

Rep #1: STRATFORD DISTRICT COUNCIL

Mark Harrison

From: [REDACTED]
Sent: 17 April 2026 12:51
To: Neighbourhood Planning
Subject: RE: Moreton-in-Marsh Neighbourhood Plan - Reg. 16 Consultation

[REDACTED]

Good afternoon

Stratford-on-Avon District Council have no comments to make on this Neighbourhood Plan.

Kind regards,

Jessica Underdown
Policy Technician (Planning and Housing)

[REDACTED] web www.stratford.gov.uk

Rep #2: Resident

Mark Harrison

From: [REDACTED]
Sent: 17 April 2026 13:21
To: Neighbourhood Planning
Subject: Regulation 16 Consultation - concern

[REDACTED]

To the attention of the District Council,

I am writing to formally express my significant concerns regarding the increasing volume of proposed housing developments in Moreton-in-Marsh without the infrastructure upgrades by Thames Water.

While I understand the necessity of meeting housing targets, adding further strain to an already fragile system without investment is unsustainable. Residents are already experiencing frequent issues that suggest the current network is at its limit, including:

- Sewer Surcharging and Overflows: Recurrent incidents of sewage backup and the use of storm overflows in our local waterways.
- Low Water Pressure: Noticeable drops in pressure during peak hours, which will only be exacerbated by hundreds of new connections.
- Frequent Pipe Bursts: An aging main system that appears unable to handle shifts in demand or ground pressure.

We need a concrete commitment to infrastructure reinforcement before these new homes are occupied, otherwise local wildlife and waterways are in serious danger from further discharge.

I look forward to your response

[REDACTED]
Moreton-in-Marsh

Rep #3: NATIONAL HIGHWAYS

Mark Harrison

From: [REDACTED]
Sent: 20 April 2026 16:35
To: Neighbourhood Planning
Cc: [REDACTED]
Subject: DL 29/5/26 - Moreton-in-Marsh Neighbourhood Plan - Reg. 16 Consultation - National Highways respon

[REDACTED]

Mark,

Thank you for providing National Highways with the opportunity to comment on the draft Moreton-in-Marsh Neighbourhood Plan – Regulation 16 Consultation. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance includes the A46 trunk road and M5 motorway which run some distance west of the Plan area.

We are interested in the traffic impact of any future development proposal and specifically the impact of growth on the continued safe and efficient operation of the SRN. In respect of traffic and transport, Plan polices should ensure development mitigates its traffic impact on the surrounding network which includes reducing the reliance on the private car by requiring development to both safeguard and improve local facilities, services, and sustainable transport options.

Following our review of the draft we are satisfied that the proposed policies within the draft Neighbourhood Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make on the document. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.

Kind regards,

Sally

Sally Parish, Spatial Planning, South West Operations

[REDACTED]

Web: www.nationalhighways.co.uk

Covering: B&NES, Bristol, Cheltenham, Cotswolds, Forest of Dean, Gloucester City, South Gloucestershire, Stroud, Tewkesbury, West of England

Rep #4: Resident

Mark Harrison

From: [REDACTED]
Sent: 03 May 2026 09:15
To: Neighbourhood Planning
Subject: Moreton in Marsh - Gebe Land car park - Consultation feedback

[REDACTED]

Dear CDC,

I have fed back locally to the Moreton in Marsh NDP group but sadly they have been influenced by a dysfunctional Town Council in my opinion.

Historically, The Diocese themselves proposed to build a car park on the Glebe Land (Bourton on the Hill road) which would have allowed GCC to bring in much needed parking management in the High Street and side streets. A picture of the proposed car park is below and please note this has pre planning approval with CDC.

The latest NDP consultation output proposes a green field designation on the Glebe Land to effectively kill any car park ideas and that is very wrong in my opinion.

Please DO NOT put a green field designation on the Glebe Land as that field is a very good location for a new out of town car park which the town desperately needs.

Many thanks,

[REDACTED]



[REDACTED]

Rep #5: Resident

Mark Harrison

From: [REDACTED]
Sent: 04 May 2026 13:02
To: Neighbourhood Planning
Subject: Proposed Neighbourhood Plan for Moreton in Marsh

[REDACTED]

Sirs

You have requested views on the proposed Neighbourhood Plan for Moreton in Marsh to be forwarded to the Independent Examiner for consideration as a next stage of the plan progression to a finished document.

My comments, written as an individual resident of the Town, are my personal views and in these, I do not represent any organisation.

You have not specified how you wish comments to be addressed to you. I have taken the option therefore to write in free text with a summary of major issues and failings within the draft document which you are to examine. This is not exhaustive.

I welcome the opportunity to comment again as part of the process and would repeat my previously held view that I am grateful for the immense amount of hard work undertaken by numerous individuals to date in constructing a document that aims to regularise and formalise guidance that can be used by the town and others to move forward. As one of the then Town Councillors who originally called for a Neighbourhood Plan to be constructed, I do not underestimate the task that others have taken on to reach the stage of the process that is evident in the documentation.

I remain of the view that it is, in my opinion, unfortunate that the process has been, in effect 'taken over' by the current Town Council which is largely not held in good repute by the general population of the town. This has led in part, to the document output being 'hijacked' in part, to meet the agenda set by the Town Council. Whilst there is much to commend the approach taken, for example in the opportunities for the general public to be consulted with in line with the prescribed disciplines of an 'NDP template', the output does not, in my opinion, reflect either some general concerns facing the Town or some of

the specific issues about which the current Town Council has demonstrably failed to address to the satisfaction of a majority of caring residents.

My gravest concern in this process is that the apathy which exists in the town and the sense of resignation which affects attempts to engage the wider community in the debate is likely to damage the credibility of the work completed. One need only examine at a next level of detail, the number of failed attempts to recruit new Town Councillors and the number of Town Councillors who have resigned their posts over the past 5 years to understand why the apathy exists. Until the ethos by which the Town Council operates changes, full engagement of the townsfolk is unlikely and this is and will be to the detriment of the people who have worked so diligently in the NDP project to date and, critically importantly, to the real engagement of the local townsfolk in taking responsibility and ownership of their community for the future.

Whilst I am certain it is not the role of the Independent Examiner in this part of the process to recognise the failings in our community, I do believe it is incumbent upon that role to deeply consider whether this plan has the full engagement of the people it seeks to guide. The role of Cotswold District Council in this is crucial and it should not hide behind apparent transparency in considering whether full and meaningful engagement has been evident and achieved. **Perceived apathy should not be seen as a silent endorsement.**

The plan as presented does little or nothing to address the significant infrastructure development needed for the town. Whilst appreciating that much in this area is outside of the direct control of people to whom this plan is most meaningful, without a significant infrastructure vision and plans in place, (including a clear financial plan), the aspirations of this NDP cannot and will not be fulfilled. The infrastructure issues are numerous and not exhaustively:

- a. Schooling and education - the current facility in the town is barely able to cope with the current demands placed upon it. The development and expansion of the town will merely exacerbate the issue unless additional primary and secondary education facilities are factored into the growth currently anticipated. It is not sustainable on any basis to continue the daily transportation students out of the area.
- b. Healthcare - the current primary care facilities are struggling to cope with the current population in any way which meets an acceptable

national standard. Add to this the demands of a population whose demographic is currently not well catered for in the area (the elderly and infirm) and whose ability to manage a changed dynamic (younger families coming to the town) must be severely questioned on the numbers requiring care (pre and post natal, maternity, CAMHS, for example). The secondary care facility is at best a token outpost to the major unit in Gloucester and hour away or Cheltenham for intermediate services and some specialities. It is at best a part-time token community service out of step with the current preferred national model of diagnostic hubs and planned treatment centres. NHS funded dentistry in Moreton in Marsh no longer exists

- c. Road networks - Moreton benefits from being on a cross road of two major transport arteries - the A429 Fosseway and the A44 east-west route. Both will be positively affected by the completion of the A417 link to the south currently under construction. But notwithstanding, congestion for traffic moving through and around the town is worsening with little apparent forethought on how relief can be achieved or how an expanded town will be able to cope.
- d. It is acknowledged that the existing Sewage and Drainage arrangements (provided by Thames Water) are beyond the point of breakdown with urgent upgrades to all water, drainage and sewage facilities required. Thames Water have stated that no upgrade is planned within the lifetime of this NDP. Notwithstanding these points, little or practical consideration has been given to finding a solution to ensure that with the numbers of houses to be built now being proposed, this core service (water, drainage and sewage) will not collapse completely in the town. There is little or no evidence that this plan addresses the wider needs of the town in this area, only an assumption that developers will make a more general contribution to the needs in this area through any CIL funding imposed on their developments. This is in effect, kicking the issue, which is already at a critical point, into 'the long grass'.
- e. The lack of a reasonable speed, stable internet infrastructure across the town is the single largest factor in my not considering Moreton in Marsh for the development of my own businesses. This plan does nothing to address the fact that as we move so rapidly into the

digital age, the support structure needed does not exist and is not planned to exist at any time in the reasonable future.

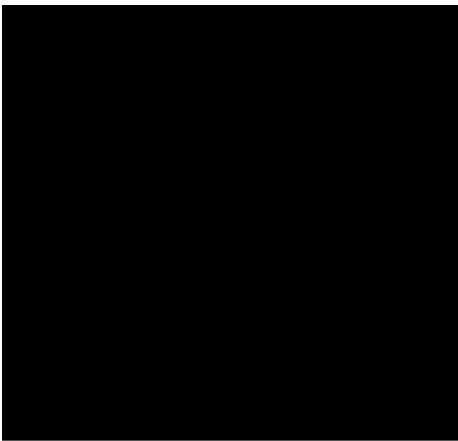
- f. Parking continues to be the most sensitive of areas for consideration - what the draft NDP has done is support the current, widely discredited Transport and Parking strategies developed by the Town Council with, at this stage a complete rejection of anything that has challenged and continues to challenge those strategies regardless of the vociferous view expressed by the Town residents over many years and in many different forums. That there is a parking problem in Moreton is not in doubt with none of the various factions, (residents, traders, tourists, shoppers, businesses and occasional pass-through visitors for example) being satisfied with the current situation. The Town Council proposal is to (in essence) remove parking spaces from areas in and around the High Street, replace some of these through the partnership agreed (without a mandate from the residents who are funding it) with GWR at the proposed Transport Hub, plus a redesignation and redesign of some other parking spaces in the Town centre with (the inevitable) support to 'green policies' (such as cycle tracks, public transport usage etc). However, if the town is to develop in size, the numbers of houses, number of businesses, increasing numbers of stay and day tourists, reducing the current inadequate provision for parking will add to the problems already being faced. Similarly, unless a 'parking strategy' for the whole town, including the side streets is developed, the problems in the central area will merely be moved to the fringes. These issues are well known and have been well debated for many years. The NDP gives a great opportunity to re-examine the issues in the context of the wider development of the town. Instead, the draft NDP under consideration, merely endorses the poor strategy that the Town Council wish to promote which has already been widely criticised in public meetings and public forums as unworkable and inadequate. This is a huge, missed opportunity for the town.
- g. The rejection of the use of the Glebe Field land as a long-term parking solution by the current Town Council is reflected and endorsed by this draft NDP. This is possibly, the most contentious part of the whole plan and is an example of where the NDP as proposed has become a 'hijacked' process. The Town Council has consistently failed, over many years, to represent the views of the

residents of the town in respect of this matter and instead, has pursued the disastrous Transport Hub project against the wishes of the people it purports to represent. The Transport Hub project was 'sold' to the residents of the town on a false basis (no mention ever being made of a partnership' with GWR at the time the townsfolk were consulted about raising funding through increasing the precept) and it remains a project which is unfunded with no sustainable plan to develop and which fails to address the issues for the town identified as important. The development of the Glebe Field land (owned by the Diocese of Gloucester) has long been recognised as a catalyst solution for many aspirations the town has held, (addressing the parking problems, creating a 'destination' centre for the development of tourism, central to a proper traffic management for the town etc etc). It is perhaps significant that the owner of the land, the Diocese of Gloucester, has objected to the designation of its land as a protected 'Green' space within the NDP. (First comment on page 20 of the pdf comments document on the NPD website). Perhaps most concerning in the NDP process, the Town Council/NDP steering committee constructing the document have completely failed to address the numerous comments made by residents as a prior part of this process responding instead by a 'stock' response of *"Glebe Field has consistently been identified by the community as an Important Local Green Space and has been included in the Neighbourhood Plan for this reason."* As a former Town Councillor and resident of the town, **I am completely unaware of any evidence that this statement is true.** Furthermore, I am completely unaware of anyone in 'the community' who has seen any evidence to support this view. The comments from the Diocese of Gloucester and the survey they undertook in respect of the potential development of the Glebe would certainly suggest that this expressed view in the draft NPD is not true. This does of course bring into some question whether there are other aspects of the draft document which are similarly based on non-evidenced untruths.

Whilst appreciating that the document as produced only has an applicable life of less than 5 years (up to 2031), as a starting point for what may follow, it is important to set the right tone and get the basics properly grounded. It can also be suggested that the document as produced deals primarily with aesthetics,

(style of building design acceptable for example) and important environmental factors, (use of renewables for example). But the opportunity to do so much more with this plan is one that should not be missed (albeit within the confines of what is 'allowable' under current legislation. The comments made above are examples where, I believe, the opportunity to maintain and create something which preserves both the heritage of the area and deal with the inevitable progress that large scale development will engender. Therefore, the failure to address the basic infrastructure elements is an opportunity missed for the future of current residents and those who are fortunate enough to be part of our whole future.

There has been a huge amount of work in getting to this point and I congratulate all involved. But it is surely the role of the Independent Examiner to see where the plan is incomplete, where it falls short on an evidence base and where the consequences of limitations identified are fully understood.



Rep #6: Resident

Consultation Response: Moreton-in-Marsh Neighbourhood Development Plan

I am broadly supportive of the Neighbourhood Plan but wish to raise three significant concerns regarding parking policy and Local Green Space designations, where the plan contradicts community consultation evidence and lacks proportionate justification.

1. Policy 14(c) Contradicts Residents' Expressed Preferences on Parking

The 2021 Residents Survey (835 responses, 35% response rate) provides clear evidence that residents want MORE parking in the town centre, not less:

- **338 residents** requested "Better design and use of existing parking spaces in town"
- **337 residents** requested "More parking capacity in the town centre"

Yet Policy 14(c) proposes to "Remove long-stay parking from the town to a location close to the train and bus stations."

The survey asked no questions about:

- Removing parking from the town centre
- Relocating parking away from the High Street
- Whether long-stay parking causes problems
- Resident support for this relocation strategy

Request: Remove or substantially revise Policy 14(c) to reflect actual community preferences, or provide robust evidence that removing town centre parking serves the community's needs.

2. Glebe Field (LGS #22) Designation Contradicts Documented Community Preferences and NPPF Criteria

The Glebe Field designation as Local Green Space fails the NPPF requirement that spaces be "demonstrably special to the local community" and appears to be a retrospective measure to block a community-supported car park.

Evidence of overwhelming community support for alternative use:

- 2018 Public Consultation: 87% supported (183/210 respondents) a Glebe Field car park
- 2018 Annual Parish Meeting: Voted 76-18 to support "securing the lease or purchase of the glebe land" for parking
- 2019 Annual Parish Meeting: Voted 23-0 in favour of TRO process acknowledging Glebe as "a good option"
- Diocese Offer: Agreed to build car park at no cost to the town (250 spaces) and lease land to council

The Council itself formally agreed (May 2018) to "work together" with the Diocese to "identify a suitable business model" for Glebe Field car park use, yet this was subsequently abandoned without further community consultation.

Weaknesses in the LGS designation:

- Describes field primarily as a "buffer" between campsite and town (planning function, not community benefit)
- Notes "stock can graze" suggesting private agricultural use
- Provides no evidence of public access or community activities
- Vague justification: "Historic connection to the Parish" without specifics

This retrospective designation directly contradicts:

- Three separate democratic votes supporting the car park
- The plan's own survey showing residents want MORE town centre parking (338 responses)
- The council's own 2018 resolution to work with Diocese on the site
- CDC planning officer's positive pre-application assessment

Request: Remove Glebe Field from Local Green Space designations. The documented evidence demonstrates this land is not "demonstrably special to the local community" as required by NPPF para 107, but rather that the community specifically supported its development for parking to address the town's most pressing concern (per survey: "HGV Traffic and congestion" - #1 concern).

3. Parking Strategy Lacks Proportionate Evidence Base and Realistic Delivery Plan

The plan's parking policies fail to meet the "Basic Conditions" requirement for proportionate evidence and rely on an unfunded proposal:

Missing evidence:

- No parking capacity study or occupancy rates
- No data on long-stay vs short-stay parking patterns
- No traffic impact assessment of removing town centre parking
- No economic impact assessment on retail/tourism
- No viability study of alternative parking locations

Unrealistic delivery assumptions:

- The Transport Hub has **no secured funding** and will require at least **two years of CIL contributions** from CDC. With the impending nationalisation of GWR funding seems even less likely.
- Even if delivered, it provides only **44 additional spaces** for town use (remainder being rail/EV provision)
- The Town Council's recently adopted 'Aspirational Plan' reduces town centre parking from **259 legal spaces (2013) to 132 spaces**

- Net impact: **Loss of 83 town centre spaces** with only 44 replacement spaces (and those unfunded)

This means residents face:

- Immediate loss of 127 spaces if/when town centre changes implemented
- Uncertain timeline (minimum 2+ years) for any replacement provision
- Significant risk the Transport Hub may never be delivered due to funding constraints

The plan proposes removing parking capacity based on a replacement facility that has no funding commitment, contradicting resident requests for MORE parking capacity (337 survey responses).

Request:

1. Remove Policy 14(c) until Transport Hub funding is secured, or
2. Explicitly state that no town centre parking reduction will occur until replacement capacity is delivered and operational, or
3. Commission a comprehensive parking study and revise strategy to align with community preferences for increased town centre capacity.

Rep #7: Resident

Mark Harrison

From: [REDACTED]
Sent: 13 May 2026 20:33
To: Neighbourhood Planning
Subject: Moreton-in-Marsh Neighbourhood Development Plan (Regulation 16 Consultation)

[REDACTED]

To Whom It May Concern,

I would firstly like to thank the Town Council, volunteers and contributors involved in preparing the Moreton-in-Marsh Neighbourhood Development Plan. The document clearly reflects a substantial amount of community effort and demonstrates a genuine commitment to preserving the character and vitality of the town while accommodating future growth. The Plan rightly identifies the importance of sustainable development, infrastructure provision, environmental stewardship and the long-term wellbeing of residents.

However, I would like to raise several concerns and recommendations which I believe require stronger emphasis and clearer policy support if the Plan is to successfully meet the future needs of Moreton-in-Marsh as the town continues to expand.

Firstly, there remains a pressing need for a long-term traffic strategy, including serious consideration of a relief or ring road solution to alleviate congestion through the town centre. Moreton's historic layout was never designed to accommodate the current volume of through-traffic, particularly along the A429 and A44 corridors. Congestion not only impacts residents' quality of life, but also affects air quality, pedestrian safety, visitor experience and the attractiveness of the High Street as a social and commercial destination. As additional housing developments are delivered over the coming years, the cumulative impact on traffic movement will become increasingly severe unless strategic infrastructure improvements are planned proactively rather than reactively.

Related to this is the urgent need for improved pedestrian infrastructure, particularly around the bridge near the Co-op and the main road corridor linking newer developments at that end of town. At present, pedestrian connectivity in this area feels fragmented and unsafe, especially for families with pushchairs, elderly residents and those with mobility challenges. A properly designed pedestrian walkway over or alongside the bridge would significantly improve safety, encourage walking instead of short car journeys and better integrate newer housing developments into the wider town. This would strongly support the Plan's sustainability and active travel objectives.

Similarly, there is a clear need for a safe pedestrian crossing and improved parking provision associated with Queen Victoria Gardens. While valuable work has already been undertaken to improve biodiversity and accessibility within the park itself, pedestrian access to the park from surrounding residential areas and the town centre remains challenging. Enhanced crossing facilities would encourage greater use of this important community asset and improve accessibility for children, older residents and visitors alike.

The Plan should also place much greater emphasis on early years childcare provision. Moreton-in-Marsh currently suffers from a significant shortage of nursery places, particularly for children under 18 months, with extremely limited availability thereafter, especially outside standard term-time arrangements. This is becoming an increasingly serious issue for working families and risks

undermining the sustainability of the town as a place for younger households to settle and remain. Housing growth must be accompanied by meaningful social infrastructure, and this should explicitly include provision for nursery and pre-school facilities.

In addition, there is a growing need to address secondary school provision. While primary education is referenced within broader infrastructure discussions, the longer-term educational needs of an expanding population require more strategic consideration. Families should not face increasing pressure to travel substantial distances for secondary education, particularly in a rural area where public transport options remain limited. The Plan should therefore advocate strongly for either expanded local provision or secured partnerships and transport infrastructure that ensure future educational accessibility.

I would also strongly encourage the Plan to prioritise more accessible, year-round green space and walking infrastructure. Although Moreton benefits from pockets of attractive green areas, there remains a shortage of connected, accessible walking routes suitable for everyday recreation, wellbeing and dog walking. The importance of accessible green infrastructure for mental health, physical wellbeing and community cohesion is now widely recognised nationally. Enhancing and connecting green spaces through usable walking routes would provide significant benefits for residents of all ages while also supporting biodiversity objectives already identified within the Plan.

Another issue which deserves greater attention is the visual and functional character of the town centre itself. Currently, parts of the town centre environment feel dominated by surface parking, which detracts from Moreton's identity as a historic market town and weakens the experience for visitors and residents alike. There is a substantial opportunity to rethink the public realm so that Moreton becomes a more attractive, pedestrian-friendly destination with stronger café culture, outdoor social spaces and enhanced support for independent businesses.

However, this must be considered carefully alongside existing and proposed parking strategies. In particular, there is growing concern regarding the proposed "transport hub" at the train station, which many residents feel is poorly conceived in its current form. When considered alongside the proposed changes to parking arrangements within the High Street, the combined effect appears likely to result in a net loss of parking provision overall. This risks increasing pressure on surrounding residential streets, reducing convenience for visitors and potentially harming local businesses that rely upon accessible short-stay parking within the town centre.

In this context, the previous proposal for an out-of-town car park on Glebe land appears worthy of renewed consideration. Relocating some parking pressure away from the centre could create opportunities to transform existing parking-dominated spaces into greener, more welcoming public areas, whilst still maintaining sufficient parking capacity to support residents, visitors and local commerce. Such an approach would support local businesses, improve tourism appeal, encourage longer dwell times within the town centre and create a more distinctive sense of place consistent with the aspirations of the Neighbourhood Plan.

I would also support the creation of a dedicated pedestrian path linking the garden centre with the town itself. At present, walking between these destinations is neither attractive nor particularly safe, despite the relatively short distance involved. Improved pedestrian links would encourage healthier travel choices, reduce short vehicle trips and strengthen connectivity between key destinations.

Healthcare provision also remains a major concern, particularly the absence of NHS dental services within the town. Access to NHS dentistry has become increasingly difficult nationally, but the lack of local provision in Moreton-in-Marsh places significant pressure on residents, many of whom are

forced to travel considerable distances or go without routine care altogether. Given the town's planned growth, the Plan should more explicitly recognise healthcare infrastructure — including dental provision — as a critical component of sustainable development.

I would also strongly encourage the Plan to adopt more ambitious expectations regarding green infrastructure provision within future housing developments. Given the scale of growth anticipated in and around Moreton-in-Marsh, it is essential that developers are required not merely to meet minimum green space standards, but to meaningfully exceed them wherever possible.

There is understandable concern amongst residents that continued large-scale housing expansion risks creating a gradual erosion of the rural character and openness that fundamentally defines Moreton's identity and attractiveness. New developments should therefore be designed in a way that preserves the feeling of a market town set within a rural landscape, rather than contributing to the perception of suburban sprawl or overdevelopment.

Enhanced green infrastructure requirements would help mitigate many of the wider concerns already identified throughout this response. Well-designed green spaces, landscaped buffers, tree planting, community orchards, walking routes and accessible recreation areas can help alleviate pressure on existing parks and amenities, improve wellbeing, support biodiversity, encourage active travel and create a more cohesive relationship between new and existing parts of the town. Importantly, they can also soften the visual impact of development and maintain the distinctive character that makes Moreton desirable both as a place to live and to visit.

The National Planning Policy Framework places significant emphasis on achieving biodiversity net gain, promoting healthy communities and securing high-quality, beautiful places. In the context of Moreton-in-Marsh, this should translate into developments that deliver genuinely usable and attractive green environments rather than small fragmented pockets of landscaping designed simply to satisfy minimum technical requirements.

If substantial housing growth is to continue, developers must play a greater role in ensuring that the town remains visually appealing, environmentally resilient and socially sustainable for future generations. Stronger green space expectations within the Plan would provide reassurance to residents that growth can occur without sacrificing the qualities that make Moreton unique.

Overall, I believe the Neighbourhood Development Plan provides an important foundation for shaping Moreton's future, but it must be strengthened to ensure infrastructure, accessibility, healthcare, education, green space and transport improvements keep pace with housing growth. Without stronger commitments in these areas, there is a real risk that the town's quality of life, community cohesion and historic character will gradually erode under increasing pressure.

I hope these comments are received constructively and can contribute positively to the ongoing development of the Plan.

Yours faithfully,

A solid black rectangular box redacting the signature of the sender.

Sent from [Outlook for Android](#)

Rep #8: Resident. (n.b. CDC sent appendices).

Mark Harrison

From: [REDACTED]
Sent: 21 May 2026 12:40
To: Neighbourhood Planning
Subject: Moreton Neighbourhood Plan

[REDACTED]

Hello,

I would like to comment on the proposed Neighbourhood Plan for Moreton-in-Marsh.

First, thanks to everyone who has worked so hard on this document, much appreciated.

May I bring to your urgent attention that some Appendices to the Neighbourhood Plan are missing from certain printed and digital versions. Page 3 lists Appendices A to H, but I can no longer find Appendices E to H.

I wish to comment on Appendix G, the Greenway documents. Moreton-in-Marsh badly needs upgraded facilities for Active Travel. The proposed East Moreton Greenway would provide a very low cost solution, by signposting an existing network of paths. I strongly support this. Walking and cycling would be easier and safer. Fewer people would use cars to travel around town.

Please will you replace the missing Appendices, so they appear in all versions of the Neighbourhood Plan. It's too hard to find Appendix G, so please will you provide a link from page 58, maybe from page 18 as well.

I am also writing in support of the The Glebe Land, as a future car park for Moreton-in-Marsh. Moreton's businesses have to compete with places like Chipping Norton, which has a huge, free public carpark.

The Glebe Land is a field alongside the A44 Bourton Road, opposite the Wellington Aviation Museum and extending towards Moreton High Street. The land is owned by the Church of England. I understand that some years ago, the Church offered to donate the land to Moreton-in-Marsh, for car parking. I feel this offer should be explored further.

Regards,

[REDACTED]

Rep #9: Resident

Mark Harrison

From: [REDACTED]
Sent: 26 May 2026 11:43
To: Neighbourhood Planning
Subject: Moreton Neighbourhood Plan

[REDACTED]

Having read the relevant paperwork and background to the Plan I fully support the aspirations as outlined. A resident since 2006 and regular visitor to the area from 1964 I have witnessed significant changes to the town many not to the good.

The High Street has declined and is less accessible with long term High street parking reducing the foot fall in shops, certainly in the sixties Moreton had a wide range of shops along the High Street most have now gone. Infrastructure is now a major concern - schools provision, sewage system , GP practices still largely the same size since 2006 and the Four Shires medical centre now is inadequate to meet the needs of Moreton and the locality. I hope serious note is taken of the Plan.

[REDACTED]

Rep #10: Resident

Mark Harrison

From: [REDACTED]
Sent: 26 May 2026 18:28
To: Neighbourhood Planning
Subject: Regulation 16 Representation – Moreton-in-Marsh Neighbourhood Plan

[REDACTED]

Dear Sir or Madam,

I am writing to submit my representation on the Moreton-in-Marsh Neighbourhood Plan as part of the Regulation 16 consultation.

I support the intention of the Neighbourhood Plan to manage development in a sustainable way. However, I believe the Plan must go further in recognising that Moreton-in-Marsh already faces significant infrastructure deficits. Further large-scale development would be unsustainable unless critical infrastructure is delivered first. My comments relate to the Basic Conditions, particularly sustainable development, general conformity with the Local Plan, and adequacy of the evidence base.

1. Health Infrastructure The town has extremely limited healthcare capacity. There is only one dental practice serving more than 5,000 residents, with little or no NHS availability. GP services are already stretched. There is no committed plan for expanded provision despite substantial population growth since the 2011 Census. Development without confirmed healthcare expansion would not meet national policy requirements for adequate health infrastructure.

2. Traffic, Air Quality and Pollution The A44 and A429 already carry heavy traffic and dissect the town, causing congestion, pollution and safety issues. Additional development would worsen these problems unless significant mitigation is secured. This raises concerns regarding sustainable transport and environmental impacts.

3. Education Capacity Local schools are already constrained, and there is no committed plan for expansion. Without additional school places, further housing growth would not be deliverable in a sustainable way.

4. Retail and Leisure Provision The town centre has an increasingly limited retail mix, with a proliferation of cafés and a lack of essential retail, leisure facilities, gyms or youth amenities. Sustainable development requires a balanced and functional town centre.

5. Rail Capacity The rail service is already close to capacity at peak times. Additional housing will place further pressure on a line with limited ability to increase frequency due to infrastructure constraints.

6. Water and Wastewater Infrastructure Thames Water has indicated that it cannot fully service existing demand. Wastewater capacity and water pressure issues are well known. Adding more homes without confirmed upgrades would be unsustainable and contrary to national policy.

7. Housing Design and Local Vernacular Any new development must reflect the local Cotswold vernacular in materials, scale and layout. Recent approvals outside the settlement boundary have not always met this standard. Stronger design requirements are needed.

8. Location of Development Development should be focused on areas with direct access to the A-roads. Proposals accessed via narrow rural lanes are unsuitable and would create safety and traffic issues.

Overall Position

I support the Neighbourhood Plan’s intention to shape development, but it must be strengthened to ensure that no further large-scale housing is supported until critical infrastructure across health, transport, education, water and utilities is demonstrably deliverable. This is essential to meet the Basic Conditions and ensure Moreton-in-Marsh remains a sustainable and functional town.



Moreton In Marsh

Rep #11: HISTORIC ENGLAND

Mark Harrison

From: Stuart, David [REDACTED]
Sent: 27 May 2026 11:44
To: Neighbourhood Planning
Subject: Moreton-in-Marsh Neighbourhood Plan - Reg. 16 Consultation

FAO Mark Harrison

Dear Mark

Thank you for your Regulation 16 consultation on the submitted version of the Moreton-in-Marsh Neighbourhood Plan.

I can confirm that there are no matters associated with the Plan upon which we wish to comment.

Kind regards

David

David Stuart | Historic Places Adviser

[REDACTED]
Historic England | South West
[REDACTED]

<https://historicengland.org.uk/southwest>



Ensuring our heritage lives on and is loved for longer.
historicengland.org.uk

Rep #12: NETWORK RAIL

Mark Harrison

From: Grace Lewis [REDACTED]
Sent: 27 May 2026 15:52
To: Neighbourhood Planning
Subject: Network Rail comments Moreton-in-marsh NDP

OFFICIAL



Network Rail

Date: 27 May 2025

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)
PROPOSAL: Moreton-in-marsh Neighbourhood Development Plan.

Dear Mark,

Thank you for consulting us on the Moreton-in-marsh neighbourhood development plan. This email forms for the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

Level Crossings

Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

There is one level crossing within the plan area that could be affected:

1. Moreteon-in-marsh Public Footpath Level Crossing

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- By any development or enhancement of the public rights of way

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the level crossing in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that *"...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway"* (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Yours Sincerely,

Grace Lewis MRTPI

Town Planner

Network Rail

www.networkrail.co.uk/property

Moreton-in-Marsh Neighbourhood Plan Regulation 16 Consultation, Representations on behalf of Catesby Estates (27th May 2026)

1. Introduction

1. Catesby Estates has instructed Marrons to submit representations to the Moreton-in-Marsh Neighbourhood Plan (MIMNP) Regulation 16 Consultation.
2. The MIMNP has been reviewed against the 'basic conditions' and legal requirements set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), and associated requirements of the National Planning Policy Framework (NPPF)¹, notably NPPF paragraph 38, and National Planning Practice Guidance (NPPG) ('Neighbourhood Planning')².
3. The representations are submitted within the context of Catesby's land interests east of Evenlode Road, Moreton-in-Marsh, which is currently subject to an outline planning application for up to 110 new homes and associated infrastructure (Cotswold District Council reference 25/04041/OUT³).
4. In summary, the following policies are currently in conflict with basic conditions (a) and (d) since they are not informed by up-to-date evidence (a requirement of national planning policy) and therefore do not contribute towards the achievement of sustainable development.
 - Policy Three: Housing Mix.
 - Policy Four: Affordable Housing.
 - Policy Ten: Principal Residence Housing.
 - Policy Nineteen: Development Boundary.
5. Detailed justification is provided in section 2.

¹ Ministry of Housing, Communities and Local Government, December 2024 version.

² Ministry of Housing, Communities and Local Government, published 6th March 2014, last updated 25 September 2020.

³ [25/04041/OUT | Outline planning application for erection of up to 110 new dwellings, public open space, landscaping, sustainable drainage system \(SuDS\) and creation of associated vehicular access point to Evenlode Road and other associated infrastructure, with all matters reserved except access into the Site | Land East Of Evenlode Road Moreton-In-Marsh Gloucestershire](#) (accessed May 2026).

2. Detailed justification

Policy Three: Housing Mix

6. The Housing Needs Analysis (Appendix H) referred to in the policy is not included in the consultation document and not available for review and comment. This needs to be included and published for consultation to support the justification for this policy, to ensure that it meets basic condition (a). Basic condition (a) requires a neighbourhood plan to have regard to national policies and guidance. National Planning Policy Framework (NPPF) paragraph 32 requires that “*all policies should be underpinned by relevant and up-to-date evidence*”.
7. If the evidence relied on is the Moreton-in-Marsh Housing Needs Survey Report (GRCC, May 2021) then that report makes clear at paragraph 1.3 that “*the survey is valid for up to 5 years from the survey (February 2020).*” The validity of that the survey therefore expired in February 2025 so needs to be updated. An up-to-date housing needs survey is also necessary to support a plan which contributes towards the achievement of sustainable development – of which meeting housing needs is an important component – to meet basic condition (d).

Policy Four: Affordable Housing

8. Policy Four requires that affordable housing should reflect local need with reference to Appendix H, Morton-in-Marsh Housing Needs Assessment. However, as explained in response to Policy Three, this evidence is missing from the consultation and so conflicts with basic condition (a) and NPPF paragraph 32, which requires plans to be underpinned by up-to-date evidence. The validity of the 2021 Housing Needs Survey Report expired in February 2025.
9. A further issue regarding Policy Four is criteria (b), which states that “*Affordable homes will be prioritised for households with a strong local connection for the parish of Moreton-in-Marsh...*”. This policy does not accord with national policy and legislation, conflicting with basic condition (a). National policy, guidance and legislation places responsibility on the allocation of affordable housing on the relevant local housing authority, as set out in Allocation of accommodation: guidance for local housing authorities in England (MHCLG,

1st April 2026)⁴. Moreton Town Council does not have statutory powers to direct the allocation of affordable housing. Responsibility sits with Cotswold District Council who use the Homeseeker Plus choice-based lettings scheme⁵.

Policy Ten: Principal Residence Housing

10. Policy Ten prevents any new open market housing unless there is a restriction to ensure its occupancy as a principal residence only. The aim of the policy is to prevent new homes being built for holiday accommodation and second homes. However, this policy is not underpinned by relevant and up-to-date evidence, in conflict with NPPF paragraph 32 and therefore basic condition (a).
11. The extent to which open market homes are being used for holiday accommodation and second homes is not evidenced. The Action on Empty Homes analysis referred to in Footnote 34 is not available as part of this consultation (there is no hyperlink against which to review the 2024 figures reference). Furthermore, any analysis of empty homes is distinct from an analysis of whether such homes are being used as holiday accommodation or as a second home. Homes may be empty for other reasons, for example because they are in need of repair or refurbishment, awaiting resolution of probate or inheritance or the owner may have moved into care. The number of empty homes does not infer a corresponding number of holiday accommodation and second homes to justify Policy Ten.
12. Neighbourhood plans which have adopted similar policies have much more detailed evidence underpinning them. For example, the St Ives Neighbourhood Plan in Cornwall had a second homes policy informed by local data, the Census and specific research undertaken by the University of Exeter. No comparable evidence is available to support the MIMNP.

Policy Nineteen: Development Boundary

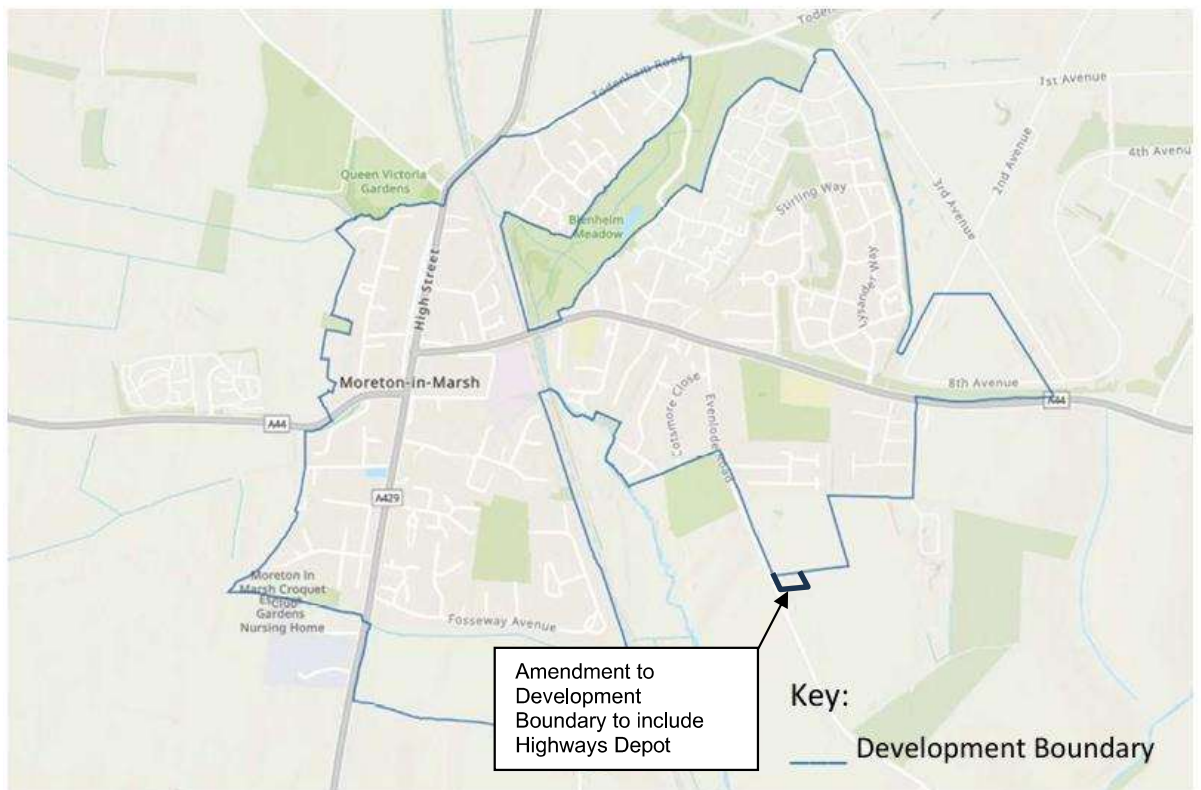
13. The Development Boundary needs to be amended to ensure that it is up-to-date and reflects the extent of the existing built-up area in order to meet the requirements of NPPF paragraph 32 and basic condition (a). On Evenlode Road, the boundary needs to include

⁴ [Allocation of accommodation: guidance for local authorities - Download this guidance - Guidance - GOV.UK](#) (accessed May 2026).

⁵ [Apply for housing - Cotswold District Council](#) (accessed May 2026).

the Gloucestershire County Council Highways Depot which adjoins the Backhouse housing scheme (21/02766/REM). This is all developed land in operational use which forms part of the built-up area. Figure 1 shows the amendment that is required.

Figure 1 Amendment to Development Boundary



3. Response to other content in the MIMNP

Footnotes and hyperlinks

14. Various hyperlinks are included as part of the MIMNP's footnotes, however, these are not available or accessible as part of the consultation document.

Missing appendices

15. Appendix F, G and H are missing from the Regulation 16 draft and need to be published as part of the consultation.

4. Summary

16. Policies Three: Housing Mix, Four: Affordable Housing. Ten: Principal Residence Housing Need and Nineteen: Development Boundary to be revisited to ensure they meet the requirements of basic conditions (a) and (d), having regard to national planning policy and contributing towards the achievement of sustainable development respectively. The lack of up-to-date evidence to support these policies is the overarching issue.
17. Footnote hyperlinks need to be accessible, and missing appendices F, G and H provided for consultation.

Rep #14: Resident

Mark Harrison

From: [REDACTED]
Sent: 28 May 2026 15:08
To: Neighbourhood Planning

[REDACTED]

Before more houses are built I would like to know that the facilities they will require have been fully considered for example Access to NHS dentists Access to Doctors Primary school places
Activities- youth clubs Guides etc
Traffic flow through the main streets
Where are all the new residents going to work These are all in addition to water, sewage etc [REDACTED]

Date: 29 May 2026

Our ref: 546556

Your ref: Moreton-in-Marsh Neighbourhood Plan

Rep #15: NATURAL ENGLAND

The logo for Natural England, featuring the words "NATURAL ENGLAND" in white capital letters on a green rectangular background. Below the green background is a solid black rectangular area.

NATURAL
ENGLAND

Mr Mark Harrison
Cotswold District Council

BY EMAIL ONLY

neighbourhood.planning@cotswold.gov.uk

Dear Mr Harrison

Moreton-in-Marsh Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 16 April 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact:

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Rep #16: Resident

Mark Harrison

From: [REDACTED]
Sent: 29 May 2026 16:07
To: Neighbourhood Planning
Subject: Moreton-in-Marsh NDP Consultation 16

You don't often get email from nick@loatdavies.com. [Learn why this is important](#)

Dear Sir/Madam,

I am writing in response to the consultation on the Moreton-in-Marsh Neighbourhood Development Plan. I am broadly supportive of the policies in the Plan, particularly those which seek to protect the rural setting, landscape character, biodiversity, heritage, green spaces and important views of Moreton-in-Marsh. These are central to the character and quality of life of the town and should be given significant weight in future planning decisions.

I particularly support the emphasis on protecting the Cotswold National Landscape and the surrounding countryside. Moreton's setting is one of its greatest assets, both for residents and visitors, and future development must not be allowed to erode the rural character of the parish or the views and landscape features that connect the town to the wider Cotswolds.

I also strongly support the designation and protection of the proposed Local Green Spaces [Policy 15], including Glebe Field. These spaces are important not only visually, but for recreation, biodiversity, wellbeing, drainage, and maintaining the distinct identity of different parts of the town. Once such green spaces are lost to development, they cannot realistically be replaced.

I welcome the Plan's focus on active travel, walking and cycling. In my view, congestion in Moreton is a greater problem than parking. The town is compact: no residential area is more than around 1.5 miles from the High Street, and many everyday journeys into the centre are therefore walkable for a large proportion of residents. While parking provision should be managed sensibly, it should not become the dominant consideration or be used to justify undermining green space, townscape quality, or the shift towards more sustainable movement. The priority should be to reduce unnecessary car journeys within the town, improve safe walking and cycling routes, and make it easier for residents and visitors to access the High Street without adding to congestion on the A429 and surrounding streets.

Overall, I support the Plan and urge that its environmental, landscape, green space and active travel policies are retained and applied robustly.

Yours faithfully,

[REDACTED]

This document is very similar to the one provided as feedback directly to the Moreton-in-Marsh Neighbourhood Development Plan Group. The group comprising of Councillors, (some with interests for the Redesdale Hall) and Members of the public, 2 of whom are trustees of the Redesdale Hall. Very few of my initial comments have been acted upon, so I want to reiterate my points where necessary.

NDP Document

Approach to Sustainable Development page 22. 2nd paragraph discussing leisure facilities, where the document states "there is no secondary school nor are there leisure facilities available to the public". This statement is incorrect, because the Fire College actually has a gym, a swimming pool, and tennis courts available to the public, only it is not sufficiently advertised and obviously the community are not aware. The council could assist with the promotion of these facilities to enable a healthier population within Moreton. There are free to use, open air gym facilities at the London Road Skatepark for use by the public and it has been highlighted many times to the council that there is no signage at the facility encouraging public use. I believe the council could, if they were serious do more to promote a healthy lifestyle.

Profile of the community today

On page 12 of the NDP plan, the profile of the "Tenure" provides a comparison between Moreton-in-Marsh, Cotswold and England. It does not state where the data is from, but I assume 2021 Census.

The comparison data referenced above, shows Moreton specifically has a higher proportion of Social rented property than either Cotswold area or England.

I disagree with your conclusions. If you are referencing this data, where is the evidence that a higher proportion of socially rented property is actually required in Moreton when this data shows the exact opposite? I can only assume the evidence is anecdotal, because collected data suggests there is no actual requirement to increase socially rented properties in Moreton. The data shows more socially rented properties are indeed required, but elsewhere in the Cotswolds or even England, but not in Moreton.

The tenure data actually implies there is a need for a higher proportion of privately rented properties within Moreton, however the objective of **NDP policy 10** may potentially curtail private rental properties.

Although the following data seems to have been removed, its relevance is still appropriate.

GRCC (HNSR) 2021, Table A7 Housing tenure, shows 650 responses, 10% socially rented and 6% private rented. This data also shows private rental being 37.5% of all available rented property.

The GRCC (HNSR) 2021 (Para' 6.5) references the 2011 Census data, where it also shows over 16% of rented property as either "private" or "other rented" and it can be calculated 36% of all available rented property is "private" These two sources imply the percentage of privately rented property available in Moreton, is reasonably constant over the ten-year period.

Even though 55% of respondents support Government Starter Homes (20% discount on market value for under 40's), there is no way of ensuring potential buyers can raise funds to complete a purchase.

I disagree with policy 10. I understand what policy 10 is trying to achieve, however it is far too over reaching and will have a detrimental impact on the much-needed private rental sector. The proposals must recognise, not all tenants want or are entitled to, a socially rented property.

Policy 10.

I disagree with the reasoned justifications and there is no evidence to support the policy.

The stated justifications are not for Moreton-in-Marsh, they are for the Cotswold District as a whole. Para' 49 references analysis by "Action on Empty Homes" as 3,409 empty homes in Cotswolds, it cannot identify how many were directly in Moreton.

The calculation of 1 in 17 is also inaccurate, as the referenced document states there are 46,109 total homes and 3,409 empty homes, realising a ratio of 1:13.5 empty homes to total homes.

Using the 2021 Census data of 2400 households within Moreton and using the worst-case calculation above of 1:13.5 empty homes, equates to 178 potentially empty homes in Moreton. According to the 2019 CDC data there are 2470 dwellings in Moreton, this would then equate to 183 potentially empty homes.

The closest and arguably most accurate comparison available, is between the 2019 CDC data and the 2021 Census data, which shows 2470 dwellings and 2400 households respectively. The comparison provides information to show 2400 households out of the potential 2470 dwellings, responded to the 2021 Census, which implies only 70 dwellings were not occupied in Moreton at the time of the 2021 Census, or only 2.8% empty homes.

The reference data does not identify the number of "second home" responses nor the tenure of the non-responding homes.

Policies 3, 4, & 10. May have undesirable consequences, the policies are written with the intent to achieve a balanced mix, however, what they seem to ignore is the affordability factor.

When affordable homes are built, some the homes are "purchased" by housing associations, some are fully rented and some part buy, part rent. The recent market situation has seen housing associations refuse to purchase the homes. The developers are then left with affordable homes to sell, but even at discounted values, they are too expensive for first time buyers.

The GRCC (HNSR) 2021 clearly identifies the low uptake of affordable homes and the difficulties of purchasing with a mortgage. No local policy can overcome this directly. If local people cannot afford to buy and housing associations do not purchase to rent, then the only option is investors for private rental. Private rentals are expensive, but for some, there is presently, no alternative. I disagree with implementing these policies in this way without consideration to the recognisable undesirable consequences.

Policy 1 (d)

If the development is conditional on an energy assessment, there should be an expectation for a minimal designed EPC rating. Maybe "B"?

Policy 4

Reasoned Justification for Policy Four

The only "justification" is identified in paragraph 25, which "identifies affordable housing needs for the District" I agree with this statement, **however I do disagree** with their conclusion that there is a need within Moreton. As I've stated above, On page 12 of the NDP plan, the profile of the "Tenure" provides a comparison between Moreton-in-Marsh, Cotswold and England. The comparison shows the need for more social housing within the District, but Moreton actually has a higher percentage of social housing than both the District, and England as a whole. Therefore, the conclusion and justification are incorrect.

Justifications 26 and 27 are not justifications for the policy, they are requirements for persons to be accepted for social housing.

Policy 6

Visitor Parking

I disagree with elements of this policy

The average walking speed of an adult is deemed to be between 3.2 and 4mph. A 15mins walk is equivalent to approximately 1 mile.

Policy 6 (g), Implies even a single residence or conversion within a 1-mile radius from the town centre, should explore the provision of public car parking. What is an applicant to provide as evidence?

The first statement below the coloured sections of the documented section, states the objective of policy six is to reduce on-street parking in residential areas, but **Policy 6(e)** states "visitor parking can be off-street or on-street", this implies a contradiction. I would expect on-street parking to be classified as the exception.

Policy 8. (b)(3)

I do not believe this section is clear and will be ineffectual. I agree traffic and transport assessments are required; however, any substantial development should also consider the impact vehicles will have specifically on parking within the town centre.

Outside the 15-minute walking time, it seems a developer does not have to consider the impact additional vehicles parking in the town will have on centre parking. The further away from the town centre a development is built, the more likely a resident will use their car to travel to town, therefore "parking" not just traffic in the town, in these circumstances should be a consideration at planning stage.

Policy 9. (c)

I disagree with this policy and reasoned justification I do not believe any sensible data will be provided. Phasing larger developments can be more detrimental to the locality through disruption (e.g. Spitfire), however the justification (48) implies developers consider surrounding parish facilities. Are developers allowed to include facilities available in neighbouring parishes, potentially offsetting any need to improve Moreton-in-Marsh facilities? This potentially opens up the "parish" facilities much wider and I recommend removing the words "and surrounding parishes"

How does a developer provide proof of adequate services with no adverse impact on soft infrastructure and over what timescale? I do not believe this can be administered by the council. Any evidence provided may not be independently verified or just anecdotal. Although required, I do not believe any sensible data could be provided.

Policy 10

I have stated above, I do not agree with this policy because it may have unexpected consequences as stated above. The council are actively promoting the tourist industry and increase to visitor numbers, but on the reverse, they are limiting the potential accommodation available to visitors, this does not make sense.

Policy 11 (b) 1. & Policy 13 (b) 1

I do not agree This policy may be detrimental to business in Moreton. The change of use resulting in the loss of employment area potentially requires the property to be marketed for a minimum of 12 months. I believe these policies will potentially have empty shops on the High Street. As an example, Jon Fox Antiques on the High Street has just been sold subject to contract. The property comprises of a shop area, two further floors of shop space, a studio, a garage and land with development potential.

This policy states, effectively this new owner will not be able to develop this site, even though it is far too large for most businesses these days. Is the purchaser expected to market the property (for an exorbitant price so it doesn't sell) for 12 months before being allowed to alter or just decide not purchase at all? Either way, the shop will potentially be empty.

The Moreton Means Business event held 24th April 2019, also suggests restricting change of use may increase the number of empty spaces in the town.

Policy 14 Contributions to local priorities

Policy 14(a)

"Refurbishment, including Public Realm Improvements around the Redesdale Hall".

I disagree with this. This requirement is too specific and nowhere within any documentation has the specific requirement "around the Redesdale Hall" been detailed. I believe this requirement has been added by some in the NDP group with Redesdale Hall "interests" and should be removed. The potential for this "improvement" is included within the council's Transport Strategy document. "Moreton-in-Marsh High Street Refurbishment improvements", encompasses all of the High Street and not just "around the Redesdale Hall", therefore any funds should be directed to improvement on any part of the High Street.

It must be noted that the Redesdale Hall is owned by a private charity, it has not provided any business case to the council or to the community and therefore altering the public realm to incorporate and assist a private business without a complete and thorough understanding is inappropriate.

Policy 14. (c)

"Remove long-stay parking from the town to a location close to the train and bus stations."

I disagree with this because this is inaccurate, Moreton Means Business Event 24th April 2019 and the Summary of feedback from 1st NDP Consultation 2nd February 2019 neither of which document the desire to move long-stay parking to the station. There were comments on how such a parking scheme would work, but this particular desire was not indicated.

It should also be noted that the planning application submitted on behalf of the council and GWR, only provides an additional 43 car parking spaces to those presently in place. The council's Transport Strategy document has identified much higher numbers of parking spaces to be removed from the High Street, believed to be a potential deficit of over 100 spaces. The business Event 2019, and the NDP feedback 2019 recognise the need for car use and parking. The Residents Survey Report 2022 also requests additional parking in the town, all of which seem contrary to the planned council Strategy.

There has been no specification to remove parking from the High Street towards the Station, it is only because the Council have entered an agreement with GWR to increase the parking at the station that this has been included, however, the expectation is that the additional parking will be for rail travellers, and not necessarily for short stay tourist visitors. Again, this is an expression introduced by council members, not necessarily the community as a whole.

The **Community Aspiration 2**, is also questionable, where is the evidence? The business Event 2019 recognised the need for parking for tourists and visitors alike and the business survey January 2022 identified 74% of businesses deemed tourism as very important to Moreton-in-Marsh. i.e. where do overnight visitors park? Residents have indicated the need for permits, but where has "preventing overnight parking" come from? No evidence has been presented to suggest this?

In General

Within much of the documentation, there appears to be an acknowledgement that Moreton-in-Marsh is lacking of "things-to-do" by business and the wider community, however, this policy provides no direction on how to enhance this. Leisure facilities and interests are seemingly ignored; no funding is requested for improvement. Interestingly the Redesdale MUGA is deemed worthy of protection, but it is in a dilapidated state and the council have no coherent plan for the area or its future use.

How does this plan or a policy intend on improving or providing vibrant facilities? Is the council considering on providing "things-to-do" or is there a plan to encourage business to invest in the "interests" of the community?

The Moreton Means Business Event 2019 highlighted tourism as important to Moreton-in-Marsh but it also highlighted the necessity to offer something to differentiate itself. Where is the differentiator in the plan?

Policy 15. Local Green Spaces (LGS)

I do not agree with all of the LGS. No's #13a, #13b & #13c are already developed and owned by the council. They should be removed from this list.

The Bowls Club (#13c) is developed with a large clubhouse and holds a 99 year lease dated 2010 from the council. The Croquet Club (#13b) holds a 50 year lease from 2020. Both clubs have a strong membership following.

The Redesdale MUGA (#13a), is in a dilapidated condition and has not been repaired by the council for years, hence creating its own "eyesore". If the council consider this area worthy of preservation, maybe they should do something to preserve it.

At the council meeting in August 2025, the council voted to approach the developers of the adjacent land to establish whether there would be any mutual benefit in working together regarding the MUGA area. Is the council now trying to reverse this decision? Has the council actually contacted the developer?

The 2022 **Residents Survey Results Report- Natural and Built Environment**, highlights "Play equipment and facilities for older children had the lowest ratings". Q47. Facilities for teenagers (13+) and Adult outdoor gym equipment were rated the lowest overall.

LGS (#19) Glebe Field this field is owned by the diocese and in the past has been contacted by members of the council in trying to establish whether the area could be utilised as a carpark for Moreton-in-Marsh.

As the Transport Hub development will under-deliver on the total additional carparking spaces with a maximum of 43 and with the council adopting its Transport Strategy document which creates a deficit of potentially 100 car parking spaces in the centre, it seems only logical to keep the options for this land open, especially as the business community and general community recognise the importance of tourism. Including it in the **protected views** is also somewhat erroneous, as the stated reason could apply to any field surrounding Moreton-in-Marsh.

There are a couple of local spaces that have not been included as protected areas;

There is a triangular area between 19-21 Sunderland Road and 19-21 Mosedale, this area was specified as an area for interesting species, it can be identified underneath the legend for "Moreton Park Green Space -1" on the South East map.

The greens area the full length of Errington, between Errington and London Road, all of the trees in this area have individual Tree Preservation Orders (TPO's). Identified underneath the legend "Buffer between Moreton Park & A44" on the South East map.

Other documentation

Vision & Objectives Survey February 2023

I note the very last line of the summary document state " 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"

Limiting the need for vehicular travel will not happen by removing parking, or not offering enough spaces. Offering a genuine choice is not only walking or cycling, the plan does not address how the “genuine choice” will be achieved.

Although it is government policy to encourage "active travel" the National Cycle routes that traverse Moreton do need upgrade and the local community recognise and understand the cycle routes in particular are hazardous for cyclists and certainly are not suitable for the uninitiated or children. The plan recognises the need for improvement, but the older established developments, especially those nearer the town centre at present cannot support active travel arrangements to the aspirational levels envisaged. The plan for future travel from additional surrounding developments, implies the connection and use of established routes, however, these routes cannot be regarded as safe for regular commuting. If the plan cannot address the limitations, then further additions are only likely to exasperate the situation more. I find it inconceivable that any administration would consider promoting active travel with the knowledge that the present older, infrastructure is incapable of growth without dramatic change. Change, depending upon how it is implemented, may have negative consequences to the economy of Moreton-in-Marsh business.

Resident Survey Results Report

Getting around Moreton-in-Marsh (Summary) states "There were over 220 suggested upgrades or new routes”

Interestingly, **Q41**, “Should parking facilities be improved in Moreton-in-Marsh?”, 70% respondents answered "yes" to "in town". The Town Council's Transport Strategy document, aims to improve the layout, but by significantly reducing parking availability, which is in contradiction to the 338/337 responses received from the survey.

Rep #18: CDC Councillor

Submission to the NDP team

The town is a classic Cotswold market town with origins in the middle ages, a wide centre roadway and trees suitable for horse and buggy and with an imposing Corn Exchange. Development was slow. *Properties were varied* but mostly terraced and conforming to the Cotswold vernacular. Pictures show varied roof lines, textures, colours. They meet the test of being interesting from a distance and close-up. *It has 96 listed buildings.*



Town centre diversity and interest

In 2003, almost all of the land east of the railway station consisted of fields. The exception was ribbon development along the A44, Evenlode Road, Todenham Road and at the Fire Service College. The quality of this build varied, but the *developments that were most representative continued this market town vernacular.*



Evenlode Road

The first development (in 2003-4) continued this, as in the picture below, albeit with better parking arrangements. Note the terrace, trees, and grass, good build quality, and Cotswold feel.



Blenheim Way

Until the recent Area Plan was approved, the town then developed without a Plan, piecemeal, without proper infrastructure. My ward as of 2023 election had grown 6x faster than the District average since 2011. A different spatial organisation, density and appearance was generally followed. Traffic grew and both developments and

utility upgrades led to months of excessive town centre traffic blocks, harming retail businesses. The town centre became a car park and throughway for traffic, much of it heavy goods vehicles. The A429 Fosseway railway bridge is listed, dangerous (especially for pedestrians visiting from that side of town), and physically vulnerable.

There have undoubtedly been a number of positive contributions to the town that are enjoyed by owners, *including four public open spaces featuring meadows, attenuation ponds, swales, woodland and streams*. Apart from one adopted by the town council, they all have legacy compliance issues. However, *they can and could offer attractive features*. Many people have moved to the town and live in properties that they are happy to live in. But the balance of the town is disturbed. The “Transport Hub” and railway are considered a reason for development, but this implies that people will work elsewhere. *A market town is not a commuter suburb: it needs a proper centre* and a thriving local economy. “Transport Hub” is a misnomer and likely to remain so, since the cost is high, additional parking low, and a prime site in the centre of town would be lost when better alternatives for parking exist.

The town partly owes its existence to being at the meeting of two main routes, the A44 and the A429, now forming a bottle neck with traffic mostly just passing through and taking value from the town.



Rep #18: GCC part 1

To: Sent via e-mail.

Amartya Deb
Economy, Environment, and Infrastructure

Our Ref:
2025/04/CDC-MIM-SEAHRA/CRC

Your Ref:

Date: 07 May 2025

Dear Mr Walker,

Moreton-in-Marsh Neighbourhood Development Plan: SEA and HRA Screening Opinions

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the consultation materials for Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) with respect to the January 2025 screening draft of Moreton-in-Marsh Neighbourhood Plan 2018-2031. Officers highlight further potential to address archaeology, urban biodiversity, transport, and public health. High-level recommendations are:

- ❖ Recognising archaeological assets and the role of historic environment in achieving net-zero, flood risk mitigation, and conserving urban biodiversity.
- ❖ Improving public mass transit, active travel, and green-blue infrastructure for better air quality, and its various benefit on health and wellbeing.
- ❖ Tapping potential of Sustainable Drainage Systems (SuDS) for biodiversity.
- ❖ Inclusion of vulnerable groups in design of the built environment.

Importantly, officers note that details within “Policy 14: Infrastructure Investment Priorities” are missing in this version of the draft plan. Officers recommend more clarity and further considerations in matters of transport infrastructure aspirations.

Detailed officer-level comments are as below.

Yours sincerely,

Amartya Deb
Senior Planning Officer
Gloucestershire County Council

DETAILED OFFICER COMMENTS

Archaeology

GCC officers welcome the inclusion of Objective “j.” under the Environment theme: “Protect and maintain archaeological and built heritage assets deemed to be of value to the community” (p. 17) and associated planning Policy 17: Buildings of Character.

However, it would be beneficial to relate the above objective and policy directly back to a hook in the vision, especially given that the attraction of Moreton-in-Marsh as a place to live and visit draws so heavily on its appearance, traditions and sense of place which in turn derive from its built, archaeological and natural heritage.

Furthermore, Policy 17 only addresses Moreton’s built heritage and fails to recognise visible and below ground archaeological sites, despite the introductory section to the Plan which focuses on the town’s history. The following document produced by Historic England can provide important pointers in terms of the role played by heritage in neighbourhood plans, including archaeology: [Neighbourhood Planning and the Historic Environment \(www.historicengland.org.uk\)](http://www.historicengland.org.uk)

The **Gloucestershire County Council Historic Environment Record (HER)** can also be contacted for data on known archaeological sites within the parish:

- SEE LINK: [Request archaeological data from Gloucestershire's Historic Environment Record \(HER\) \(www.gloucestershire.gov.uk\)](http://www.gloucestershire.gov.uk)

It would be useful to recognise the contribution of heritage assets and the numerous cross-cutting benefits they can offer in delivering upon the ambitions underpinning other policies. The protection and enhancement of the historic environment has a strategic role to play in delivering long-term sustainability, climate resilience, the restoration of nature, and economic infrastructure.

For example, in regard to Policy 1: Climate Adaption and Energy Efficiency in Developments, Historic England’s Advice Note 18 on *Adapting Historic Buildings for Energy and Carbon Efficiency* could be referenced. For Policy 2: Managing Flood Risk, the conservation and restoration of historic water bodies and floodplain meadows can reduce flood risk. The use of Design Codes is a tangible way of supporting Policy 3: Housing Mix and is a positive element of the Plan, describing the character of the built environment and setting out good design principles for future development. Policy 7: Brownfield First should recognise that brownfield sites can provide benefits to the historic environment, for example in encouraging greater use of derelict sites in the conservation area or just outside, but it should also recognise that brownfields sites often have their own built and archaeological heritage and should be designed in a way that incorporates historic environment considerations at the appropriate stages.

Policy 15: Local Green Spaces would benefit from more explicitly addressing the contribution of local heritage assets to, and their need for protection as part of green spaces. For Policies 15: Local Green Spaces & Policy 18: Enhancing Biodiversity, it would be worthwhile highlighting the numerous cross-cutting benefits that heritage

assets can offer to the management of designated areas, and in delivering sustainable development, land use and enhanced biodiversity. As set out in Natural England's guidance on *Nature recovery and the historic environment*:

"Conserving and enhancing the historic environment is an integral part of protecting, managing, and planning for nature and landscapes".

For example, historic routes, designed landscapes and other heritage assets are often wildlife rich sites which, appropriately managed, can act as important links in a national biodiversity network. Their characteristics will often dictate what species can and cannot thrive. The historic environment can help with understanding whether certain habitats and species will prosper and inform decisions about restoration options and appropriate management. Policy 19: Protected Views could utilise heritage assets to reinforce the importance of Protected Views.

Ultimately, a spatially aware and sustainable Plan should recognise that the protection and enhancement of heritage can coexist alongside multiple other uses and be mutually beneficial.

Ecology

GCC officers have no further comments to make.

Flood Risk Management

Of interest to the Flood Risk Management team are the following points from Policy 2: Managing Flood Risk (p. 26):

- a) *When proposals for development are being considered, all sources of flood risks must be considered at the appropriate stages and the sequential and exception tests used to divert development to areas with lower probability of flooding, in accordance with NPPF guidance.*
- b) *Proposals for development on land identified by the Environment Agency as lying within either Flood Zone 2 or 3, or in Flood Zone 1 in the circumstances outlined in footnote 63 of paragraph 181 of the December 2024 NPPF, will require a Flood Risk Assessment (FRA), using appropriate calculations based on the highest expected groundwater levels for the area (200 year maximum). Proposals will only be supported where it can be demonstrated in the FRA that:*
 1. *they include appropriate site-specific measures to address effectively all the identified surface and ground water issues; and*
 2. *any residual flood risk can be safely managed.*
- c) *Where it is appropriate to do so new developments should incorporate Sustainable Drainage Systems (SuDS).*

GCC officers note there is nothing particularly contentious in the above quoted paragraphs; nothing beyond what the Lead Local Flood Authority (LLFA) already considers.

Policy 18: Enhancing Biodiversity (p. 51): GCC officers note that it does not mention here how enhancing biodiversity can also be integrated into well designed SuDS, which is disappointing.

Minerals and Waste Planning

GCC officers have no further comments to make.

Public Health and Communities

GCC officers welcome the opportunity to comment on this Neighbourhood Development Plan (the plan) and on matters specific to the health and wellbeing of residents that live, work and take their enjoyment in Moreton-in-Marsh and the surrounding neighbourhood area.

Reflecting on the midway point of the plan period (2018-31), it is worth noting that all plan-makers have experienced significant changes during this time that have had a profound impact on shaping our local communities in Gloucestershire. In acknowledging this, the wider determinants of health, such as economic development, employment, and our built and natural environment are brought ever-more into focus, and place-making affords an opportunity for a “right first time” approach to embed primary interventions to improve health and well-being into planning and neighbourhood development.

In response to this, we would welcome a more specific reference to “health and wellbeing” within the plan’s vision and objectives. Whilst objectives around the challenges of environment, housing, transport and the economy imply that these themes have an impact in supporting good health, an explicit focus on this throughout the plan would raise the profile and highlight the importance of healthy place-making. As example, this is apparent in the Cotswold Local Plan’s policies: *H4 Specialist Accommodation for Older People, INF7 Green Infrastructure, and INF3 Sustainable Transport within the Cotswold Local Plan.*

The transport systems and the wider built environment in Moreton-in-Marsh play a crucial role by either promoting or hindering physical activity. The draft document mentions:

“Moreton-in-Marsh as to be generally considered well served by transport, but that it can be difficult or impossible to travel to local villages and even some of the nearby towns using public transport.” (p.7)

In acknowledging this, it is good to see the community commitment to the extensive footpath network across the countryside around Moreton, some of which the draft Neighbourhood Plan states, provide valuable access to nearby attractions including Batsford Arboretum, the Cotswold Falconry, Bourton House Garden and Sezinecote

Gardens into and around the local countryside as well as a number of cycle paths which encourages both walking and cycling.

The propensity to walk and cycle has the potential to contribute to an improving picture of air quality across the plan area. Air pollution has negative effects on health throughout the life course, from pre-birth to old age. The plan should look to set out purposeful policies based around sustainability that should contribute to improving the air we breathe. This could include exploring infrastructure for electric cars within the plan area, which we welcome the consideration of in [Policy 1 \(e\)](#).

Our children are especially vulnerable to dirty air. There is a strong link between air pollution and the worsening of asthma symptoms, and it also plays a part in causing asthma in some. Among children with asthma, those exposed to higher levels of air pollution suffer more frequent chronic respiratory symptoms. Designing-in the “habit for movement”, drives further co-benefits to health including, reduced non-communicable diseases burden (cardiovascular and respiratory disease), injuries, and better mental health.

GCC officers welcome the plan’s intent to ensure community access and enjoyment continues across local green spaces in the plan area ([Policy 15](#)). Again, with such valuable assets, specific reference to both the physical and mental health benefits of these facilities and community infrastructure should be detailed. Giving consideration to high quality green and blue infrastructure across all stages of plan-making and development will support the improvement of health and wellbeing and build a sense of community and place. We encourage plan makers, if they are unfamiliar, to consider the incorporation of the Building with Nature Framework:

- [Planners — Building with Nature \(www.buildingwithnature.org.uk\)](http://www.buildingwithnature.org.uk)

Noting the Plan’s objectives concerning housing supply, it would be strengthened further by acknowledging the changing needs of housing over a life course and ensuring that mix and tenure of housing provision will provide high standards of affordable, accessible dwellings, and that accessibility to the local facilities is a primary consideration. The importance of accessible housing design cannot be overstated - impacting individuals with disabilities and health challenges, but also the wider systems in society including adult social care and the NHS. Improving and maintaining the health of older adults is a strong social responsibility and the Chief Medical Officer’s annual report 2023; Health in an aging society [Chief Medical Officer’s annual report 2023: health in an ageing society - GOV.UK \(www.gov.uk\)](#) underlines the geography of older age in the UK. The report makes it clear that the increase in an aging population will be in our rural and semi-rural areas. Cotswold district has seen the 2nd highest population growth out of Gloucestershire’s six districts and has the highest % of 65+ year olds. See: [2021 Census \(www.gloucestershire.gov.uk\)](http://www.gloucestershire.gov.uk). Thus, catering to older population should be an area of focus for plan makers in the Cotswold.

Local plans should include specific and measurable targets for accessible and adaptable new build housing. This should include a minimum 8% for wheelchair housing or M4 3 and we would advocate that all of the rest of the new build housing should be to the lower but very important M4 2 standard. With regards to specific policies within the draft plan:

Policy 3: Housing Mix

GCC officers welcome the commitment around purpose built older people accommodation and housing designed to meet the aspirations of older people in Moreton-in-Marsh wishing to downsize. Part B of this policy states that 'at least 25% of dwellings, should meet Lifetimes Home Standards or its equivalent.' We would welcome a stronger commitment within the plan to develop more accessible and adaptable homes. Given both the demographics of Moreton-in-Marsh, as highlighted in the introduction section, and the update from the government in October 2024 to ensuring that all new buildings are accessible and adaptable where possible to increase the stock of more inclusive home, a commitment to 95% of all new homes to meet M4(2) standards and 5% (based on need) to meet M4(3) standards within the Neighbourhood Plan would reflect the needs of residents in Morton-in-March and national government direction: [Performance of Housing Authorities in DFG Delivery \(www.foundations.uk.com\)](https://www.foundations.uk.com)

Policy 4: Affordable Housing

GCC officers welcome the inclusion of a policy on affordable housing. However, given that the diverse results for Morton-in-Marsh within the Index of Multiple Deprivation (IMD), highlighted on page 11, we would welcome a stronger commitment to providing social housing tenure as an affordable housing option, as it is not explicitly referenced within the policy. Providing social housing would support Morton-in-Marsh to reduce deprivation in several key areas: employment, education and barriers to housing. It would support with retaining people in the local area and enabling them to have an opportunity to access both work and education opportunities.

Policy 5: Well Designed Housing and Places

GCC officers welcome the inclusion of Policy 5 and have no comments to add.

Staying with housing, we note that the plan does not identify any challenges re. social isolation and loneliness that can affect older people in particular; and is harmful to health. The Cotswold Local Plan captures the challenges in this area:

“Research shows the effects of loneliness/isolation increases the risk of high blood pressure, being more prone to depression, and leads to a 64% increased chance of developing clinical dementia. Social isolation causes 43% of social referrals in South Cotswolds” [SD4 (5a.4.20)].

Plan makers may wish, if not already, to familiarise themselves with the 2022 Director of Public Health annual Report for Gloucestershire; *No person is an island; Social connections in Gloucestershire* [Annual Public Health Report 2022-23.pdf \(gloucestershire.gov.uk\)](https://www.gloucestershire.gov.uk). The report highlights both the power of social connections but also the challenges, many of which are experienced by those living in rural areas across Gloucestershire. Crucially, it sharpens a focus on the work being done to tackle social isolation and the responsibility we all share in supporting those most in need. Using national studies, it was calculated that around 6,000 older people in Gloucestershire feel lonely always or often. This also underlines the importance of considering how communities create opportunities for social connections across the life course. A local survey reveals that 5% of social care service users aged 65+ had little social contact with people and felt isolated, and a further 15% had some social contact but not enough [Summary \(gloucestershire.gov.uk\)](https://www.gloucestershire.gov.uk).

Transport Planning

GCC officers welcome the Moreton-in-Marsh Neighbourhood Plan consultation. The draft plan usefully sets out the transport context, highlighting the town's mainline railway station, local bus connections, and walking and cycling network. We welcome the inclusion of high quality, safe transport links in the vision for Moreton-in-Marsh.

GCC officers acknowledge the focus of Policy 14: Infrastructure Investment Priorities on trying to resolve the present parking issue in the town centre by providing alternative car parking at the Transport Hub. ***However, officers also note that the justification for Policy 14 and relevant details are missing from the shared draft Neighbourhood Plan under consultation.***

GCC officers recommend that the remit of Policy 14 is expanded to also consider active travel links to/from the station, EV and car club parking spaces, as well as bus stop/real time passenger information provision. The draft Neighbourhood Plan may also consider other infrastructure such as lighting, CCTV and seating/other community facilities to enhance the public realm environment and enhance feelings of safety. Officers believe this is important to provide genuine modal choice and to encourage sustainable means of access to Moreton-in-Marsh Railway Station. Officers have assumed that the Railway Station is what the Transport Hub is referring to and recommend that this to be explicitly set out in the policy wording.

Officers recommend, the Neighbourhood Plan should provide greater clarity in terms of the community aspiration for transport hubs. In GCC's Interchange Hub strategy and Bus Service Improvement Plan, officers have highlighted two sites in particular that would qualify as transport hubs:

- Moreton-in-Marsh High Street
- Moreton-in-Marsh Railway station

An explicit reference to the above-mentioned sites would be helpful, as both sites have significant potential to improve the existing public realm environment and ease the interchange between sustainable modes.

GCC officers agree with transport matters raised by GCC's Public Health colleagues (see above). Officers would welcome measures to promote the Active Travel network in and around Moreton-in-Marsh, including provision of wayfinding to and from transport hubs, the town centre, and onward destinations.

In addition, GCC officers recommend that Policy 21: Transport and Active Travel explicitly refer to destinations for active travel beyond links to national cycle ways, for example to key services such as transport hubs, education, health, employment and retail. Our countywide cycling infrastructure plan also identifies a key link between Stow and Moreton, highlighting a latent demand for active journeys between the two settlements.



Rep #20: GCC part 2

To: Sent via e-mail.

Amartya Deb
Economy, Environment, and Infrastructure



Our Ref: 2026/04/CDC-MIMNDPR16/AD

Your Ref:

Date: 29 May 2026

Dear Sir/Madam,

Moreton-in-Marsh Neighbourhood Plan (Regulation 16) Consultation

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the materials for Regulation 16 consultation of Moreton-in-Marsh Neighbourhood Plan 2018-2043, through Cotswold District Council. At this stage of consultation, highlights of officer comments include:

- ❖ High-quality design of public realm and built environment for the town to become more inclusive – particularly for the elderly and mobility users.
- ❖ Various considerations towards nature recovery as well as climate change adaptation and mitigation per March 2026 update of LURA 2023.

GCC officers of Transport Planning has advised that on Parking matters, further discussion will be needed with GCC's Highways Development Management.

Previously submitted GCC officer response to SEA and HRA Screening Opinions of this plan preparation consultation is attached as:

- **Annexure 1 – GCC202501CDCMIMSEAHRAAD**

Detailed officer-level comments are as below.

Yours faithfully,

Amartya Deb
Senior Planning Officer
Gloucestershire County Council

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INTRODUCTION

Moreton-in-Marsh is a small, but growing market town in Cotswold District. Partly surrounded by the picturesque Cotswolds National Landscape, and with a conservation area designated along its High Street, the town has a rich legacy of cultural and natural heritage. Currently, the town also has a relatively higher share of old age population (higher than county average).

Bearing these in mind, this GCC officer response highlights need for the Regulation 16 draft of Moreton-in-Marsh Neighbourhood Plan 2018-2043 to address matters of **climate and nature**. In addition to having regard to Gloucestershire Local Nature Recovery Strategy, GCC officers advise on reducing car dependency and enabling active travel in the public realm. This includes improving pedestrian infrastructure along the High Street.

This officer-level response should be read with GCC officer response to SEA and HRA Screening Opinions of plan preparation in May 2025. It advises on recognising archaeological assets and the role of historic environment in achieving net-zero, flood risk mitigation, and conserving urban biodiversity.

Moreton-in-Marsh is well connected by regional highway and rail networks that pose both opportunities and challenges – emphasising a strong link between **roads and places**. In addition to those matters identified by the draft plan, GCC officers point out how further infrastructural improvements in public realm, can create a high-quality built environment that encourages accessibility and sustainable mobility.

Alongside advice on strengthening policies through wordings and further details, GCC officers suggest several ways Community Infrastructure Levy (CIL) can be utilised for making the town more inclusive and accessible for vulnerable population.

DETAILED OFFICER COMMENTS

Adult Social Care

GCC officers support draft plan's policies for Moreton-in-Marsh town, that will embed new developments with health, accessibility, and affordability principles to support vulnerable groups and sustain the care workforce (as outlined in the [Gloucestershire market position statement \(MPS\) 2024](#)) and the three shifts detailed in the Government's 10-Year Health Plan for England ("Fit for the Future", July 2025) i.e.,

Shift 1 – From hospital to community care.

Shift 2 – From analogue to digital.

Shift 3 – From sickness to prevention.

Policy Three – Housing Mix

GCC officers welcome the objective outlined in the draft neighbourhood plan (regulation 16) to ensure "new homes are of **high-quality design** and built to Building Research Establishment Environmental Assessment Method (BREEAM) standards" (page 19) and the inclusion of design codes (Appendix A). However, given the age profile detailed in the draft neighbourhood plan, officers feel that **Policy Three could be strengthened** by including **specific building targets** relating to M4 (2) Accessible and Adaptable properties and M4(3) Wheelchair user dwellings, part of Approved Document M of the UK Building Regulations.

The Old Age Dependency Ratio (OADR) for the Cotswolds is 450. This means there are 450 people of pensionable age per 1,000 working age people ([Data & Analysis Team 2021](#)) – the average for Gloucestershire is 379 and England 365. The high OADR highlights the need for coordinated strategic planning across housing, transport, community support, and **digital inclusion** to ensure that future developments provide **age friendly communities**, that foster a supportive and inclusive environment, allowing individuals to lead healthy, meaningful lives as they grow older.

Housing that supports **community engagement, independence, and dignity** contributes to better **mental and physical health outcomes**. To ensure new housing supports community engagement officers would recommend including specific targets for M4 (2) and M4 (3) that align with the most recent evidence. For example, the [Gloucestershire Local Housing Needs Assessment 2019](#) proposes a target of 67% for M4(2) new builds and 67% of new housing to meet M4(2) standards and 8% to meet M4(3) standards.

Policy Four – Affordability

GCC officers welcome the inclusion of Affordable Housing being tenure blind – built using the same materials and material and in the same style as any market housing on the site to the same standards. Moreton East and Moreton West are both in the 4th decile for the deprivation domain barriers to housing and services ([indices-of-](#)

[deprivation-2025-data-table.xlsx](#)). This measures the physical and financial accessibility of housing and local services. A decile score of 4 means that Moreton-in-Marsh is in the 40% most deprived areas nationally for barriers to housing and services. Therefore, GCC officers **would welcome reference to specific affordable housing numbers** or % required on new developments, including socially rented and affordable homes, **enabling residents of all ages** and backgrounds to live securely and sustainably and reduce the barriers to housing and local services currently experienced by residents of Moreton-in-Marsh.

The Gloucestershire MPS details a static working-age population in the Cotswold and rising demand for adult social care. Aligning housing growth with affordability and accessibility supports workforce stability and reduces recruitment pressures.

Policy Fourteen – Infrastructure Investment Projects

Officers welcome the inclusion of improving Accessibility around Moreton-in-Marsh in Policy Fourteen. The Centre for Ageing better have developed some age friendly guides, includes guides on **age friendly bus stops, parks and green space, seating and rest, and age-friendly streets** (see: [Age-friendly Built Environment Quick Guides | Centre for Ageing Better](#), that could be adopted by Moreton-in-Marsh to improve accessibility across the town **through use of CIL** to meet this objective.

Additional resources to include in the relevant appendices:

1. **Age-Friendly Communities Framework.**

Endorsed by the Local Government Association, this framework helps local authorities create inclusive environments through better transport, public spaces, and housing access. See: [Age-friendly Communities: a handbook of principles to guide local policy and action](#)

2. **Co-Production and Community-Led Housing.**

The Older People's Taskforce encourages co-production with older adults to design housing that reflects diverse cultural, faith, and lifestyle needs, fostering community engagement and reducing isolation. See: [Our Future Homes: Housing that promotes wellbeing and community for an ageing population - GOV.UK](#)

3. **Equality Act 2010 & Public Sector Equality Duty.**

Requires authorities to eliminate discrimination and involve disabled people in policy and service design. See: [Equality Act 2010](#)

Archaeology

Our previous comments made in GCC officer response (dated May 2025) to the SEA and HRA Screening Opinions regarding Policy 16 on "Conserving non-designated heritage assets" (previously 17 "Buildings of Character") and other policies remain current.

For convenience, GCC officer-level response to Moreton-in-Marsh’s Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinions is attached as **Annexure 1**.

Ecology

Policy Seventeen – Enhancing Biodiversity

GCC officers welcome the draft neighbourhood plan’s Policy Seventeen on “Enhancing Biodiversity”. Please note, this **policy now needs to be reviewed** due to various updates to planning policy and guidance relating to nature recovery.

In February 2026, **GCC adopted the Gloucestershire Local Nature Recovery Strategy (LNRS)**. Further information on can be found here: [Gloucestershire Local Nature Recovery Strategy | Gloucestershire County Council](#).

In March 2026, Sections 98 and 99 of the Levelling-up and Regeneration Act 2023 came into force. This now means that there are additional legal compliance requirements for development plans & neighbourhood plans.

Section 98 of the LURA states the following:

(b) take account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the plan area, including in particular —

- (i) the areas identified in the strategy as areas which –
 - (A) are, or could become, of particular importance for biodiversity, or*
 - (B) are areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits,**
- (ii) the priorities set out in the strategy for recovering or enhancing biodiversity, and*
- (iii) the proposals set out in the strategy as to potential measures relating to those priorities.*

The current **Planning Practice Guidance (PPG) on Natural Environment, Paragraph: 046** Reference ID: 8-046-20250219 Revision date: 19 02 2025 provides **further detail** on “**How should local planning authorities have regard to Local Nature Recovery Strategies in plan making?**” This could help support the draft plan’s decisions.

Minerals and Waste Planning

GCC officers have no further comments to make.

Transport Planning

Vision and Objectives

GCC officers broadly supportive of the vision and objectives for the draft NDP in the longer term 2043 ambition for sustainable growth that benefits from access to local services, excellent transport links, a network of safe walking and cycling routes, limiting the need for vehicular travel within the town and offering choice of transport options to reduce congestion and emissions, to improve air quality and public health.

Proposed growth and development proposals in the town have identified several infrastructure issues to be addressed. This includes local services, traffic management, public realm, safer and more pleasant access for residents and visitors, for which GCC officers are broadly supportive where sustainable development meets the needs of the community and requirements of National Planning Policy Framework (NPPF).

Community aspirations: New Steering Group

GCC officers are broadly supportive of a new Community Plan Steering Group to support and follow through on the community aspirations identified in the preparation of the Moreton-in-Marsh Neighbourhood Plan.

Heavy Goods Traffic and Congestion

GCC officers note that the draft neighbourhood plan (Reg.16) aims to address the challenges of **increasing traffic on the A429 Fosse Way**, and the impacts this has on the High Street on local community. In addressing the community's main concern for congestion and heavy goods vehicle (HGV) traffic, GCC officers welcome the transport objectives to improve public realm and traffic management in the town centre. Officers understand, this will ensure Moreton-in-Marsh remains a thriving key service centre in the north of Cotswold District, whilst recognising alternatives to private car use by encouraging modes such as active travel and public transport.

This increase in traffic congestion, recognised in the draft plan, is also leading to air pollution, increased noise pollution, and road safety risks for pedestrians, cyclists and mobility users accessing the town and crossing the High Street. Therefore, GCC officers support road safety and the **safe movement of people and freight** (where appropriate) in and around the town.

Policy Twenty – Transport & Active Travel

To meet the aims of the draft neighbourhood plan, transport policies should consider additional specific infrastructure improvements in Moreton-in-Marsh town centre. GCC officers feel, there is **a strong need for improvements** in pedestrian infrastructures, pedestrian space, and pedestrian safety **along the High Street**.

Officers recommend **increasing pedestrian crossings** to improve permeability of the high street.

To address “**Community Aspiration 3 on Public Transport**”, Policy Twenty should also consider seeking developer contributions to improving the railway station and promote it as a key “**transport hub**” for Moreton-in-Marsh town and the northern areas of Cotswold. Improvements include enhanced bus stop, cycle parking and active travel facilities to encourage travel to/from the station by sustainable modes.

GCC officers would welcome **further details** on the parish’s vision for an “**interchange hub**” within Moreton-in-Marsh. As stated in Policy Twenty, GCC officers welcome prioritisation of active travel to/from new development in accordance with national guidance. Although, a **distinction between different active travel modes (walking, wheeling and cycling)** as well as **public transport** should be made **in the policy wording**.

Parking standards and facilities

GCC officers of Transport Planning **cannot comment specifically on** parking in residential standards and provision of parking facilities in the town where active travel opportunities are explored – these will **require further discussion** and agreement with **GCC’s Highways Development Management**.

Rep #21: Resident

Mark Harrison

From: [REDACTED]
Sent: 29 May 2026 18:04
To: Neighbourhood Planning
Subject: Moreton in Marsh - Gebe Land car park - Consultation feedback

[REDACTED]

Dear CDC

The latest NDP consultation output proposes a green field designation on the Glebe Land to effectively prevent its use as a car park at any point in the future. I strongly disagree with such a designation.

As a result, my view is that a green field designation should NOT be placed on the Glebe Land as that field is a very good location for a new out of town car park which the town desperately needs.

Yours faithfully

[REDACTED]