

YOUR  
**COTSWOLD**  
YOUR **PLAN**

CREATING A FUTURE  
THAT IS GREEN TO THE CORE



**Cotswold District Local Plan  
Update Consultation:  
Development Strategy and Site  
Allocations Plan (2026-41)**

Summary of Consultation  
Representations

Town and Country Planning (Local Planning)  
Regulations 2012  
Regulation 18 consultation  
1 February 2024 to 7 April 2024

## Contents

<b>Introduction</b> .....	1
What will happen next? .....	1
<b>Summary of responses to the Local Plan consultation survey questions on the Vision, Objectives and Development Strategy Options</b> .....	2
<b>Summary of feedback on the draft Vision, Objectives and Development Strategy Options Topic Paper</b> .....	12
Executive Summary .....	12
Implications of extending the Local Plan period to 2041 .....	13
Extended Local Plan Period .....	13
Vision and Objectives.....	13
Development Needs .....	14
Land Supply.....	14
<b>Vision and Objectives</b> .....	15
Proposed updates to the adopted Local Plan Vision .....	15
<i>For the supporting text of Proposed updates to the adopted Local Plan Vision, you said (3 comments received):</i> .....	16
Proposed updates to the adopted Local Plan Objectives .....	16
<i>For the supporting text of the Proposed updates to the adopted Local Plan Objectives, you said (11 comments received):</i> .....	16
<b>Proposed new Development Strategy (done by Development Strategy and Site Allocations Plan 2026-41)</b> .....	17
Development Strategy Options.....	19
<b>Preferred Development Strategy and Broad Locations for Growth</b> .....	24

## Introduction

Cotswold District Council is partially updating its adopted Local Plan to make it “Green to the Core”. The adopted Local Plan covers a period from 2011 to 2031. At the same time, the Council is also considering need for different types of development and supporting infrastructure beyond 2031 and options for how these may be delivered, which forms part of a Development Strategy and Site Allocations Plan – work on this commenced in January 2024.

The Council undertook a Local Plan consultation between 1 February 2024 and 7 April 2024 on the Development Strategy and Site Allocations Plan. This was the first consultation on this Local Plan, a is formally as a Regulation 18 ‘Issues and Options’ consultation. The consultation considered the vision and objectives of the Local Plan; the Local Plan period; development needs, requirements and land supply; and development strategy options for accommodating planned growth.

This document summarises the consultation responses that were received on:

- the [survey questions on the draft Vision, Objectives and Development Strategy Options](#); and
- Feedback on the [Vision, Objectives and Development Strategy Options Topic Paper](#).

The full consultation responses are published alongside this summary report. A separate report also summarises the responses to the Local Plan Partial Update draft policies.

The assessment of sites submitted through the ‘Call for Sites’, which ran throughout the consultation period, will be presented in the forthcoming update to the Council’s Strategic Housing and Economic Land Availability Assessment.

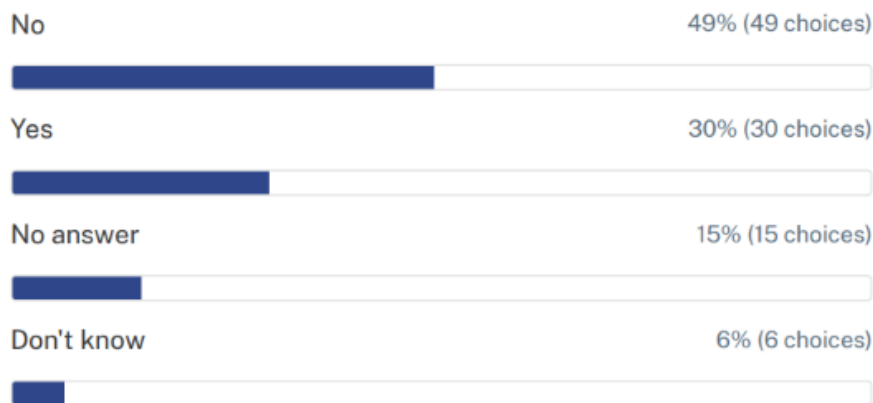
Please note, this report provides a summary of the consultation responses and feedback. AI has been used to assist in the summarisation process. The full comments / consultation feedback will be considered when policies are updated / produced.

### What will happen next?

The Council will consider the full consultation representations, as well as further evidence studies, to produce a draft Development Strategy and Site Allocation Plan. The draft Local Plan will undergo at least one (possibly more) further round of public consultation and you will be able to see and comment on this before the Local Plan is submitted to the Planning Inspectorate for an independent examination in public.

# Summary of responses to the Local Plan consultation survey questions on the Vision, Objectives and Development Strategy Options

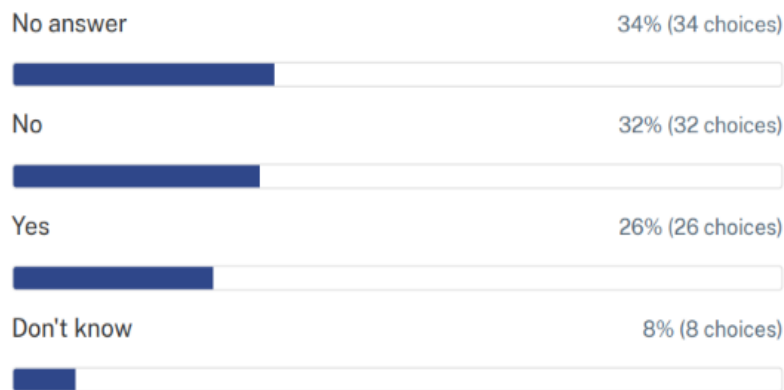
## Dev Strategy Q1: Do you agree with the draft Vision? Yes / No / Don't Know



## Dev Strategy Q2: Tell us more about why you agree or disagree with the draft Vision.

1. Respondents expressed a range of views, with a significant emphasis on concerns about infrastructure and the impact of new housing developments. Many respondents are worried about the strain on existing infrastructure, such as roads, sewage, healthcare, and parking, due to proposed housing increases, particularly in Moreton-in-Marsh. There is a call for improvements to be made before further development is allowed.
2. The need to protect the rural character and environment of the Cotswolds was also highlighted, with concerns about overdevelopment in rural areas and its impact on wildlife and green spaces. Some respondents suggested that the vision should include a stronger commitment to environmental goals and addressing climate change.
3. There were mixed views on the draft vision itself, with some agreeing that it is a logical progression from previous plans, while others argued that it should be more aspirational and clearly define where the administration is heading. The need for a diverse range of housing to meet community needs was mentioned, including affordable homes and specialist accommodation for different sectors of the community, such as older people. The importance of creating healthy, sustainable communities was also noted.
4. Several responses indicated that the vision should not only focus on Cirencester but also consider other towns and villages within the district. In summary, respondents are calling for a balanced approach that addresses infrastructure needs, protects the rural character and environment, ensures a diverse range of housing, and has a clear aspirational vision for the future. There is a strong desire for development to be sustainable and considerate of the unique characteristics of the Cotswolds.

**Dev Strategy Q3: Do you agree with the draft Objectives? Yes / No / Don't Know**

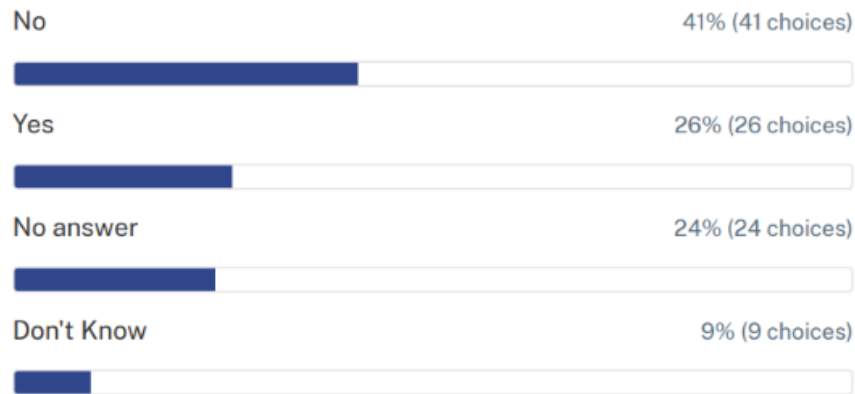


**Dev Strategy Q4: Tell us more about why you agree or disagree with the draft objectives**

1. Respondents expressed a range of concerns and suggestions regarding the draft objectives. A recurring theme is the need for housing development to prioritise local needs, with emphasis on social housing, affordable homes, and smaller properties for downsizing. Many are worried about overdevelopment and its impact on infrastructure, such as flooding and sewage capacity, and the preservation of the Cotswolds' distinct rural character.
2. The importance of biodiversity net gain and environmental protection is highlighted, but some question the practicality of these objectives without clear implementation strategies. There is also a call for more explicit definitions and measurable criteria for objectives like creating high-quality jobs.
3. Concerns about the focus on Cirencester to the detriment of northern settlements are mentioned, with suggestions that service provision should be distributed more evenly across the district. The need for sustainable development that accounts for environmental impacts such as air quality and flood risk is also stressed.
4. Several responses call for a clearer commitment to renewable energy schemes and zero-carbon development, though some note the challenges posed by current building regulations. The potential disconnect between objectives and policy wording, as well as the dual consultation process, is a concern for ensuring that objectives are effectively delivered.
5. A few respondents agree with the draft objectives without objection, while others believe that additional green objectives are merely a box-ticking exercise without real impact. The need for more imaginative and diverse housing that addresses risks such as flooding and traffic congestion is also mentioned.
6. Overall, there is a clear desire for development that is sensitive to local needs, environmentally sustainable, and well-integrated with necessary infrastructure and services. Respondents advocate for careful planning that ensures the Cotswolds' beauty and character are preserved while addressing the housing needs of local communities.

**We have identified eight development strategy scenarios that could accommodate additional development up to 2041. A combination of scenarios 1, 2, 6 and 7 is being proposed to accommodate additional development needs up to 2041.**

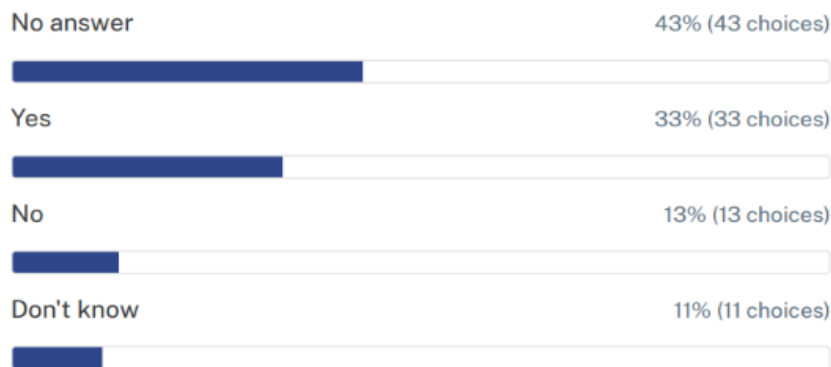
**Dev Strategy Q5: Do you agree with the proposed development strategy (scenario combination)? Yes / No / Don't Know**



**Dev Strategy Q6: Tell us more about why you agree or disagree.**

1. Respondents expressed a range of views, with a notable emphasis on concerns about infrastructure, particularly in relation to water services and traffic management. Many respondents are worried about the impact of new developments on existing services and the environment, with several highlighting the inadequacy of Thames Water's services. There is a recurring theme of opposition to overdevelopment, especially in Moreton-in-Marsh, where respondents fear it could spoil the town's character and strain resources.
2. Several respondents suggest that development should be more dispersed across the district to support smaller communities and avoid concentrating pressure on infrastructure in a few areas. The idea of a Garden Village is debated, with some arguing that Moreton does not fit the criteria and suggesting alternative locations like Kemble or Bledington.
3. The need for a balanced approach to housing distribution is emphasised, with calls for development to prioritise sustainable locations and consider the provision of affordable housing. Some respondents feel the current strategy does not adequately address the need for social housing or local people's desires.
4. There is also a sentiment that the strategy should not only focus on growth around transport nodes but also consider the vitality of smaller settlements and their ability to support local services. A few responses suggest that neighbouring authorities could take on some of the housing needs to alleviate pressure on Cotswold District.
5. Overall, while there is some support for the proposed combination of development scenarios, there is a call for a more nuanced approach that takes into account the unique challenges of rural communities, infrastructure capacity, and environmental considerations.

**Dev Strategy Q7: Are there any other scenarios that should be considered? Yes / No / Don't Know**



**Dev Strategy Q8: If you answered 'yes' to the above question, please tell us what other scenarios you think should be considered.**

1. Respondents expressed a variety of views on how development should be approached in their area. A recurring theme is the need for infrastructure improvements before or alongside any new development. There is a concern about the lack of public transport in rural areas and scepticism about the feasibility of clustered villages linked by common public transport services.
2. Several respondents suggest that development should be spread more evenly across the district, rather than focusing on a few areas. There is also a call for new towns or small settlements with their own facilities, and for considering village clusters to allow local people to remain in their communities.
3. The importance of preserving the countryside and avoiding development on green fields is highlighted by some respondents. There is also resistance to more buildings and developments in certain areas, with calls to avoid overburdening particular locations.
4. A few responses indicate that specific scenarios, such as 3 and 5, should be considered, while others suggest that brownfield sites within existing developments could be an option while others suggest that brownfield sites within existing developments could be an option. The need for a balanced economic and housing growth strategy that supports sustainability and reduces dependence on inadequate public transport is also mentioned.
5. Overall, there is a clear desire for a thoughtful approach to development that considers infrastructure, evenly distributes growth, preserves rural communities and the environment, and addresses the specific needs of different areas within the district.

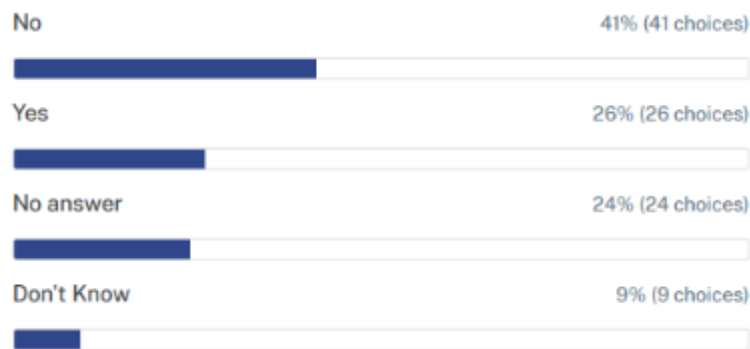
**If you answered yes to the above question, please tell us where**

1. Respondents have proposed various locations for residential, industrial, and mixed-use developments, with a focus on sustainable growth and the preservation of local character. Several submissions suggest expanding existing settlements northwards, such as in Tetbury, or developing on specific sites like Totterdown Hill in Fairford, Land North of the Knoll in Kempsford, and areas in Moreton-in-Marsh. There is also interest in redeveloping existing industrial estates, such as the one on Cirencester Road in Tetbury.
2. Some respondents have reconfirmed the availability of previously submitted sites for development, like the land to the rear of Templefields and Crossfields in Andoversford and land northwest of Highfield Cottage in Tetbury. There are also mentions of new housing developments that consider

low carbon and healthy living, as seen in Evenlode Road, and proposals for affordable housing in Blockley.

3. A few responses highlight the importance of small-scale developments and the need for a variety of housing types to support small and medium-sized builders. There is also a call for the allocation of land for Local Green Spaces to preserve community areas.
4. However, not all respondents are in favour of development; one explicitly states opposition to any new development in Moreton-in-Marsh, citing an already fair share of development in recent years.
5. Overall, the responses indicate a preference for strategic and sustainable development that supports local needs, with a mix of residential and employment uses, while also considering the impact on the environment and local services.

**Dev Strategy Q9: Do you agree with the proposed development strategy? Yes / No / Don't Know**



**Dev Strategy Q10: Tell us more about why you agree or disagree with the proposed development strategy.**

1. Respondents expressed a range of views, with a notable emphasis on concerns about infrastructure, particularly in relation to water services and traffic management. Many respondents are worried about the impact of new developments on existing services and the environment, with several highlighting the inadequacy of Thames Water's services. There is a recurring theme of opposition to overdevelopment, especially in Moreton-in-Marsh, where respondents fear it could spoil the town's character and strain resources.
2. Several respondents suggest that development should be more dispersed across the district to support smaller communities and avoid concentrating pressure on infrastructure in a few areas. The idea of a Garden Village is debated, with some arguing that Moreton does not fit the criteria and suggesting alternative locations like Kemble or Bledington.
3. The need for a balanced approach to housing distribution is emphasised, with calls for development to prioritize sustainable locations and consider the provision of affordable housing. Some respondents feel that the current strategy does not adequately address the need for social housing or the desires of local people.
4. There is also a sentiment that the strategy should not only focus on growth around transport nodes but also consider the vitality of smaller settlements and their ability to support local services. A few responses suggest that neighbouring authorities could take on some of the housing needs to alleviate pressure on the Cotswold District.
5. Overall, while there is some support for the proposed combination of development scenarios,



there is a clear call for a more nuanced approach that takes into account the unique challenges of rural communities, infrastructure capacity, and environmental considerations.

**Dev Strategy Q11: Do you know of any land that is available for development and/or designation?**

- Market homes
- Affordable homes
- Gypsy and traveller pitches
- Other types of residential development
- Employment development (e.g. office, industrial or storage and distribution uses)
- Other commercial development (e.g. retail, other town centre uses, etc.)
- Renewable energy infrastructure / facilities (see policy CC2)
- A Local Green Space (should any land be designated as a Local Green Space?)

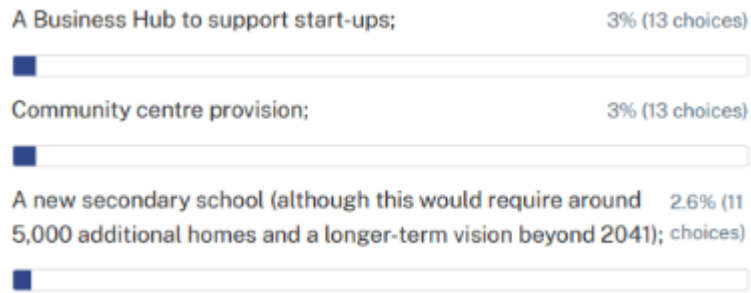


**Dev Strategy Q12: If you answered yes, please tell us where. Where you are able to please complete a 'call for sites' form - <https://www.cotswold.gov.uk/planning-and-building/planning-policy/strategic-housing-and-economic-land-availability-assessment/>)**

Please note, the results of the Call for Sites will be presented separately in the forthcoming update to the Council's Strategic Housing and Economic Land Availability Assessment.

**Dev Strategy Q13: Moreton is being considered as a potential location to meet future housing and economic needs. We believe the following infrastructure is essential and would need to be provided alongside new growth. Please indicate what infrastructure is important to you. Tick all those that apply:**





**Dev Strategy Q14: Please tell us if there is any other infrastructure not listed in the previous question.**

1. Respondents raised several concerns and suggestions regarding infrastructure. A recurring theme is the need for improved traffic management, with many advocating for a new road to divert traffic away from town centres. There is also a call for better sustainable transport options, including reinstating bus services and improving cycling infrastructure.
2. Concerns about flooding and the need for effective flood management and wastewater treatment are frequently mentioned. There is scepticism about the need for additional housing and a preference for fixing current infrastructure issues before adding more homes.
3. Several respondents express the importance of medical and dental services, while others highlight the need for leisure facilities accessible to residents. The potential impact of development on local businesses and retail outlets is also a concern.
4. Some responses suggest that the existing primary school has spare capacity and that a new secondary school may not be necessary until beyond 2041. Green spaces and ecological enhancements are valued, with suggestions for integrated recreational areas and wildlife-friendly features.
5. There is also a sentiment that some infrastructure developments are needed now, rather than in the future, given the recent growth in Moreton. Lastly, there is a call for clarity on where new developments will be located and how they will integrate with existing transport systems.

**Dev Strategy Q15: If a new road were to be provided in Moreton-in-Marsh, what things would be important for you? Tick all those that apply:**



**Dev Strategy Q16: Please tell us if there is another important 'road' consideration not listed in the previous question.**

- I. Respondents to the 'Development Strategy, Vision and Objectives (2026 -41)' project have raised several concerns and suggestions regarding road considerations for Moreton. A common theme

is the need to alleviate traffic congestion, particularly in the town centre, with some advocating for a bypass or alternative routes to divert traffic, including HGVs. There is a call for clarity on proposed road locations and their impact on traffic flow, with some respondents highlighting the lack of information to make informed decisions.

2. Environmental concerns are also prominent, with worries about the impact of new roads on the local landscape, habitats, and designated areas such as the Cotswolds National Landscape. Some suggest that any new road should be landscape-led, possibly tree-lined or incorporating wildflower verges for biodiversity
3. The need for pedestrian and cycling infrastructure in conjunction with new roads is frequently mentioned, indicating a desire for sustainable transport options. There are also calls for consideration of the impact on nearby towns and villages, such as Stow-on-the-Wold, which could experience increased traffic and congestion as a result of development in Moreton.
4. Several respondents express concern about the practicality and deliverability of new roads, citing potential barriers such as railway lines, floodplains, and the availability of land for development. There is also a sentiment that new developments should not be restricted by the completion of road infrastructure.
5. Other considerations include the need for proper road maintenance post-construction, the potential for noise reduction measures, and the suggestion that new roads should cater specifically to HGVs to reduce town centre traffic.
6. Overall, respondents emphasise the importance of comprehensive planning that addresses traffic flow, environmental impact, and sustainable transport options while considering the broader implications for local communities and landscapes.

# Summary of feedback on the draft Vision, Objectives and Development Strategy Options Topic Paper

## Executive Summary

*For the supporting text of Executive Summary, you said (50 comments received):*

- 1. Housing Need and Distribution:** There is a theme of disagreement with the housing figures and distribution strategy proposed in the Local Plan Update. Several comments argue that the nationally calculated 'standard methodology' for calculating housing need is inappropriate given the Cotswold District's exceptional landscape and the issues of certain towns like Moreton-in-Marsh. Some respondents consider the proposed strategy's emphasis on Moreton as a growth area for around or over 1,500 homes to be disproportionate and a cause for under-delivery of affordable housing elsewhere. Some comments also call for the need for a full Local Plan review and renewed vision that equitably spreads housing across the district and addresses affordable housing shortages.
- 2. Infrastructure and Services Capacity:** Some comments express concerns about the capacity of infrastructure and services in relation to the proposed housing developments, particularly in Moreton-in-Marsh. Concerns include inadequacy of current sewage and wastewater systems, traffic congestion, insufficient public transport, lack of school places, and healthcare services. The perceived lack of infrastructure investment, alongside doubts about Thames Water's capacity to upgrade systems and challenges facing the provision of new roads, are seen as considerable barriers to accommodating new housing.
- 3. Environmental and Flooding Concerns:** Comments reflect growing apprehension about the environmental impact of proposed housing developments, specifically in relation to flooding, water management, and natural habitat loss. There is some scepticism about the potential mitigation measures for flooding, the environmental assessments for new development areas, and there are concerns about the irreversible damage to wildlife habitats and increased pollution. The proposed scale of growth in Moreton-in-Marsh is particularly noted as a contributor to potential flooding issues, which further compounds residents' apprehension about the developments.
- 4. Local Economy and Employment Opportunities:** Several comments highlight a disconnect between housing development and local employment opportunities, suggesting that the focus on housing does not adequately address the need for job creation. There is concern that without significant increases in local employment sites and business growth, residents will be forced to commute, negating the objective of reducing private vehicle use. The potential underutilisation of employment landscapes and the Plan's insufficient detail on proposed employment allocations are criticised for lacking strategy for long-term economic growth.
- 5. Transportation and Accessibility:** The inadequacy of the public transportation system alongside concerns about the increase in private vehicle usage resulting from the new housing development is a recurring theme. Comments suggest that Moreton-in-Marsh, despite having a railway station, doesn't offer sufficient transportation options to support the scale of development proposed. Residents cast doubt on the assumption that the railway station will significantly reduce car dependency and thus question the logic behind positioning Moreton as a growth area based on its transport hub status.
- 6. Quality of Life and Community Character:** The comments reveal a strong sentiment that the proposed housing expansions, particularly the increase of 1,500 homes in Moreton-in-Marsh,

would fundamentally alter the character and quality of life in the town. Residents are concerned about overcrowding, the loss of historic market town charm, and the destruction of the community fabric. The potential harm to local tourism, heritage, and residents' well-being due to increased development pressures are noted, with appeals to protect green spaces and maintain the rural identity of the area.

## Implications of extending the Local Plan period to 2041

*For the supporting text of Implications of extending the Local Plan period to 2041, you said (9 comments received):*

1. **Local Plan Timeframe and Period:** Comments reflect concerns about the proposed or existing local plan's duration and timeframe, specifically regarding whether the plan period should extend to 2041 or beyond to meet the 15-year minimum guideline from the National Planning Policy Framework. Several comments raise the issue that the current planning is unrealistic in its schedule and doesn't account for potential delays such as examinations, government changes, and housing need assessments.
2. **Consistency and Clarity:** Several comments emphasise the need for clarity and consistency within the Local Plan or between different planning documents. There is confusion among stakeholders about how different updates and revisions interact and the need for clear communication about the plan's objectives, timeframe, and relationship with other policies.
3. **Local Plan Strategy and Vision:** Comments suggest that a strategic vision is needed for addressing housing needs and supply, infrastructure challenges, and offering a clear direction for development in the Cotswold District. This includes the idea of combining updates into a single, cohesive Local Plan that aligns with strategic objectives.
4. **Development and Infrastructure:** Concerns are raised about the scale of development, particularly in the context of existing infrastructure capabilities. Some stakeholders are concerned about the impacts of proposed development on local communities, referencing the scale of development and infrastructure, such as transport, utilities, and community services.
5. **Efficiency and Resource Utilisation:** There is a viewpoint that suggests creating a new, extended Local Plan would be more efficient and resourceful than conducting partial reviews. This perspective focuses on the economic and practical benefits of a longer-term plan versus short-term updates.

## Extended Local Plan Period

*For the supporting text of Extended Local Plan Period, you said (2 comments received):*

1. **Local Plan Period Extension:** There is a suggestion that the Local Plan period should be extended beyond 2026-2041 to align with national guidelines, cover a longer timescale for strategic developments, and follow precedent from the previous plan period.

## Vision and Objectives

*For the supporting text of Vision and Objectives you said (13 comments received):*

1. **Housing Strategy and Development:** Several comments address concerns and viewpoints regarding housing strategies and development plans, including extension of planning periods, consideration of past over-delivery, and future growth scenarios for settlements like Lechlade.

2. **Environmental and Climate Considerations:** Comments reflect a desire for the Local Plan to strongly consider environmental and climate impacts. Specific concerns include the potential impact on floodplains, handling of sewage, carbon emission reduction, the Future Homes Standard, and broader environmental strategies related to net-zero carbon, biodiversity, retrofitting buildings, and reuse of buildings to minimize footprint.
3. **Vision and Objectives Alignment:** Several contributors commented on the vision and objectives of the Local Plan, suggesting amendments and expressing support for the inclusion of responding to the climate crisis, health and well-being, vibrant economy, delivering a net gain in biodiversity, and addressing the housing crisis with affordability and suitability considerations.
4. **Infrastructure and Services Concerns:** Comments bring forth concerns regarding the sufficiency of local services and infrastructure, such as medical facilities, to support the population growth expected from new housing developments. The need to review and potentially enhance infrastructure to accommodate additional residents is highlighted.
5. **Local Economy and Employment:** Concerns about the Local Plan's impact on the local economy and employment opportunities are discussed in the context of large-scale developments, suggesting the use of employment, training, and skills plans to foster job creation and local economic benefits.

## Development Needs

*For the supporting text of Development Needs, you said (6 comments received):*

1. **Housing Need Calculation:** Multiple comments discuss the method for calculating the housing needs within Cotswold District, specifically citing the Standard Method and its outcome of 493 dwellings per annum (dpa). Some comments suggest that due to factors like inward migration and affordability, this number could be higher, proposing at least 522 dpa. Additionally, the application of a degree of flexibility is mentioned, which could further increase the figures proposed.
2. **Government Policy and Consultation Response:** Commentary is made on the government's approach to past over-delivery of housing and how it should influence the current plan period. Although there was a consultation indicating that over-delivery might be deducted from future requirements, the latest National Planning Policy Framework (NPPF) has not included such a change. This suggests a level of uncertainty and advises that planning documents should be cautious in including such assumptions until there is more clarity from future policy changes.
3. **Local Agreement and Concern:** There is agreement among some respondents on the issues raised, and a concern is expressed about the localised impact of housing distribution within the district, questioning why Moreton is receiving a high number of houses.

## Land Supply

*For the supporting text of Land Supply, you said (6 comments received):*

1. **Housing Supply Shortfall:** Multiple comments express concern over an identified shortfall in housing supply for the 2026-2041 period, suggesting that the projected figures may be optimistic and that actual delivery might fall short of the targets due to over-reliance on uncertain factors such as windfall dwellings and the deliverability of strategic sites.
2. **Need for Additional Sites:** Comments indicate that in order to meet the 7,400 to 7,830 dwelling requirement, it is necessary to identify and allocate additional sites for housing beyond



what is currently planned, to account for deliverability issues and provide sufficient supply flexibility.

3. **Delivery of Affordable Housing:** The comments reflect concerns regarding the delivery of affordable housing, emphasising the local housing strategy's goal to increase the supply of affordable homes and the reliance on larger sites to fulfil the local need for affordable housing.
4. **Methodology and Calculations:** The comments discuss various critiques of the methodology used to calculate housing need, including issues with rounding figures, projections for windfall dwellings, and the completion rates at strategic sites, suggesting that these might lead to inaccurate supply estimates.
5. **Policy Consistency:** Comments express the necessity for the housing plan to be positively prepared and consistent with national policy as stated in the National Planning Policy Framework (NPPF), especially regarding providing a sufficient number of homes to meet the present and future need.

## Vision and Objectives

*For the supporting text of Vision and Objectives, you said (7 comments received):*

1. **Support for Vision and Objectives with Reservations:** The comments express broad support for the Council's Vision and Objectives regarding the inclusion of responses to the climate crisis, nature recovery, and sustainable developments. They reference compliance with national policies such as NPPF Paragraphs 8, 20, 96, 157, and 158. However, there are reservations about the feasibility and justification of including zero carbon obligations in new development projects, suggesting that net zero should be a long-term aspiration rather than an immediate requirement.
2. **Proposed Development Strategy Options:** There is a discussion around different development strategy scenarios, with a preference for Scenario 1, which involves non-strategic site allocations and growth focused on Principal Settlements. Comments mention the importance of leveraging existing services, facilities, and employment opportunities. There is also support for Scenario 7, which focuses growth around key public transport corridors and hubs, emphasising the benefits of sustainable travel options.
3. **Updating the Plan Period:** The comment supports updating the plan's vision period to 2041 to reflect the need for future growth but advises that if there are delays in the plan-making process, the period should extend to ensure a full 15-year scope from the adoption date as required by Paragraph 22 of the NPPF.
4. **Transport Capacity and Infrastructure Needs:** The comment raises concerns over the existing transport capacity with the growth focus on Moreton-in-Marsh (MiM). It suggests that major investment is needed for covering both East-West and North-South directions, including a ring road, addressing the fact that local employment areas extend beyond the current station's reach.
5. **General Agreement:** Two comments simply express agreement with earlier statements or find the information satisfactory, but without providing specific insights, they cannot be grouped under a more concrete theme.

## Proposed updates to the adopted Local Plan Vision

We proposed to update the adopted Local Plan Vision to include:

- Responding to the climate crisis;
- Providing more socially rented homes;
- Making the Local Plan Green to the Core;
- Supporting health and well-being; and
- Enabling a vibrant economy.

*For the supporting text of Proposed updates to the adopted Local Plan Vision, you said (3 comments received):*

1. **Response to Climate Change and Environmental Concerns:** Comments express support for acknowledging climate change and promoting nature recovery. Concerns are raised about the impacts of new housing developments on the environment, including risks of flooding and destruction of natural habitats, particularly considering recent flooding events and an outdated sewerage system in Moreton-in-Marsh.
2. **Housing Development and Infrastructure:** One comment questions the appropriateness of a proposed large housing development in Moreton-in-Marsh due to existing infrastructure challenges, such as an inadequate sewerage system and potential for increased flooding, suggesting that the focus on the town as a transport hub may be diverting attention from these issues.
3. **General Agreement with Priorities:** There is an expression of general agreement with the outlined priorities or sentiments conveyed in the other comments, but no additional specific concerns or support is detailed.

### Proposed updates to the adopted Local Plan Objectives

We also proposed to update to the adopted Local Plan Objectives to include:

- Zero carbon developments;
- Transitioning to a low carbon economy whilst maintaining a vibrant economy;
- Providing more opportunities to access affordable housing, particularly social rented housing;
- Delivering Biodiversity Net Gain;
- Ensuring that development supports positive health outcomes; and
- Reducing transport carbon emissions.

*For the supporting text of the Proposed updates to the adopted Local Plan Objectives, you said (11 comments received):*

1. **Environmental Concerns and Sustainability:** Several comments express the need for environmental preservation and enhancement, with specific focus on compliance with legislations like DEFRA's Environment Act and active involvement in biodiversity conservation. The importance of sustainable travel and transport decarbonisation strategies is highlighted, with suggestions to include references to reducing car use and ensuring transportation development aligns with the fiscal and environmental needs of the area. There are concerns over ensuring that 'zero carbon' initiatives genuinely reflect their intent and caution is advised to prevent an increase in flood risk due to new developments.
2. **Housing and Social Infrastructure:** Comments emphasise the importance of social rented housing to create balanced communities and insist on the need for evidential support in housing policies to meet standards of soundness. Furthermore, there is a call to reassess the infrastructure

development plan (IDP) to ensure it addresses local community needs rather than unrelated projects. Proper planning to avoid increasing flood risks with new developments is also deemed essential.

3. **Transportation and Connectivity:** Comments underline the significance of developing an effective transport hub to enhance local and regional connectivity, particularly through public transport connections. The necessity of adequate transportation links for new businesses, and an emphasis on rail development to reduce car use, are also brought forward.
4. **Local Plan Clarity and Strategy:** There are calls for clarification on whether certain transport decarbonisation reports would be part of the evidence base for the updated Local Plan. It is also suggested that amendments be made to reflect more of an ensuring stance towards objectives such as sustainable travel within the Local Plan.
5. **General Agreement and Support:** A few comments display agreement with proposed changes without specifying further details or concurring with the overall direction of the discussed policies.

## Proposed new Development Strategy (done by Development Strategy and Site Allocations Plan 2026-41)

We proposed eight development strategy options to accommodate additional development requirements up to 2041. These were:

- **Scenario 1: Additional non-strategic site allocations:** This option would roll forward the adopted Local Plan development strategy of focussing the majority of additional growth at Principal Settlements, including allocating some sites outside existing development boundaries. The supporting evidence for identifying Principal Settlements would be updated. This may result in some settlements no longer being a Principal Settlement and / or other settlements becoming a Principal Settlement.
- **Scenario 2: Main service centre focus:** This option would focus the majority of future development (beyond existing commitments) at main service centres. The main services centres have not yet been determined but they would offer the greatest range of services and facilities, public transport accessibility and employment provision.
- **Scenario 3: Dispersed growth:** This option would disperse development across the district across larger and smaller settlements.
- **Scenario 4: Village clusters:** Like Scenario 3, this option would also disperse growth. However, settlements would be considered collectively in small groups or 'clusters' based on their combined offer of services, facilities, employment provision and transport accessibility. Each village 'cluster' would then be the focus for an appropriate and proportionate amount of growth.
- **Scenario 5: New settlement(s):** This option would initiate the development of one or more new settlements in the district. The new settlement(s) would grow to include all the services, facilities, employment provision and accessibility standards found within a Main Service Centre. The size criteria of the new settlement and the potential location are yet to be determined.
- **Scenario 6: New strategic site(s):** This option would deliver one or more new strategic sites at a Principal Settlement(s) at a level that meets Main Service Centre expectations. As with a new settlement, strategic sites have a long lead in time from conception of the idea to

the first spade being put in the ground. A new strategic site(s) would therefore be expected to deliver housing towards the mid to end of the updated Local Plan period and would likely continue delivering into the following Local Plan period.

- **Scenario 7: Focus growth around transport nodes:** This option would focus future growth (beyond existing commitments) along key public transport corridors and around public transport hubs (e.g. rail stations). In so doing, people would be less likely to use their car, helping to reduce congestion and carbon emissions.
- **Scenario 8: Request neighbouring authority to deliver some of the housing need:** If it is not possible to deliver the full local housing need within the district, it would be necessary to enquire with neighbouring Local Planning Authorities whether they could accommodate some of the district's need. It has not yet been determined whether this option is necessary.

We suggested a combination of Scenarios 1, 2, 6 and 7 to accommodate additional development needs up to 2041. The adopted development strategy of identifying Principal Settlements would continue where the principle of development is supported. However, the strategy would have a greater focus on reducing carbon emissions and focussing growth at locations with good transport connectivity and access to services, facilities and employment. Accordingly, some settlements may become a Principal Settlement and other settlements may have their Principal Settlement status rescinded.

Additional non-strategic site allocations would be made at the Principal Settlements whilst ensuring that the scale and extent of development within the Cotswolds National Landscape (formerly the Cotswolds Area of Outstanding Natural Beauty) remains limited and that development is directed away from areas with higher flood risk. In addition, given that Moreton-in-Marsh is a transport hub, which has a railway station; good provision of services, facilities and employment; and has various sites outside the Cotswold National Landscape, the consultation proposed the town to become a focus for strategic-scale growth of over 1,500 additional dwellings up to 2041. However, it was cautioned that a longer-term vision, including additional development, may be required to deliver some infrastructure items such as a secondary school.

The adopted development strategy of enabling small-scale residential development in Non-Principal Settlements (Policy DS3) was proposed to also continue, although it would have an increased emphasis on settlements that have better access to services, facilities and employment. It was suggested that consideration may be given to whether some sites could be allocated in Village Clusters (Scenario 4). Together, development in Non-Principal Settlements, Village Clusters and windfall sites <sup>(1)</sup> would provide additional flexibility within the housing land supply should any site allocations not come forward as planned.

Market housing would continue to be prohibited outside Principal and Non-Principal Settlements (i.e. in open countryside) unless it is in accordance with other policies that expressly deal with residential development in such locations.

An assessment of potential broad locations for growth is provided in the accompanying document titled, 'Cotswold District Local Plan Update: Integrated Impact Assessment'. Available from the 12 February 2024.

The feedback received on the development strategy options will be considered alongside relevant evidence as it emerges and used to refine the preferred approach.

*For the supporting text of Vision and Objectives, you said (13 comments received):*

---

<sup>1</sup> Windfall sites are sites not specifically identified in the development plan. The windfall allowance for the new Local Plan period is based on the assumption that the current windfall allowance of 138 dwellings per annum will be rolled forward.

## Development Strategy Options

1. **Support for Dispersed Growth and Focus on Non-Strategic Site Allocations:** There is a significant trend among commenters supporting a diversified approach to development that includes non-strategic site allocations and a degree of dispersed growth, notably including the use of small and medium-sized sites for speedier delivery and to support the vitality of rural and small communities. Some comments also highlighted the importance of not relying solely on large strategic sites due to the potential for long lead times that can slow down housing delivery.
2. **Focus on Principal Settlements and Service Centres:** There is support for the Council's focus on growth in principal settlements and main service centres that are seen as sustainable locations due to their existing facilities and services; however, there is also a recognition of the need to ensure these areas are not overburdened and that consideration is given to constraints such as the National Landscape.
3. **Integration of Development with Transportation and Infrastructure:** Commenters discuss the need to align development with transportation, particularly focusing on public transport nodes and strategic sites that can facilitate improvements in infrastructure, including possibilities for new roads and public transport services.
4. **Concerns Over Impact on Small Communities and Infrastructure:** Some commenters express concerns that concentrating development, particularly in larger numbers like the proposed 1,500 dwellings in Moreton-in-Marsh, might put unsustainable pressure on infrastructure and lead to overdevelopment of smaller communities.
5. **Challenges in Moreton-in-Marsh Development Proposals:** There are split opinions regarding proposals for significant development in Moreton-in-Marsh, with some supporting the town as a focus for growth due to its service centre status and transport links, while others are concerned about the impact on the local area including infrastructure and environmental constraints.
6. **Need for Affordable and Varied Housing:** There is a call for a wider range of housing types and tenure, improvement in housing affordability, and the provision of social rented dwellings to meet the needs of different segments of the population, including the younger and economically active demographic.

*For the supporting text of Development Strategy Options, you said (21 comments received):*

### **Scenario 1: Additional non-strategic site allocations**

*For the supporting text of Scenario 1: Additional non-strategic site allocations, you said (13 comments received):*

1. **Support for Scenario 1:** Multiple comments express support for Scenario 1, which involves additional non-strategic site allocations in Principal Settlements following the current development strategy. They highlight that this strategy is tested and effective, should be continued, and aligns with the Integrated Impact Assessment (IIA). It is deemed sustainable as it focuses on existing settlements that are capable of growth, provides a range of services, and has positive effects on healthy and vital communities, accessibility, public transport, climate change, employment opportunities, and economy. The need for a dispersed approach that reduces development pressure on larger settlements and the importance of retaining the status of existing Principal Settlements is emphasised.
2. **Concerns about Growth Distribution and Settlement Boundaries:** Some comments raise

concerns about the distribution of growth and the rigidness of settlement boundaries. While supportive of Scenario 1, it is mentioned that it's essential to review the sustainability and capacity for additional growth of Principal Settlements. Suggested improvements include having looser settlement boundaries to accommodate sustainable expansion and recognizing that some smaller Principal Settlements, like Kemble, offer extensive services and public transport which support growth potential.

- 3. Focus on Infrastructure and Local Needs:** Comments underscore the importance of integrating new housing and employment developments with infrastructure improvements. Adequate infrastructure is crucial to support the self-containment of settlements, viability of public transport services, and future growth. Comments suggest that a critical mass of development can facilitate the necessary infrastructure, like roads and schools, and urge the review of the role of some Principal Settlements, advocating for a future-focused approach.
- 4. Challenges and Criticism of Development Strategies:** There's criticism towards the approach to allocations, highlighting issues with how previous development has affected the balance in communities while addressing historical imbalances and inadequacies. Concerns are mentioned regarding the lack of plan for the Lechlade area and the impact of unrestricted growth on community infrastructure and the town's character. There's also scepticism about development in Moreton due to issues with past developments during a time without an adequate plan.
- 5. Opposition or Lack of Clarification:** Some comments show outright opposition to the proposed scenarios or express the inability to provide detailed insights due to lack of information on the Principal Settlements list. There is a call for more detail on the specific site allocations and the updated evidence for identifying Principal Settlements.

## **Scenario 2: Main Service Centre focus**

*For the supporting text of Scenario 2: Main Service Centre focus, you said (13 comments received):*

- 1. Support for Main Service Centres as Focal Points:** There's a consensus that Main Service Centres like Cirencester, Bourton-on-the-Water, and Moreton-in-Marsh should be focal points for development due to their current infrastructure, services, and employment opportunities. They are perceived as well-connected, optimal for development, and the proposed strategy is supported if it includes enhancements to transportation and services and does not lead to over-concentration in a few areas.
- 2. Need for Equitable Distribution and Infrastructure Enhancement:** Multiple comments express a need for equitable distribution of development across all Principal Settlements. They suggest that while Main Service Centres are key, development should not be overly concentrated there and should also aim to support smaller settlements. Concerns include the risk of damage to heritage and landscape, the need for sufficient infrastructure and service improvements, and the potential negative consequences of focusing too heavily on Main Service Centres.
- 3. Challenges of Over-Development in Main Service Centres:** A theme emerges around the potential challenges of over-development in the Main Service Centres. This includes increased traffic, pressure on existing infrastructure, the potential for reduced support in non-Main Service Centres, and the risk of neglecting sustainable growth in all Principal Settlements.
- 4. Uncertainty and Questions About Main Service Centres:** Some comments indicate uncertainty about which settlements are considered Main Service Centres, implying the need for clarity in the planning process.
- 5. Sustainability and Transport Concerns:** Comments raise sustainability and transport

considerations, highlighting the importance of improving public transport connections and ensuring that developments near Main Service Centres do not inadvertently increase car dependency. This underscores the need for thoughtful integration of development with existing transport infrastructure to promote sustainability.

### **Scenario 3: Dispersed growth**

*For the supporting text of Scenario 3: Dispersed growth, you said (12 comments received):*

1. **Dispersed Growth Sustainability Concerns:** Multiple comments express concerns about the sustainability of dispersed growth, mentioning the lack of infrastructure and public transport, the potential increase in car dependency, and the strain on local services.
2. **Dispersed Growth Support with Conditions:** Some comments show support for dispersed growth if it helps support services and facilities in small villages, boosts smaller housebuilders, or if growth is tied to improvements in public transport and infrastructure.
3. **Dispersed Growth in Principal Settlements:** Several comments support the idea of dispersed growth but emphasise that it should be focused on principal settlements as opposed to smaller villages.
4. **Opposition to Dispersed Growth:** A few comments explicitly state opposition to Scenario 3, citing it as not aligning with sustainability goals or being counter to reducing carbon emissions.
5. **Smaller Scale Growth through Neighbourhood Plans:** There is a sentiment that smaller scale growth might be acceptable if it goes through Neighbourhood Plans, which could gain community support and benefit local communities.

### **Scenario 4: Village clusters**

*For the supporting text of Scenario 4: Village cluster, you said (16 comments received):*

1. **Public Transport Concerns:** A significant number of comments raise concerns about the inadequacy of public transport, suggesting that the success of a clustered villages approach depends on improved public transport connectivity. Strong doubts are expressed about its feasibility, given the current state of rural transport options.
2. **Sustainability and Growth Strategy:** Comments touch upon how the village clusters approach aligns with sustainability and NPPF objectives. Some see it as an opportunity for sustainable growth, meeting local needs and supporting smaller builders, while others believe development should be focused on larger settlements for greater sustainability.
3. **Village Clusters Strategy Clarity:** There are remarks concerning the lack of clarity and detail in the proposal for village clusters. The strategy is perceived as not well thought out, with little information on which villages would be grouped and how.
4. **Community Support and Services:** Several comments identify the potential benefits of clustering villages, such as supporting local services, boosting community cohesion, and providing more housing. However, the sustainability of these benefits is questioned without improved services, particularly transport.
5. **Resistance to Village Clusters:** A few commenters explicitly express that the village clusters approach is not favoured or supported, either due to a lack of differentiation from other scenarios or concerns about the approach's viability.

## Scenario 5: New settlement(s)

*For the supporting text of Scenario 5: New settlement(s), you said (11 comments received):*

1. **Risks and Challenges of New Large-Scale Developments:** The comments express concerns regarding the risks and challenges of focusing primarily on new large-scale developments, such as longer lead times for completion, complexity in assembly and delivery, and potential adverse impacts on the Cotswold National Landscape. There are worries that overreliance on large sites may lead to housing under-delivery due to delays as experienced with the Chesterton site.
2. **Support for Dispersed Development Across Settlements:** Several comments advocate for dispersed development across settlements, suggesting this approach should form the majority of housing supply and mitigate risks associated with large-scale developments. It's argued that this strategy would better meet community needs without overburdening infrastructure.
3. **Unsuitability of a New Settlement in Cotswolds:** Concerns emphasised include the negative effects a new settlement could have on the Cotswolds landscape and the difficulty in finding a suitable location. The strategy of creating a new settlement is largely discouraged due to environmental, social, and economic impacts.
4. **Challenges in Infrastructure and Funding:** Comments point out the significant challenges in funding and building the necessary infrastructure to support new settlements. They question whether funding would be diverted from improving existing infrastructure and the overall viability of new developments.
5. **Potential Positive Impact of New Settlements:** While there is consensus regarding the risks of new developments, some comments recognise that if executed properly, a new settlement could bring environmental, social, and economic benefits, helping to provide a thriving community inclusive of infrastructure and employment.
6. **Concerns Over Environmental Impact:** The environmental impact of new settlements is a common concern, with comments pointing out the difficulty in development without harming the character of the area, landscapes, or affecting existing vegetation and hedgerows. A preference is expressed for maintaining the district's core green ethos.

## Scenario 6: New strategic site(s)

*For the supporting text of Scenario 6: New strategic site(s), you said (12 comments received):*

1. **Strategic Site Delays and Diversified Development:** Multiple comments express concern about delays associated with strategic site development and advocate for a spread of developments across multiple smaller sites to ensure a flexible and deliverable housing supply throughout the plan period.
2. **Scenario 6 Suitability and Infrastructure Concerns:** Comments raise doubts about the suitability of Scenario 6 due to its potential adverse impacts on the Cotswold National Landscape and the need for careful planning to ensure infrastructure supports new developments without overburdening existing facilities.
3. **Support for Scenario 6:** Some comments express support for Scenario 6, highlighting the potential for strategic sites to contribute significantly to housing supply, fund infrastructure, and be logical in certain locations like Morton.
4. **Local Community and Values:** Comments reflect the community's desire to preserve their



local heritage and market town values while accepting development that effectively resolves town issues without disrupting the existing balance.

5. **Specific Site Feedback:** Comments provide feedback for specific sites or suggestions such as the Chesterton Farm site, the need for master planning, allocation of land for schools, and the potential for Morton as a strategic growth location.
6. **Opposition to New Strategic Site(s):** There is opposition to new strategic site(s) based on the drawbacks shared with new settlements, such as finding suitable locations and the associated risks.

### **Scenario 7: Focus growth around transport nodes**

*For the supporting text of Scenario 7: Focus growth around transport nodes, you said (19 comments received):*

1. **Sustainability and Public Transport:** The comments indicate a robust discussion regarding the sustainability of development by focusing on areas with good public transportation, specifically rail services. Supporters of Scenario 7 argue that concentrating growth around transport nodes, such as in Moreton-in-Marsh and Kemble, is a sustainable approach which aligns with local objectives for environmentally friendly development and could improve the viability of public transport systems. Some view this as an opportunity to fund additional transport services and develop a new Transport Strategy. However, there are concerns about the potential overreliance on transport nodes for growth and sustainability. Critics suggest that this might lead to increased congestion, pressure on specific towns, and could overlook the need for broader infrastructure improvement across various communities.
2. **Housing and Community Impact:** Several comments express concerns regarding the impact on communities, particularly Moreton-in-Marsh, due to potential overdevelopment and a lack of existing infrastructure to support substantial growth. Some emphasise the need for improved facilities, the challenges posed by significant recent developments, and issues with traffic congestion. Concerns include the impact on local landscapes, health, and well-being, as well as scepticism about the prospects of generating sufficient employment within these target areas to accommodate new residents.
3. **Accessibility and Viability:** Several contributors question the viability and practicality of the proposed concentration of development around transport hubs. They point out the limitations of public transport availability, such as few stations, limited destinations, and service frequency. There's apprehension that reliance on rail and bus services might not cover the transportation needs of the community, resulting in persistent car usage. Additionally, it's suggested that the strategy should consider the connectivity of neighbouring authorities and potential electric vehicle policies when planning.

### **Scenario 8: Request neighbouring authority to deliver some of**

*For the supporting text of Scenario 8: Request neighbouring authority to deliver some of, you said (12 comments received):*

1. **Opposition to Scenario 8:** Several comments express opposition to Scenario 8, which entails requesting a neighbouring authority to accommodate part of the housing need. The concerns are primarily about the sufficiency of land within the district to meet the housing requirement, and the absence of evidence suggesting neighbouring districts would agree to take on this extra housing need.

2. **Concerns about the Process and Potential Sites:** Some comments raise concerns about the process of accommodating housing growth, particularly mentioning the need for a flexible approach to settlement boundaries and site allocations to minimize landscape impact.
3. **Strategic Location of Housing:** Some comments suggest that strategic positioning of housing development is important, emphasising the need for housing to be built where it's most wanted, taking into account social housing demands and transport impacts of developments occurring outside the district.

## Preferred Development Strategy and Broad Locations for Growth

*For the supporting text of Preferred Development Strategy and Broad Locations for Growth, you said (44 comments received):*

1. **Infrastructure Concerns:** Comments consistently highlight concerns about existing and future infrastructure, particularly in Moreton-in-Marsh, with an emphasis on transport, education, health, wastewater treatment, flooding, and the natural environment. The challenge of accommodating the projected housing growth without exacerbating current issues such as traffic congestion, insufficient public services, and inadequate sewage infrastructure is frequently addressed. The need for a comprehensive planning approach, including a master plan for Moreton-in-Marsh prior to development, is also a recurring theme.
2. **Housing Distribution Strategy:** Many comments express opposition to the concentration of many additional homes in Moreton-in-Marsh, citing the impact on the town's character, sustainability, and local needs. Alternatives like dispersed growth, growth focused on Cirencester, new settlements, or strategic growth across multiple settlements are discussed. Requests are made for equitable distribution of housing growth to maintain the Cotswold's rural character and avoid overburdening individual towns.
3. **Environmental and Flooding Concerns:** Comments underscore the issues of potential flooding, particularly when building on floodplains, and the impact on local watercourses and ecosystems. Concerns about the environmental consequences of overdevelopment, potential ecological damage, and the necessity for sufficient sustainable drainage systems are raised. The importance of preserving the unique landscape of the Cotswolds and ensuring that new development does not increase flood risk is emphasised.
4. **Transportation Issues:** Transport is a common point of discussion, with a focus on the current inadequacy of public transport options, traffic congestion along key roads such as the A429, and the need for improved transport infrastructure to support new development. The status of Moreton-in-Marsh as a transport hub is questioned, and suggestions include the need for detailed traffic assessments and investment in public transport.
5. **Sewage and Water Infrastructure:** Multiple comments address the current limitations of sewage and water infrastructure, referring to the overburdened sewage treatment capacities and pollution issues. Concerns regarding Thames Water's ability to upgrade facilities to match the proposed development are prevalent. The need for adequate infrastructure improvements prior to new housing construction is repeated across several responses.