooding and habitat loss.	The Council has carefully considered concerns regarding the environmental impact of proposed development, including flooding risk and potential habitat loss. The Local Plan is predicated on delivering sustainable development, and all sites will be assessed against environmental constraints such as flood zones, biodiversity designations, and ecological sensitivity to ensure only suitable and deliverable sites are proposed for allocation. Strategic flood risk assessment work is being updated to inform site selection and policy requirements, and the Council will continue to apply the sequential and exception tests in line with national policy. In addition, measures to protect and enhance habitats will be embedded within the plan, supported by updated evidence on green infrastructure and biodiversity net gain.
Local Economy and Employment: A disconnect between housing development and local employment opportunities, with a need for job creation to reduce commuting	The Local Plan's economic development strategy will seek to align housing and employment growth, supporting vibrant and self-sustaining communities. The Council is undertaking a Housing and Economic Needs Assessment (HENA) to establish up-to-date requirements for jobs and homes and is actively assessing land for employment development to ensure sufficient provision for business growth. Existing employment sites will be protected through policy, and the Council is calling

Main Points Raised	How the Main Points Were Addressed
	for additional land for employment growth to meet future needs and attract investment. These measures will help deliver a balanced strategy that strengthens the local economy and reduces reliance on long-distance commuting.
Transportation and Accessibility: Inadequate public transportation and increased private vehicle usage are recurring themes.	The Local Plan's development strategy will be predicated on sustainable development principles, proposing growth in locations with existing or potential for improved public transport connectivity. The Infrastructure Delivery Plan (IDP) will set out the transport improvements required to support planned growth. A key consideration in identifying proposed site allocations will be accessibility to services, facilities, and employment without reliance on private cars, ensuring that development supports sustainable travel choices.
Preferred Development Strategy	
Infrastructure Needs: Emphasis on the need for comprehensive infrastructure planning, including traffic management, wastewater treatment, and public transport improvements.	An Infrastructure Delivery Plan (IDP) is being prepared to identify and coordinate the infrastructure required to support planned growth. This includes assessing capacity for highways, utilities, education, health. In addition, water supply and wastewater treatment capacity will be assessed through the Water Cycle Study, ensuring that growth is deliverable without adverse impacts on water infrastructure or the environment. A key consideration in identifying proposed site allocations will be accessibility to services, facilities, and employment without reliance on private cars, supported by improvements to public transport and active travel networks.
Housing Distribution: Opposition to concentrating many additional homes in Moreton-in-Marsh, with suggestions for more dispersed growth.	While the Local Plan is predicated on delivering sustainable development, the distribution of housing must balance accessibility to services, facilities, and employment with environmental and infrastructure constraints. The preferred development strategy being consulted on includes eight locations for strategic-scale growth, alongside development distributed across 16 principal settlements and 13 non-principal settlements, ensuring a balanced approach across the district. In addition, the Council is undertaking a feasibility study in Moreton-in-Marsh to assess

Main Points Raised	How the Main Points Were Addressed
	the potential for strategic-scale growth, informed by transport capacity, flood risk, and landscape sensitivity.
Environmental Impact : Concerns about the potential environmental consequences of overdevelopment, particularly in terms of flooding and habitat destruction.	The Local Plan is predicated on delivering sustainable development, and all proposed site allocations will be assessed against environmental constraints, including flood risk, biodiversity, and landscape sensitivity, to ensure only suitable and deliverable / developable sites are taken forward. Updated evidence, including the Strategic Flood Risk Assessment (SFRA) and ecological studies, will inform site selection and policy requirements. In addition, the plan will incorporate measures to protect and enhance habitats and secure biodiversity net gain, in line with national policy.
Community Character: Fears that large-scale housing developments could alter the character and quality of life in towns like Moreton-in-Marsh.	The Local Plan is predicated on delivering sustainable development, and site selection process will take account of heritage, landscape, and environmental constraints to ensure that only suitable and deliverable sites are proposed for allocation. The preferred development strategy includes a balanced distribution of growth across eight strategic-scale locations and a range of principal and non-principal settlements, reducing reliance on any single town. This approach aims to meet housing needs while safeguarding the distinctive character of communities.
Proposed Updates to the Local Plan	
Climate Crisis Response: Support for including responses to the climate crisis and promoting nature recovery.	The Council welcomes support for addressing the climate crisis and promoting nature recovery. The Local Plan is predicated on delivering sustainable development and will embed policies that reduce carbon emissions, promote renewable energy, and support energy-efficient design. Updated evidence will inform these policies. In addition, the plan will strengthen requirements for biodiversity net gain and green infrastructure, ensuring that development contributes positively to nature recovery and resilience to climate impacts.

Main Points Raised	How the Main Points Were Addressed
Affordable Housing : Emphasis on providing more socially rented homes and ensuring housing developments meet local needs.	Policy H2 has been updated to increase social rented housing provision. Further local plan site allocations are proposed, which will deliver more affordable housing, including social rented housing.
Sustainable Development : Calls for zero carbon developments and transitioning to a low carbon economy.	The Local Plan is predicated on delivering sustainable development and will include strengthened policies to support energy-efficient design, renewable energy generation, and low-carbon construction methods. Updated evidence will inform these policies. In addition, the plan will promote sustainable transport, biodiversity net gain, and green infrastructure, ensuring that development contributes to climate resilience and the district's transition toward a low-carbon future.
Development Strategy Scenarios	
Scenario 1: Non-Strategic Site Allocations: Support for additional non-strategic site allocations in Principal Settlements.	The Council has reviewed the evidence base for transport and utilities and engaged with infrastructure providers to confirm deliverability. While the scenario offered some sustainability benefits, the feedback indicated that a more balanced distribution of growth would better reflect community aspirations and reduce pressure on one location. As a result, the preferred strategy incorporates elements of Scenario 1 - such as focusing growth in sustainable locations—but combines this with a broader spatial approach to ensure infrastructure can support development and local distinctiveness is maintained.
Scenario 2: Main Service Centre Focus: Mixed views on focusing development in main service centres, with concerns about overburdening infrastructure	The Council has refined its approach to ensure that while Main Service Centres remain key locations for development, the preferred strategy includes a revised settlement hierarchy that includes further Principal and Non-Principal Settlements to enhance sustainable transport and protect local character. This balanced approach reflects community aspirations for growth that is both sustainable and well-supported by infrastructure.

Main Points Raised	How the Main Points Were Addressed
Scenario 3 : Dispersed Growth: Concerns about sustainability and infrastructure support for dispersed growth.	The Council considered these points and concluded that a highly dispersed pattern would present significant challenges for sustainable transport and infrastructure delivery. The preferred strategy therefore limits growth in less sustainable locations, concentrates development in settlements with stronger service provision, and supports smaller-scale growth through Rural Exception Sites where appropriate.
Scenario 4: Village Clusters: Mixed views on the feasibility and benefits of clustering villages for development.	The Council has reviewed transport and service provision evidence and concluded that a village cluster model may still be able to deliver sustainable growth. The principle of clustering villages where strong functional links already exist was considered valuable. The preferred strategy therefore includes a single village cluster – Quenington, Ampney Crucis, and Coln St Aldwyns – where proximity, shared services, and accessibility make this approach deliverable. This targeted application addresses concerns about clarity and sustainability while retaining the benefits identified during consultation.
Scenario 5: New Settlements: Concerns about the risks and challenges of creating new large- scale settlements.	The Council reviewed these issues in the context of the significantly increased housing target of 18,650 homes for the new plan period. It concluded that while a widespread reliance on new settlements would not be appropriate – i.e. new settlements in the Cotswolds National Landscape – the scale of growth required is unlikely to be met through growth of existing settlements alone. The preferred strategy therefore includes a new settlement to the west of Driffield and invites proposals for further new settlements, subject to robust evidence and deliverability assessments. This approach balances the need for strategic growth with the concerns raised during consultation by ensuring that any new settlement is planned comprehensively, supported by infrastructure, and designed to respect the district's landscape and character.
Scenario 6 : New Strategic Sites: Support for strategic sites but	The Council reviewed these issues against the increased housing target of 18,650 homes and concluded that strategic sites will play an important role in meeting this

Main Points Raised	How the Main Points Were Addressed
concerns about delays and infrastructure impacts.	need. The preferred strategy therefore includes provision for new strategic sites in sustainable locations – or locations that could be made to be sustainable – supported by detailed master planning and infrastructure delivery plans. This approach addresses concerns about delays by combining strategic sites with allocations in existing settlements and smaller sites, ensuring a balanced and deliverable housing supply throughout the plan period.
Scenario 7: Growth Around Transport Nodes: Support for focusing growth around transport nodes but concerns about overreliance on public transport.	The Council considered these issues alongside the significantly increased housing requirement of 18,650 homes and the need for a deliverable strategy. While the preferred approach retains the principle of directing growth to well-connected locations, it does not rely solely on rail hubs. Instead, it combines this with allocations in other sustainable settlements and strategic sites to ensure flexibility and resilience. Importantly, consideration has been given to Gloucestershire County Council's proposed bus corridors, ensuring that a large proportion of growth is aligned with planned public transport improvements to reduce car dependency and support sustainable travel. This integrated approach addresses concerns about viability and infrastructure while maximising opportunities for sustainable connectivity.
Scenario 8: Neighbouring Authority Support: Opposition to relying on neighbouring authorities to accommodate housing needs.	The Council has dropped this option from the 2025 Local Plan Regulation 18 consultation. The preferred strategy focuses on delivering 14,660 homes within Cotswold through a combination of sustainable allocations, strategic sites, and new settlements. However, this still falls short of the full housing requirement of 18,650 homes, so the Council has begun discussions with neighbouring local planning authorities under the Duty to Cooperate. These conversations will explore whether any unmet need can be accommodated elsewhere if required, but this will be considered separately from the Local Plan strategy.

Table 6 – Cirencester Framework Masterplan

Main Points Raised by Representations	How the Main Points Were Addressed
In general terms the Vision and Principles of the FM were	
strongly supported.	
Car parking facilities remained a concern for many	Clearly there are issues here for the next iteration of the
Many respondents did not like the example buildings put	Framework Masterplan to respond to. But the fundamentals of
forward for illustrative purposes.	the Framework Masterplan - the basic "direction of travel", the
The "town beach" idea was unpopular.	vision and principles – were publicly supported.
The idea to potentially relocate GP facilities to the Waterloo	
site met with a mixed response.	

3.16 A more detailed report of the consultation responses on the Cirencester Framework Masterplan is provided at Appendix B below.

4. Local Plan Consultation carried out under Regulation 18, 2025

Introduction

- 4.1 In December 2024, the government introduced new housing target. For Cotswold District, this meant a more than 100% increase to its annual housing target which requires a full update to the Local Plan. An additional 18,650 additional new homes are now needed for the new Local Plan period, which will run from 2025 to 2043. From 14 November 2025 until 2 January 2026, the Council is running a consultation under Regulation 18 which looks at different development strategy options to deliver this target.
- 4.2 This Statement of Consultation will be updated accordingly after the consultation has concluded.

5. Appendix A - Examples of consultation methods

Local Plan Consultation carried out under Regulation 18, 2022

The consultation document, comment form, FAQs, summary infographic pages, and more detailed Evidence Topic Papers were made available on the <u>Council's website</u>.

Hard copies of the consultation document, including a standard comment form, were also made available at the District public libraries and Council Offices at Trinity Road, Cirencester and Moreton Area Centre, High Street, Moreton-in-Marsh.

Pull down banners were provided for the council office receptions to advertise the event and **correx boards** put up in key locations across the district. The consultation was advertised internally to Members (also via 'mail chimp') and officers on the Publica Portal.

Two public drop-in sessions were arranged for residents and businesses to view the document and discuss issues and options with the team:

- Wednesday, 2nd March 2022 from 2pm until 6:30pm at the Committee Rooms, Council Offices, Trinity Road, Cirencester, GL7 1PX; and
- Wednesday, 9th March 2022 from 2pm until 6:30pm at Moreton Area Centre, High Street, Moreton-in-Marsh, GL56 0AZ.

Town and parish councils were notified by letter/ email and asked to share the event on their social media platforms. Posters were provided to display on their notice boards.

Everyone registered on the **Local Plan consultation database**, including town and parish councils, adjoining authorities and statutory consultees, were notified. Those not on email were sent a letter.

Simple <u>one-page infographics</u> summarising each of the 18 topics were created to help people understand the issues.

Once it was clear that 13-18 years olds were not staying to look at the online consultation and town and parish councils needed support with responding, further 'tiles' targeting these groups were created on the consultation platform.

A 2-sided A5 flyer was delivered via Royal Mail Door-to-Door service to all (some 48,000) households in the District at the beginning of the consultation period. The consultation could also be accessed by mobile phones and a QR code was created to help people more easily take part.

Social media was used to draw attention to the consultation, such as on Facebook and Twitter, using paid promotion ads on Facebook (7 times) to ensure the majority of residents will have sight of the consultation. The emphasis and following on social media have grown (Communications Report).

A <u>video message by the Portfolio Holder</u> Cabinet Member for Climate Change and Forward Planning, and a short film animation were both released to help promote the consultation

The consultation was publicised in the media with public consultation notification advert in the Cotswold Journal and Gazette and Wiltshire and Gloucestershire Standard w/c 7th February 2022 and a press release.

News items were also posted to those who signed up to the consultation platform, as well as in the Cotswold District's E-newsletter ('Cotswold Round-up') in February and March and engaged with businesses through the 'Business Matters' equivalent.



We need to take action

to tackle the climate and ecological emergencies and ensure there are enough homes for local people now and in the future.

Cotswold District Local Plan (partial update)
Issues and Options Consultation
Friday 4th February until Sunday 20th March

To take part go to issuesandoptions.commonplace.is or scan the QR code using your phone's camera.



#YourCotswoldYourPlan #GreenToTheCore



Local Plan consultation to respond to the climate emergency and promote a carbon zero Cotswolds

Ø FEB 4, 202

COTSWOLD DISTRICT COUNCIL

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012

PUBLIC CONSULTATION NOTICE - REGULATION 18

A six-week public consultation period for the Partial Update to the Cotswold District Local Plan 2011-2031 (a Regulation 18 'Issues and Options' consultation) commences on Friday 4th February 2022 and ends at 11:59pm on Sunday 20th March 2022.

You are invited to comment on the Local Plan (a Partial Update) and its supporting documents.

WHAT IS A LOCAL PLAN?

It is the starting point for determining local planning applications. The Cotswold District Local Plan applies to the whole of Cotswold District and includes a range of planning policies covering housing, the economy, the environment and infrastructure; it also provides a strategy for delivering growth up to 2031.

A PARTIAL UPDATE

Although the Cotswold District Local Plan 2011-2031 was adopted in 2018, Local Plans must be periodically reviewed to keep them up to date. This can be a targeted update

We have a new online consultation platform that makes it easier for you to let us know what you think. Please scan the QR code (using your phone's camera app) to take part in the consultation.

Alternatively you can access the consultation by visiting issuesandoptions@commonplace.is

You can also come and talk to us about the proposals.

2nd March, 2pm - 6.30pm Cotswold District Council Offices, Trinity Road, Cirencester, GL7 1PX

9th March, 2pm - 6.30pm Moreton-in-Marsh Area Centre, GL56 0AZ

Hard copies of the document are available to view at both Council Offices, Trinity Road, Cirencester and Moreton-in-Marsh as well as all District Libraries.

Forward Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX Telephone: 01285 623000 or email: localplan@cotswold.gov.ul





COTSWOLD YOUR PLAN

> CREATING A FUTURE THAT IS GREEN TO THE CORE

BIODIVERSITY

KEY FACTS

Biodiversity is "the variety of life on Earth - the variety of ecosystems or habitats, of species and of the genetic diversity they contain. We value wildlife in its own right but biodiversity also underpins much of the economic

ISSUES

- National policy will soon require at least a 10% 'biodiversity net gain' in developments to leave the natural environment in a measurably better state than beforehand.
- Need to respond to actions contained with the District Council's Climate Change Emergency and Ecological

YOUR COTSW9LD YOUR PLAN

CREATING A FUTURE THAT IS GREEN TO THE CORE

We need to take action

to tackle the climate and ecological emergencies and ensure there are enough homes for local people now and in the future.

COTSWOLD DISTRICT LOCAL PLAN (partial update) Issues and Options Consultation

Friday 4th February until Sunday 20th March





Local Plan Consultation carried out under Regulation 18, 2024

Two **public drop-in sessions** were arranged for residents and businesses to view the document, through the day and early evening, and discuss issues and options with the team:

- Wednesday, 21st February from 10am until 8pm at the Corinium Museum, Park Street, Cirencester, GL7 2BX; and
- Wednesday 6th March from 10am until 8pm at the Redesdale Hall, High Street, Moreton-in-Marsh, GL56 0AX

Town and parish councils were notified by letter/ email and asked to share the event on their social media platforms. Posters were provided to display on their notice boards. Two Town and Parish Council (only) events were arranged:

- Thursday 8th February from 6:00pm to 8:00pm at the Council Chamber, Council Offices, Trinity Road, Cirencester, GL7 1PX; and
- Thursday 29th February from 6:00pm to 8:00pm at Moreton Area Centre, High Street, Moreton-in-Marsh, GL56 0AZ

Everyone registered on the **Local Plan consultation database**, including town and parish councils, and statutory consultees, were notified. Those not on email were sent a letter.

A **school event** was organised at Deer Park School, Cirencester to promote interest. Specific 'tiles' for more tailored messaging targeting Moreton-in-Marsh, and the Cirencester Masterplan were also created on the online consultation platform.

Social media was used to draw attention to the consultation such as on Facebook and Twitter using paid promotion ads on Facebook to ensure a majority of residents will have sight of the consultation. The Council employs the following social media channels Instagram, Facebook, YouTube, Nextdoor, Twitter and LinkedIn.

A **video message** by the Portfolio Holder Cabinet Member for Climate Change and Forward Planning, was released to help promote the consultation and explain the Local Plan which is available on YouTube.

The consultation was publicised in **traditional media** with a formal public consultation notification advert and a press release issued in the Wiltshire and Gloucestershire Standard at the start of the consultation.

The Local Plan consultation was also a feature promoted on the **council's website** such as the news page, homepage and banner, and on the Planning Policy pages.

News items were also posted in the **Cotswold District's E-newsletters** (Cotswold Round-up) in February and March and engaged with businesses through the Business Matters' equivalent.



THAT IS GREEN TO THE CORE



WE'RE UPDATING THE LOCAL PLAN AND WE NEED YOUR VIEWS.

THE RIGHT AREAS FOR DEVELOPMENT **NET ZERO HOMES AS STANDARD** THE RIGHT PLACES FOR INFRASTRUCTURE MORE AFFORDABLE HOUSING BETTER CONNECTIVITY AND SUSTAINABLE TRANSPORT OPTIONS PROTECTING RURAL EMPLOYMENT SITES **ENHANCING NATURE AND BIODIVERSITY**

Take part and help to shape the future of Cotswold District 1 February to 24 March your.cotswold.gov.uk



#YourCotswoldYourPlan #GreenToTheCore







COTSWOLD DISTRICT COUNCIL

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

PUBLIC CONSULTATION NOTICE - REGULATION 18

A public consultation period for the Update to the Cotswold District Local Plan (a Regulation 18 consultation) commences on Thursday I** February 2024 and ends at 11:59pm on Sunday 24th March 2024. You are invited to comment on the Local Plan and its supporting documents. During this period the Council also is consulting upon a draft Framework Masterplan Supplementary Planning Document for Cirencester Central Area (the "masterplan"). This will end at 11:59pm on Sunday 17th March.

WHAT IS A LOCAL PLAN?

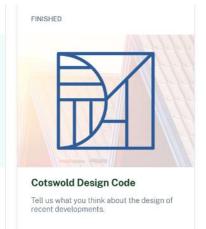
It is the starting point for determining local planning applications. The Cotswold District Local Plan applies to the whole of Cotswold District and includes a range of planning policies covering housing, the economy, the environment and infrastructure; it also provides



Local Plan Update Consultation

Take part in the Cotswold District Local Plan Update consultation





•95 participants

Local Plan Update Consultation

Cotswold District Council is updating its adopted Local Plan to make it "Green to the Core". The adopted Local Plan covers a period from 2011 to 2031. At the same time, the Council is also considering development needs up to 2041 and options for how these might be delivered.

The consultation closes on Sunday 24th March 2024.

More information

Draft Cirencester Town Centre Masterplan

The District Council is also consulting on the Draft Cirencester Town Centre Masterplan, which sets out a vision for the future of the town centre and how it needs to evolve to remain vibrant and successful.

More information







01 FEB 2024

'Green to the Core' Local Plan consultation begins

Residents are invited to give their views on updates to Cotswold District Council's adopted Local Plan (2011 - 2031) to make it 'Green to ...





01 FEB 2024

From Roman to renewal honouring our past, celebrating our present and inspiring our...

Our future vision for Cirencester Town Centre developed for public consultation

YOUR COTSWOLD YOUR PLAN

CREATING A FUTURE
THAT IS GREEN TO THE CORE

WE'RE UPDATING THE LOCAL PLAN AND WE NEED YOUR VIEWS.

Take part and help to shape the future of Cotswold District 1 February to 7 April your.cotswold.gov.uk







CIRENCESTER TOWN CENTRE MASTERPLAN

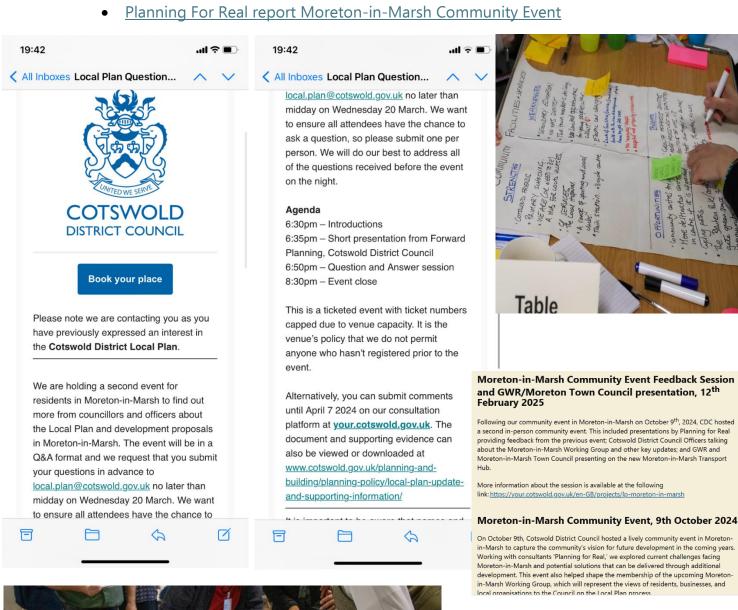
FROM ROMAN TO RENEWAL - HONOURING OUR PAST, CELEBRATING OUR PRESENT AND INSPIRING OUR FUTURE

Take part and help to shape the future of Cirencester from 1 February to 17 March your.cotswold.gov.uk



Additional consultation events were organised in Moreton-in-Marsh: Question and Answer session at the Fire Service College, Moreton (March 2024) and an invitation-only active participation workshop at St David's Centre, Moreton (October 2024) with a follow-up session (February 2025).

- Moreton-in-Marsh Question Time Questions
- Moreton-in-Marsh Question Time Fact Sheet





6. Appendix B – Summary of responses to the informal consultation on the Cirencester Framework Masterplan

Consultation on the emerging FM took place between February and April 2024, including a well-attended exhibition/drop in session at the Corinium Museum on 21st February 2024.

A total of 172 responses to the survey were received together with 34 responses to the FM consultation document. In addition, consultation on the Local Plan Update yielded 5 representations relating to revised policies for Cirencester Town Centre. These polices go hand in hand with the FM. It follows that to get a fuller picture of the representations in this context, it is necessary to consider both elements together.

Main themes:

Vision & Principles (98 responses to Vision, 95 responses to Principles)

70% of respondents agree with the vision of the FM, highlighting several key areas for improvement and consideration. A recurring theme is the need for better facilities and activities for youth, including a cinema and enhanced cultural life. Accessibility issues were frequently mentioned, with a focus on maintaining vehicle access to the town centre including for private transport, and improving disabled access. Overall, there is a call for a balance between making Cirencester a leisure and tourism destination while ensuring it remains functional and accessible for local residents.

In terms of the underpinning principles of the FM, over 75% of respondents agree. A recurring theme is the need for a balance between development and maintaining the town's character, with calls for increased residential units, particularly affordable and social housing. There is a strong emphasis on improving public transport, including better bus services, connections to local villages, and a transport link to Kemble Station. Many advocate pedestrianisation and improved cycling infrastructure, while others stress the importance of car access and parking for residents, the elderly, and businesses.

Access, Movement and Parking (91 responses)

Respondents frequently mentioned Cricklade Street and Castle Street as areas that should be prioritised for pedestrians. The Market Place was also commonly cited as a location that should be pedestrian-friendly. Some respondents believe that the current pedestrian provisions are sufficient and that no additional streets need to be prioritised. Overall, while there is a trend towards pedestrianizing certain streets, there is also a significant sentiment for maintaining the status quo and ensuring accessibility for vehicles.

Respondents overwhelmingly support prioritizing certain streets for pedestrians, citing reasons such as safety, the enhancement of the shopping experience, and the reduction of traffic and pollution. The main shopping areas, particularly Market Place and Cricklade Street, are frequently mentioned as locations that would benefit from pedestrian prioritisation due to high foot traffic and narrow pavements. A few responses suggest that not all streets should be prioritised for pedestrians or that the focus should be elsewhere. However, these views are in the minority compared to the overall trend advocating for pedestrian-friendly measures.

Mobility hub location

Respondents suggested various locations for a new town centre mobility hub, with a significant number favouring the Forum car park area. The Waterloo car park area was also frequently mentioned as a suitable site. Other locations mentioned include the old station area and the old Tesco site. Respondents generally favour locations for the proposed mobility hub that are central, easily accessible, and close to the town centre, with several mentioning proximity to the Market Place and main roads as key factors. Accessibility for buses, coaches, and potentially a light rail link is a recurring theme, with respondents noting the need for the hub to facilitate quick and efficient transport links to other destinations. The old station area is frequently mentioned as a suitable location due to its historical significance, space availability, and potential for integration with other transport services.

Overall, the trend among respondents is to locate the mobility hub in central areas with existing parking facilities, like the Forum car park and Waterloo car park, while also considering the unique characteristics and limitations of Cirencester as a historic market town.

Relocation of off-street public parking facilities

Respondents have diverse opinions on the relocation of off-street parking in the town centre. A significant number of respondents are against moving the parking out of the town centre, citing concerns about the negative impact on local businesses and the necessity for short-stay parking for town centre users. Some suggest that current parking locations are suitable and should not be changed. Others propose alternative locations for off-street parking, such as peripheral areas or specific sites like Whiteway car park Dyer Street and near the old Tesco site.

Park and ride solutions are mentioned, with some in favour while others are against it, fearing it will deter quick visits to the town. Overall, while there is no consensus, there is a clear concern about the impact of parking relocation on town centre accessibility and business viability, with many respondents emphasizing the need for a practical balance between creating a safer environment and maintaining convenient access to

the town centre. The trends indicate a desire for convenient, central parking, concerns about traffic and safety, and a call for better public transport solutions to accompany any changes to parking infrastructure.

Land Uses (47 responses)

60% of respondents agree with the broad mix and location of proposed land uses.

Overall, respondents are calling for a balanced approach that considers affordability, healthcare, transportation, and the preservation of the town's character while remaining flexible to market demands and private development proposals.

A recurring theme is the need for affordable and social housing, with emphasis on one or two-bedroom units. There is also a call for improved healthcare facilities to accommodate the growing population. Transportation and parking are other major concerns, with suggestions for areas dedicated to taxis and public transport the need for a car park near leisure areas and the importance of convenient parking for healthcare facilities.

Some respondents express confusion or dissatisfaction with the proposed zoning and land use mix, finding it unclear or too rigid. There is a sentiment that the unique character of the town should be preserved and not lost to generic development. A few responses suggest that the market should dictate development rather than pre-set planning. Concerns about noise and disruption from evening entertainment venues are mentioned as well as a desire for green, peaceful spaces.

A Reimagined East-West Route (30 responses)

80% of respondents agree with the idea of a new footbridge across Bristol Road to reconnect the town with its Roman Amphitheatre.

Examples of Development in Other Towns (44 responses)

NB. A fairly strong reaction to the example buildings shown in relation to the various sectors of the town centre was anticipated. It is stressed that these were included for illustrative purposes and to stimulate debate/reaction. It is not the purpose of this framework masterplan to set out detailed building designs. The final version will not include these illustrative ideas.

A mixed response: roughly 30% of respondents didn't like the examples; 38% liked them; about 27% were neutral with the remainder giving no response.

Respondents expressed concerns about the modernisation of the Old Station, Sheep Street, and Brewery area, emphasising the importance of maintaining the traditional Cotswold market town character and avoiding generic modern designs that could detract from Cirencester's unique charm and history. Some respondents are open to

modern elements if they integrate well with the Cotswold style while others prefer a focus on greenery and pedestrian-friendly spaces.

There is a desire for mixed-use spaces that include residential, retail, dining, and leisure amenities but concerns about potential noise and disturbance for nearby residents, particularly the elderly, have been raised.

There is also a call for careful consideration of the scale of development to ensure it remains human-sized and does not feel overbuilt or claustrophobic. The need for authenticity and avoiding "soulless" or overly contemporary designs that could become dated is a recurring theme.

Overall, respondents want development that respects Cirencester's heritage and enhances its market town feel while incorporating modern conveniences and amenities in a way that is sensitive to the local community's needs and the town's historic character.

Several interesting examples of developments in other towns were uploaded by respondents.

The Forum

Respondents are predominantly concerned about the modern design of the proposed buildings, feeling that they clash with the historical and traditional character of the town. Many comments suggest that the new structures are too modern, garish, or out of place. Overall, there is a strong sentiment that any development should be sensitive to Cirencester's unique history and aesthetics, with a preference for traditional designs that incorporate modern elements subtly and thoughtfully.

Linking Dyer Street to Waterloo

Respondents have expressed concerns about the proposed designs and ideas for linking Dyer Street to Waterloo, with a strong emphasis on maintaining the character and heritage of Cirencester. The most frequent criticisms are that the modern and angular designs, as well as materials like glass and concrete, are out of touch with the town's character.

Overall, there is a clear desire for any development to be sensitive to Cirencester's historical context and character, with a preference for integrating healthcare into residential areas and enhancing pedestrian access while managing flood risks.

Healthcare Facility at the Waterloo

Respondents have expressed concerns regarding the location and accessibility of a new healthcare facility in the 'Linking Dyer Street to Waterloo' project. Some believe that while a new facility could be beneficial, it should not replace current services but

rather complement them, with suggestions for additional locations closer to specific areas like Chesterton.

Parking availability is a recurring theme, with respondents highlighting the necessity of convenient parking for local movement and for those who are unwell and prefer driving to walking or using public transport. The importance of the facility being accessible by bus for those who are ill and have difficulty walking is also mentioned.

Overall, while there is some support for a new healthcare facility, respondents emphasize the need for careful consideration of location, accessibility, parking, and the integration with existing healthcare services.

Town Beach

Respondents are generally sceptical or negative about the idea of creating a manmade beach in Cirencester on the Churn, citing concerns about maintenance, cleanliness, and suitability. Many feel that the beach would quickly become dirty and unattractive. There are also doubts about the beach's ability to compete with existing local attractions and concerns about its potential to flood.

Overall, there is a trend towards preferring more green space over a beach and some suggest alternative locations for community spaces.

Next Steps

The Framework Masterplan Supplementary Planning Document, currently in preparation, has taken account of all representations received during informal consultation.