

Name	Reference	Comment	SG Response	Amendments to NP
Marrons on behalf of Catesby Estates	Policy One – Climate Adaption and Energy Efficiency in Developments	<p>5. Draft Submission Policy One seeks for new developments to be energy efficient and climate adaptive.</p> <p>6. Criteria (d) details that an energy assessment which minimises carbon footprint and energy requirements should be conditioned for new developments this needs removing from the plan as it is considered to be unduly onerous.</p> <p>7. Criterion (e) considers the impact of electric vehicles use, this is considered to be unnecessary given that it is now a requirement of building regulations for the provision of electric charging points with new residential properties. Therefore, this requirement should be removed from the policy.</p>	<p>5/6 This Policy is compatible with Policy INF10 in the Local Plan, and builds on this by introducing a higher level of climate related components</p> <p>7) It is a requirement of all new builds to have EV charging points, however this is only if they have associated parking spaces. This policy requires ALL new builds to have an EV charging point regardless of whether they have associated parking space.</p>	<p>BP (d) reworded to: <i>‘Where relevant and appropriate, energy assessment showing how new developments minimises carbon footprint and energy requirements should be submitted as part of the planning application’</i></p> <p>BP (e) reworded to: <i>Provision of electric vehicle charging, to account for current and projected future need, should be incorporated in relevant planning applications whether domestic, commercial or industrial uses.</i></p>
Marrons on behalf of Catesby Estates	Policy Two – Managing Flood Risk	<p>8. Draft Submission Policy Two of the MMNP seeks to minimise flooding events and investment in sewage capacity by ensuring that the capacity and capability to the local water management infrastructure is able to supply any new development.</p> <p>9. Catesby Estates agree with part (a) of Policy Two, which follows NPPF guidance in diverting development towards areas with lower probability of flooding. Catesby also agree with the majority of part (b) of the policy in stating where site-specific Flood Risk Assessments (FRA) are required. 10. However, they object to part of Policy Two part (b), which requires FRAs to use ‘appropriate calculations based on the highest expected groundwater levels for the area (200 year maximum)’. There is no national policy behind this requirement, and it would be unreasonable to ask developers to assess on this basis. FRAs usually design around 100 year flood events, rather than 200 years. Moreover, groundwater data is not available for a 200 year period. 11. Catesby Estates</p>	<p>8/9 The community of M in M have strongly indicated its concern regarding flooding, and this policy seeks to minimise these concerns.</p>	<p>BP (b) wording added ‘..outlined in footnote 63 of paragraph 181 of the December 2024 NPPF (or subsequent NPPF iterations), will require a Flood Risk Assessment (FRA).’</p>

		therefore request the following text is removed from Policy Two part (b) of the MMNP: “using appropriate calculations based on the highest expected groundwater levels for the area (200 year maximum).”		
Marrons on behalf of Catesby Estates	Policy Three – Housing Mix	<p>12. The MMNP provides details of the housing needed in Moreton-in-Marsh in Policy Three.</p> <p>13. Criterion (a) of Policy Three states that proposals for more than six dwellings should show how it meets needs in line with the Moreon-in-Marsh Housing Needs Analysis. The Moreton-in-Marsh Housing Needs Analysis was produced in May 2021. This is considered to be out of date by virtue of time and does not include the latest Official National Statistics.</p> <p>14. The National Planning Policy Guidance (NPPG) ‘Neighbourhood Planning’ also says that neighbourhood plans that contain policies relevant to housing supply should take account of the latest and up-to-date evidence of housing need (Paragraph: 040 Reference ID: 41-040-20160211). Therefore, this policy is not in compliance with the basic condition (a) - to be in compliance with national policy and guidance.</p> <p>15. Criterion (b) of the policy also states that at least 25% of dwellings should meet Lifetime Home Standards. Evidence will need to be provided to support this requirement, which there currently is not.</p> <p>16. Criterion (c) of the policy details the types of houses that should be provided. There are 5 different types of housing detailed in this policy, of which none are evidenced for the need for. Therefore, robust evidence is needed to support the provided types of housing.</p> <p>17. Therefore, the policy should be reviewed and amended to only include requirements where up-to-date evidence of needs to support those requirements is available and can be referenced, as per Paragraph 040 (Reference: Reference ID: 41-040 20160211) for the NPPG ‘Neighbourhood Plans’.</p>	<p>sufficiently current to be considered reference for this policy. A Local Authority is required to update their HNA every 15 years with a review every five. Therefore an HNA which is only four years old can be deemed to be current for a Neighbourhood Plan . This Policy is in compliance with national policy and therefore meets the Basic conditions.</p> <p>15 Noted</p> <p>16 The MiMNPSG believe this evidence is shown in the reasoned justification</p> <p>17 Noted</p>	<p>HNA added as Appendix and reference to HNA added to BP (a).</p> <p>BP (a) Wording amended ‘Proposals for more than six dwellings <i>Any proposal which results in a net gain in dwellings</i> should demonstrate..’</p> <p>BP (b) reference to Lifetime Home Standards removed.</p>

Marrons on behalf of Catesby Estates	Policy Four – Affordable housing	18. This policy sets out a local connection criterion to which affordable housing should be given, to meet local needs. The allocation of affordable housing should be made by the local authority as the housing authority. Therefore, this policy should be removed.	It is reasonable to ask for people with a local connection to be taken into account in the first instance with the recognition that the Local Authority will be the ultimate arbiters.	BP (a2) wording added <i>‘tenure blind, i.e. built using the same materials and in the same style as any market housing on the site. Wording removed from BP(b): In all new housing developments providing affordable housing the first occupancy of all affordable homes will be prioritised for households with a strong local connection with the parish of Moreton-in-Marsh, as defined in figure P4(a) below and any relevant planning policy guidance. Reference to HomeSeeker Plus added to Local Connection Criteria. BP (C) wording added <i>‘.Cotswold Strategic Housing Market Assessment 2015 (or subsequent updates) or any local objectively assessed need.’</i></i>
Marrons on behalf of Catesby Estates	Policy Five – Well Designed Housing and Places	19. This draft policy aims to ensure that housing meets local needs and that they are design to a high-quality. 20. Part (j) of this policy details the requirement for a minimum of 10% of new dwellings to provide space for allotments. There is no evidence or justification for this requirement. Therefore, this part of the policy needs to be reviewed and amended. It should be noted that Catesby ran a public consultation and feedback from locals suggested that there was a surplus of allotments.	It is nationally recognised that allotments bring a huge number of benefits to both individuals and local communities. There is no space to expand current allotments and it has been noted by the Town Council that there are no allotments on east side of town.	Wording added to BP (h) <i>‘If the development site is not within a reasonable distance (3/4 mile) of existing allotments, sufficient space should be identified...’</i>
Marrons on behalf of	Policy Eight – Hard Infrastructure	21. This draft policy aims to ensure appropriate hard infrastructure is in place to support new development prior to completion of the project.	It is reasonable to ask for infrastructure to be in place for any new development in order	No action taken

Catesby Estates		22. Catesby object to criteria c and d of this policy. The delivery of certain infrastructure can sometimes be outside of a developer's control, such as works to the highway by the Highway Authority, funded by a developer through a Section 106 Agreement. As such, the requirement to ensure that the infrastructure is in place no later than the completion of the development is therefore considered unreasonable, and should be deleted	to avoid putting undue pressure on existing infrastructure.	
Marrons on behalf of Catesby Estates	Policy Nine – Soft Infrastructure	23. Policy Nine seeks to ensure appropriate soft infrastructure is in place to support new development. 24. Catesby object to part c of this policy. The delivery of certain infrastructure can sometimes be outside of a developer's control. The requirement to ensure that the infrastructure is in place no later than the completion of the development is therefore considered unreasonable.	It is reasonable for the Policy to ask for decisions to be made on a case-by-case basis.	No action taken
Marrons on behalf of Catesby Estates	Policy Ten – Principal Residence Housing	25. Policy Ten of the MMNP seeks to combat properties being bought as second homes in Moreton-in-Marsh. 26. This policy states that new open market will be supported where there is a restriction to ensure its occupancy as a principal residence and sets out some examples of what proof of entitlement would be. 27. It is considered that this policy is not in compliance with the NPPF. It does not meet paragraph 16 of the NPPF, as it has not been prepared positively in a way that is aspirational and deliverable and is ambiguous of what is considered appropriate evidence that can be used to demonstrate someone is a principal resident. 28. There is also no evidence to support or justify this policy as required in the NPPG 'Neighbourhood Planning' that neighbourhood plans that contain policies relevant to housing supply should take account of the latest and up-to-date evidence of housing need (Paragraph: 040 Reference ID: 41-040-20160211). Therefore, this policy is not in compliance with the basic condition as it does not comply with national policy and guidance. 29. This policy is also contrary to meeting the housing needs in the district and will restrict people being able to	Throughout community consultation second home ownership has been a constant issue raised by respondents. Although the MiMNPSG have asked CDC for information relating to second home ownership in MiM, they have been told there is no specific breakdown of numbers available. Unfortunately, the TC and SG do not have the resources to acquire this information out themselves. As this is an important issue with the community, the MiMNPSG wish to keep this policy in the Neighbourhood Plan.	No action taken

		access housing when there is a significant need. Therefore, it should be removed.		
Marrons on behalf of Catesby Estates	Policy Eighteen – Important views	<p>30. Draft submission Policy Eighteen aims to preserve important views within the parish. Clarification is required on the inserts provided for this policy. As the list of proposed views does not match with the photos taken in the area. For example, view 18 on the list “From Evenlode Road (National Cycle Network Route Number 48) NNE, is view 23 on the images. Therefore, making it hard to match up views.</p> <p>31. Furthermore, the explanations given for the reasons for protecting these specific views is considered to not be robust and clear. Therefore, we object to policy eighteen because of the lack of clear reasoning and details.</p>	<p>MiMNPSG has reviewed and refined all Important Views</p> <p>Tourism is a valued part of the economic well being of Moreton-in Marsh and the exceptional views it enjoys contribute in no small part to this successful income stream. Therefore, it is considered crucial that the views identified remain unspoilt. None of the views mentioned in this policy has any impact on the Development Boundary as set out in the Local Plan</p> <p>The objective of this policy is to ensure that the town maintains its links to the surrounding countryside which is important to its residents.</p>	<p>Policy wording amended: “Protected Views” references amended to read “Important Views”</p> <p>Amend BP (c) wording ‘Development proposals which would have an unacceptable impact on a Protected View will not be supported. Development proposals throughout the Neighbourhood Area must be sensitive to the importance of maintaining key views’</p>
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions.	Description of land owned by GCC	<p>3 Gloucestershire County Council own a parcel of land approximately 3ha in size, in the south-eastern part of Moreton in Marsh.</p> <p>4 This land is on the edge of the settlement in an area characterised by a mix of residential, employment and agricultural uses. Adjacent land formed part of the allocation M12A in the local plan. That site now has planning permission for 67 dwellings and has recently been developed by Backhouse Housing Limited.</p> <p>5 The land is located outside the National Landscape designation and outside of but adjacent to the Moreton-in-Marsh settlement boundary. It is also outside the Moreton-in-Marsh conservation area. There are a</p>	Moreton in Marsh Neighbourhood Plan is not allocating sites for development	

		<p>number of listed buildings within Moreton in Marsh, but none are directly affected by the site. The site is also in flood zone 1, with a small amount of surface water flooding in the northern part which would be avoided by development. A public right of way crosses the land.</p> <p>6. The land is within walking distance of a bus stop with regular services to Cheltenham and Bourton on the Water. There are an array of services and facilities in Moreton-in-Marsh which are also within walking distance of the site including the train station 0.9 miles away.</p>		
<p>SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions</p>	<p>Housing in Cotswold District</p>	<p>7. The NDP is clear that it has been written in accordance with the currently adopted Cotswold Local Plan (2018) which sets out that 8400 homes needed to be delivered before the end of the plan period (in simple terms this was an average of 390 and 475 homes per year although there were some slight discrepancies and alterations to this). This means that the NDP does not contain any housing allocations beyond mentioning the allocations in the 2018 Local Plan (all of which have been completed).</p> <p>8. Whilst the Cotswold Local Plan 2018 remains part of the development plan for the area, the District Council has confirmed that in light of the changes to the standard method (see below), an update is required, and they have commenced work on a new local plan. Therefore, the emphasis on the 2018 local plan and the reliance on 203 houses being allocated for Moreton in March between 2011 and 2031 on page 15 of the NDP does not take account of the full set of circumstances and this housing figure is not up to date.</p> <p>9. Our understanding therefore is that that the NDP will not help to meet the demands being placed on Cotswold District Council by the new standard method for calculating housing need in the 2024 NPPF, which confirms that the Council's requirement has increased to 1036 homes per year. This places considerable pressure on the District Council in an area which is</p>	<p>No Neighbourhood Plan is obliged to identify sites for allocation. Moreton in Marsh NP identifies generic policies as it has chosen to allow CDC to identify the sites required for housing in the Moreton in Marsh Parish.</p> <p>In addition, CDC responded through Regulation 14 consultation: ‘To note, the housing allocations in the supporting text are from the Local Plan – no new allocations are made. There is no requirement for Neighbourhood Plans to allocate housing sites.’</p>	<p>No action taken</p>

		<p>heavily constrained by the National Landscape designation.</p> <p>10. Paragraph 69 of the NPPF confirms that in most circumstances, once strategic policies have been adopted, housing figures will not need to be re-tested at a neighbourhood plan examination, “unless there has been a significant change in circumstances that affects the requirement”.</p> <p>11. The changes to the standard method and the resulting housing requirement increases within the district do represent a significant change in circumstances since the 2018 local plan was adopted. Moreton-in-Marsh Town Council should therefore, in accordance with paragraph 70 of the NPPF, have been supplied with an indicative housing requirement to reflect the latest housing needs. None of the NDP consultation materials appear to confirm what that indicative housing requirement is. If no such requirement has been provided, we ask that the Town Council engages with the District Council on this point, to ensure that the neighbourhood plan is sound and fit for purpose.</p> <p>12. The District Council has produced a proposed development strategy in its papers for cabinet meeting on 16 October 2025. This will form the basis of the next regulation 18 consultation on the emerging local plan. This document indicates an increase of potentially 420 homes in Moreton in Marsh across the plan period with a further circa 1700 homes via a strategic extension to the town. The indicative information suggests that the site could fall into either category at present (the consultation document is not intended to show precise locations for housing at this point). Whilst cabinet need to consider the report and it needs to be consulted upon; this would appear to provide a good starting point which is realistic based on data produced by RPS1.</p> <p>13. Meeting housing requirements has other implications. The Town Council will be keen to limit ‘unplanned’ development (i.e. development which is not</p>		
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		<p>advocated for in the local or neighbourhood plan). Councillors and those preparing the plan may be aware of the effect of paragraph 11d) of the NPPF which confirms that where the Council cannot demonstrate a five-year supply of deliverable housing sites (as is the case at present), the so-called ‘tilted balance’ applies where there is a presumption to permit development notwithstanding a conflict with local plan policies, unless there are strong reasons to refuse or the adverse impacts significantly and demonstrably outweigh the benefits. The ‘Cotswold District Housing Land Supply Report’ released in June 2025, paragraph 5.3, confirms that Cotswold District Council can only demonstrate a housing land supply of 1.8 years when the supply is measured against the government’s revised ‘standard methodology’. If the Council does not allocate sufficient sites (including via neighbourhood plans where appropriate), this can have a significant impact on housing land supply.</p> <p>14. With this in mind, we note paragraph 14 of the NPPF which states that: “In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).”</p> <p>15. We consider that if the draft NDP stays as it is currently drafted (with no allocation to meet identified need) then by the time it is ‘made’ then criterion b) of paragraph 14 of the NPPF will not be met, and any possible conflict associated with the NDP’s lack of allocations will not be an adverse impact which would significantly and demonstrably outweigh the benefits.</p>		
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		<p>16. Our client is discussing the prospect of bringing the site forward via a planning application, however, given the timescales involved in getting the various technical reports together, it may be that this neighbourhood plan is made prior to a planning application being determined.</p> <p>17. It may also be preferable for the Town Council to draft a policy shaping development at this site to ensure that the scheme aligns with the needs of the neighbourhood to the greatest possible extent. Whilst a planning application would involve local engagement, the neighbourhood plan may be the best forum for these discussions to ensure that all parties are on the same page from the outset.</p>		
<p>SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions</p>	<p>Suitability of the site and key benefits</p>	<p>18. It is clear that this site could contribute towards meeting the housing target above in a sustainable way with a small scale, proportionate addition to Moreton-in-Marsh. Growing existing settlements will be an important part of meeting district housing requirements.</p> <p>19. The sustainability of Moreton in Marsh as a settlement is established above. The site is appropriately located, adjacent to an existing settlement boundary for one of the larger settlements in Cotswold District, which is also noted as having one of the main employment centres in the district in the draft NDP (paragraph 52).</p> <p>20. The January 2016 SHELAA report identifies the site as suitable, available, and achievable for both employment and residential uses. Additionally, the most recent SHELAA produced by the District Council in 2021 recognises the site as a ‘candidate for further consideration for allocation in the Local Plan’. The conclusions of the assessment (provided at Appendix A) were favourable; <i>“It would make best use of available land to develop the whole of this field, rather than just the part of it that has planning permission for 67 dwellings. In so doing, there would be an opportunity to improve the southern edge of the settlement and deliver biodiversity enhancements and tree planting.”</i> <i>“This site</i></p>	<p>Moreton in Marsh Neighbourhood Plan is not allocating sites for development</p>	<p>No action taken</p>

		<p><i>is a candidate for further consideration for allocation within the Local Plan, subject to overcoming highway issues on Evenlode Road and that necessary infrastructure that is needed to support the development can be delivered.”</i></p> <p>21. Any development at the site would follow the following parameters as outlined in the SHELAA:</p> <ul style="list-style-type: none">• <i>no housing development should be located within the area which has higher than accepted levels of odour from the adjacent sewage treatment works;</i>• <i>the design should include a substantial amount of additional tree planting to screen the adjacent highways depot, the sewage treatment works, and the industrial estate;</i>• <i>the proposal should retain and enhance the existing hedgerows with a more diverse range of native species;</i> <p><i>and</i></p> <ul style="list-style-type: none">• <i>the proposal should deliver the ecological enhancements identified in the Biodiversity section above.”</i><p>22. The land had a draft allocation in the earlier versions of the 2018 Cotswold Local Plan (MOR_E11). Due to lack of access via the employment site to the north, this was removed from the local plan (access to employment land through the residential site was not considered appropriate). However, it demonstrates that the District Council has been comfortable with the proposed allocation of the site in terms of landscape impact (the employment allocation as it would've arguably had a more substantial landscape impact than dwellings).</p><p>23. Paragraph 69 of the Framework confirms that small and medium sites can make an important contribution to meeting the housing requirement of an area, in a manner that can be built-out relatively quickly.</p><p>24. The site is not 'isolated' (as defined at NPPF paragraph 84) as it is sustainably located adjacent to the Backhouse residential area in Moreton-in-Marsh, which offers a number of existing everyday services. Any future</p>		
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		<p>occupants will only serve to further support these local services and facilities. It is a key theme throughout the draft NDP that the town should continue to thrive and build on its commercial offering. Businesses are more likely to invest in towns (thus creating jobs) where they can see growth in the number of households.</p> <p>Conversely, businesses may risk closure if they become less viable, including where there is no growth in profits. New housing can help to prevent this, or to reduce the risk.</p> <p>25. The residents survey report published with the consultation documents confirms that a greater number of apprenticeships are sought in the town. These types of job opportunities are usually likely to be taken up by younger people. However, young people may be priced out of the area if housing supply remains low and demand remains high.</p> <p>26. The report makes it clear that more employment sites are supported by the majority of respondents. The report also identifies traffic concerns. However, unless houses are built in Moreton in Marsh, there will need to be some commuting to the new employment sites which runs the risk of exacerbating the traffic issue. The allocation of the site for housing therefore aligns with the growth strategy for Moreton in Marsh advocated in the draft neighbourhood plan.</p> <p>27. Additional benefits which may come forward include provision of 40% affordable housing (this requirement can be drafted into the policy), s106 funding as appropriate, CIL contributions, Biodiversity net gain and economic benefits during construction and from the occupants.</p> <p>28. A sensitively designed scheme together with ecological, landscape and visual enhancements appropriate to the location of the site on the edge of the village are considered achievable and these matters do not represent a barrier to allocation. The public right of way would be retained if the site were to come forward.</p>		
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		<p>All of the above can be secured through appropriate policy wording and the development management process. 6</p> <p>29. In respect of the sewerage works, the Council has already undertaken assessments which confirm that the site should not be unduly affected. Below is a diagram from an odour constraints assessment prepared in respect of the local plan review (July 2017)². The purple area shows the modelled dispersion of odours (as a 98th percentile of 1-hour mean concentrations) from the standard operation of the Moreton-in-Marsh WwTW. The site is shown edged approximately with a purple line. The allocated site is to the west labelled 12a. We understand that the operations at the sewage treatment works have not changed since 2017.</p> <p>30. Initial feasibility investigations have confirmed that the site can comfortably accommodate up to 53 dwellings. This is what we believe the proposed allocation should be based on. An indicative masterplan is produced with this submission but it should be noted that we expect this to evolve as our client considers various issues and discusses with stakeholders.</p>		
<p>SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions</p>	<p>Policy 5 Paragraph e) and Paragraph j)</p>	<p>e) states “layouts must retain important trees and hedgerows. The planting of new trees and shrubs of similar species to those already evident in the immediate surroundings is required.”</p> <p>j) states “Sufficient space should be identified to provide allotments for a minimum of 10% of the new dwellings unless credible evidence shows this not possible”.</p> <p>Whilst we can understand the rationale behind these policies:</p> <p>e) should consider taking into account the fact that there are mitigation measures which can be used to offset the impact such as a payment for the amenity value of the tree being removed (via s106), or replacement planting.</p> <p>j) may cause some practicality issues for example a development of 10 houses would need to provide just 1 allotment which may make management difficult and</p>	<p>e) it is more important to the community that the existing flora and fauna is preserved where possible and where not, it should be replaced with similar species. Mitigation measures in the form of financial contributions are not what is wanted by the community.</p> <p>j) It is nationally recognised that allotments bring a huge number of benefits to both individuals and local communities.</p>	<p>BP (B) removed BP (C) removed BP (h) now (f) ‘Where appropriate’ wording removed Wording added to BP (j) now (h) ‘<i>If the development site is not within a reasonable distance (3/4 mile) of existing allotments, sufficient space should be identified...</i>’ Wording added to BP (k) now (i) ‘.open space with the opportunity for recreation and physical activity</p>

		result in piecemeal placement of allotments across the town. This policy could potentially enhance a sense of community by requiring sites to contribute financially to provision on a designated site owned or managed by the community. The neighbourhood plan could allocate that site.	There is no space to expand current allotments and it has been noted by the Town Council that there are no allotments on east side of town.	<i>proportionate to the development is expected..'</i>
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions)	Policy 8, paragraph d) and Policy 9, paragraph c)	The Town Council will need to ensure that policies meet the tests for s106 agreements which is likely to be the tool used by the Council to achieve the necessary infrastructure. Often the trigger for obligations like this would be “prior to occupation” so it may be worth aligning the policy wording with this.	Noted	No action taken
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions)	Policy 14	Although we do not have any specific concerns with the infrastructure investment priorities outlined in policy 14, it may be preferable to use the policy to highlight the priorities and then suggest that contributions will be sought for these where appropriate and in accordance with CIL regulations. This slightly shifts the emphasis of the policy to confirm the degree of flexibility, whilst still making local priorities clear. We note that Cotswold District Council completes an infrastructure funding statement each year, where priorities for CIL spending are identified. The neighbourhood plan should align with this list.	Noted	No action taken
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at	Policy 18	There appears to be a discrepancy with the numbering and/or errors on the important views map which are outlined below.	Noted	MiMNPSG has reviewed and refined all Important Views

<p>Evenlode, Moreton in Marsh and not in respect of any of their administrative functions</p>				
<p>SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions</p>	<p>Policy 19</p>	<p>It is unclear whether or not this policy is referring to the 2018 Cotswold Local Plan (we suspect it is). As outlined above, the standard method housing requirement is now being used by Cotswold District Council after a significant change in circumstances. It may be worth considering something along the following lines: <i>Additional development which would result in Moreton-in-Marsh growing by significantly more than the minimum number of dwellings required by the standard method or the latest Cotswold District Local Plan over this period (whichever is being used by the District Council to identify housing requirement at the time a decision is made), will not be supported.</i></p>	<p>Yes, the development boundary map is taken from the 2018 Cotswold Local Plan.</p>	<p>BP (B) reworded: Additional development which would result in Moreton-in-Marsh growing by significantly more than the minimum number of dwellings required by the Cotswold District Local Plan over this period, will not be supported <i>'Development within the development boundary which delivers the number of dwellings required by the Cotswold District Local Plan will be supported'</i></p>
<p>SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions</p>	<p>Policy 20 paragraph f)</p>	<p>As with policy 14, the drafting may benefit from ensuring that any required contributions meet the relevant legal tests. Additionally, 'all developments' is incredibly broad and could mean anything from an extension to 100 homes. A caveat could be introduced to indicate that the contributions will be sought where appropriate and subject to the relevant legal tests.</p>	<p>Noted</p>	<p>BP (B) wording added: <i>'Larger residential schemes (100 dwellings or more) should promote non-car use.'</i> BP (C,6) removed BP (e) reworded 'Proposals should seek, where possible, to create cycle paths so as to provide safe and effective routes across the Neighbourhood Area, and where possible join up with <i>the Local Cycle and Walking Infrastructure Plan (LCWIP)</i></p>

				<i>and National Cycle Network Ways.'</i>
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions)	Minor amendments and comments	<ul style="list-style-type: none"> • Policy 2, paragraph a) – should potentially refer to National planning policy and planning practice guidance rather than ‘NPPF guidance’ for clarity and accuracy. 	Noted	BP (a) wording added: ‘..in accordance with NPPF <i>and</i> PPG guidance.’
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions)	Minor amendments and comments	<ul style="list-style-type: none"> • Policy 3, paragraph a) - This policy refers to the “Moreton-in-Marsh Housing Needs Analysis”. However, it is not clear what this document is. There is a housing need survey report published with the consultation, but it isn’t clear whether this is what the policy refers to. 	Housing Needs Analysis (HNA) prepared by Gloucestershire Rural Community Council (GRCC) in 2021.	HNA added as Appendix and reference to HNA added to BP (a).
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of	Minor amendments and comments	<ul style="list-style-type: none"> • Page 22 – this refers again to the 203 houses for Moreton in Marsh during the plan period, we consider that this figure will need to be updated as outlined above. 	Noted	The most up-to-date figure will be inserted when the plan is submitted for examination.

any of their administrative functions				
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions)	Minor amendments and comments	<ul style="list-style-type: none"> View #18 is described as “Diamond Way footpath (HMM15) looking along River Evenlode”. However, the River Evenlode runs north to south on the opposite side of Evenlode Road to where the view ‘triangle’ is shown on the important views map. HMM15 is also on the opposite side of the road. It is difficult to identify any of the viewpoint images which would fit where #18 is shown so we cannot see that #18 as shown on the map is fully justified. There appear to be similar errors with other view points (for example #21 which states it is looking from Evenlode Road but is actually from the A44). If the reference numbers have been mixed up or shown incorrectly on the map, the Town Council may consider it appropriate to hold a consultation specifically on the views to allow meaningful comment. 	noted	MiMNPSG has reviewed and refined all Important Views
SF Planning on behalf of Gloucestershire County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions)	Availability and Achievability	<p>33. A site is considered to be appropriate for allocation where it is suitable, available and achievable. Above, the site is confirmed as being suitable given the current context.</p> <p>34. In terms of both availability and achievability, the site is presently available for residential development, and there is no impediment to its delivery within the next five years.</p> <p>35. The scheme on the adjacent allocated site was designed to enable future links to this site should it come forward for housing in the future and rights of access have been retained.</p> <p>36. The site could be advanced quickly following the grant of permission and therefore could aid with housing supply in the short to medium term, thereby helping to sustain a five-year housing land supply of deliverable sites.</p>	Moreton in Marsh Neighbourhood Plan is not allocating sites	No action taken
SF Planning on behalf of Gloucestershire	Conclusion	37. We consider, for reasons outlined in this submission that it would be appropriate for the NDP to allocate some sites to meet its housing needs.	Moreton in Marsh Neighbourhood Plan is not allocating sites	No action taken

<p>County Council (as landowners of Land at Evenlode, Moreton in Marsh and not in respect of any of their administrative functions</p>		<p>38. The site should be one of those allocated for housing as it is ideal for residential development due to its sustainable location. It is available for development to be achieved in the short to medium term.</p> <p>39. Development at the site would enable Moreton-in-Marsh to grow proportionately in a well-managed way and perform its functions as a principal settlement. This growth will in turn allow local businesses and services to grow too.</p>		
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