



COTSWOLD
District Council

Siddington Neighbourhood Plan
c/o Michael Barge
Siddington Parish Council

Enquiries to: Mark Harrison
Senior Planning Policy Officer
mark.harrison@cotswold.gov.uk

siddingtonndp@outlook.com
By e-mail only

14th May 2026

Dear Michael,

**Siddington Neighbourhood Plan
Comments on the Reg 14 consultation draft plan**

Thank you for consulting CDC for comments on the draft plan, as part of the Regulation 14 consultation. Firstly, I would like to congratulate you, the Parish Council and their Steering Group on reaching this stage in plan preparation and for creating a detailed and well-considered draft plan for the future of the parish.

Thank you also for the opportunity to work constructively with you by being able to comment on a pre-Reg 14 version of the draft. Given many of those comments were taken into account, the comments here may seem “light”, but that is more an indication of the quality of the plan.

Comments have been made about both the supporting text, which sets the context and justification for the policies, and on the policies proposed for inclusion in the Plan. They are intended to inform modification to the Plan so that it best meets the expectation of the Parish Council in terms of the future determination of development proposals, and, crucially, that the Plan can proceed to independent examination once it has been submitted, with a greater expectation of a positive outcome.

As is the nature of making comments, they primarily pick up on parts for improvement, but please do not assume I have a negative view of the draft; overall the quality, scope and approach of the plan is good and a document the group can be proud of.

I hope the comments made are helpful in reaching a conclusion to Reg. 14 plan preparation. We will, of course, continue to support the Parish Council and Steering Group with advice as necessary and with practical support on any modifications required to the Plan once you have had a chance to review the comments received in response to the Reg. 14 consultation.

Finally, I need to advise that the comments made here, in response to the Reg. 14 draft plan, do not constitute a *formal* opinion from CDC about whether the Plan as currently drafted meets the basic conditions. CDC is not required to issue a decision statement in respect of that matter until the independent examination has been completed. We would therefore reserve the right to make further representation as necessary following the submission of the plan to CDC.

Yours sincerely,

Mark Harrison

Mark Harrison BSc(Hons) MA MRTPI
Senior Planning Policy & Neighbourhood Plans Officer
Planning Policy and Infrastructure
Cotswold District Council

P: Cotswold District Council, Trinity Road, Cirencester, GL7 1PX

T: CDC colleagues [chat to me on Teams](#)

E: mark.harrison@cotswold.gov.uk

W: [Planning Policy webpages](#)



COTSWOLD
District Council

Regulation 14 Consultation

Regulation 14 of the Neighbourhood Planning Regulations require the draft plan proposal to be the subject of pre-submission consultation before it is submitted to the local authority for independent examination. The consultation should last at least 6 weeks.

Pre-submission consultation requirements include publicising the draft plan to people who live, work or run business in the area. The publicity must include details of the proposed neighbourhood plan, where and when it may be viewed, and how to make comments on the plan and by what date.

Certain statutory bodies must be consulted, including the district council (as the local planning authority), the Environment Agency, Natural England and Historic England. It is also advisable to consult local business or community organisations, such as chambers of commerce, civic societies and local trusts.

Producing a summary of the plan may be useful to many people who do not want to read the whole document. Drop-in events may be a useful means of allowing people to ask questions or discuss the plan on a one-to-one basis.

The draft plan and supporting documents should be uploaded to the neighbourhood plan website. Printed copies should be made available at convenient locations, such as libraries, community centres, council offices and other key public buildings. Copies should be available to send to people who can't access a digital or displayed copy.

Representations and Modifications

Any comments received by the end of the consultation period must be considered conscientiously by the qualifying body. All representations need to be considered, but it is legitimate for the neighbourhood plan body to take a different view. Indeed, different representations may demonstrate opposing views. A planning judgement needs to be taken.

A decision will need to be made over whether or not to amend the Neighbourhood Plan in response to each representation. The decision on whether or not to amend the plan, and the reasoning behind them, should be recorded, as this information will need to be incorporated in the Consultation Statement.

Consultation Statement

The Regulations require that a Consultation Statement is prepared and submitted with a Neighbourhood Plan when the plan is sent to the District Council. The Consultation Statement must:

- Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- Explain how they were consulted;
- Summarise the main issues and concerns raised by the persons consulted; and
- Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

The qualifying body will need to agree the modifications and approve the resulting draft of the plan for submission to the local planning authority.

Environmental effects

It is a requirement that all neighbourhood plans submitted for examination be accompanied by either a strategic environmental assessment report (SEA) or a screening determination stating that the plan would not have significant environmental effects.

Local Authorities should screen emerging neighbourhood plan proposals at the earliest stage, to ascertain whether they are likely to trigger any EU directives.

Habitats Regulations Assessment (HRA) and Screening Strategic Environment Assessment (SEA) Screening

The HRA/ SEA Screening Opinion was prepared (January 2026) by CDC. CDC consulted the Environment Agency, Natural England and Historic England on the screening opinion, with a deadline of Friday 6th February for responses.

The screening opinion concluded that the draft Neighbourhood Plan does not directly impact on land use through the allocation of sites for housing or other forms of development and is therefore considered unlikely to have significant environment effects and that full SEA is not required.

Basic Conditions

The Basic Conditions an Examiner will consider for a Neighbourhood Plan are as follows:

- National policy compliance
- Contribution to achievement of sustainable development
- General conformity with “strategic policy”
- Compatible with EU obligations (e.g. SEA)
- Does not breach habitats regulations

MHCLG guidance (June 2025) on plan-making also requires:

- Clarity and certainty;
- Detailed policies map(s);

- Sufficient evidence and justification.

Comments provided by CDC will be based upon these considerations, although as above a *formal* opinion on the basic conditions cannot be made until after independent examination.

Conformity with Strategic Policy

Please note that an emerging Neighbourhood Plan can only be considered against policies in the adopted (i.e. current) Cotswold District Council Local Plan 2011-2031 (adopted in August 2018). Although a Local Plan review is underway, this currently carries no weight.

However, of note, is that as part of the Local Plan review, areas of growth are proposed to the south/ south-east of Cirencester, adjacent to the parish. This can help understand why no housing sites are proposed for allocation in the draft Neighbourhood Plan despite a district-wide and local need. There is no requirement for Neighbourhood Plans to allocate housing sites.

Comment Schedule

Policy No.	Policy Summary	CDC Comments
Objectives	<p>Built Environment Objective - To protect Siddington’s identity as a rural village settlement distinct from the nearby urban centre of Cirencester.</p> <p>Natural Environment Objective - To protect and enhance the local natural environment for the benefit of future generations including biodiversity, green and open spaces, views, and footpaths.</p> <p>Community Facilities Objective - To encourage and enhance a strong sense of community by working together to support, maintain and improve the existing facilities for all age groups.</p> <p>Traffic Impact Objective - To maintain and enhance connectivity throughout the parish on foot, bicycle, and bus to minimise traffic problems and reduce emissions.</p>	<p>Traffic impact objective. Traffic and transport tends to sit outside of the scope of a NP, except for e.g. allocating land for a car park. There are parts of S12 which are useful, but this objective seems greater than could be realistically achieved through a NP.</p>
Policy S1 – Preventing Coalescence of	This policy proposes a “green gap” restricting development, to	– Note the change of the term “designated” to “identified” as previously suggested.

<p>Siddington with Cirencester</p>	<p>prevent the coalescence of Cirencester and Siddington.</p>	<ul style="list-style-type: none"> – Note the removal of the term ‘increase’ in regards coalescence. – The policy is now worded more positively and focuses more on the physical, perceptual and visual merits of the “gap”, rather than ‘blocking’ development. - Just for the purposes of clarify, it might be worth differentiating between Siddington Parish and built form (village) of Siddington, and ensure correct terminology used throughout the document.
<p>Policy S2 – Settlement Boundary and Infill Development</p>	<p>This policy proposes a settlement boundary tight to the existing built form. Outward expansion of the settlement is specifically not supported. Infill development within the settlement boundary is supported in this policy. However, Local Plan policy DS3 (Small-Scale Residential Development in Non-Principal Settlements) already permits small-scale residential development subject to some criteria.</p>	<p>Overall, this policy gives clarity as to what constitutes ‘inside’ or ‘outside’ the settlement.</p> <p>To note, in the Local Plan any settlement with a settlement boundary is considered a principal settlement. Neighbourhood Plans should not change the spatial strategy of a Local Plan. We are assuming that Siddington intends to be a non-principal settlement with a settlement boundary, meaning the provision of Local Plan policy DS3 still applies?</p> <p>Para 6.8.3 had previously stated 82% additional homes in Siddington since WWII. England & Wales had c. 11.1m dwellings in 1945, and now has 25.6m, a 131% increase. Therefore an 82% increase is well below the national average since WWII. However, the justification now states a 452% increase in home. Can the data be provided/ evidenced?</p> <p>How does this policy support sustainable development?</p> <p>Settlement boundaries are used to discourage expansion into open countryside and encourage/ prioritise re-use of buildings, development of brownfield sites etc.</p> <p>Most settlement boundaries would be “rounded”. As drawn, it excludes a lot of potential sites that would be larger infill (within the built form) without the village extending outwards.</p> <p>Most settlement boundaries are drawn to include recent developments, such as Rural Exception Sites, or in conjunction with the allocation of a site outside an existing settlement boundary.</p> <p>Both are to support development, whereas this appears to only constrict development.</p>

FOR APPROVAL BY CLLR. LAYTON – BEFORE RESPONDING TO SIDDINGTON CONSULTATION

		<p>As drawn this would seriously restrict sustainable development, additional housing and could jeopardise the longevity of facilities and services.</p> <p>Does Policy 1 do enough to protect coalescence, that this policy would be largely unnecessary?</p> <p>7.8.4 Implication that the NP is enabling Old Taland as a makeweight to this policy – there would already be support through planning policy if it secured the future conservation of heritage assets.</p>
<p>Policy S3 – Housing Mix</p>	<p>This policy indicates the type of housing supported in the Parish, but does not make any formal requirements.</p>	<p>Note that parts referring to Affordable Housing has been removed. This was suggested as Local Plan Policy H2 has a threshold of 11 or more, or 6-10 dwellings in rural areas, at which affordable housing contributions/ provision apply.</p> <p>In context of Policies 1 and 2, unlikely there would conceivably be a development of a size that would constitute a housing mix policy.</p> <p>The local connection criterion has also been removed as there is a Gloucestershire process for prioritising. The SG could still identify neighbouring parishes for purposes of what constitutes “local”.</p>
<p>Policy S4 – General Design Principles</p>	<p>This policy supports high quality design and sets out a list of criteria which should be met by all development.</p>	<p>Preserve or enhance is a term associated with heritage assets, just to clarify that this is intended to apply to all development.</p> <p>2 – could add ... <i>by respecting building lines, orientation, heights, and dormer levels, where appropriate.</i></p> <p>5 – would this not contradict Policy 1?</p> <p>7 – all policies of the Local Plan should be adhered to where relevant. And likely to be a new policy adopted soon. Suggest deleting.</p> <p>9 and 10 are prudent, but would be better move to support text for interpretation of criterion 8, not as policy wording.</p> <p>16-25 much of these criteria are duplicate of the Local Plan. Only locally specific points adding to an existing policy will be effective. Can the SG double check these and remove where duplicate wording or same approach?</p>

FOR APPROVAL BY CLLR. LAYTON – BEFORE RESPONDING TO SIDDINGTON CONSULTATION

Policy S5 – Old Talland School of Equitation	This policy supports development on a brownfield site, which conserves, re-uses and enhances heritage assets on the site. This is primarily a heritage and design policy and does not specifically support or seek to allocate the site for housing, for example.	As per the SEA screening response from Historic England, we would suggest trilateral work on this policy, particularly around ‘tightening up in the policy of the criteria in heritage terms’.
Policy S6 – Local Green Space Policy	This policy highlights two local green spaces that are already designated through the Local Plan.	Should read Figure 14 not 15. As (a) and (b) are already designated in the Local Plan, and they will be “passport” into the new Local Plan good to draw attention to them and indicate the boundaries in this document, but recommend deleting this policy. This would be duplicating, and their designation does not need to be assessed again.
Policy S7 – Important Views Policy	This policy identifies views considered important by the community and how to preserve them in the context of new development.	Part 4 is too strong, and not positively worded. The remainder of the policy reads well.
Policy S8 – Trees, Hedgerows and Woodland	Policy addresses protection Trees, Hedgerows and Woodland	As per comments on Policy S6, similarly this policy duplicates Local Plan policy EN7.
Policy S9 – Flooding	Policy addresses how flood risk will be assessed and managed in context of new development.	Although this has been highlighted as a key issue, nothing locally/ site specific being added to the scope/ approach of Local Plan policy EN14? Also see comments below.
Policy S10 – Sustainable Transport and Active Travel	This policy identifies new pedestrian/ cycle routes and promotes sustainable transport.	Good justification to improve connectivity and walkability. Locally specific, and details use of CIL etc. Also see comments below.
Policy S11 – Community Facilities	This policy identifies community facilities to conserve.	Still not sure how “suitable employment or service trade uses” fit into this, in part (c). Last sentence of (c) not required (duplicates 2 and c combined).

Comments from CDC Senior Conservation Officer:

The only omission I can see is that there is no reference in the document to **non-designated heritage assets**. I would therefore suggest including a paragraph after 3.3.7 which refers to listed buildings, to advise that other buildings of historic interest can be identified as non-designated heritage assets and also form an important part of the character and historic interest of Siddington. For information I include below some definitions from the Historic England Website.

Definitions

The NPPF defines a heritage asset as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets are of two types: ‘designated heritage assets’, and ‘non-designated heritage assets’.

Designated heritage assets are largely designated nationally under the relevant legislation (listed buildings, scheduled monuments, registered historic parks and gardens and registered battlefields), but also include world heritage sites, which are designated by UNESCO, and conservation areas, which are designated locally under relevant legislation. Designated heritage assets, with the exception of conservation areas and World Heritage Sites, are listed in the National Heritage List for England (NHLE), the official and up-to-date database of all nationally-protected historic buildings and sites in England. Information about the different designation regimes and how to search the list can be found in the listing pages of the Historic England website. Designated heritage assets receive a greater degree of protection within the planning system than non-designated heritage assets; works to some assets, such as listed buildings and scheduled monuments, are subject to additional consent regimes. Information on conservation areas can be found on local planning authority websites.

Non-designated heritage assets are locally-identified ‘buildings, monuments, sites, places, areas or landscapes identified by plan making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets’.

Non-designated heritage assets can be identified in a number of ways, including: Local heritage lists; Local and Neighbourhood Plans; Conservation area appraisals and reviews and Decision-making on planning applications.

Comments from CDC Senior Policy Officer on Flood Risk:

The policy could be more positively named e.g. **Managing Flood Risk**

The policy has elements which repeat national and Local plan policy (SuDs, betterment, prevention flooding elsewhere), but no mention of flood zones. Could cross ref perhaps to other water polices NPPF/ LP to avoid any conflict, ‘...in accordance with other relevant policies...’ Note this is mentioned in the supporting text below 6.15.1.

The intent of the policy is to reduce flood risk in the parish (alongside the strategic policy of the Local Plan). This is best stated in the supporting text ‘...within the vicinity of the development to reduce surface water run-off and mitigate against any fluvial flood risk, but also to any impact to lower lying parts of the parish (para. 6.15.5). This could be moved for clarity to the top/ introduction of the supporting text, or to help introduce the policy with a short explanation.

There is focus on attenuation in the policy (which I understand is part of a SuDs system) - is it the only possible achievable SuDs type in the NDP area? Should this be re-worded to mean SuDs in their entirety? E.g. 'Where development is proposed in an area at risk of flooding mitigation measures giving priority to the use of sustainable drainage systems (SuDS) must be included'.

'attenuation features must be accompanied by a long-term funded maintenance/management plan' is this meant to be only specific this type of SuD, and if so, perhaps why (additional information is needed in the supporting text)?

FOR APPROVAL BY CLLR. LAYTON – BEFORE RESPONDING TO SIDDINGTON CONSULTATION

Also if SuDs are to be mentioned, I would suggest the positive 'multi-functional benefits' of SuDs: along the lines of e.g.

'Where practicable, SuDs must be designed to be multi-functional and deliver benefits for wildlife, amenity and landscape'

Is there a development size limit on the requirement for the 'Water Management Statement'? Use the supporting text to explain where the policy would apply. 'New development' suggests new build (and not extensions / change of use?).

Could remove the words '*secure arrangements for*' is not strictly necessary in clause (g)?

The supporting text mentions the SWOX and '*The Plan encourages the use of designs and technologies to reduce water usage*' but this is not referenced in the policy? E.g. '*Schemes that incorporate rainwater harvesting to capture, store and reuse grey water will be supported*'

Comments from CDC Sustainable Transport Lead:

S10A I would suggest merging S10A and S10B and removing duplication. Remove S10A1, put S10A2 at the bottom of the policy. Then add “, including through proposals in point X of this policy” to S10B 2 a.

S10B 1 and 3 and 2 & 4 appear to be duplicates and different versions so should be consolidated (keeping 1 & 2).

I would also suggest they add “in line with the sustainable transport hierarchy” to S10B 2 b, along with a visual or written hierarchy such as shown here [An introduction to the sustainable travel hierarchy - Energy Saving Trust](#).

As per my comments pre-R14, the engagement and proposals on new routes is good to see.