

Comment ID: 10939

Location in consultation document: Question 1

Name: Lana Tricker

Comment: None of the scenarios supports the aim of the Local Plan to be sustainable and “green to the core”. They all undermine the ethos of the Cotswolds, the preservation of which has been central to previous CDC Local Plans. The scenarios take little account of the policies contained in the Neighbourhood Plans in the district.

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

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

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

Some alternatives to be given further consideration are:

Smaller, non-strategic developments throughout the Cotswold National Landscape.

Changing the designation of holiday homes in the Cotswold Lakes.

Allowing a larger expansion of the Steadings to the south of the existing plan.

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

Comment ID: 10940

Location in consultation document: Question 2

Name: Lana Tricker

Comment: Adopting a plan that provides for development locations that are not considered sustainable is inconsistent with the NPPF and goes against everything that has been promoted in previous CDC Local Plans.

If CDC decides to locate developments in unsustainable sites it should admit publicly that it is abandoning good planning practice.

No. Siddington is being targeted because it lies outside the National Landscape, not because it is sustainable. The incorrect Principal Settlement classification further hides the fact that the village lacks services, transport, and infrastructure. Unsustainable locations should not be used to meet housing numbers.

Comment ID: 10941

Location in consultation document: Question 3

Name: Lana Tricker

Comment: Increasing housing density in developments in rural locations (such as Siddington) is inappropriate and would threaten their rural character.

Comment ID: 10943

Location in consultation document: Question 4

Name: Lana Tricker

Comment: There is no prospect of the proposed level of development in Siddington being sustainable. Siddington is currently reliant on Cirencester and we expect that would continue.

No. A three- to four-fold expansion would merge Siddington with Cirencester, overwhelm rural infrastructure, increase flood risk, and destroy the village's identity. The village's misclassification as a Principal Settlement further undermines the justification for this level of growth.

Comment ID: 10949

Location in consultation document: Question 5

Name: Lana Tricker

Comment: Yes. The Plan should consider:

- The incorrect Principal Settlement classification
- The protection of village identity and cohesion
- Flood resilience
- Rural infrastructure limits
- The importance of the green buffer with Cirencester

Comment ID: 10945

Location in consultation document: Question 6

Name: Lana Tricker

Comment: I agree with the vision but the proposals in the Consultation document will not deliver that vision. From the perspective of Siddington, the proposals:

- Do not deliver a sustainable community but threaten the destruction of our existing community.
- Will involve development that does not prioritise environmental stewardship, social equity or economic vitality.
- Will not respect Siddington's unique landscape, heritage or character.
- Will not result in Siddington "maturing" into a thriving community.
- Will not offer employment opportunities in Siddington.
- Will not offer additional essential facilities to Siddington.
- Are unlikely to involve integrated infrastructure and sustainable transport networks.
- Will involve Siddington growing disproportionately
- Will reduce the green space available to the Siddington community.

Comment ID: 10616

Location in consultation document: Question 1

Name: Laura

Comment: I object to this plan in full my reasons involve the absolute detrimental impact to wild life in the meadow, added congestion on the roads, doctors surgery not being able to cope, schools being negatively impacted, traffic problems and roads are unstable as it is for example the impact last year with the lechlade bridge.

Comment ID: 11118

Location in consultation document: 6. Call for sites

Name: Laura Dent

Comment: Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11097

Location in consultation document: Context

Name: Laura Dent

Comment: Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11084

Location in consultation document: Increasing density

Name: Laura Dent

Comment: I think more housing developments should be made to include more 1/2 bed flats so more properties can be created in a smaller footprint but also because these types of properties are vital to first time buyers who do not want to be restricted by affordable home limitations eg not owning the entire property.

Comment ID: 11086

Location in consultation document: Question 1

Name: Laura Dent

Comment: Scenario 5. I think creating new settlements outside the national landscape is a good idea and would allow sustainable development with these new settlements also having new infrastructure and facilities, something that can't always happen in an existing settlement and where the facilities such as doctors surgeries are already struggling with influx of new housing and new patients. I support scenario 5 provided Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11115

Location in consultation document: Question 1

Name: Laura Dent

Comment: Support scenario 5 as I think the creation of new settlements outside the aonb/national landscape is important first the protection of the aonb. The creation of new settlements provides the opportunity for sustainable development rather than just expanding existing towns and stretching the infrastructure and facilities. I support scenario 5 provided that Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11091

Location in consultation document: Question 2

Name: Laura Dent

Comment: Yes because people will still want to buy properties that are only accessible by car, something that is common when people live in the countryside such as the Cotswolds. There are plenty of villages that could each have small new developments or developments up to 50 homes and not be negatively impacted, but the cumulative effect of this could have a massive positive impact on housing targets. Also this 'bit by bit' of adding small developments on to existing villages that are considered unsustainable due to lack of public transport, would mean the principle settlements wouldn't take the largest burden of development, something that could hugely impact their setting within the national landscape and could really harm tourism vs the towns in the Cotswolds in the Stroud/Oxfordshire Cotswold national landscape.

Comment ID: 11094

Location in consultation document: Question 3

Name: Laura Dent

Comment: Higher density housing would make sense however, I would not support this if it meant that developments didn't have to include suitable open green space for residents and the public, and also wouldn't support this if it meant habitats and biodiversity were negatively impacted by forcing developments to ignore BNG principles of trying to do more on site net gain.

Comment ID: 11117

Location in consultation document: Question 3

Name: Laura Dent

Comment: I would support the creation of new flats as I think these properties are vital for first time buyers (1/2 beds) that don't want to be tied to affordable ownership schemes, and also they provide more properties per area. However I do not believe housing density should override green open space for residents and the public and should not override spaces for biodiversity. Forcing higher density housing on sites may mean developers can't or won't follow BNG guidelines to try to mitigate on site rather than off site and this shouldn't be allowed to happen

Comment ID: 11078

Location in consultation document: Scenario 1

Name: Laura Dent

Comment: Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11106

Location in consultation document: Scenario 1

Name: Laura Dent

Comment: Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11080

Location in consultation document: Scenario 2

Name: Laura Dent

Comment: Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11108

Location in consultation document: Scenario 2

Name: Laura Dent

Comment: Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11109

Location in consultation document: Scenario 3

Name: Laura Dent

Comment: Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11081

Location in consultation document: Scenario 5

Name: Laura Dent

Comment: I support scenario 5. I think creating new settlements outside the aonb/national landscape is a good idea and should follow the principles of Poundbury by Prince Charles. Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 11113

Location in consultation document: Scenario 5

Name: Laura Dent

Comment: I support scenario 5 provided Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy. I support the concept of creating new settlements outside of the AONB/national landscape and these new towns should be based on the principles used by Prince Charles for Poundbury, creating a new town that is sustainable, creating new towns will mean new infrastructure and facilities can be incorporated in to these settlements, unlike just adding more housing to existing towns where facilities such as GP surgeries are already overstretched by the influx of recent house building such as in Tetbury

Comment ID: 11085

Location in consultation document: The Council's preferred option

Name: Laura Dent

Comment: I support scenario 5 provided Any development/proposed sites to be included in the local plan for the principle settlement of Tetbury must only be included if they are on the north/northwest/west of the town where this would be sustainable and be within walking distances to the new doctors surgery, the schools and Tesco's (the only large supermarket in Tetbury). Any development sites proposed to the south of Bath bridge must not be considered as these are not close to these services and would increase traffic on the Bath Road and make the Berrels Road junction even more dangerous than it already is. The local plan needs to incorporate the local nature recovery strategy.

Comment ID: 10004

Location in consultation document: Question 1

Name: Lester Napper

Comment: My problem is that I don't like any of the scenarios. I live in Kemble, which I love and have lived in for a large part of my life, and this is the second local plan consultation I've gone through. Not living in the Cotswold National Landscape and instead living in one of the Principal Settlements, this whole process of dealing with the demands of central government makes me quite fed up. Here we go again.

A key and unfair aspect of CDC planning is the issue of the planning distortion created by the Cotswold National Landscape. This results in severe restrictions for building on the Cotswold National Landscape and leaves those settlements outside the CNL, a much smaller area than that covered by the CNL, having to take the unfair burden of the house building demands of central government.

The irony is that Kemble village, with its limestone houses and high plateau landscape, is obviously part of the Cotswolds, but because of the arbitrary nature of the CNL boundary it is excluded from the protection it would have been given. It is less than a mile from that boundary.

Perhaps the problem is that the CDC is too small an authority to deal with this. As part of a greater authority the decision making might be easier. East Gloucestershire, as has been suggested as a possible new authority, would surround the CNL and provide more options for balanced development. As it is, the Cirencester/ Upper Thames area of the CDC, where so much development is proposed, is crammed up against the Wiltshire/ Swindon border and has it's own restrictions for new development, such as large areas of water.

Sadly, perhaps the CDC has had it's day. There will of course be unintended consequences whatever happens

Comment ID: 9989

Location in consultation document: Question 4

Name: Lester Napper

Comment: I live in Kemble.

I feel that the the development for Kemble cannot be sustainable because of the number of houses and the speed with which they will be built. The purple wedge on the Kemble pie chart on Map 3 shows so clearly the change

Since the building of Clayfurlong Grove in the early 1950's, Kemble has grown modestly with housing developments that have been no more than 50 houses and most have been 25 or less. Now, and seemingly in a hurry, 590 houses are going to be bolted onto the village and in one place. This will result in a dramatic and unbalancing impact on Kemble, which currently has 388 dwellings. This cannot be sustainable. How can a village adapt to this number that quickly. Fifty to seventy houses in a local plan would have been manageable to the community but not 590 in one hit! However, because Kemble has a significant railway station, is on the A429, and has already had some modest housing developments over the past 75 years, it is deemed necessary to double the village. I am not against any development but I'm totally against this number of houses.

I also have two issues with the site of the proposed development.

1. The site at 120metres elevation is on one of the highest points in the parish and is part of the plateau dominated by the ancient Kemble Wood. 590 houses will be easily visible and especially so from the Cotswold National Landscape at Tarlton and Rodmarton which overlooks Kemble Wood. This wouldn't be the case with fewer houses. There is no easy hiding of Kemble New Town.

2. The issue of flooding. The proposed site slopes gently south towards Kemble Wick, as does all the land south of Kemble Wood. Kemble Wick is at the head of a small valley which flows south to Oakwell Farm. All the water from the Kemble Wood plateau drains into this valley. As locals are very well aware, the road that runs down this valley is often made impassable by floods which also damage the road. These floods occur after periods of heavy rain, which is happening more often.

The question is, where will the runoff from 590 houses and their service roads go? If into the aquifer then again as locals know the streams will rise after a time lapse. In the current case of the Kemble Wick Valley once the clayey soils of the area are saturated the ditches into the valley become full and the road becomes flooded. I can't believe that 590 houses won't make these floods worse.

Comment ID: 10098

Location in consultation document: Indicative figures

Name: Lindsey Boyden

Comment: Response to Cotswold District Council Local Plan Review: Preferred Options Consultation (Regulation 18) on behalf of Mrs Lindsey Boyden

Introduction

1. We submit these comments on behalf of our client, Marchesi Farming Limited ('Our client'), which is steadfastly opposed to the Cotswold District Council's ('CDC' / 'the Council') preferred strategic growth option for new housing in the Cotswold district.

2. The central thesis of this submission is that CDC's preferred strategy (scenario 5) is deeply flawed and unsustainable, including the proposal to establish a new village settlement of 840 dwellings within the area identified as 'Broad Zone 19' ('BZ19') to the west of Driffield. Driffield would be dwarfed and irreparably harmed by a new village of this size on its doorstep. This proposal should not be carried forward into the Council's draft Local Plan at Reg.19 consultation stage.

3. Our focus is BZ19/ Driffield, however, many of the criticisms apply with equal force to similar proposals affecting several other small villages and settlements which lie outside the Cotswolds National Landscape, which have been targeted for major housing growth in the Local Plan Review period to 2043.

Inadequate consultation / procedural flaws related to the Reg. 18 consultation

4. According to the National Planning Policy Framework (NPPF) advice Plan making should be shaped by early proportionate and effective engagement. Plans should be underpinned by relevant and up-to-date evidence. Consulting on strategic spatial options to 2043 while explicitly inviting the public to compare scenarios requires the core evidence that differentiates those scenarios. Even, if CDC is genuine when it says it has not made its mind up, a preferred strategy has been selected, therefore consultees are entitled to see the evidence that makes it preferred.

5. The current Reg. 18 consultation materials do not permit individual residents to make properly informed responses (see NPPF, paras 16(c) and 32-33; also, the

principles in *R v Brent London Borough Council, ex parte Gunning* (1985) 84 LGR 168). It appears the LPA is consulting on a strategic spatial choice (preferred scenario 5) without publishing the essential infrastructure evidence needed for people to respond intelligently. But if infrastructure capacity/delivery is a key differentiator, as it should be, an Infrastructure Delivery Plan ('IDP') is not optional in practical terms. Without an IDP, the public cannot test whether Option 5 is effective (infrastructure can actually be delivered/phased/funded) or justified relative to the other six scenarios because reasonable alternatives cannot be meaningfully compared.

6. This seriously compromises the Plan's ability to be effective/deliverable, which is key test of its soundness at Examination.

7. In our view, the current Regulation 18 consultation is legally inadequate. We consider that additional information is desperately required to ensure those consulted have a better understanding of the strategic choices so far made by CDC. As a basic minimum we request the following:

a. Publication of an IDP (or equivalent infrastructure evidence). This should cover the proposed growth quantum and locations, including phasing and funding assumptions.

b. Publication of the comparative site/area appraisal explaining why the Cotswolds National Landscape area has been almost wholly discounted (see NPPF para 36(b)).

c. Re-opening / extension of the Reg 18 consultation once this information has been published to cure the flawed public consultation process.

Land ownership

8. We enclose a plan which correctly identifies our client's landholdings in and around the village of Driffild. Our client is the owner of a large block of productive farmland within BZ19 occupying a central portion of that target zone. This land is used for a successful sustainable farming (Marchesi Farming Limited) which has operated for many years.

9. Correction: The Driffield and Harnhill Parish Council consultation reply is seriously inaccurate. The submitted plan ought to be officially retracted and must be ignored, as it fails to identify any of our client's extensive landholdings within BZ19, none of which is to be made available for development. It is deeply regrettable that our client was not individually consulted by the Parish Council on this matter as this important error could have been easily avoided prior to making its submission.

10. Our client is comforted by recent assurances received from the Council that it will not resort to use of compulsory purchase powers to achieve its housing growth plans for BZ19/ Driffield. Any plans for compulsory purchase of our client's land would threaten the viability of the successful farming operation. This business employs local people in a manner which is consistent with the preservation of the local area, its ecological and environmental interests. The continuation of the farming business is secured for future generations by legal 'trust' arrangements which have already been created.

11. We make the simple point that if housing and infrastructure delivery should ever become dependent on upon the success of a separate land assembly process via 'CPO', then the expected delivery timetable will be seriously impacted (delayed), and in turn this would jeopardise the Plan's ability to pass the test of soundness at Examination.

Response to consultation questions

Question 1

Which of the above scenarios has your preference? Why do you prefer this option?

12. It is Hobson's choice for those residents of the Cotswold district who live in places targeted for new housing settlements outside the National Landscape.

13. Overall, scenarios 1, 3, and 4 represent the most sustainable form of development for the district. There is no reason why these scenarios should be regarded as mutually exclusive. Major development within the Cotswolds National Landscape should also be presented as a standalone option, not tagged on to scenario 5. Options 2 & 5-7 suffer from significant infrastructure constraints and other critical limitations. They are highly unsustainable options which must be avoided.

14. However, there are two important matters which need to be considered as urgent priority before any choice is fixed upon (and upon which the Reg. 18 consultation is almost wholly silent):

15. The first is whether the full quota of housing needs can and should be met wholly within CDC's administrative boundaries for the Plan period to 2043. CDC operates under a specific legal duty to work co-operatively with other neighbouring authorities in relation to such matters. Some of them may well be better placed to cater for the excessive burden of housing numbers as now demanded by Central Government given the significant natural constraints to development in this rural district. This is a political problem that needs to be resolved by co-operation across arbitrary administrative boundaries at this formative stage of planning. Given the long lead-in times for strategic planning and the need for decisions that transcend short-term political cycles, a commitment to sound and sustainable planning principles offers the most appropriate necessary response to increased housing requirements.

16. Secondly, the Council has not adequately explained its methodology (with appropriate evidence) as to why the large swathe of land within the Cotswolds National Landscape should be excluded from all but two of the presented growth scenarios, namely the Main Service Centre focus under scenario 3 and major development within the Cotswolds National Landscape as a constituent part of scenario 6.

17. This matter is of vital importance given the additional capacity which may exist to accommodate sustainable new housing in such areas. It should be noted especially that whilst national policy under the NPPF gives "great weight" to conserving and enhancing the landscape and scenic beauty of National Landscapes, this does allow for some limited development in protected areas in exceptional circumstances, typically where there is a proven local need and no reasonable alternative locations. Those circumstances exist now.

18. Therefore, it is simply not good enough to say that additional housing development in such areas is 'contrary to national policy' and 'not considered to be a viable option'. There is no inherent reason why National Landscape protection should automatically outweigh other important criteria for assessment of the likely harmful effects of development. This is implicit within the Reg.18 consultation (para. 2.3): 'However, there may be matters that justify a lower housing requirement, such as protected areas or assets of particular importance providing a strong reason for

restricting the overall scale, type or distribution of development in the plan area.’ (our emphasis). The well-preserved historic form and character of village settlements such as Driffield is a prominent feature of the Cotswolds area outside the National Landscape.

19. On highways, and the extremely damaging effect of carrying such a large extra volume of traffic on minor country roads, paragraph 116 of the NPPF provides as follows:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

20. This typically requires consideration of “a range of realistic transport scenarios tested in agreement with the local planning authority and other relevant bodies (including statutory consultees where appropriate), to assess potential impacts and determine the optimum transport infrastructure required to mitigate any adverse impacts, promote sustainable modes of travel and realise the vision for the site.” (NPPF, Glossary).

21. In theory, this should provide an equally compelling reason to reject the new ‘strategic’ settlement options (including scenario 5 affecting land to the west of Driffield) where it has not been adequately demonstrated that a large increase in traffic movements could be safely accommodated on the local road network without giving rise to severe cumulative impacts.

22. Thus, whilst scenarios 1-4 may seem comparatively ‘underwhelming’ in terms of their potential ability to match up to the near unassailable height of the centrally driven housing needs targets, they at least do not require wholesale abandonment of the soundly based policies of the current Local Plan nor policy trade-offs which have not been properly explained.

23. It must not be forgotten that these tried and tested Local Plan policies have operated successfully to deliver sustainable housing growth in the district over many

years. They have allowed rural communities such as Driffield not only to survive - but also to thrive - in ways which are truly sustainable. All this was achieved in recent times without compromising CDC's ability to satisfy the overarching legal requirement to produce a robust supply of deliverable housing covering a rolling 5-year Plan period.

24. Of scenario 5 especially, it is well-nigh impossible to imagine that housing delivery could ever be satisfactorily accommodated on the significant scale now proposed for within BZ19 to the west of Driffield. Not when measured against the recognised benchmark criteria for 'sustainable' rural development as hitherto applied to housing proposals in the rural countryside within the Cotswold district.

25. By way of illustrative example:

26. In relation to the rural character of the area, Policy DS3 of the adopted Local Plan (2011-2031) currently permits small scale residential development which meets the following criteria:

- a) It demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally;
- b) is of a proportionate scale and maintains an enhances sustainable patterns of development;
- c) complements the form and character of the settlement; and
- d) does not have an adverse cumulative impact on the settlement having regard to other developments permitted during Local Plan period

27. Policy EN 4 states that development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape, and requires that it takes account of landscape character, visual quality and local distinctiveness.

28. In relation to highways and access Policy INF4 relating (Highway Safety) states that development will be permitted that is, inter alia, 'well integrated with the existing transport network within and beyond the development itself, avoiding severance of communities as a result of measures to accommodate increased levels of traffic on the highway network' and '... avoids locations where the cumulative impact of congestion or

other undesirable impact on the transport network is likely to remain severe following mitigation’.

29. In relation to flood risk and drainage Local Plan Policy EN14 requires that proposals should not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment as result of flooding, through the appropriate application of the sequential and exception tests, and the provision of site specific flood risk assessments where applicable.

30. In relation to Ecology and North Meadow SAC Local plan policy EN8 seeks to protect features, habitats and species and as such supports proposals which would conserve and enhance biodiversity. This policy is aimed at avoiding fragmentation or loss of habitats, in accordance with section 15 of the NPPF.

31. In April 2024, CDC granted ‘permission in principle’ for a scheme of just two new build houses on a site of approx. 0.95 hectares comprising residential curtilage at the southern end of the gardens of nos. 1-3 Corner Houses, Driffield (ref. 24/00055/PLP). The matter had been referred to the determination of the Planning Committee by the Ward Member on account of the following reason:

“Driffield has no buses, no school, no shop and no other facilities so I am not satisfied that the criteria for DS3 sustainable development has been fully assessed and satisfied.”

32. It was noted in the officer report that Driffield was a ‘Non-Principal Settlement’ for the purposes of Policy DS3 of the Local Plan. Under the heading ‘Principle of Development’ the scheme was assessed against, and found to be compliant with, the development strategy for the district which (para. 10.6 of the officer report):

‘... seeks to direct new build open market residential development to sites with Development Boundaries (Policy DS2), or within Non-Principal Settlements such as villages and hamlets in the case of small scale residential development (Policy DS3)’.

33. The overarching aims of well-intentioned policies like these would be needlessly sacrificed in relation to the excessive housing growth plans for BZ19/ land west of Driffield.

34. Flood-risk would seem to render insurance as commonly applied to be unavailable here. Flood-risk planning should exclude building houses in these high-risk zones, and if the 'sequential test' is properly applied, this must prevent any major new housing developments being built in areas that would increase flood risk elsewhere. We commend you to the Driffield and Harnhill Parish Council reply which highlights many of the current deficiencies of the current drainage and sewage system in this vicinity, and the significant flooding events experienced by residents from existing water flows from east of the A419 between the Ampney Brook and the Churn which is highly prone to flooding (e.g. the recent flood event of November 2024).

35. Parts of the A419 (including near Cirencester and surrounding villages) are surfaced in concrete, which tends to generate more tyre/road noise than asphalt. This has been reported as a long-standing concern for residents living alongside those stretches. For example, in 2014 a local community noise survey covering villages along the A419/A417 corridor (including Driffield, Harnhill, Latton, South Cerney) found that:

a. A very high proportion of households could hear road noise from the A419, and many found it disruptive or very disruptive.

b. Common impacts reported included the need to keep windows closed, difficulty using gardens comfortably, and in some cases sleep disturbance or stress attributed to road noise.

[source: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://a419nag.co.uk/wp-content/uploads/2014/07/A419-NAG-Report-July-20141.pdf]

36. The inhabitants of any new dwellings built close to the A419 would also suffer the same deleterious effects of noise pollution which could render those abodes undesirable, unsaleable and empty.

37. Further, the BZ19 target zone may fall within the Outer Zone of Influence for the North Meadow SAC, which engages Local Plan Policy EN9 and the overriding statutory duty for 'Appropriate Assessment' to be carried out under the Habitats Regulations. This must ensure that any net increase in occupants does not compromise the integrity of the SAC due to increased recreational pressure in combination with other development in the surrounding area. This constitutes an extremely high threshold against harmful development in the context of the planned level of housing growth for land west of Driffield. Without proven mitigation, yet to be formulated, this would constitute a very significant obstacle to delivery and hence the soundness of the proposals would be seriously called into question at Examination.

38. These issues are compounded by the impossible burden of attempting to squeeze all development needs into a relatively small target area under scenario 5 (i.e. roughly 20% of land in the district which is not designated as the Cotswolds National Landscape) including other planned new settlements nearby to Driffield, such as the 640 houses at Ampney Crucis.

39. In summary, development on the scale currently envisaged would clearly represent an excessive, disproportionate, highly unsustainable and damaging form of development to the relatively unspoilt Domesday village of Driffield. It would place an unreasonable strain on existing infrastructure and services that would be damaging to social cohesion of the existing community, and other surrounding areas. It threatens to cause irreparable harm to the historic form, character and landscape beauty of an age-old settlement, not to mention the wholesale destruction of a significant area of productive farmland. Sir Douglas Haig himself would not have come up with a strategy this wildly optimistic from the safety of his map room.

40. Finally, we would point out that the consultation introduces a false comparison which is highly misleading, where it is stated at paragraph 2.18 that 'Scenario 5 is preferable over the other scenarios as it provides the housing land supply with the highest percentage of the government's housing target (79%)'. It goes on:

'It is unlikely that the other scenarios would be accepted as the Council's strategy by an independent Inspector at the Examination in Public when Scenario 5 can deliver the most housing in a sustainable way (subject to further assessment).'

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42. Absolutely not. The council should never consider locating development in areas it deems unsustainable, even to meet increased housing needs targets.

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established case law consistently emphasise that development must be sustainable in environmental, social, and economic terms.

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To what extent would you support increasing housing density in developments (such as smaller houses and gardens, more flights or higher buildings) to help meet the full housing target? Please also explain why.

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51. In a word, 'no'.

52. The proposed level of additional housing growth for the district (to 2043) requires a step change in delivery which would be impossible to achieve without a massive level of new infrastructure provision. It would take years of co-ordinated infrastructure planning and delivery at a strategic level to properly provide for housing growth on the scale currently imagined. This problem is especially acute for generally inaccessible and poorly serviced rural settlements such as Driffield.

53. More importantly, however, it is plainly obvious that the required level of infrastructure provision (e.g. shops, roads, healthcare services, schools, public transport options, employment opportunities etc..) could only be delivered at enormous cost to the taxpayer. Has this important issue been considered at all? Whilst such considerations do not wholly dictate strategic decision-making, 'viability' is still a key test of plan soundness. Finance considerations are embedded into local plan making because Local Plans must show that planned development is viable and deliverable, meaning:

- a) infrastructure needed to support growth can be funded and delivered
- b) developer contributions (S106 / CIL) are realistic
- c) public funding expectations are reasonable.

54. Infrastructure requirements and cost are also part of the "reasonable alternatives" assessment which should be carried out to determine the spatial strategy, e.g. choices as to whether the approach should be focused on growth in the Principal Settlements or directly adjacent to sustainable transport corridors as to opposed to dispersed growth across multiple villages – or entirely new village settlements of the kind which CDC is proposing to build.

55. Financial realism and prudence must play a pivotal role in making choices about strategic housing growth on the grand scale currently being mooted. We consider that factors including the cost of new roads, utilities, schools, and healthcare capacity, availability/capacity of existing infrastructure, and deliverability within the Plan period all point to poor value for money when allocating public infrastructure investment to the aims and objectives of the Council's preferred scenario 5 for land west of Driffield.

56. In our view there is likely to be greater positive benefit in terms of GDP growth from concentrating capital expenditure in established areas which have the necessary facilities and employment opportunities for those who will live there. Such factors need to be properly considered centre stage at a time when the burden of taxation is at an historically high level combined with the escalating cost of massive public debt.

Question 5

Are there any other matters beyond conventional housing that have not been listed here that you think should be considered in the Development Strategy for the updated Local Plan?

57. We wish to underline the points made in response to the preceding question.

58. The most important aspect of sustainable housing delivery is to ensure that the right level of infrastructure provision, e.g. healthcare improvements, schools, transport nodes and employment provision, is brought on-line in the right sequence and in step with the planned ramp up in housing numbers.

59. The consultation proposals suffer from a glaring absence of detailed information relating to the IDP and information about how sustainable transport networks will be created to cater for the additional traffic volumes which can be anticipated in Driffield and other generally inaccessible rural locations within the district.

60. The requirements also include appropriate provision of related shops and services at a level commensurate with the planned size of the new settlements, and which is sufficient to reduce what could be a very significant level of traffic spilling onto

inadequate minor roads connecting to the main service centres, e.g. Cirencester. Without adequate investment on a grandiose scale (which calls into question the very expediency of seeking to attain such objectives), it is likely that new settlements will be heavily reliant on the private car to access relevant jobs and services.

61. Certainly, the range of jobs typically available in rural areas such as Driffield are unlikely to provide suitable employment opportunities for everyone who may wish to live in these places. This issue warrants serious attention, particularly in light of the rapid advancement of AI and its potentially destabilising impact on the labour market, where significant displacement of blue-collar roles is anticipated. The rise of AI negates job possibilities, so consideration has to be given to building likely unsaleable housing, occupied by jobless households on benefit which will contribute little practical benefit to the long-term sustainability of the existing rural communities. In this 'Brave New World' it is not unreasonable to assume that the main driver of GDP growth (and related job opportunities) will come from established towns and cities, and main service centres. Surely it is prudent to plan for a future that is already fast approaching.

62. As outlined in our response above, these risks are comparatively greater in relation to the Council's adopted strategy (scenario 5) than some of the other options because it is unduly focused on the creation of a series of new settlements in a few isolated locations rather than a more balanced spatial distribution across the district. CDC itself anticipates a 20% shortfall on its headline figure of 14,660 homes due to infrastructure constraints and other risks. For example, the inadequacy of existing water supply and wastewater treatment infrastructure is specifically noted as well as the financial difficulties faced by Thames Water at present (see para. 3.13 of the consultation document).

63. In our view the Council's planned strategy risks creating 'dormer' communities which will not be self-sustaining. A far more resilient, achievable and cost-effective solution would be to focus growth on already sustainable areas including those settlements which lie within the Cotswolds National Landscape, provided that detailed planning and technical assessments are carried out to determine the appropriate level of growth which can be accommodated within them.

Question 6

Do you agree with the vision and objectives? Or is there anything else that should be covered in the vision and objectives? Please explain.

64. We have one further and important representation to make. The Council has the right to designate and monitor the use to which properties are put. There are numerous houses in the Cotswold Water Park - well in excess of the quota demanded by central government.

It is clear: REMEMBER THE NOVELIST'S DILEMMA. The hero is tied up, villains have chains upon him. How to free him?

The Novelist knew what to do. He wrote: "with one bound, Jack was free."

Here is the One Bound to our freedom:

We have the quota and more: it is within the designated "Holiday Homes" at the Water Park Lakes and elsewhere. There are thousands of them, helpfully.

The Council should simply change the requirements so these properties are entitled to be occupied for the twelve month of the year. This categorises "homes" – there, job done, the Council has the quota.

Yes, there will be necessary admin, but you will be aware this will be FAR LESS IN COST to the government, and thus far less to the taxpayer, than forcing through the dreaded mega-development.

There won't be extra vehicles dangerously nose-to-tail polluting the inadequate narrow lanes; no overwhelm of the sewerage; no unnecessary ruination of productive farmland.

Extra vehicle movements would foist detrimental air and noise pollution on new build properties, there are no jobs locally for the blue-collar, especially not on flooding certainty areas as ours is, which of course renders such new builds uninsurable. There will be no spectre of forcing the unacceptable upon decent voters. The extra "Homes" are all there. No protests. No years of misery; District Council and Councillors reputation spared. THE COUNTRYSIDE SAVED.

The reward is, that OUR countryside will not be overwhelmed, and be seen to your credit. A precedent for countryside across England, here.

Be overjoyed to activate all the “Homes”. They are the solution.

KEYSTONE LAW on behalf of Marchesi Farming Limited

(Ref: Ben Garbett)

22nd December 2025

Appendix

Map will not load into this comment section

Comment ID: 9795

Location in consultation document: Question 4

Name: Lindsey Boyden

Comment: Response to Cotswold District Council Local Plan Review: Preferred Options Consultation (Regulation 18) on behalf of Mrs Lindsey Boyden

Introduction

1. We submit these comments on behalf of our client, Marchesi Farming Limited ('Our client'), which is steadfastly opposed to the Cotswold District Council's ('CDC' / 'the Council') preferred strategic growth option for new housing in the Cotswold district.

2. The central thesis of this submission is that CDC's preferred strategy (scenario 5) is deeply flawed and unsustainable, including the proposal to establish a new village settlement of 840 dwellings within the area identified as 'Broad Zone 19' ('BZ19') to the west of Driffield. Driffield would be dwarfed and irreparably harmed by a new village of this size on its doorstep. This proposal should not be carried forward into the Council's draft Local Plan at Reg.19 consultation stage.

3. Our focus is BZ19/ Driffield, however, many of the criticisms apply with equal force to similar proposals affecting several other small villages and settlements which lie outside the Cotswolds National Landscape, which have been targeted for major housing growth in the Local Plan Review period to 2043.

Inadequate consultation / procedural flaws related to the Reg. 18 consultation

4. According to the National Planning Policy Framework (NPPF) advice Plan making should be shaped by early proportionate and effective engagement. Plans should be underpinned by relevant and up-to-date evidence. Consulting on strategic spatial options to 2043 while explicitly inviting the public to compare scenarios requires the core evidence that differentiates those scenarios. Even, if CDC is genuine when it says it has not made its mind up, a preferred strategy has been selected, therefore consultees are entitled to see the evidence that makes it preferred.

5. The current Reg. 18 consultation materials do not permit individual residents to make properly informed responses (see NPPF, paras 16(c) and 32-33; also, the

principles in *R v Brent London Borough Council, ex parte Gunning* (1985) 84 LGR 168). It appears the LPA is consulting on a strategic spatial choice (preferred scenario 5) without publishing the essential infrastructure evidence needed for people to respond intelligently. But if infrastructure capacity/delivery is a key differentiator, as it should be, an Infrastructure Delivery Plan ('IDP') is not optional in practical terms. Without an IDP, the public cannot test whether Option 5 is effective (infrastructure can actually be delivered/phased/funded) or justified relative to the other six scenarios because reasonable alternatives cannot be meaningfully compared.

6. This seriously compromises the Plan's ability to be effective/deliverable, which is key test of its soundness at Examination.

7. In our view, the current Regulation 18 consultation is legally inadequate. We consider that additional information is desperately required to ensure those consulted have a better understanding of the strategic choices so far made by CDC. As a basic minimum we request the following:

a. Publication of an IDP (or equivalent infrastructure evidence). This should cover the proposed growth quantum and locations, including phasing and funding assumptions.

b. Publication of the comparative site/area appraisal explaining why the Cotswolds National Landscape area has been almost wholly discounted (see NPPF para 36(b)).

c. Re-opening / extension of the Reg 18 consultation once this information has been published to cure the flawed public consultation process.

Land ownership

8. We enclose a plan which correctly identifies our client's landholdings in and around the village of Driffild. Our client is the owner of a large block of productive farmland within BZ19 occupying a central portion of that target zone. This land is used for a successful sustainable farming (Marchesi Farming Limited) which has operated for many years.

9. Correction: The Driffield and Harnhill Parish Council consultation reply is seriously inaccurate. The submitted plan ought to be officially retracted and must be ignored, as it fails to identify any of our client's extensive landholdings within BZ19, none of which is to be made available for development. It is deeply regrettable that our client was not individually consulted by the Parish Council on this matter as this important error could have been easily avoided prior to making its submission.

10. Our client is comforted by recent assurances received from the Council that it will not resort to use of compulsory purchase powers to achieve its housing growth plans for BZ19/ Driffield. Any plans for compulsory purchase of our client's land would threaten the viability of the successful farming operation. This business employs local people in a manner which is consistent with the preservation of the local area, its ecological and environmental interests. The continuation of the farming business is secured for future generations by legal 'trust' arrangements which have already been created.

11. We make the simple point that if housing and infrastructure delivery should ever become dependent on upon the success of a separate land assembly process via 'CPO', then the expected delivery timetable will be seriously impacted (delayed), and in turn this would jeopardise the Plan's ability to pass the test of soundness at Examination.

Response to consultation questions

Question 1

Which of the above scenarios has your preference? Why do you prefer this option?

12. It is Hobson's choice for those residents of the Cotswold district who live in places targeted for new housing settlements outside the National Landscape.

13. Overall, scenarios 1, 3, and 4 represent the most sustainable form of development for the district. There is no reason why these scenarios should be regarded as mutually exclusive. Major development within the Cotswolds National Landscape should also be presented as a standalone option, not tagged on to scenario 5. Options 2 & 5-7 suffer from significant infrastructure constraints and other critical limitations. They are highly unsustainable options which must be avoided.

14. However, there are two important matters which need to be considered as urgent priority before any choice is fixed upon (and upon which the Reg. 18 consultation is almost wholly silent):

15. The first is whether the full quota of housing needs can and should be met wholly within CDC's administrative boundaries for the Plan period to 2043. CDC operates under a specific legal duty to work co-operatively with other neighbouring authorities in relation to such matters. Some of them may well be better placed to cater for the excessive burden of housing numbers as now demanded by Central Government given the significant natural constraints to development in this rural district. This is a political problem that needs to be resolved by co-operation across arbitrary administrative boundaries at this formative stage of planning. Given the long lead-in times for strategic planning and the need for decisions that transcend short-term political cycles, a commitment to sound and sustainable planning principles offers the most appropriate necessary response to increased housing requirements.

16. Secondly, the Council has not adequately explained its methodology (with appropriate evidence) as to why the large swathe of land within the Cotswolds National Landscape should be excluded from all but two of the presented growth scenarios, namely the Main Service Centre focus under scenario 3 and major development within the Cotswolds National Landscape as a constituent part of scenario 6.

17. This matter is of vital importance given the additional capacity which may exist to accommodate sustainable new housing in such areas. It should be noted especially that whilst national policy under the NPPF gives "great weight" to conserving and enhancing the landscape and scenic beauty of National Landscapes, this does allow for some limited development in protected areas in exceptional circumstances, typically where there is a proven local need and no reasonable alternative locations. Those circumstances exist now.

18. Therefore, it is simply not good enough to say that additional housing development in such areas is 'contrary to national policy' and 'not considered to be a viable option'. There is no inherent reason why National Landscape protection should automatically outweigh other important criteria for assessment of the likely harmful effects of development. This is implicit within the Reg.18 consultation (para. 2.3): 'However, there may be matters that justify a lower housing requirement, such as protected areas or assets of particular importance providing a strong reason for

restricting the overall scale, type or distribution of development in the plan area.’ (our emphasis). The well-preserved historic form and character of village settlements such as Driffield is a prominent feature of the Cotswolds area outside the National Landscape.

19. On highways, and the extremely damaging effect of carrying such a large extra volume of traffic on minor country roads, paragraph 116 of the NPPF provides as follows:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

20. This typically requires consideration of “a range of realistic transport scenarios tested in agreement with the local planning authority and other relevant bodies (including statutory consultees where appropriate), to assess potential impacts and determine the optimum transport infrastructure required to mitigate any adverse impacts, promote sustainable modes of travel and realise the vision for the site.” (NPPF, Glossary).

21. In theory, this should provide an equally compelling reason to reject the new ‘strategic’ settlement options (including scenario 5 affecting land to the west of Driffield) where it has not been adequately demonstrated that a large increase in traffic movements could be safely accommodated on the local road network without giving rise to severe cumulative impacts.

22. Thus, whilst scenarios 1-4 may seem comparatively ‘underwhelming’ in terms of their potential ability to match up to the near unassailable height of the centrally driven housing needs targets, they at least do not require wholesale abandonment of the soundly based policies of the current Local Plan nor policy trade-offs which have not been properly explained.

23. It must not be forgotten that these tried and tested Local Plan policies have operated successfully to deliver sustainable housing growth in the district over many

years. They have allowed rural communities such as Driffield not only to survive - but also to thrive - in ways which are truly sustainable. All this was achieved in recent times without compromising CDC's ability to satisfy the overarching legal requirement to produce a robust supply of deliverable housing covering a rolling 5-year Plan period.

24. Of scenario 5 especially, it is well-nigh impossible to imagine that housing delivery could ever be satisfactorily accommodated on the significant scale now proposed for within BZ19 to the west of Driffield. Not when measured against the recognised benchmark criteria for 'sustainable' rural development as hitherto applied to housing proposals in the rural countryside within the Cotswold district.

25. By way of illustrative example:

26. In relation to the rural character of the area, Policy DS3 of the adopted Local Plan (2011-2031) currently permits small scale residential development which meets the following criteria:

- a) It demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally;
- b) is of a proportionate scale and maintains an enhances sustainable patterns of development;
- c) complements the form and character of the settlement; and
- d) does not have an adverse cumulative impact on the settlement having regard to other developments permitted during Local Plan period

27. Policy EN 4 states that development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape, and requires that it takes account of landscape character, visual quality and local distinctiveness.

28. In relation to highways and access Policy INF4 relating (Highway Safety) states that development will be permitted that is, inter alia, 'well integrated with the existing transport network within and beyond the development itself, avoiding severance of communities as a result of measures to accommodate increased levels of traffic on the highway network' and '... avoids locations where the cumulative impact of congestion or

other undesirable impact on the transport network is likely to remain severe following mitigation’.

29. In relation to flood risk and drainage Local Plan Policy EN14 requires that proposals should not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment as result of flooding, through the appropriate application of the sequential and exception tests, and the provision of site specific flood risk assessments where applicable.

30. In relation to Ecology and North Meadow SAC Local plan policy EN8 seeks to protect features, habitats and species and as such supports proposals which would conserve and enhance biodiversity. This policy is aimed at avoiding fragmentation or loss of habitats, in accordance with section 15 of the NPPF.

31. In April 2024, CDC granted ‘permission in principle’ for a scheme of just two new build houses on a site of approx. 0.95 hectares comprising residential curtilage at the southern end of the gardens of nos. 1-3 Corner Houses, Driffield (ref. 24/00055/PLP). The matter had been referred to the determination of the Planning Committee by the Ward Member on account of the following reason:

“Driffield has no buses, no school, no shop and no other facilities so I am not satisfied that the criteria for DS3 sustainable development has been fully assessed and satisfied.”

32. It was noted in the officer report that Driffield was a ‘Non-Principal Settlement’ for the purposes of Policy DS3 of the Local Plan. Under the heading ‘Principle of Development’ the scheme was assessed against, and found to be compliant with, the development strategy for the district which (para. 10.6 of the officer report):

‘... seeks to direct new build open market residential development to sites with Development Boundaries (Policy DS2), or within Non-Principal Settlements such as villages and hamlets in the case of small scale residential development (Policy DS3)’.

33. The overarching aims of well-intentioned policies like these would be needlessly sacrificed in relation to the excessive housing growth plans for BZ19/ land west of Driffield.

34. Flood-risk would seem to render insurance as commonly applied to be unavailable here. Flood-risk planning should exclude building houses in these high-risk zones, and if the 'sequential test' is properly applied, this must prevent any major new housing developments being built in areas that would increase flood risk elsewhere. We commend you to the Driffield and Harnhill Parish Council reply which highlights many of the current deficiencies of the current drainage and sewage system in this vicinity, and the significant flooding events experienced by residents from existing water flows from east of the A419 between the Ampney Brook and the Churn which is highly prone to flooding (e.g. the recent flood event of November 2024).

35. Parts of the A419 (including near Cirencester and surrounding villages) are surfaced in concrete, which tends to generate more tyre/road noise than asphalt. This has been reported as a long-standing concern for residents living alongside those stretches. For example, in 2014 a local community noise survey covering villages along the A419/A417 corridor (including Driffield, Harnhill, Latton, South Cerney) found that:

- a. A very high proportion of households could hear road noise from the A419, and many found it disruptive or very disruptive.
- b. Common impacts reported included the need to keep windows closed, difficulty using gardens comfortably, and in some cases sleep disturbance or stress attributed to road noise.

[source: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://a419nag.co.uk/wp-content/uploads/2014/07/A419-NAG-Report-July-20141.pdf]

36. The inhabitants of any new dwellings built close to the A419 would also suffer the same deleterious effects of noise pollution which could render those abodes undesirable, unsaleable and empty.

37. Further, the BZ19 target zone may fall within the Outer Zone of Influence for the North Meadow SAC, which engages Local Plan Policy EN9 and the overriding statutory duty for 'Appropriate Assessment' to be carried out under the Habitats Regulations. This must ensure that any net increase in occupants does not compromise the integrity of the SAC due to increased recreational pressure in combination with other development in the surrounding area. This constitutes an extremely high threshold against harmful development in the context of the planned level of housing growth for land west of Driffield. Without proven mitigation, yet to be formulated, this would constitute a very significant obstacle to delivery and hence the soundness of the proposals would be seriously called into question at Examination.

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39. In summary, development on the scale currently envisaged would clearly represent an excessive, disproportionate, highly unsustainable and damaging form of development to the relatively unspoilt Domesday village of Driffield. It would place an unreasonable strain on existing infrastructure and services that would be damaging to social cohesion of the existing community, and other surrounding areas. It threatens to cause irreparable harm to the historic form, character and landscape beauty of an age-old settlement, not to mention the wholesale destruction of a significant area of productive farmland. Sir Douglas Haig himself would not have come up with a strategy this wildly optimistic from the safety of his map room.

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Are there any other matters beyond conventional housing that have not been listed here that you think should be considered in the Development Strategy for the updated Local Plan?

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62. As outlined in our response above, these risks are comparatively greater in relation to the Council's adopted strategy (scenario 5) than some of the other options because it is unduly focused on the creation of a series of new settlements in a few isolated locations rather than a more balanced spatial distribution across the district. CDC itself anticipates a 20% shortfall on its headline figure of 14,660 homes due to infrastructure constraints and other risks. For example, the inadequacy of existing water supply and wastewater treatment infrastructure is specifically noted as well as the financial difficulties faced by Thames Water at present (see para. 3.13 of the consultation document).

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KEYSTONE LAW on behalf of Marchesi Farming Limited

(Ref: Ben Garbett)

22nd December 2025

Appendix

Comment ID: 9796

Location in consultation document: Question 4

Name: Lindsey Boyden

Comment: Response to Cotswold District Council Local Plan Review: Preferred Options Consultation (Regulation 18) on behalf of Mrs Lindsey Boyden

Introduction

1. We submit these comments on behalf of our client, Marchesi Farming Limited ('Our client'), which is steadfastly opposed to the Cotswold District Council's ('CDC' / 'the Council') preferred strategic growth option for new housing in the Cotswold district.

2. The central thesis of this submission is that CDC's preferred strategy (scenario 5) is deeply flawed and unsustainable, including the proposal to establish a new village settlement of 840 dwellings within the area identified as 'Broad Zone 19' ('BZ19') to the west of Driffield. Driffield would be dwarfed and irreparably harmed by a new village of this size on its doorstep. This proposal should not be carried forward into the Council's draft Local Plan at Reg.19 consultation stage.

3. Our focus is BZ19/ Driffield, however, many of the criticisms apply with equal force to similar proposals affecting several other small villages and settlements which lie outside the Cotswolds National Landscape, which have been targeted for major housing growth in the Local Plan Review period to 2043.

Inadequate consultation / procedural flaws related to the Reg. 18 consultation

4. According to the National Planning Policy Framework (NPPF) advice Plan making should be shaped by early proportionate and effective engagement. Plans should be underpinned by relevant and up-to-date evidence. Consulting on strategic spatial options to 2043 while explicitly inviting the public to compare scenarios requires the core evidence that differentiates those scenarios. Even, if CDC is genuine when it says it has not made its mind up, a preferred strategy has been selected, therefore consultees are entitled to see the evidence that makes it preferred.

5. The current Reg. 18 consultation materials do not permit individual residents to make properly informed responses (see NPPF, paras 16(c) and 32-33; also, the

principles in *R v Brent London Borough Council, ex parte Gunning* (1985) 84 LGR 168). It appears the LPA is consulting on a strategic spatial choice (preferred scenario 5) without publishing the essential infrastructure evidence needed for people to respond intelligently. But if infrastructure capacity/delivery is a key differentiator, as it should be, an Infrastructure Delivery Plan ('IDP') is not optional in practical terms. Without an IDP, the public cannot test whether Option 5 is effective (infrastructure can actually be delivered/phased/funded) or justified relative to the other six scenarios because reasonable alternatives cannot be meaningfully compared.

6. This seriously compromises the Plan's ability to be effective/deliverable, which is key test of its soundness at Examination.

7. In our view, the current Regulation 18 consultation is legally inadequate. We consider that additional information is desperately required to ensure those consulted have a better understanding of the strategic choices so far made by CDC. As a basic minimum we request the following:

a. Publication of an IDP (or equivalent infrastructure evidence). This should cover the proposed growth quantum and locations, including phasing and funding assumptions.

b. Publication of the comparative site/area appraisal explaining why the Cotswolds National Landscape area has been almost wholly discounted (see NPPF para 36(b)).

c. Re-opening / extension of the Reg 18 consultation once this information has been published to cure the flawed public consultation process.

Land ownership

8. We enclose a plan which correctly identifies our client's landholdings in and around the village of Driffild. Our client is the owner of a large block of productive farmland within BZ19 occupying a central portion of that target zone. This land is used for a successful sustainable farming (Marchesi Farming Limited) which has operated for many years.

9. Correction: The Driffield and Harnhill Parish Council consultation reply is seriously inaccurate. The submitted plan ought to be officially retracted and must be ignored, as it fails to identify any of our client's extensive landholdings within BZ19, none of which is to be made available for development. It is deeply regrettable that our client was not individually consulted by the Parish Council on this matter as this important error could have been easily avoided prior to making its submission.

10. Our client is comforted by recent assurances received from the Council that it will not resort to use of compulsory purchase powers to achieve its housing growth plans for BZ19/ Driffield. Any plans for compulsory purchase of our client's land would threaten the viability of the successful farming operation. This business employs local people in a manner which is consistent with the preservation of the local area, its ecological and environmental interests. The continuation of the farming business is secured for future generations by legal 'trust' arrangements which have already been created.

11. We make the simple point that if housing and infrastructure delivery should ever become dependent on upon the success of a separate land assembly process via 'CPO', then the expected delivery timetable will be seriously impacted (delayed), and in turn this would jeopardise the Plan's ability to pass the test of soundness at Examination.

Response to consultation questions

Question 1

Which of the above scenarios has your preference? Why do you prefer this option?

12. It is Hobson's choice for those residents of the Cotswold district who live in places targeted for new housing settlements outside the National Landscape.

13. Overall, scenarios 1, 3, and 4 represent the most sustainable form of development for the district. There is no reason why these scenarios should be regarded as mutually exclusive. Major development within the Cotswolds National Landscape should also be presented as a standalone option, not tagged on to scenario 5. Options 2 & 5-7 suffer from significant infrastructure constraints and other critical limitations. They are highly unsustainable options which must be avoided.

14. However, there are two important matters which need to be considered as urgent priority before any choice is fixed upon (and upon which the Reg. 18 consultation is almost wholly silent):

15. The first is whether the full quota of housing needs can and should be met wholly within CDC's administrative boundaries for the Plan period to 2043. CDC operates under a specific legal duty to work co-operatively with other neighbouring authorities in relation to such matters. Some of them may well be better placed to cater for the excessive burden of housing numbers as now demanded by Central Government given the significant natural constraints to development in this rural district. This is a political problem that needs to be resolved by co-operation across arbitrary administrative boundaries at this formative stage of planning. Given the long lead-in times for strategic planning and the need for decisions that transcend short-term political cycles, a commitment to sound and sustainable planning principles offers the most appropriate necessary response to increased housing requirements.

16. Secondly, the Council has not adequately explained its methodology (with appropriate evidence) as to why the large swathe of land within the Cotswolds National Landscape should be excluded from all but two of the presented growth scenarios, namely the Main Service Centre focus under scenario 3 and major development within the Cotswolds National Landscape as a constituent part of scenario 6.

17. This matter is of vital importance given the additional capacity which may exist to accommodate sustainable new housing in such areas. It should be noted especially that whilst national policy under the NPPF gives "great weight" to conserving and enhancing the landscape and scenic beauty of National Landscapes, this does allow for some limited development in protected areas in exceptional circumstances, typically where there is a proven local need and no reasonable alternative locations. Those circumstances exist now.

18. Therefore, it is simply not good enough to say that additional housing development in such areas is 'contrary to national policy' and 'not considered to be a viable option'. There is no inherent reason why National Landscape protection should automatically outweigh other important criteria for assessment of the likely harmful effects of development. This is implicit within the Reg.18 consultation (para. 2.3): 'However, there may be matters that justify a lower housing requirement, such as protected areas or assets of particular importance providing a strong reason for

restricting the overall scale, type or distribution of development in the plan area.’ (our emphasis). The well-preserved historic form and character of village settlements such as Driffield is a prominent feature of the Cotswolds area outside the National Landscape.

19. On highways, and the extremely damaging effect of carrying such a large extra volume of traffic on minor country roads, paragraph 116 of the NPPF provides as follows:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

20. This typically requires consideration of “a range of realistic transport scenarios tested in agreement with the local planning authority and other relevant bodies (including statutory consultees where appropriate), to assess potential impacts and determine the optimum transport infrastructure required to mitigate any adverse impacts, promote sustainable modes of travel and realise the vision for the site.” (NPPF, Glossary).

21. In theory, this should provide an equally compelling reason to reject the new ‘strategic’ settlement options (including scenario 5 affecting land to the west of Driffield) where it has not been adequately demonstrated that a large increase in traffic movements could be safely accommodated on the local road network without giving rise to severe cumulative impacts.

22. Thus, whilst scenarios 1-4 may seem comparatively ‘underwhelming’ in terms of their potential ability to match up to the near unassailable height of the centrally driven housing needs targets, they at least do not require wholesale abandonment of the soundly based policies of the current Local Plan nor policy trade-offs which have not been properly explained.

23. It must not be forgotten that these tried and tested Local Plan policies have operated successfully to deliver sustainable housing growth in the district over many

years. They have allowed rural communities such as Driffield not only to survive - but also to thrive - in ways which are truly sustainable. All this was achieved in recent times without compromising CDC's ability to satisfy the overarching legal requirement to produce a robust supply of deliverable housing covering a rolling 5-year Plan period.

24. Of scenario 5 especially, it is well-nigh impossible to imagine that housing delivery could ever be satisfactorily accommodated on the significant scale now proposed for within BZ19 to the west of Driffield. Not when measured against the recognised benchmark criteria for 'sustainable' rural development as hitherto applied to housing proposals in the rural countryside within the Cotswold district.

25. By way of illustrative example:

26. In relation to the rural character of the area, Policy DS3 of the adopted Local Plan (2011-2031) currently permits small scale residential development which meets the following criteria:

- a) It demonstrably supports or enhances the vitality of the local community and the continued availability of services and facilities locally;
- b) is of a proportionate scale and maintains an enhances sustainable patterns of development;
- c) complements the form and character of the settlement; and
- d) does not have an adverse cumulative impact on the settlement having regard to other developments permitted during Local Plan period

27. Policy EN 4 states that development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape, and requires that it takes account of landscape character, visual quality and local distinctiveness.

28. In relation to highways and access Policy INF4 relating (Highway Safety) states that development will be permitted that is, inter alia, 'well integrated with the existing transport network within and beyond the development itself, avoiding severance of communities as a result of measures to accommodate increased levels of traffic on the highway network' and '... avoids locations where the cumulative impact of congestion or

other undesirable impact on the transport network is likely to remain severe following mitigation’.

29. In relation to flood risk and drainage Local Plan Policy EN14 requires that proposals should not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment as result of flooding, through the appropriate application of the sequential and exception tests, and the provision of site specific flood risk assessments where applicable.

30. In relation to Ecology and North Meadow SAC Local plan policy EN8 seeks to protect features, habitats and species and as such supports proposals which would conserve and enhance biodiversity. This policy is aimed at avoiding fragmentation or loss of habitats, in accordance with section 15 of the NPPF.

31. In April 2024, CDC granted ‘permission in principle’ for a scheme of just two new build houses on a site of approx. 0.95 hectares comprising residential curtilage at the southern end of the gardens of nos. 1-3 Corner Houses, Driffield (ref. 24/00055/PLP). The matter had been referred to the determination of the Planning Committee by the Ward Member on account of the following reason:

“Driffield has no buses, no school, no shop and no other facilities so I am not satisfied that the criteria for DS3 sustainable development has been fully assessed and satisfied.”

32. It was noted in the officer report that Driffield was a ‘Non-Principal Settlement’ for the purposes of Policy DS3 of the Local Plan. Under the heading ‘Principle of Development’ the scheme was assessed against, and found to be compliant with, the development strategy for the district which (para. 10.6 of the officer report):

‘... seeks to direct new build open market residential development to sites with Development Boundaries (Policy DS2), or within Non-Principal Settlements such as villages and hamlets in the case of small scale residential development (Policy DS3)’.

33. The overarching aims of well-intentioned policies like these would be needlessly sacrificed in relation to the excessive housing growth plans for BZ19/ land west of Driffield.

34. Flood-risk would seem to render insurance as commonly applied to be unavailable here. Flood-risk planning should exclude building houses in these high-risk zones, and if the 'sequential test' is properly applied, this must prevent any major new housing developments being built in areas that would increase flood risk elsewhere. We commend you to the Driffield and Harnhill Parish Council reply which highlights many of the current deficiencies of the current drainage and sewage system in this vicinity, and the significant flooding events experienced by residents from existing water flows from east of the A419 between the Ampney Brook and the Churn which is highly prone to flooding (e.g. the recent flood event of November 2024).

35. Parts of the A419 (including near Cirencester and surrounding villages) are surfaced in concrete, which tends to generate more tyre/road noise than asphalt. This has been reported as a long-standing concern for residents living alongside those stretches. For example, in 2014 a local community noise survey covering villages along the A419/A417 corridor (including Driffield, Harnhill, Latton, South Cerney) found that:

- a. A very high proportion of households could hear road noise from the A419, and many found it disruptive or very disruptive.
- b. Common impacts reported included the need to keep windows closed, difficulty using gardens comfortably, and in some cases sleep disturbance or stress attributed to road noise.

[source: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://a419nag.co.uk/wp-content/uploads/2014/07/A419-NAG-Report-July-20141.pdf]

36. The inhabitants of any new dwellings built close to the A419 would also suffer the same deleterious effects of noise pollution which could render those abodes undesirable, unsaleable and empty.

37. Further, the BZ19 target zone may fall within the Outer Zone of Influence for the North Meadow SAC, which engages Local Plan Policy EN9 and the overriding statutory duty for 'Appropriate Assessment' to be carried out under the Habitats Regulations. This must ensure that any net increase in occupants does not compromise the integrity of the SAC due to increased recreational pressure in combination with other development in the surrounding area. This constitutes an extremely high threshold against harmful development in the context of the planned level of housing growth for land west of Driffield. Without proven mitigation, yet to be formulated, this would constitute a very significant obstacle to delivery and hence the soundness of the proposals would be seriously called into question at Examination.

38. These issues are compounded by the impossible burden of attempting to squeeze all development needs into a relatively small target area under scenario 5 (i.e. roughly 20% of land in the district which is not designated as the Cotswolds National Landscape) including other planned new settlements nearby to Driffield, such as the 640 houses at Ampney Crucis.

39. In summary, development on the scale currently envisaged would clearly represent an excessive, disproportionate, highly unsustainable and damaging form of development to the relatively unspoilt Domesday village of Driffield. It would place an unreasonable strain on existing infrastructure and services that would be damaging to social cohesion of the existing community, and other surrounding areas. It threatens to cause irreparable harm to the historic form, character and landscape beauty of an age-old settlement, not to mention the wholesale destruction of a significant area of productive farmland. Sir Douglas Haig himself would not have come up with a strategy this wildly optimistic from the safety of his map room.

40. Finally, we would point out that the consultation introduces a false comparison which is highly misleading, where it is stated at paragraph 2.18 that 'Scenario 5 is preferable over the other scenarios as it provides the housing land supply with the highest percentage of the government's housing target (79%)'. It goes on:

'It is unlikely that the other scenarios would be accepted as the Council's strategy by an independent Inspector at the Examination in Public when Scenario 5 can deliver the most housing in a sustainable way (subject to further assessment).'

41. However, it is later conceded (at paragraph 3.13) that 'Although Scenario 5 plans around 14,660 homes, not all are likely to be built on time. Realistically, around 20% fewer homes may be delivered during the Local Plan period, meaning only about 11,730 homes are expected.' This gives an overall percentage of 62%, which is much closer to the percentages quoted for scenarios 1-4, which range from between 42-51%.

Question 2

Should the council consider locating development in locations it considers unsustainable to meet? Please explain.

42. Absolutely not. The council should never consider locating development in areas it deems unsustainable, even to meet increased housing needs targets.

43. On occasions there may be exceptional circumstances to justify such development taking place, a massive shortfall in housing numbers being one example; but this should always be the exception not a general rule.

44. From a planning law and policy perspective, sustainable development is a bedrock planning principle which underpins both national and local planning frameworks. Locating housing in unsustainable areas, which means areas which typically suffer from insufficient infrastructure, poor access to services, or a lack of transport options, simply to meet numerical targets, risks creating significant long-term problems. These include increased car dependency, environmental harm, and a diminished quality of life for future residents.

45. Overall, CDC's strategy also carries a sizeable risk of creating places where no one wants live, or where no one can afford to live, at the same time as ruining centuries-old settlements where people already do reside quite happily.

46. The very purpose of planning to meet housing targets is not to override sound principles of planning judgment according to normally accepted standards, but to guide growth in a way that is viable and beneficial for communities. The NPPF and

established case law consistently emphasise that development must be sustainable in environmental, social, and economic terms.

47. Historical lessons also demonstrate that new settlements cannot easily be engineered. The enormous challenge of establishing a new village near Driffield presents a very real planning risk to timely delivery which would not meet the test of Plan soundness.

48. In our view, therefore, the Council's overriding focus should be to concentrate on delivering housing where it is most readily supported by existing infrastructure, with appropriately planned strategic enhancements where it will contribute positively to truly sustainable communities. To echo the objectives enshrined within criterion (a) of Policy DS3, this is where such development that would 'demonstrably support or enhance the vitality of the local community and the continued availability of services and facilities locally'.

Question 3

To what extent would you support increasing housing density in developments (such as smaller houses and gardens, more flights or higher buildings) to help meet the full housing target? Please also explain why.

49. The emphasis should always be on creating attractive desirable places for people to live, and appropriate enhancement to local settlements, without fundamentally altering their character. This generally means targeting higher densities only within central, urban neighbourhoods within the Principal Settlements.

50. The comparisons to inner city areas in London or Bristol are far wide of the mark. Such densities should not be given any serious contemplation, as they are totally unsuitable for rural settlements in the Cotswold area. Packed-in houses with smaller gardens on less spacious plots are generally less desirable and would be harmful to the natural character and charm of well-preserved villages such as Driffield. It might also cause resentment amongst local people where these inequalities exist, potentially eroding the social cohesion of the existing communities.

Question 4

Do you think the proposed level of development up to 2043 - the end of the local plan - and beyond 2043 is sustainable? If not, what provisions would need to be added to the settlement(s) to make them a sustainable location for the proposed level of development? These could be new services, facilities or the provision of infrastructure. Please clearly state which settlement(s) your comment relates to.

51. In a word, 'no'.

52. The proposed level of additional housing growth for the district (to 2043) requires a step change in delivery which would be impossible to achieve without a massive level of new infrastructure provision. It would take years of co-ordinated infrastructure planning and delivery at a strategic level to properly provide for housing growth on the scale currently imagined. This problem is especially acute for generally inaccessible and poorly serviced rural settlements such as Driffield.

53. More importantly, however, it is plainly obvious that the required level of infrastructure provision (e.g. shops, roads, healthcare services, schools, public transport options, employment opportunities etc..) could only be delivered at enormous cost to the taxpayer. Has this important issue been considered at all? Whilst such considerations do not wholly dictate strategic decision-making, 'viability' is still a key test of plan soundness. Finance considerations are embedded into local plan making because Local Plans must show that planned development is viable and deliverable, meaning:

- a) infrastructure needed to support growth can be funded and delivered
- b) developer contributions (S106 / CIL) are realistic
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KEYSTONE LAW on behalf of Marchesi Farming Limited

(Ref: Ben Garbett)

22nd December 2025

Appendix

How can I attach a map to this comment?

Comment ID: 9883

Location in consultation document: 1. Introduction

Name: Lisa

Comment: CDC has not challenged central Government adequately regarding the new national planning policy framework which sets out a standard method for calculating the number of homes required. 'Currently' 84% of the Cotswolds is 'not available' for development. Two letters 'voicing concern' from CDC to central

Government is inadequate and legal representation should be undertaken.

Comment ID: 9878

Location in consultation document: 1. Introduction

Name: Lisa

Comment: The council plan is not sound and is deeply flawed in many areas eg a major error in that CDC included land which is NOT available in broad zone 19 for inclusion in their Regulation18 preferred option. Therefore rendering regulation 18 legally inadequate and inaccurate.

Comment ID: 9896

Location in consultation document: Context

Name: Lisa

Comment: The council has inaccurately considered the options. CDC failed to ascertain correctly that land identified within broad zone 19 to facilitate its preferred option is, in fact, unavailable for development by the landowners and will be unavailable by the landowners.

Comment ID: 9928

Location in consultation document: Question 1

Name: Lisa

Comment: 1,3 and 4 are most sustainable.

Options 2, 5-7 have factual significant infrastructure constraints alongside other major limitations. Preferred option 5 will cause substantial harm. It will negatively impact safety, increase air and light pollution and cause destruction and harm to productive farmland, landscape, wildlife and built heritage. It will negatively impact the safety of residents and cause human mental and physical suffering to those residents who live in the villages of Harnhill and Driffild and beyond.

Comment ID: 9934

Location in consultation document: Question 2

Name: Lisa

Comment: No. It should never consider locating development in areas which would exacerbate the situation. Option 5 is neither deliverable, sustainable, desirable. Flooding is a constant threat and occurrence in Harnhill and Driffield and in the surrounding roads. Sewerage capacity is factually constrained. Ampney Brook has to be regularly pumped by Thames water. Main sewer line was recently hydro-locked.

There are non-existent services, infrastructure and travel options.

Comment ID: 9937

Location in consultation document: Question 3

Name: Lisa

Comment: The Cotswolds, aesthetically, is a major draw for tourism which supports businesses and livelihoods. We should not 'pack in' accommodation in undesirable developments and spoil forever the unique draw of this whole area. Higher densities should only be sited, if necessary within urban, principal developments with higher densities of populations.

Comment ID: 10548

Location in consultation document: Question 6

Name: Lisa

Comment: No I do not agree with the vision and objectives. Option 5 is flawed due to no infrastructure. The existing infrastructure is wholly inadequate in terms of sewerage and water supply. Flood risk is severe to roads and properties in and around Drifffield. Any new development would add to flooding risks. Roads are currently impassable many times a year. New surface water runoff would severely add to the risk. Mineral resources would be sterilised.

Great visual harm to landscape and coalescence to existing urban areas.

Development completely out of scale with landscape.

Safety of residents would be compromised due to exponential new number of vehicle movements through narrow single track roads.

Comment ID: 10552

Location in consultation document: Infrastructure needs

Name: Lisa

Comment: Infrastructure is non existent on Driffield.

Development requires massive investment and a fix to a sewerage system which is at capacity and discharges into waterways. Thames Water regularly use tankers to remove excess water from Ampney Brook in Driffield. Flooding to roads and properties is a regular occurrence and single track roads are frequently impassable in Driffield and Harnhill. Roads in this area are dangerous and a safety risk to residents. The area around Driffield is organically farmed and home to many rare and protected species. Any development would cause great harm to the landscape, ecosystem and built heritage. The character of domesday village and conservation area known as Driffield would be destroyed by a development.

Driffield would also be forced into coalescence with Cirencester.

Comment ID: 10556

Location in consultation document: Question 4

Name: Lisa

Comment: Indicative map south Cotswolds.

No, the development in Driffield and broad zone 19 is not sustainable. There is no infrastructure and massive investment to factually constrained sewage systems, dangerous single track roads, services, water quality mitigation, mineral resource sterilisation mitigation, and mitigation of high visual landscape harm would render development unsustainable.

Comment ID: 10560

Location in consultation document: 4. Beyond conventional housing

Name: Lisa

Comment: 4.2 you will not protect the natural and historic environment, by going ahead with your preferred choices, you will destroy the protected landscape around Driffeld and cause high visual harm to the landscape. You will destroy organic farmland, endanger and destroy protected species, destroy ridge and furrow farmland and cause air and light pollution. You will destroy historic built heritage, forever harm the scale of villages, cause untold human harm and negatively impact the safety of residents. You will create further flooding to roads and houses and pollution to sensitive waterways.

Comment ID: 10569

Location in consultation document: Context

Name: Lisa

Comment: Once again I reiterate.

You say you have identified sites for further investigation. How did you identify the area near Drifffield which is NOT available.

I requested information under the freedom of information act 6 weeks ago regarding who promoted R157A-E which I am legally entitled to. I have NOT received a response.

I demand an answer.

Comment ID: 10567

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

Name: Lisa

Comment: Major, glaring, wrongful inclusion of land known as R157A-E into the preferred option 5 of Cotswold district councils local plan. Due diligence lacking because this land is not available for development by the landowner. I requested a freedom of information request approximately 6 weeks ago as to who promoted this land and I have NOT had a reply!!

Comment ID: 10563

Location in consultation document: Indicative maps

Name: Lisa

Comment: You have glaringly and factually not consulted current landowners in certain areas and have mistakenly shown their land as available for development - their land is NOT available for development and you have therefore caused GREAT HARM to residents in Drifffield and Harnhill through this error and Cotswold District Councils lack of thorough investigations.

Comment ID: 10571

Location in consultation document: Question 1

Name: Lisa

Comment: 1, 3 and 4 are more sustainable.

The Cotswold National

Landscape should be considered as there has been development and they should share the burden. Development should not be dumped in options 2 and 5-7 which suffer from significant infrastructure constraints and critical limitations which make these areas wholly unsustainable. Broad zone 19 is factually constrained in terms of sewerage capacity. Thames water frequently tankers water away from Ampney Brook. Sewage is released into surrounding areas.

Flooding to roads and houses in Driffield and Harnhill is frequent and endangers the life and health of residents. Any new development would exponentially increase that risk. The narrow roads around Driffield and Harnhill are dangerous and a safety risk. A new development would endanger the lives of residents through the exponential increase of vehicle movements and air pollution.

Comment ID: 10575

Location in consultation document: Scenario 5

Name: Lisa

Comment: Flawed.

Significant infrastructure costs. There is currently NO infrastructure whatsoever.

Sewerage capacity is factually constrained. Water quality would be detrimentally impacted to sensitive waterways. Mineral resources sterilised.

Development will adversely damage the natural and historic landscape.

Built heritage and protected landscape decimated.

Flooding risk exponentially increased to Driffield and Harnhill which already experience flooding to houses and have impassable roads.

Safety of residents compromised by exponential traffic growth in the area on single track dangerous roads.

Development would seriously harm protected wildlife species and destroy organic farmland. These habitats which encourage and enhance biodiversity would be destroyed.

The vitality of the rural community and the character of Driffield and Harnhill would be destroyed and forced into coalescence with urban Cirencester.

The natural and historic landscape would be destroyed by this development.

Comment ID: 10564

Location in consultation document: Table 3

Name: Lisa

Comment: Glaring and wrongful inclusion of land for a new settlement near Drifffield.

This land is NOT available and is organically, productively and regeneratively farmed.

Comment ID: 8955

Location in consultation document: Table 2

Name: Lisa Wright

Comment: Fairford seems to be getting a disproportionate number of additional housing. Whilst I appreciate we need more housing, could we not spread it amongst us - for example - why is Lechlade not getting so many extra houses? There are various sites there that are also appropriate near Hillier Garden Centre. You are only increasing the housing here by 18% (as opposed to 70% in Fairford) yet there are many more shops and restaurants. You seem to be concentrating on 3 principal sites to enlarge and like Moreton in the Marsh, we simply don't have the infrastructure. You will ruin the make up of the town; we have very little public transport, the school is full, the doctors are overrun and the discharge into the Coln is unacceptable. For new housing, you must have solar on all houses. For sewage, you must separate grey and black water to enable grey water to be easier to reuse. You need to prove to the residents that services will be significantly better, get more doctors, upgrade the sewage system, increase public transport, more shops, extra school places before you start the big build. Otherwise the residents will lose faith. The traffic on the narrow roads will not cope - can you install signs on the new 20 mph routes that light up when you are over the speed limit? No one takes any notice otherwise!

Comment ID: 8784

Location in consultation document: Increasing density

Name: Liz Farnham

Comment: I am supportive of some increased housing density but there needs to be clear guidelines about what is appropriate i.e. what this means and what is suitable in different parts of the District.

- I am in favour of smaller gardens but there needs to be nearby green spaces for people's wellbeing and children to play.
- I am not, however, in favour of high-rise buildings but recognize that town-houses are appropriate.
- But consideration also needs to be given to the needs of the aging population and so some bungalow provision is needed and assisted housing for people with accessibility needs. These need to be close to amenities so that people don't become isolated as they can no longer drive and in the absence of public transport.

Comment ID: 8786

Location in consultation document: Question 1

Name: Liz Farnham

Comment: I agree with Option 5 – it balances pragmatism with government policy and the national demand for housing.

Comment ID: 8785

Location in consultation document: Question 2

Name: Liz Farnham

Comment: Yes, I think that CDC should consider locating some development in locations it considers unsustainable, and it should prioritise securing infrastructure to make them more sustainable.

For example, Tetbury is poorly served by transport infrastructure and has limited local employment and yet it is the second largest settlement in the District. It needs some growth to remain viable and to secure investment in infrastructure, such as public transport, education, and medical and leisure facilities. I am of the opinion, therefore, that more housing is need in Tetbury over the course of the new Local Plan.

Comment ID: 8787

Location in consultation document: Question 4

Name: Liz Farnham

Comment: Q4. No.

Kemble may have a railway station but it doesn't have other facilities and infrastructure to sustain such a substantial increase in the population and associated demands. This will result in the need to travel to Malmesbury, Cirencester or Tetbury for secondary schools, shopping, medical facilities, and leisure. Local roads cannot accommodate these increased traffic volumes. Kemble residents would not directly contribute to these towns via their precept. There is already congestion at the junctions with A433; consideration for roundabouts or traffic lights will be needed.

Moreton-in-Marsh is already heavily congested and therefore a by-pass is urgently needed, there and in Stow-on-the-Wold for road safety reasons. Otherwise tourists, who are the main source of employment, will go elsewhere. There is currently no secondary school in Moreton-in-Marsh. Pupils have to travel to Bourton-on-the-Water or Chipping Camden. With such a significant increase in housing underway and more planned, consideration also needs to be given to education needs. I do not believe that the proposed development would fund these infrastructure needs.

Comment ID: 8788

Location in consultation document: Question 5

Name: Liz Farnham

Comment: With such an increase in the population, investment is needed in critical infrastructure such as roads, sewage treatment (already urgent in Tetbury, even without further development), Cirencester hospital, and new burial site(s) and/or a crematorium are also needed in the south of the District.

What support is being given to building truly affordable housing? Youngsters and people with young families need to be able to live and work in the Cotswolds, to keep it thriving and vibrant.

Equal priority needs to be given to local employment and appropriate industry.

Acknowledgement of, and support to, the planting of the Great Western Community Forest which aims to connect people with nature by creating a network of woodlands and green spaces, to enhance diversity and mitigate climate change. This is especially important given local flooding issues.

Solar panels should be incorporated into new housing and should not take up land that would be better used for growing food or possibly for housing. Indeed, housing developments should be designed and orientated to make maximum use of solar power.

A concern is the availability of local labour and materials to build all these houses and, hence, I question whether the Local Plan is achievable.

Comment ID: 8789

Location in consultation document: Question 6

Name: Liz Farnham

Comment: Yes, I agree. The vision is comprehensive.

Comment ID: 8783

Location in consultation document: Scenario 5

Name: Liz Farnham

Comment: I agree with Option 5 – Cotswold District must seek to identify the best location for its quota of housing whilst bearing in mind deliver-ability, or the decision will be taken out of our hands.

Comment ID: 9119

Location in consultation document: Question 6

Name: Louise Brittain

Comment: I am in agreement as the position the council is in is impossible. I would expect the best infrastructure and facilities built into the plan and increased health care for the community. A good start would be to stop the downgrading of our community hospital. I would also expect to see plenty of green spaces built into the plan. These should be substantial for the benefit of the community and wildlife. My fear is that the promise of infrastructure rarely is produced in reality and these homes need to be at least 75% social/affordable. The homes should be of a good standard and a manageable size.

Comment ID: 10868

Location in consultation document: Increasing density

Name: Louise Elstow

Comment: Increasing density can be done using more flats. Some of the consultation documents refer to densities that are similar to inner London, but surely something inbetween single house density and tower block can be designed in a way which supports the local landscape. Arguably a smaller site which is well designed from a climate resilience, biodiversity and human centred approach is going to be more sensitive to local surroundings, and sustainable than low density sprawling housing estates. Also, if they are served by adequate public transport and appropriate local education and healthcare services, with communal spaces and facilities, they can foster a much better sense of community than villages with 'executive' houses. It is possible to design medium density sites which sit well within a beautiful landscape.

Comment ID: 10892

Location in consultation document: Scenario 5

Name: Louise Elstow

Comment: Whilst I accept that we can't build everywhere, the proposed suggestion of number 5 disproportionately affects only a small number of sites which seems unfair. Fairness is not a material consideration, so I will concentrate instead on matters that are.

a) Transport - the road infrastructure is in a poor state and lacks capacity for the additional traffic this scale of building would bring. Rural bus services are limited and these along with more safe cycle routes, links to the rail network would need to be significantly improved to make these sites more climate friendly. Siddington is only 3 miles from Kemble station and yet you cannot get there by bus.

b) sewerage and broader infrastructure. Our systems have not been designed to cope with this number of houses.

c) flooding risks - Siddington and the road into Cirencester near Tesco's already floods every year now, making the road network impassable. Additional houses would put pressure on these roads (given the additional traffic they will bring) and is also likely to increase flood risk (by reducing run off etc).

d) water - we already have water supply issues. By concentrating development in a small area, all of the infrastructure and resources will be locally constrained.

e) our public health services have already been eroded and are not adequate. Any additional building in the area MUST be accompanied by additional public services.

Comment ID: 10889

Location in consultation document: Scenario 6

Name: Louise Elstow

Comment: It is unclear why some level of sensitive development within the National Landscape site is not possible. Given the proportion of land in CDC which sits within the National landscape (over 80%) it seems unfathomable that 100% of the house building must take place within 16% of the area, or that the allocation for CDC does not take this into account. Siddington a village of around 350 houses currently (and already situated next to the Steadings - a site of over 2000 new homes), as a result is proposed as needing to account for around 9% of the housing allocation. This is directly a result of the condensing of the entire budget into a tiny proportion of land. The owners of expensive houses that the consultation says means the CDC allocation has increased so much, will continue to live in the National Landscape whilst the general public in Siddington and the few miles around (Cirencester, Preston etc) will be deluged by more new houses.

Comment ID: 9834

Location in consultation document: Table 2

Name: Louise Russell

Comment: Flooding in Quenington

Thames Water has been repeatedly called out from 2019 to the current date to attend to the Fowlers Hill Pumping Station SPSFOWLLP2ZZ because of flooding problems in Victoria Road GL7 5BP - Thames Water will also have the details. There have also been meeting with representatives from Thames Water, Gloucestershire Highways and Quenington PC on 20.03.25 and 03.11.25 to discuss this problem. It was raised at the Flooding Public Meeting at Bourton-on-the-Water chaired by Geoffrey Clifton-Brown MP on 05.12.25. The flooding problems need to be sorted before any new building is considered in Quenington.

Comment ID: 10967

Location in consultation document: Question 1

Name: Lucie Rowe

Comment: None of the above scenarios are my preference. The sheer scale of the proposed is ridiculous and seems to be in complete contrast to what has been aimed for previously in the District.

To consider Siddington in particular as a "Principle Settlement" is far fetched to say the least (although that can be said about most of the other villages/areas mentioned). This is a rural area and this maintained through keeping the the villages and small market towns as individual and separate "units" rather than making them into one large town/city with various suburbs.

Alternatives that could be looked at include the turning of the already over developed lake areas so say holiday homes into permeant residences and looking at the homes which are empty across the whole of the District.

Comment ID: 10974

Location in consultation document: Question 2

Name: Lucie Rowe

Comment: No it shouldn't. If the area is considered to unsuitable then it is for a reason, and realistically that reason is unlikely to change but more like get worse, what ever it is.

The Council should be prepared to stand by it's reasoning which is most likely made with the knowledge of the local area and peoples needs in the area rather than the governments unrealistic demands.

Comment ID: 10977

Location in consultation document: Question 3

Name: Lucie Rowe

Comment: There are some small areas in most villages etc which could cope with a couple (single figures) of houses which would not break out of already naturally created village boundaries, which could be supported. BUT we are talking SINGLE figures and only if the utilities etc which are in such a dire state can cope. The dense developments that are being suggested as these will ruin / remove the rural character of the area.

Comment ID: 11002

Location in consultation document: Question 4

Name: Lucie Rowe

Comment: No I don't. When specifically discussing Siddington the issue of the increase in flooding is so significant if there was more development in the village itself or any of the surrounding area be that Kings Hill, Preston, The Steadings etc there is no amount of provisions that would make it suitable/sustainable for the any level of development.

Comment ID: 11003

Location in consultation document: Question 5

Name: Lucie Rowe

Comment: Yes. The Plan should consider specifically in relationship to Siddington:

- The incorrect Principal Settlement classification
- The protection of village identity and cohesion
- Flood resilience
- Rural infrastructure limits
- The importance of the green buffer with Cirencester

Comment ID: 11009

Location in consultation document: Question 6

Name: Lucie Rowe

Comment: Whilst I agree with the admirable vision and objectives, the reality seems so far removed. The majority of these things should be addressed BEFORE the major developments are even considered, instead a lot of these things seem to be currently removed from the local area as a whole.

From the perspective specifically of Siddington, the proposals:

- Do not deliver a sustainable community but threaten the destruction of our existing community.
- Will involve development that does not prioritise environmental stewardship, social equity or economic vitality.
- Will not respect Siddington's unique landscape, heritage or character.
- Will not result in Siddington "maturing" into a thriving community.
- Will not offer employment opportunities in Siddington.
- Will not offer additional essential facilities to Siddington.
- Are unlikely to involve integrated infrastructure and sustainable transport networks.
- Will involve Siddington growing disproportionately
- Will reduce the green space available to the Siddington community

Comment ID: 10679

Location in consultation document: Question 3

Name: Lucie Spurway

Comment: High density/multi level housing would not be appropriate for villages such as Fairford, destroying the character of both the village and cotswold region. With the unitary authority in 2027 it would be more appropriate for urban areas such as gloucester to accommodate high density

Comment ID: 10682

Location in consultation document: Question 3

Name: Lucie Spurway

Comment: High density/high level housing is inappropriate for village locations such as Fairford destroying the rural heritage.

With unitary authority in 2027 it would be more appropriate to place such housing in already urban areas eg Gloucester

Comment ID: 10691

Location in consultation document: Question 5

Name: Lucie Spurway

Comment: Fairford is an old historic town with an already congested A road through its very centre. If the proposed development takes place at very least a new road infrastructure would be required (by-pass) to keep traffic out of the village. There is also a well known sewerage contamination problem in the area which would need to be addressed prior to building not, as currently happens, after construction if at all. By focusing housing up by the school this increases safe walking routes to school and may minimise car journeys. It also preserves the historic gateway to Fairford on Cirencester Road to the West, as laid out in the previous local plan. Cycle ways and alternatives to cars must also be considered.

Comment ID: 10705

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

Name: Lucie Spurway

Comment: The 2021 SHEELA Fairford Site Assessment (1) A2.2.4 (G) discounted site 36B and went onto describe it as being part of a planning application for 92 dwellings. This is incorrect as this land was not part of the application made on the adjoining F50. It appears to be a copy and paste error. We would like to highlight the importance of maintaining this 36B land as arable farming land retaining the important rural buffer between Fairford and Horcott and the long views on the approach to Fairford providing a setting for our historic rural market town.

Comment ID: 10706

Location in consultation document: Question 3

Name: Lucie Spurway

Comment: Proposals for high density/multi level housing is inappropriate for a rural location like Fairford. With the unitary authority in 2027 it would be more applicable for urban style housing to be put into urban areas eg Gloucester

Comment ID: 10710

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

Name: Lucie Spurway

Comment: Whilst not relating to the proposed location for Fariford development, we have noted an error in the 2021 SHELAA Fairford Site Assessment 1 A2.2.4 (G) as 36B has never been prt of any planning application for 92 dwellings. This application was on F50. We must highlight the importance of retaining 36B as arable farming land which forms the rural buffer between Fairford and Horcott and maintains long views on the approach to Fairford to the West placing it within the context of a historic rural cotswold town

Comment ID: 9792

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

Name: Lucinda Turner

Comment: The table below states that the village of Kemble has 388 dwellings, to allow the village to grow by an additional 587 homes will completely destroy the village environment. With only a small primary school, tiny shop and small surgery the additional infrastructure that would be required to cope with the additional headcount would be huge. There are no opportunities for employment in Kemble so a car is essential if you are going to work, and travelling by train is limited to those who can afford the expensive rail fares (approx £11,000 for an annual season ticket into London)

Comment ID: 9794

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

Name: Lucinda Turner

Comment: The proposed site for development at Kemble is on the flight path for the Cotswold Airport. Please be aware that light aircraft, private jets and large commercial planes (going to be scrapped) fly over the proposed site on a regular basis.

Comment ID: 9798

Location in consultation document: Question 1

Name: Lucinda Turner

Comment: Scenario 3 is in my opinion the best option, as it would make more sense to build housing closer to good services, transport links and job opportunities. The majority of this housing will be occupied by young people/families who need access to all of the above services, and probably wouldn't want to be out in rural communities where owning a car is a necessity.

Comment ID: 9800

Location in consultation document: Question 2

Name: Lucinda Turner

Comment: I presume that the Council considers unsustainable to mean development of areas of the National Landscape. The National Landscape in the Cotswolds comes under national policy protection and is one of the many reasons why the beauty of the area attracts so many international visitors. It should be protected at all costs and the development targets set by the government reduced accordingly.

Comment ID: 9799

Location in consultation document: Question 3

Name: Lucinda Turner

Comment: In towns and cities it is possible to increase the density of the housing as it would not look so out of place. It is normal to see large properties converted into flats, smaller gardens, streets of terraced properties etc

Comment ID: 9797

Location in consultation document: Question 4

Name: Lucinda Turner

Comment: In my opinion the only way the proposed development at Kemble could work, would be if a separate independent settlement could be built away from the village that had its own shops, school, surgery etc. The village of Kemble is a unique place to live with a good cross section of housing and over the years has adapted to development on a smaller scale. The volume of development suggested on the doorstep of the village would completely change the character of the village and the community. Kemble would become a small town with no facilities.

Comment ID: 9808

Location in consultation document: Question 5

Name: Lucinda Turner

Comment: Whilst we have a train station at Kemble that services Swindon, Reading and London (at a price) A huge carpark was built to service the station but every week day the carpark remains empty, this has come about due to the working from home culture that we now have in the UK thus greatly reducing the need to travel by train. In addition to the suggested development at Kemble the Chesterton development will have a huge impact on levels of traffic passing through Ewen and Kemble, using the villages as a cut through to the A429. People move to villages to enable them to reside in a quiet environment, where they can get involved with their community and its way of life, there is an appreciation of the beautiful countryside surrounding our local villages and the wildlife that inhabit those spaces. I would hope that any development would be done sympathetically and that all the necessary steps would be taken to reduce the carbon footprint of any possible new homes.

Comment ID: 9809

Location in consultation document: Question 6

Name: Lucinda Turner

Comment: I do agree with the vision, I just think that the proposed number of new homes is unrealistic for the Cotswolds.

Comment ID: 10855

Location in consultation document: Question 6

Name: Lucy

Comment: Poulton is a non-sustainable rural village and does not have the essential facilities or infrastructure required to support further housing growth.

For Poulton to be considered sustainable, the following facilities would need to be in place or legally guaranteed before any development:

- Village-wide flood mitigation (not site-by-site)
- Adequate sewage and wastewater treatment capacity
- Full-fibre broadband (FTTP) to every dwelling
- Reliable indoor and outdoor mobile phone coverage
- Viable public transport (including evenings and weekends)
- Access to primary education capacity or adequate transport links to 6th form education facilities
- Access to GP, Dentist and healthcare services
- Safe highway capacity and traffic management

These facilities do not exist in Poulton and are not secured by the Local Plan.

Flooding and sewage problems are long-standing and unresolved, particularly around Ranbury, Bell Lane, Stoney Pool and the A417 bridge. Past development has already worsened flooding elsewhere.

Poulton also suffers from poor broadband speeds and unreliable mobile signal, resulting in digital exclusion. This restricts home working, access to NHS digital services, emergency communications, education and day-to-day public services. Digital infrastructure is now essential infrastructure, equivalent to water or electricity.

Allocating housing in Poulton fails the Local Plan soundness tests: • Not positively prepared (known infrastructure deficits unresolved)

- Not justified (reasonable alternatives exist in sustainable locations)
- Not effective (no guaranteed delivery of infrastructure before occupation)

- Not consistent with national planning policy

Failing even one test makes a plan unsound. Poulton fails all four.

Conclusion

Poulton is not an appropriate location for further housing growth. Unless flood mitigation, sewage upgrades and full digital infrastructure are delivered and operational before occupation, the proposed allocation should be removed or substantially reduced.

Comment ID: 10722

Location in consultation document: 4. Beyond conventional housing

Name: Lucy Abel Smith

Comment: The report highlighted the problems of the Cotswolds. However no real definition of where to site green solutions so called as every new build should have solar panels on the roof. Not requirement to reign in the manipulation of bulldozers and land. No comments on the present government's on consultative bodies as Historic Gardens. words only on retaining village character.

All amenities should be catered for including those for worship. Honeypots tourism can be countered by information from Airbnbs to tourist offices to hotels and restaurants. and this to be done at a national level.

Solar and wind are visually the most destructive to the countryside and in the Cotswolds to tourism.

Please consider the use of AI and its astonishing greedy use of water .

Infrastructure needs are paramount and before anymore houses are built there should be implemented first.

Comment ID: 9978

Location in consultation document: 3. Indicative figures

Name: Luke

Comment: 2. Material planning considerations – why the Kemble site (currently known as site K8 in current local plan and the shown in the this document with arrows) is inappropriate

I set out below my objections to the proposed strategic allocation at Kemble – including land previously assessed as “K8” – under standard material planning headings.

2.1 Scale and dominance

The quantum being suggested for Kemble (around 590 dwellings within the Plan period and a further ~480 beyond) would increase the settlement from roughly 380–390 dwellings to well over 1,000. That is an increase of around 160%, not a modest growth.

For a small rural village:

- This is disproportionate to its existing size and role.
- The historic core and railway village would be visually and numerically swamped by new-build estate housing, so that the original village becomes a small historic fragment attached to a new commuter settlement.
- The sense of a distinct, self-contained village would be lost, replaced by a much larger, suburbanised place out of scale with its setting and the surrounding hamlets.

CDC’s own technical work recognises that “overdevelopment” is clearly engaged where a settlement doubles in size. Here, the proposal goes significantly beyond that threshold. Such an increase would visually and functionally dominate the existing historic core, so that the “real” village – with its Conservation Area, listed buildings and long-established streets – risks becoming a small historic enclave on the edge of what would in effect be a modern estate settlement. In practice, Kemble would be pushed from being recognisably a village towards a small town in terms of population, without the corresponding level of facilities, services or planned infrastructure investment.

2.2 Layout and density of buildings

To accommodate such numbers on the land including K8:

- The layout would inevitably involve large continuous tracts of built form stretching beyond the existing village envelope and across the current railway edge.

- Density is likely to be relatively tight once allowances are made for SuDS, open space, safeguarding buffers, and infrastructure.
- This is entirely at odds with the traditional nucleated pattern of Kemble and the surrounding Kemble & Ewen Special Landscape Area, which is characterised by compact villages and open fields between them.

The result would be the effective merging of Kemble's historic core with a new "estate" quarter that pays little respect to the established settlement grain, field pattern or the dip-slope landscape.

2.3 Appearance and design of development and materials proposed

Although no detailed designs exist yet, experience on similar strategic sites suggests:

- Delivery is likely to be led by volume housebuilders, using standard house types, materials and street patterns.
- The contrast between Cotswold stone historic buildings and Conservation Area on one side, and large tracts of modern estate housing on the other, will be stark – particularly on the A429 approach where the current open fields provide a simple, agricultural foreground to the village and Cotswolds beyond.
- The need to integrate attenuation basins, engineered SuDS features, pumping stations, sub-stations and extensive hard surfacing will further erode the rural, pastoral character of this gateway.

In a location that functions as a gateway to the Cotswolds National Landscape, this change in appearance would be dramatically harmful, even if the detailing of individual houses is "polite".

2.4 Highway safety

Kemble already experiences:

- Pedestrians walking along fast rural roads where pavements are narrow, intermittent or non-existent, particularly on the village approaches where development has extended towards the A429.
- Conflicts between vehicles, cyclists and pedestrians around the station and school at busy times.

A large new allocation to the south-west:

- Pushes the built edge further out beyond the railway, meaning more people will need to walk or cycle along or across busy roads to reach the school, station and village facilities.

- Risks increasing the number of residents using routes that are not designed for high volumes of pedestrian traffic and are already perceived locally as unsafe.

Without clear, committed and deliverable improvements to pedestrian/cycle links and junction safety – which are not demonstrated at this stage – the proposal raises real highway safety concerns.

2.5 Traffic and parking issues

The scale of development proposed would:

- Add a very significant number of daily car trips onto the A429 and local lanes;
- Increase pressure on station parking, which already draws a wide catchment of commuters; and
- Inevitably increase on-street parking in residential areas if the site and wider village cannot absorb the extra demand.

Given the village's role as a railhead for London commuters, a large strategic site risks turning Kemble into an even larger park-and-ride and commuter base, with traffic and parking impacts well beyond those envisaged when the current road network and station arrangements were planned.

2.6 Drainage and flood risk

The Kemble Landscape Appraisal identifies the K8 area as part of the “Dip Slope Lowland (TV3a – Kemble Dip Slope)” with lime-rich loamy and clayey soils with impeded drainage. The land slopes generally towards Kemble Wick and the railway line.

In addition:

- Gloucestershire County Council and CDC have already recognised flooding problems at Kemble Wick and have commissioned or supported work to understand and mitigate surface water and fluvial pathways.
- Local residents report that flooding has worsened since construction of the solar farm further down-slope, which has itself altered surface water behaviour.

A large housing scheme on K8 and adjacent land would:

- Replace a significant area of permeable farmland with roofs, roads and hard surfacing, inevitably increasing surface water run-off towards Kemble Wick and the railway.
- Require substantial SuDS attenuation basins and drainage infrastructure because infiltration options are limited on impeded-drainage soils.

On this topography, and with known downstream issues:

- There is a real risk of worsening flood risk in Kemble Wick and along the railway corridor, contrary to national policy that seeks to avoid increasing flood risk elsewhere.
- It is far from clear that mitigation can be achieved without further engineering and landscape harm in precisely the area that currently acts as a buffer.

2.7 Noise, dust, fumes etc.

There are two distinct aspects here:

1. Construction and operation

o A scheme of this magnitude would involve years of heavy construction activity: HGV movements, dust, noise and disturbance across a prolonged period, affecting not just existing residents but also the tranquillity of the Kemble & Ewen SLA and the railway wildlife corridor.

2. Interaction with Kemble Airport flight paths

o At present, light aircraft and other flights at Cotswold Airport (Kemble) generally avoid overflying the main built-up part of the village on approach and departure, respecting the fact that Kemble is a residential area.

o If the open fields at K8 – which currently form part of the open buffer between the village and the airport approaches – are built over and legally become part of the village, there is a serious risk that:

❓ Existing informal practice and/or operational guidance that discourages overflight of the village will be weakened or re-drawn, because the “village” footprint will now extend much further towards the airfield.

❓ More flights and circuit patterns could legitimately cross directly over a much larger residential area, increasing aircraft noise exposure for current and future residents.

That is in addition to extra road traffic noise, local air quality impacts (from additional vehicle movements), and the cumulative effect of lighting and activity from the solar farm, existing development at Top Farm, and the proposed strategic site.

2.8 Impact on character or appearance of area

The character and appearance of this part of Kemble is defined by:

- The open agricultural fields to the south and west, including K8, which provide a clear rural setting and foreground to the village;
- The distinct break between Kemble’s nucleated settlement and Kemble Airfield/business park; and

- The transitional feel of the Kemble & Ewen SLA as the southern edge of the Cotswolds dip-slope.

A large strategic estate in this location would:

- Fill in the current break and blur the distinction between the village and the airfield/business park;
- Replace the simple, open foreground with a visually dominant block of housing; and
- Substantially alter the way Kemble is experienced on approach from the A429 and surrounding lanes, especially in views towards the church spire and historic core.

This is not a marginal or subtle change. It is a fundamental redefinition of the village's landscape setting, contrary to the objectives of the SLA and the adopted Local Plan.

2.9 Effect on listed buildings and conservation areas

The proposed allocation would directly affect the setting of the Kemble Conservation Area and several listed buildings, including All Saints' Church and its Grade II spire*, which is a local landmark.

Currently:

- Views from the Malmesbury (A429) direction and other public vantage points show the church and village rising from a foreground of open agricultural land, with the dip-slope and Cotswolds beyond.

If K8 and adjoining land are developed at the scale proposed:

- Those views will be interrupted and filtered by substantial new housing, diminishing the legibility of the historic village in its landscape context.
- The ability to "read" Kemble as a compact rural settlement nestled in its fields will be lost, replaced by a more sprawling, urbanised edge.

The Kemble & Ewen Neighbourhood Development Plan and Design Guide treat open land to the south-west of the village as part of the village's heritage setting and identify non-designated heritage assets in this area. A strategic allocation here would cut across those carefully considered local policies.

2.10 Effect on trees and wildlife / nature conservation

The railway corridor and the fields around K8 function as an important wildlife corridor, linking habitats along the River Thames, hedgerows, grassland and railway embankments. Local ecological work (e.g. for the Kemble Community Garden) has already identified:

- Reptile interest (including slow-worms);
- Foraging bats;
- Protected and notable bird species; and
- Great crested newt “amber zones” in the wider area.

A large housing site here would:

- Fragment and remove areas of grassland, hedgerows and field edges that currently support these species;
- Place increased pressure on the remaining railway corridor through lighting, noise, pets and human activity; and
- Make it far more difficult to achieve genuine on-site Biodiversity Net Gain of at least 10%, as now required by law, without extensive additional landtake or off-site compensation.

Given the sensitivity of this “gateway” ecological network, the risk is that habitat and connectivity are lost where they matter most for the relationship between the village and the wider landscape.

2.11 Impact on the community, services and open space

Community impacts include:

- Primary school capacity and character – Kemble’s school is an important part of village life. Planning for another ~1,000 houses in and around the settlement, on top of Chesterton and other commitments, raises:
 - o Questions about whether local schools can absorb the numbers without losing their small-school character; and
 - o The prospect of increased home-to-school transport if local capacity is exceeded.
- Health, community and recreation facilities – There is no clear, costed or evidenced package showing how GP, community and recreation facilities would be expanded to serve a settlement of this size.
- Loss of village identity – Doubling or more than doubling the village threatens the sense of a close-knit community. New housing of this scale, driven largely by in-migration and commuting, risks creating a place where:
 - o A high proportion of residents have weak ties to the existing community; and
 - o The social fabric and local voluntary organisations struggle to absorb rapid change.

By contrast, a more dispersed pattern of modest growth in AONB and non-AONB villages would help sustain multiple schools and services across the district without overwhelming any one community.

CDC's most recent Open Space / Green Space assessment already shows Kemble as having a deficit of accessible local green space per person against its own standards. Tripling the population in practical terms – without a commensurate and secured increase in high-quality, accessible open space – would deepen that deficit and risk eroding the very qualities (rural setting, access to green space, village character) that make Kemble attractive in the first place. In simple terms, the plan would load far more people onto a settlement that already falls short on open space and facilities, and where there is no clear, funded strategy to put that right.

From a community perspective, the proposal feels less like carefully planned, proportionate growth and more like imposed overspill, with the existing community and its services expected to absorb very substantial change over a short period.

2.12 Aerodrome safety, SuDS and birdstrike risk

A further material consideration is the relationship between K8, SuDS requirements and Cotswold Airport (Kemble).

Kemble lies within the aerodrome safeguarding zone for Cotswold Airport. Civil Aviation Authority guidance (CAP 772: Wildlife Hazard Management at Aerodromes; CAP 738: Safeguarding of Aerodromes; and CAST Advice Note 3: Wildlife Hazards Around Aerodromes) is clear that:

- Open standing water – such as attenuation ponds, basins, reed beds and drainage lagoons – within the safeguarding radius is a recognised attractant for hazardous birds (including gulls, corvids, pigeons, gamebirds and starlings); and
- Developments that increase the “carrying capacity” for such birds or create flight lines between feeding, breeding and roosting areas can significantly increase birdstrike risk.

The K8 land:

- Lies on impeded-drainage clayey soils, meaning that infiltration-based SuDS (soakaways etc.) are constrained; and
- Would, at the scale now proposed, require very substantial attenuation volumes to control run-off to greenfield rates, given the downstream flood issues at Kemble Wick.

- In practice, unless all attenuation is provided in expensive underground tanks, a strategic allocation on K8 is likely to involve one or more sizeable SuDS basins or ponds. Even if described as “normally dry”, experience elsewhere shows that these features can hold water for long periods in wet conditions and effectively behave as open water.

Taken together with:

- The existing solar farm further down-slope (which itself offers perching and habitat for certain species); and
- The birds already using the surrounding farmland (crows, pigeons, gulls, gamebirds and starlings are all frequently present),

there is a real risk that extensive SuDS provision on K8 would:

- Attract larger numbers of hazardous birds into the safeguarding zone; and
- Increase the complexity of managing birdstrike risk for the aerodrome.
- From a planning perspective, that raises two serious issues:
- Public safety and aviation safety – it is not clear that CDC has properly assessed whether a development of this scale, with realistic SuDS requirements, is compatible with CAA guidance and Cotswold Airport’s safeguarding; and
- Deliverability – if, to satisfy aviation concerns, developers are required to avoid significant open water, that may force unusually costly underground solutions which further undermine the viability and practicality of the site.

As an individual resident, I am very concerned that CDC is proposing to allocate this site without first demonstrating that aerodrome safety, SuDS design and bird hazard can be satisfactorily resolved.

2.13 Economic impact and sustainability

There are both economic positives and negatives, but in this case the negatives are significant:

- The proposal is heavily commuter-oriented, relying on Kemble’s London rail link. It is not primarily about meeting local employment or housing needs in the immediate rural area.
- Much of the associated spending (shopping, major services) would likely leak to Cirencester, Swindon, Cheltenham or further afield, rather than strengthening a genuinely local economic base.
- The pattern of development – a large new estate in a rural village – sits uneasily with national objectives to:

- o Minimise the need to travel;
- o Locate significant growth where there is a critical mass of services and jobs; and
- o Support local services in multiple villages, not concentrate them in one expanded commuter hub.

In sustainability terms, the proposal appears to be car-dependent, commuter-driven growth, rather than a genuinely sustainable, locally-focused extension.

2.14 Government policy

The proposal conflicts with Government policy in several ways, including:

- The NPPF tests of soundness – it is not clearly justified (most appropriate strategy against alternatives), nor effective (deliverable given constraints), nor fully consistent with national policy on landscape, flood risk, safeguarding, BNG and BMV land.
- The strengthened duty under the CRow Act as amended to “seek to further” the purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape, which plainly extends to its gateways and setting.
- Policies on rural housing and services, which encourage small-scale development in a wider range of villages to support services, rather than concentrating disproportionate growth in a single location that largely serves commuter demand.

2.15 Proposals in the Local Development Plan

The proposed allocation at Kemble is inconsistent with:

- The adopted Local Plan, including:
 - o Policy EN4 and EN6 on landscape and SLAs, which seek to avoid significant harm to the Kemble & Ewen SLA and to maintain settlement pattern and key views; and
 - o The conclusions of the SHELAA, which found K8 to be of High landscape sensitivity and “currently unsuitable for allocation”.
- The Kemble & Ewen Neighbourhood Development Plan, which is based on:
 - o Modest, incremental growth;
 - o Protection of key open spaces and the village’s setting; and
 - o Reinforcement of the village’s scale and character, not wholesale expansion across the railway.

To now promote a strategic allocation that effectively reverses those adopted positions without robust new evidence undermines the credibility of the plan-led system at local level.

2.16 Previous planning decisions (including appeal decisions)

Recent decision-making shows how sensitive this landscape is, even for very small schemes:

- At Bittenham Springs, Ewen, the Inspector only allowed a single annex because it would be barely perceptible and have negligible impact on the SLA and Conservation Area.
- At Stanmore House, Ewen, an appeal for just three dwellings was dismissed partly due to harm to the Kemble & Ewen SLA's "gentle transitional" character and gappy linear settlement pattern.
- At New Covert, Ewen, CDC emphasised that, even outside the SLA boundary, the SLA's special character was a material consideration requiring careful design and limited scale.

It is very difficult to reconcile:

- CDC's and Inspectors' stance that even one annex or three dwellings can be problematic in or near this SLA;
- With the suggestion that hundreds of dwellings on a far more prominent, gateway site at Kemble are acceptable under the very same policy framework.

Previous decisions and evidence therefore strongly support the conclusion that a strategic allocation at Kemble on land including K8 is not appropriate, not justified and not consistent with the adopted development plan or with national policy.

Comment ID: 9972

Location in consultation document: The Council's preferred option

Name: Luke

Comment: Spatial option – why CDC's preferred strategy is the wrong choice and unsound

1.1 Legal and policy context in brief

Cotswold District is unusually constrained: around 80% of the District lies within the Cotswolds National Landscape (formerly the Cotswolds AONB), a fact acknowledged in CDC's existing Local Plan and in its recent housing evidence as a major constraint on accommodating growth within the District as a whole (Cotswold District Local Plan 2011–2031, "Portrait of Cotswold"; AECOM, Review of the Cotswold District Local Plan 2011–2031 Housing Requirement, August 2023).

Section 85 of the Countryside and Rights of Way Act 2000, as amended by section 245 of the Levelling-up and Regeneration Act 2023, now requires that:

"A relevant authority... shall in exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, seek to further the purpose of conserving and enhancing the natural beauty of the area."

(CRoW Act 2000, s 85 as amended by LURA 2023, s 245).

This is a strengthened duty, replacing the previous requirement merely to "have regard to" the AONB purpose. Government and National Landscapes Association material make clear that "seek to further" is intended to impose a more demanding, proactive obligation on plan-makers and decision-makers, while not amounting to an absolute bar on development in protected landscapes (Defra/LURA 2023 implementation guidance; National Landscapes Association guidance on the new duty).

In parallel, the National Planning Policy Framework (NPPF 2023/2024):

- Requires that "great weight" is given to conserving and enhancing landscape and scenic beauty in National Parks and AONBs/National Landscapes, which "have the highest status of protection in relation to these issues" (NPPF paras 176–177 / equivalent); and
- Applies a specific test for "major development" in these areas: such development should be refused other than in exceptional circumstances and where it is in the public interest, taking into account the need for the development, the cost of and scope for alternatives outside the designated area, and the extent of any harm and its mitigation (NPPF para 177 / equivalent).

At the same time, the NPPF's plan-making policies require Local Plans to be:

- Positively prepared – meeting objectively assessed needs as far as consistent with the NPPF;
- Justified – “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”;
- Effective – deliverable over the plan period; and
- Consistent with national policy – enabling sustainable development in accordance with the Framework (NPPF paras 11 and 35).

The Cotswolds National Landscape Management Plan and published guidance further emphasise that:

- The strengthened duty applies not only to decisions within the National Landscape boundary but to any function that “affects” it – including Plan allocations and large developments in its setting and gateways; and
- “Natural beauty” is understood broadly, to include landscape, settlement pattern, heritage and the social and economic well-being of communities (Cotswolds National Landscape Management Plan; Cotswolds National Landscape Board “seek to further” duty guidance).

The importance of properly applying the new duty has already been underlined by the Dedham Vale National Landscape judicial review, where the Secretary of State accepted that failing to apply the strengthened duty when granting permission for a car park scheme was an error of law, and consented to the decision being quashed and remitted (see, for example, Campaign for National Parks and Landmark Chambers case summaries on the Dedham Vale litigation).

Most significantly for CDC, recent Secretary of State housing decisions within and adjacent to the Cotswolds AONB – notably Highfield Farm, Tetbury and Oakley Farm, Cheltenham – show that the NPPF “major development” policy is a balanced test, not a blanket prohibition. In those cases, substantial housing development within or on the edge of the Cotswolds AONB was allowed where:

- There was a serious shortfall in market and affordable housing;
- There were limited realistic alternatives outside the AONB; and
- Strong landscape and design mitigation was secured (Secretary of State decision, Highfield Farm, Tetbury, APP/F1610/A/12/2173305, decision 13 February 2013; Secretary of State decision, Oakley Farm, Cheltenham, APP/B1605/W/21/3273053, decision 5 October 2022).

In other words:

- The new duty and NPPF policies raise the bar for major development in National Landscapes; but
- They do not justify treating the AONB as an absolute “no-go” area for housing or as a reason to concentrate almost all growth in the remaining 20% of the District.

1.2 CDC’s handling of Scenario 6 and reasonable alternatives

CDC’s own Development Strategy Options Topic Paper (November 2025) and Preferred Options material indicate that:

- Several spatial scenarios were tested (Scenarios 1–7);
- Only Scenario 6, which explicitly included the possibility of some major development within the Cotswolds National Landscape, would meet the full updated housing requirement of approximately 18,650 dwellings to 2043 (CDC Local Plan Review Preferred Options and Topic Papers); and
- Scenario 6 has nonetheless been discounted at an early stage on the basis that it would be “contrary to national planning policy”.

From what I have seen, there does not appear to be a full, side-by-side comparison of Scenario 6 with the other options in the Sustainability Appraisal / SEA, nor any detailed exploration of whether:

- A carefully targeted pattern of small and medium-scale allocations within the AONB, genuinely meeting local housing needs in particular villages, could satisfy the NPPF “exceptional circumstances” and public interest test; or
- A mixed strategy, combining modest AONB allocations with non-AONB growth and cross-boundary working, would better balance landscape protection, local needs and deliverability.

Instead, by ruling out Scenario 6 in principle as “contrary to national policy”, CDC seems to have self-limited its consideration of reasonable alternatives.

Under the Environmental Assessment of Plans and Programmes Regulations 2004 and the associated Planning Practice Guidance on Sustainability Appraisal/SEA, plan-making authorities are expected to:

- Identify and assess “reasonable alternatives” to the preferred strategy; and
- Avoid artificially constraining the range of options in a way that predetermines the outcome (Environmental Assessment of Plans and Programmes Regulations 2004, regs 8–12; PPG “Strategic environmental assessment and sustainability appraisal”).

It is hard, as a resident, not to conclude that:

- CDC has effectively defined national policy more rigidly than the NPPF and case law require; and
- Then used that self-imposed constraint to disregard the only scenario that would meet full needs without dumping disproportionate growth into a small number of non-AONB locations like Kemble.

1.3 Misuse of the AONB/National Landscape duty and “major development” test

The way CDC appears to have applied the strengthened section 85 duty and NPPF “major development” policy has two problematic consequences.

First, by treating major development within the Cotswolds National Landscape as almost automatically unacceptable, CDC has:

- Failed to recognise that the NPPF’s exceptional circumstances/public interest test is capable of being met, as illustrated by Highfield Farm, Tetbury and Oakley Farm, Cheltenham; and
- Failed to grapple with the reality that, in a District where 80% of land is designated, an entirely “AONB-free” solution is neither realistic nor consistent with the objective of meeting housing needs in different parts of the area (NPPF paras 60–65).

Second, CDC’s approach appears to ignore the “affects” limb of the new duty. Section 85, as amended, applies not only when a function is exercised “in relation to” land within the National Landscape, but also where it is exercised “so as to affect” such land. That plainly includes:

- Allocating very large housing sites immediately adjacent to, or at gateways to, the Cotswolds National Landscape; and
- Choosing a spatial strategy that concentrates the majority of growth at the edges of the designation rather than dispersing it more sensitively.

Kemble is a prime example. Although the village itself just falls outside the mapped National Landscape boundary, the Kemble & Ewen Special Landscape Area (SLA) is explicitly described by CDC’s own landscape consultants as:

- A “gentle transitional landscape between the Cotswolds dip slope to the north and the Thames Valley to the south”; and
- Forming the southern edge of the dip slope which continues north into the Cotswolds AONB, with Kemble and Ewen having a clear sense of unity with the Cotswolds to the north (Cotswold District Special Landscape Areas Review, White Consultants, 2017, Kemble & Ewen SLA section).

In practical terms, this means that:

- Large-scale development on land including K8 is not just a local landscape issue; it directly affects the setting and gateway of the Cotswolds National Landscape along the A429; and
- The strengthened duty requires CDC to “seek to further” the conservation and enhancement of that National Landscape when deciding how much growth to place here – not simply to rely on the fact that the line on the AONB map is a short distance away.

From my reading of the Preferred Options material, CDC has largely used the high proportion of AONB land as a reason to push growth into the remaining 20%, rather than as a prompt to think creatively about:

- Small, well-designed schemes within AONB villages which genuinely meet local need and can be shown to satisfy the NPPF major development test; and
- A more balanced distribution of growth between AONB and non-AONB areas, and across different parts of the District.

1.4 Ignoring successful approaches in other highly constrained authorities

Other authorities with high AONB coverage have adopted more nuanced strategies that CDC appears not to have seriously explored.

For example:

- The Arnside & Silverdale AONB Development Plan Document (Lancaster City Council/South Lakeland District Council) includes small, locally-needed allocations within the AONB itself, alongside strong landscape protection policies. Those allocations are justified precisely because they support the viability of particular communities and services within the designated landscape.
- West Oxfordshire District Council’s Local Plan uses AONB sub-areas (such as the Burford–Charlbury sub-area of the Cotswolds AONB) and takes explicit account of localised housing need within those sub-areas, with Inspectors making clear in appeal decisions that:
 - o Where there is no identified local need in a given AONB sub-area, district-wide housing pressures do not automatically justify further AONB harm; but
 - o Conversely, modest development that genuinely meets local needs within an AONB community can be acceptable, even where landscape impacts require careful management (West Oxfordshire DC Local Plan and examination material; Cotswolds National Landscape housing/appeal position papers).

The common features of these approaches are that they:

- Do not treat the AONB as completely off-limits;

- Do not concentrate almost all growth into one portion of the authority simply because it lies outside the designation; and
- Do seek to match housing provision to local needs in different parts of the protected landscape, thereby supporting schools and services in a wider range of villages.

By contrast, CDC's current strategy appears to:

- Minimise allocations within AONB settlements, even where there is clear evidence of acute affordability and service pressures; and
- Place very large, estate-scale growth in a limited band of non-AONB locations, including Kemble, which are themselves closely tied to the character and setting of the Cotswolds National Landscape.

1.5 Consequences: "dumping" growth and failing local communities

From a resident's perspective, the combined effect of CDC's choices is that:

- The non-AONB portion of the District is treated as a "sacrifice zone", expected to absorb a disproportionate share of the new housing simply because it lies outside the line on the map;
- AONB communities with serious housing and service pressures – for example Northleach, Bourton-on-the-Water, Bledington, Upper Rissington, Chipping Campden, Bibury, North Cerney, Stow-on-the-Wold and Quenington – receive relatively little directly targeted, small-scale housing to meet their own needs; and
- Non-AONB settlements such as South Cerney, Lechlade and Poulton also see their local needs sidelined in favour of large strategic allocations at Kemble and around Cirencester.

This is particularly problematic at Kemble, because:

- The village lies on the edge of the Cotswolds National Landscape and within the Kemble & Ewen SLA, which has been identified by CDC's own evidence as a key gateway and transitional landscape to the AONB; and
- The scale of growth proposed (around 590 dwellings within the Plan period and a further ~480 beyond) would increase the village by around 160%, effectively turning it into a much larger commuter settlement driven by the London rail link, rather than modestly meeting local rural needs.

In my view, a strategy which:

- Avoids grappling with the NPPF “major development” test in the AONB, despite High Court and Secretary of State decisions showing it can be satisfied in appropriate cases;
- Rejects Scenario 6 in principle instead of testing it properly as a reasonable alternative; and
- Then loads growth onto edge-of-AONB locations like Kemble without robust justification,

cannot sensibly be described as “positively prepared”, “justified” or “consistent with national policy”.

It also does not, in spirit or practice, “seek to further” the conservation and enhancement of the Cotswolds National Landscape across the whole District, as the amended section 85 duty requires. Instead, it risks:

- Allowing the social and economic health of many AONB villages to deteriorate further, with schools and services under-supported; while
- Overwhelming a small non-AONB village at a key gateway, compromising the very landscape and settlement character that the National Landscape designation exists to protect.

For these reasons, I consider CDC’s chosen spatial option to be the wrong choice in principle, and certainly not a sound basis for loading a strategic housing allocation onto Kemble and the land including K8.

Comment ID: 8684

Location in consultation document: Increasing density

Name: Lynn Ferris

Comment: It is a shame that all the housing being proposed never includes appartment dwellings to maximise land usage, the US are particularly good as this, car ports and storage below ground level and three or four stories above set out with shared space

Comment ID: 10084

Location in consultation document: Employment and commercial development needs

Name: Lynne

Comment: Despite Moreton in Marsh doubling in size over the last twenty years, little or no effort has been made to develop the necessary infrastructure. The risk of flooding continues, with warnings from the Environment Agency a regular occurrence. Raw sewage is pumped into the rivers at an unacceptable level. Doctors and. Doctors have been put under an unreasonable strain to provide medical care. Opportunities for new employment remain limited, and parking remains an unresolved issue after fifteen years. Despite being a 'principal settlement', Moreton only has a primary school with no secondary education within walking distance. The list goes on, with no effort given to encourage improvements in standards.

Comment ID: 10085

Location in consultation document: Infrastructure needs

Name: Lynne

Comment: Despite Moreton in Marsh doubling in size over the past twenty years, why hasn't any additional infrastructure been instigated? This should include schooling, traffic calming, parking, sewage, pavements/footpaths, and entertainment, to name but a few.

Comment ID: 10083

Location in consultation document: Question 4

Name: Lynne

Comment: Developing the Cotswolds to the extent proposed by the Government would be counterproductive. The area's popularity as a tourist destination stems from its rich history, historic buildings, and farmed countryside, which have been cultivated over centuries. The Government's plan to wipe out this heritage in less than twenty years would create an urban landscape that would not attract tourists and significantly reduce foreign income. While the area has a diverse range of businesses, many of which rely directly or indirectly on tourism, the proposed level of urbanisation would destroy the goose that lays this golden egg of tourism, not just for the Cotswolds but for the entire country. It's important to remember that tourism is the UK's second-largest source of income, after financial services.

Comment ID: 10081

Location in consultation document: Table 2

Name: Lynne

Comment: Kemble is comparatively underdeveloped and not in an Area of Outstanding Natural Beauty. However, it has a train service to London in just over an hour and a train travel time of less than three quarters of an hour to Cheltenham. There's also easy access to the M4, which leads to Oxford, London, and Bristol.

Currently, the privately owned Cotswold Airport, a 532-acre underused site, is primarily used for leisure and only open six days a week. If this site were developed with medium-density housing, it could provide around four thousand homes in the region.

Considering the 'Cotswold Airport' site could reduce the pressure on other sites like Moreton in Marsh, which is already due for overdevelopment. Moreton lacks the speedy access to London and other major employment areas and struggles with inadequate infrastructure to support its current population.

Comment ID: 750

Email/Letter Representation

Name: L A Benham

Comment: [Click here to view full comment](#)

Comment ID: 638

Email/Letter Representation

Name: L. A. Benham

Comment: [Click here to view full comment](#)

Comment ID: 450

Email/Letter Representation

Name: Lana Tricker

Comment: [Click here to view full comment](#)

Comment ID: 163

Email/Letter Representation

Name: Lattimore

Comment: [Click here to view full comment](#)

Comment ID: 239

Email/Letter Representation

Name: Laura Holt

Comment: [Click here to view full comment](#)

Comment ID: 411

Email/Letter Representation

Name: Laura Hopkins

Comment: [Click here to view full comment](#)

Comment ID: 226

Email/Letter Representation

Name: Lechlade on Thames Town Council

Comment: [Click here to view full comment](#)

Comment ID: 235

Email/Letter Representation

Name: Lila Walton

Comment: [Click here to view full comment](#)

Comment ID: 392

Email/Letter Representation

Name: Linda Alderslade

Comment: [Click here to view full comment](#)

Comment ID: 119

Email/Letter Representation

Name: Linda Benatar

Comment: [Click here to view full comment](#)

Comment ID: 494

Email/Letter Representation

Name: Lindsay Raphael

Comment: [Click here to view full comment](#)

Comment ID: 111

Email/Letter Representation

Name: Lindsey Boyden

Comment: [Click here to view full comment](#)

Comment ID: 118

Email/Letter Representation

Name: Lindsey Boyden

Comment: [Click here to view full comment](#)

Comment ID: 793

Email/Letter Representation

Name: Lis Courtown

Comment: [Click here to view full comment](#)

Comment ID: 101

Email/Letter Representation

Name: Lisa Collins

Comment: [Click here to view full comment](#)

Comment ID: 444

Email/Letter Representation

Name: Lisa Collins

Comment: [Click here to view full comment](#)

Comment ID: 473

Email/Letter Representation

Name: Lisa Collins

Comment: [Click here to view full comment](#)

Comment ID: 573

Email/Letter Representation

Name: Lisa Collins

Comment: [Click here to view full comment](#)

Comment ID: 756

Email/Letter Representation

Name: Lisa Collins

Comment: [Click here to view full comment](#)

Comment ID: 723

Email/Letter Representation

Name: Liza Narracott

Comment: [Click here to view full comment](#)

Comment ID: 428

Email/Letter Representation

Name: Lorraine & Kieth Townsend

Comment: [Click here to view full comment](#)

Comment ID: 552

Email/Letter Representation

Name: Lorraine O'Connor

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