



COTSWOLD

District Council

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| Council name | COTSWOLD DISTRICT COUNCIL |
| Name and date of Committee | CABINET MEMBER FOR HOUSING AND PLANNING DECISION MEETING, 9th October 2025 |
| Subject | RESPONSE TO MORETON IN MARSH REG. 14 NEIGHBOURHOOD PLAN CONSULTATION |
| Wards affected | Moreton East Ward, Moreton West Ward |
| Accountable member | Cllr. Juliet Layton, Deputy Leader and Cabinet Member for Housing and Planning Email: juliet.layton@cotswold.gov.uk |
| Accountable officer | Mark Harrison, Senior Local and Neighbourhood Planning Policy Officer Email: mark.harrison@cotswold.gov.uk |
| Report author | Mark Harrison, Senior Local and Neighbourhood Planning Policy Officer Email: mark.harrison@cotswold.gov.uk |
| Summary/Purpose | To agree a response to Moreton in Marsh Town Council on their Reg. 14 draft Neighbourhood Plan. |
| Annexes | Annex A – draft response to Moreton in Marsh Town Council Annex B – Moreton in Marsh Neighbourhood Plan 2018-2031 Regulation 14 Draft (July 2025) |
| Recommendation(s) | That the Cabinet Member for Housing and Planning resolves to: <ol style="list-style-type: none">1. Agree (with or without amendments) to send the response (Annex A) to Moreton in Marsh Town Council.2. Authorise officers to continue their support in aiding Moreton in Marsh Town Council in the preparation of their Neighbourhood Plan outside this formal consultation response. |
| Corporate priorities | All of the corporate priorities are captured by the draft Neighbourhood Plan: <ul style="list-style-type: none">• Delivering Good Services |



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| | <ul style="list-style-type: none">• Responding to the Climate Emergency• Delivering Housing• Supporting Communities• Supporting the Economy |
| Key Decision | <p>NO</p> <p>Whilst a Neighbourhood Plan <i>could</i> have a significant impact in regards part 2, in its current guise the draft plan is not deemed to have a <i>significant</i> impact to the planning framework.</p> |
| Exempt | <p>NO</p> |
| Consultees/ Consultation | <p>Moreton in Marsh Town Council are responsible for the consultation at Reg. 14 stage and should have reached out to other relevant stakeholders.</p> <p>The response (Annex A) is specific to Cotswold District Council. We have consulted internally with officers who have specialist expertise in specific planning topics:</p> <p>Policy 1 - Climate Adaptation and Energy Efficiency in Developments <i>Olivia McGregor – Climate Change and Carbon Reduction Lead was consulted but no response yet received</i></p> <p>Policy 2 - Managing Flood Risk <i>Jo Corbett – Senior Planning Policy Officer has been consulted on this policy and comments embedded into the response.</i></p> <p>Policy 3 – Housing Mix <i>Fin McEwan – Strategic Housing Specialist has been consulted on this policy and comments are embedded into the response.</i></p> <p>Policy 4 - Affordable Housing <i>Fin McEwan – Strategic Housing Specialist has been consulted on this policy and comments are embedded into the response.</i></p> <p>Policy 5 - Well Designed Housing and Places <i>Mike Napper – Principal Planning Officer (DM) was consulted but was</i></p> |



unable to provide a response.

Policy 6 - Parking in Residential Developments

Sarah Williams – Principal Transport Planner at Gloucestershire County Council has been consulted on this policy and comments are embedded.

Policy 7 - Brownfield First

Fin McEwan – Strategic Housing Specialist has been consulted on this policy and comments are embedded into the response.

Policy 15 - Local Green Spaces

Lesley Davis – Planning Policy officer has been consulted on this policy and comments are embedded into the response.

Policy 16 – Non-designated Heritage Assets

Danielle Berry – Natural, Built and Historic Environment Team Manager was consulted but opted to defer response to NP Officer

Policy 20 – Transport and Active Travel

Sarah Williams – Principal Transport Planner at Gloucestershire County Council has been consulted on this policy and comments are embedded.



1. EXECUTIVE SUMMARY

- 1.1** The Council has been invited to provide a response to the Moreton in Marsh draft Neighbourhood Plan (Reg. 14) (Annex B). A draft response for approval is at Annex A.

2. BACKGROUND

- 2.1** Moreton in Marsh Town Council were designated a Neighbourhood Planning Area in September 2018. They have prepared a draft Neighbourhood Plan 2018-2031 (July 2015) and are currently undertaking a public consultation in accordance with Regulation 14 of the Neighbourhood Planning Regulations, from 1st September until 12th October 2025.
- 2.2** The Regulation 14 consultation is a formal stage of consultation on a neighbourhood development plan (NDP). It is a six-week period during which the draft plan is made public to allow people who live or work in the area to comment on the proposals. This consultation is essential for ensuring that the plan is well-informed and that the community's needs and concerns are considered. The consultation must be conducted by the qualifying body, which in this case is Moreton in Marsh Town Council, and it involves publicising the draft plan, consulting statutory bodies, and allowing for public comments. The consultation results are then used to amend the draft plan before it is submitted to Cotswold District Council who will then publicise the Plan and supporting documents for a minimum of six weeks for a Regulation 16 consultation; and any comments submitted will be sent directly to the independent examiner for independent examination.
- 2.3** A Neighbourhood Plan is required to meet the Basic Conditions (set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990):
- National policy compliance
 - Contribution to achievement of sustainable development
 - General conformity with "strategic policy" of the Local Plan
 - Compatible with EU obligations (e.g. SEA)
 - Does not breach habitats regulations
- 2.4** The Ministry for Housing, Communities and Local Government (MHCLG) guidance (June 2025) on plan-making also requires:
- Clarity and certainty
 - Detailed policies map(s)



- Sufficient evidence and justification

- 2.5** The draft Neighbourhood Plan can only be considered against the adopted (i.e. current) Local Plan; despite there being an emerging reviewed Local Plan.
- 2.6** Once a Neighbourhood Plan is adopted, planning applications in the Moreton in Marsh neighbourhood area will be assessed against both that Neighbourhood Plan and the Local Plan in tandem. An important point is that duplication is not required.
- 2.7** As a local planning authority, Cotswold District Council has a statutory duty to support groups in preparing a Neighbourhood Plan. Our response comments (Annex A) intend to support Moreton in Marsh Town Council in preparing a plan that will meet the basic and legal conditions, and support the objectives of their community.

3. MAIN POINTS

- 3.1** The draft Neighbourhood Plan (Annex B) proposes 20 policies and these are set out in the table below:

| Policy No. | Policy Title | Policy Objective |
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| 1 | Climate Adaptation and Energy Efficiency in Developments | New developments to be energy efficient and climate adaptive. |
| 2 | Managing Flood Risk | New developments to be energy efficient and to climate adaptive. |
| 3 | Housing Mix | New developments to provide a range of housing to meet the needs of local people. |
| 4 | Affordable Housing | New developments to provide a range of housing to meet the needs of local people. |
| 5 | Well Designed Housing and Places | New developments to provide a range of housing to meet the needs of local people To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) or equivalent, standards. |



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| 6 | Parking in Residential Developments | <p>To ensure new homes are of high-quality design and built to Building Research Establishment Environmental Assessment Method (BREEAM) or equivalent standards.</p> <p>Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health.</p> |
| 7 | Brownfield First | New developments on brownfield sites to take priority over greenfield sites. |
| 8 | Hard Infrastructure | Ensure appropriate infrastructure is in place to support new development prior to completion of the project |
| 9 | Soft Infrastructure | Ensure appropriate infrastructure is in place to support new development prior to completion of the project. |
| 10 | Principal Residence Housing | <p>New developments to provide a range of housing to meet the needs of local people</p> <p>To support the provision of principal residence housing for those wishing to live in Moreton in Marsh.</p> |
| 11 | Employment Land | New developments to facilitate and support the growth of the business base within Moreton in Marsh, creating more jobs across a diverse range of sectors. |
| 12 | Small Business Units | Support development of small business units/shared space. |
| 13 | Retail Provision | Support development of small business units/shared space |
| 14 | Infrastructure Investment Priorities | New developments to support and sustain a vibrant, attractive and successful town centre |



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| | | that meets the needs of the local community and visitors. Improve the public realm and traffic management within and through the town to provide easier, safer and more pleasant access for residents and visitors, using developer contributions. |
| 15 | Local Green Spaces | Protect and maintain open green spaces. |
| 16 | Non-designated Heritage Assets | Protect and maintain archaeological and built heritage assets deemed to be of value to the community. |
| 17 | Biodiversity | Preserve and increase opportunities for biodiversity net-gain. |
| 18 | Important Views | Preserve important views within the parish. |
| 19 | Development Boundary | Protect the sensitive natural environment and exceptional rural assets surrounding Moreton in Marsh. |
| 20 | Transport & Active Travel | Create a more connected parish for residents and visitors alike, limiting the need for vehicular travel within the town and offering a genuine choice of transport options to help reduce congestion and emissions, to improve air quality and public health. |

3.2 Annex A contains the Council's proposed responses to each of these policies, to help shape the plan into one that will meet the basic and legal conditions and support the objectives of their community.

4. ALTERNATIVE OPTIONS

4.1 The Council can send Annex A with or without amendments as drafted.

4.2 The Council could opt to not respond to this consultation, however:

- we have a statutory duty to support the neighbourhood planning process.



- plan preparation will take place between now (Reg 14 consultation) and Reg. 15 submission based on the comments submitted. This is when Moreton in Marsh Town Council will be required to submit a plan proposal to Cotswold District Council with a statement explaining how the Plan has met the requirements of the 1990 Act. The Council could opt to make new comments at this stage, but an Examiner of the plan could rightly question why any objections have been raised at a later stage when they could have been raised at Reg. 14.
- In addition, providing a timely response would maintain a positive collaborative relationship with Moreton in Marsh Town Council and help to ensure that their plan aligns with the strategic policies of the adopted Local Plan in accordance with the basic conditions.

5. CONCLUSIONS

- 5.1** The Council's response (Annex A) aims to provide supportive comments or queries to support Moreton in Marsh Town Council in preparing a Neighbourhood Plan that meets the basic and legal requirements, whilst reflecting the objectives of their community.

6. FINANCIAL IMPLICATIONS

- 6.1** None direct.
- 6.2** The Council already have financial obligations towards the procedural elements of Neighbourhood Planning following Reg. 15. Some or all of this can be reclaimed from the Government (MHCLG).
- 6.3** Officer support towards Neighbourhood Planning is already budgeted for.

7. LEGAL IMPLICATIONS

- 7.1** None direct.
- 7.2** Once adopted the Neighbourhood Plan must be considered as part of relevant planning applications, and planning is a statutory function for Cotswold District Council.



8. RISK ASSESSMENT

- 8.1** As there are no legal nor financial responsibilities in the Council providing this response, the sole risk at this stage would be reputational as the comments can be made public through the Consultation Statement and publication of Neighbourhood Plan documents for examination.

9. EQUALITIES IMPACT

- 9.1** Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to eliminate discrimination and promote equality in relation to:

- Race
- Disability
- Gender, including gender reassignment
- Age
- Sexual Orientation
- Pregnancy and maternity
- Religion or belief

- 9.2** The response (Annex A) would indicate where the draft Neighbourhood Plan could discriminate against any of the above; there are none identified at this stage.

10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

- 10.1** Policy 1 is focused on Climate Adaptation and considered in the response (Annex A).
- 10.2** Throughout preparation of the plan, and in the responses provided, consideration is given to the sustainable balance of development in line with national policy and guidance, including climate change/ adaptation.

11. BACKGROUND PAPERS

None