



**COTSWOLD**  
District Council

Moreton-in-Marsh Neighbourhood Plan  
c/o Peter Richardson  
Moreton-in-Marsh Town Council

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By e-mail only

14<sup>th</sup> May 2026

Dear Mr Richardson,

**Moreton-in-Marsh Neighbourhood Plan**  
**Response to Reg 16 draft Neighbourhood Plan consultation**

Firstly, I would like to congratulate the Town Council and their Steering Group on reaching this stage in plan preparation and for creating a well-considered draft plan for the future of the parish.

I have consulted colleagues throughout the District Council on the draft plan and have received a number of comments from various service areas. The District Council's comments are presented in the schedule that follows this letter with internal consultees comments embedded with our own.

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.

I hope that you will see these comments as critical support. They are intended to inform modification to the Plan so that it best meets the expectation of the Town 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.

I hope the comments made by the District Council are helpful in reaching a conclusion to plan preparation. We will, of course, continue to support the Town Council and Steering Group with advice as necessary and with practical support.

Finally, I would advise that the comments made by the District Council in response to this consultation on the pre-submission draft plan do not constitute a *formal* opinion about whether the Plan as currently drafted meets the basic conditions.

The District Council is not required to issue a decision statement in respect of that matter until the independent examination has been completed (which follows this consultation).

Yours sincerely,

Mark Harrison

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## **Regulation 16 Consultation**

Regulation 16 of the Neighbourhood Planning Regulations require the draft plan proposal to be the subject of consultation after submission (Reg 15) to the local authority for independent examination. The consultation should last at least 6 weeks.

A consultation for the plan is being undertaken from Thursday 16<sup>th</sup> April to Friday 29<sup>th</sup> May. Comments for the District Council are provided as relevant on the day of 14<sup>th</sup> May 2025.

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 and local business or community organisations, such as chambers of commerce, civic societies and local trusts.

## **Representations and Modifications**

Representations made during the consultation will be collated and redacted by CDC, and sent to an Independent Examiner (once procured). They will then appraise the comments, the Plan, and supporting evidence to make recommendations, and if necessary modifications, on whether the plan meets the Basic Conditions in order for the plan to be adopted by CDC.

## **Considerations**

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, consultations and a feasibility study have been undertaken regarding housing development in Moreton. This can help understand why no housing sites are proposed for allocation in the Neighbourhood Plan despite a district-wide and local need. There is no requirement for Neighbourhood Plans to allocate housing sites.

### Comment Schedule

<b>Policy No.</b>	<b>Policy Name</b>	<b>CDC Comments</b>
n/a	General comment	For clarity the Policy number, title and text should be within a single box, excluding the objective.
1	Climate Adaptation and Energy Efficiency in Developments	<p>Change of the term <i>proposals</i> has been made since Reg 14, as suggested.</p> <p>Criterion (b) is set out in LP Policy INF10 1(b) and duplication is not required.</p> <p>Criteria (c) and (f) could be moved to supporting text. They express encouragement for such development but do not effectively change policy position.</p> <p>The term '<i>where relevant or appropriate</i>', has been made since Reg 14, as suggested.</p> <p>Criterion (e) has been reworded since Reg 14, as suggested. Had suggested at Reg. 14 making prescriptive the requirement e.g. 10% or 20% of spaces.</p>
2	Managing Flood Risk <b><i>Jo Corbett – Senior Policy Officer has</i></b>	This policy largely repeats Local Plan and national planning policy, including assessing all sources of flood risk and reference to SuDs. There is a specific reference to groundwater and

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	<i>made these comments.</i>	which the NDP might need to clarify /evidence in the justification if not already.
3	Housing Mix	<p>Threshold has been reduced from six dwellings to all dwellings, since Reg. 14, as suggested.</p> <p>The Housing Needs Analysis should now be visible as Appendix H.</p> <p>Would have preferred Lifetime Home Standards to be updated to M4(2) building regulations, rather than removed completely.</p> <p>Could 5 be <i>fully serviced</i> land? e.g. power grid, water, sewage connections.</p> <p>Criterion (b) could be removed, duplicates (c) and (1).</p>
4	Affordable Housing	<p>The term '<i>tenure blind</i>, has been added since Reg 14, as suggested.</p> <p>Criterion (b) has been amended since Reg 14, as suggested.</p> <p>The 'white box' following the policy now refers to the HomeSeeker Plus (or any subsequent) policy; and that the Local Connection Criteria (white box) is supplementary to the HomeSeeker Plus policy (enabled by <a href="#">para 34.1</a> of GCC's policy document). However, the white box should also indicate the 'surrounding parishes' as mentioned in para 34.1.</p> <p>Criterion (c) has been amended, but as written still applies to all proposals, should it be only proposals that include affordable housing?</p> <p>Criterion (d) our understanding is this would contradict national legislation. Could instead propose Discounted Market Sale (DMS) which can tie a perpetual discount to the land.</p>
5	Well Designed Housing and Places	<p>Previous Reg 14 criterion (b) has been deleted as superfluous to (a).</p> <p>Reference to a Design Guide has been removed since Reg 14, as suggested.</p>

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		<p>Criterion (e) – depends on how busy the road is, whilst earthwork barriers are appropriate alongside busy/ main roads, on a quieter road development facing onto the road can enhance the streetscape.</p> <p>Criterion (f) Prefer that the term ‘where appropriate’ is reinstated from Reg. 14.</p> <p>Criterion (h) this has been altered, but better would be an assessment of supply/ demand for allotments. And would extending current sites/ allocating new sites be better than smaller allotments on each development site?</p> <p>Criterion (i) still advocate for these being centralised to the development e.g. village green concept with properties facing, as opposed to “wedges” or “empty plots”.</p>
6	Parking in Residential Developments	<p>Please see comments below.</p> <p>Criterion (b) suggest garages are excluded from the count of the first parking space e.g. where 2 spaces must be provided, only 1 can be a garage space.</p>
7	Brownfield First	<p>Whilst this is a good objective, the policy criteria would not make any change to the determination of planning applications.</p> <p>No sites have been identified which could add to this policy.</p>
8	Hard Infrastructure	<p>Is it possible for criterion (d) to be stronger e.g. <i>before</i> the sale of any dwellings?</p>
9	Soft Infrastructure	<p>Criterion (b) or if the capacity can be increased through the new development?</p>
10	Principal Residence Housing	<p>This policy seems disproportionately strong compared to the justification, and no specific evidence showing % in Moreton is provided.</p>
11	Employment Land	<p>Main employment locations in the parish are now outlined in the supporting text.</p>

12	Small Business Units	<p>What constitutes small? Does this apply up to a certain floorspace or number of employees? E.g. 200 sq. m. is a number likely to come forward in the new local plan.</p>
13	Retail Provision	<p>Moreton has a Key Retail Centre as set out in the retail hierarchy of Policy EC7.</p> <p>The policy proposes a new Core Retail Area. Reiterate that instead the Key Retail Centre boundary should be altered, which would be clearer, and ensure LP Policy EC7 still applies.</p> <p>There needs to be clear justification for the proposed locations of the boundary. Can the more transparent version of Figure 13 (seen elsewhere) be used.</p>
14	Infrastructure Investment Priorities	
15	<p>Local Green Spaces</p> <p><b>Lesley Davis – Planning Policy officer</b> has been consulted on this policy and comments embedded.</p>	<p>Met with Moreton SG to revisit all Local Green Spaces proposed in Reg 14. Satisfied that these all meet the criteria for designation. Except perhaps no.5 Entrance to Fire Services College.</p> <p>Which version of the NPPF? (Para 75).</p> <p>Suggest at part (b) encouraging developers to engage with the TC as an early stage of the development process.</p>
16	<p>NDHAs</p> <p><b>Laurie Davis – Senior Conservation Officer</b> has been consulted on this policy and comments embedded.</p>	<p>Criteria (b) and (c) have been removed since Reg 14 as suggested. The list of each NDHA should be listed in the policy; even if further detail is retained in an Appendix.</p> <p>Still not seeing any justification, assessments, or evidence for each that supports identification as an NDHA. Cannot support the inclusion of any without this information.</p> <p>Also to note that the identified non-designated heritage assets are not a definitive or exhaustive list, and that the Local Planning Authority could take a different view or identify further assets as part of the planning process. That disclaimer should be included somewhere.</p>

17	Biodiversity	<p>Numbering/ lettering needs reordering.</p> <p>Generally supportive of this policy, but criteria could be streamlined, duplicate wording in many places.</p> <p>Criterion (f) on Biodiversity Opportunity Areas (BOAs) has been removed from Reg 14.</p> <p>Criterion (h) other relevant policies in the development framework will apply regardless.</p> <p>Criterion (g) not clear how an applicant “<i>ensure the viability of the surrounding Cotswold National Landscape</i>” ?</p>
18	Important Views	<p>This policy has been amended. The views are now identified on the Policies Map. Support the wording of this policy, it is proportionate (not too onerous).</p>
19	Development Boundary	<p>The policy does not appear to alter the Development Boundary already set out in the Local Plan.</p> <p>Criterion (b) is not positively worded and does not support the principle of sustainable development, suggest removing.</p>
20	Transport & Active Travel	

Comments from **Harrison Bowley, Head of Development Management (CDC):**

With Policy 6, previously raised that the parking requirements are not consistent with Manual for Gloucestershire Streets:

Bedrooms	MfGS (Rural)	NDP
1	1	1
2	1	2
3	2	2
4	2	3
5+	3	4

Additional, visitor spaces are required at 1 space per 5 dwellings in MfGS, and 1 per 2 dwellings in the NDP. The MfGS requirements are a minimum so the NDP does not conflict with this, but I would question if there is a strong evidence base to support setting such high minimum requirements?

From a design/streetscape perspective, car dominance can create numerous issues, including large expanses of hardstanding and wider highways including layby style spaces. This all erodes the quality of design and inevitably reduces green space and street trees within development. It will also inevitably reduce density of developments. Criterion e of Policy 5 requires “*Wherever possible, developments should be screened from the road using earthworks, native species green hedging and/or trees for highway boundaries wherever possible and where these are in keeping with the existing streetscape.*” In practice, these objectives are unlikely to be compatible.

Could also consider this from a modal shift perspective. The over-provision of car parking can undermine modal shift objectives where it encourages car ownership and car-based trips, particularly in locations where walking, cycling and public transport offer realistic alternatives which will be the case of parts of Moreton. Parking provision should therefore be evidence-based, proportionate to the accessibility of the site, and balanced against the need to promote sustainable transport and achieve good design.