



COTSWOLD
District Council

Cirencester Neighbourhood Plan
c/o Andrew Tubb
Cirencester Town Council

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By e-mail only

14th May 2026

Dear Mr Tubb,

Cirencester Neighbourhood Plan
Response to Reg 16 draft Neighbourhood Plan consultation

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

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

Comments have been made about both the supporting text, which sets the context and justification for the policies, and on the policies proposed for inclusion in the Plan.

I hope that you will see these comments as critical support. They are intended to inform modification to the Plan so that it best meets the expectation of the Town Council in terms of the future determination of development proposals, and, crucially, that the Plan can proceed to independent examination once it has been submitted, with a greater expectation of a positive outcome.

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

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

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

Yours sincerely,

Mark Harrison

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Regulation 16 Consultation

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

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

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

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

Representations and Modifications

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

Considerations

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

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

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

- Clarity and certainty;
- Detailed policies map(s);
- Sufficient evidence and justification.

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

Conformity with Strategic Policy

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

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

Comment Schedule

Policy No.	Policy Name	CDC Comments
AM1	The Cirencester Spoke & Wheel Cycle and Footpath Network	Generally supportive of what is set out about 20 min neighbourhoods, the town centre policy, VLR alternative route to Kemble etc. One slight tweak I'd make: Policy AM3 - The Pedestrian Experience
AM2	Town & Country Connections	Experience Point C) curating > spaces that facilitate events and festivals
AM3	The Pedestrian Experience	
AM4	Integrated Mobility Hub	Allan Keller, Sustainable Transport Lead has made these comments.
AM5	Strategic Connections & Transport Links	
AM6	Sustainable and Active Travel	
DBE1	Design Quality Harrison Bowley, Head of DM has made these comments.	
DBE2	Protection of Landscape & Townscape Views	Policy DBE2 (g) almost seems to be encouraging potential development at Powells School ... but this would clearly need to bear in mind the conservation area & potential setting of LBs.

	<p>Justin Ayton, Senior Conservation Officer has made these comments.</p>	
DBE3	<p>Redevelopment and Conversion of Existing Properties</p> <p>Justin Ayton, Senior Conservation Officer</p> <p>and</p> <p>Harrison Bowley, Head of DM, have made these comments.</p>	<p>Policy DBE3 (c) the subdivision of large houses should perhaps have a caveat regarding listed buildings/designated heritage assets, where subdivision may be inherently harmful & not their optimum viable use.</p> <p>While the objective of supporting vitality and reuse of buildings in the town centre is recognised, the policy seeks to control matters that are not always capable of being regulated through the planning system. In particular, the merging of units may not always constitute development requiring planning permission, and criterion a cannot ensure occupation by “small, local and/or independent traders”, as planning controls land use rather than the identity of end users. Criterion c appears arbitrary and would require justification through the evidence base. The policy should be simplified and refocused on matters that planning can properly control, such as external design, frontage subdivision/amalgamation where permission is required, and the principle of upper-floor residential reuse</p>
DBE4	<p>Protection of Non-Designated Heritage Assets</p> <p>Justin Ayton, Senior Conservation Officer has made this comment.</p>	<p>The list should not be presented as in any way definitive, even if up for potential additions at a later date. The LPA must have the freedom to decide on a case-by-case basis whether a building is an NDHA even if not identified in the Neighbourhood Plan.</p>
DBE5	<p>Net-Zero and Energy Efficiency Measures in the Design & Construction Process</p>	<p>Perhaps just changing “and” to “or” between emissions and embodied would do the trick?</p> <p>The policy also says “should”, so if there were pertinent reasons not to, e.g. the proposal was very minor.</p>
DBE6	<p>Energy Use in New Buildings</p> <p>Harrison Bowley, Head of DM, have</p>	<p>I always have concerns with these sorts of policies as they largely duplicate other regimes such as building regs and are incredibly challenging for planning officers to assess given the specialist knowledge required. Criterion f is very onerous. This should be covered as a pre-commencement requirement only.</p>

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	made these comments.	
DBE7	Homes in Multiple Occupation Harrison Bowley, Head of DM, have made these comments.	No objection in principle insofar as it seeks to manage the amenity and character impacts of HMOs. However, as drafted it is overly rigid and would benefit from modification. Criteria (a) and (c) are reasonable planning considerations. By contrast, criteria (d) and (e) introduce absolute thresholds and separation distances that appear arbitrary unless clearly justified by a robust and up-to-date evidence base. Criterion (b) is unclearly worded and should be simplified. The policy should also recognise that it will only operate where planning permission is required for an HMO proposal.
QPR1	Illuminated Signage	No comment.
QPR2	Quality Streets & Spaces	No comment.
QPR3	Social and Civic Spaces	No comment.
QPR4	Heritage Trails and Wayfinding Systems	No objection in principle, however it is unclear if this relates to development that would require planning permission.
TMN1	20 Minute Neighbourhoods	Support this concept.
NE1	Natural and Semi-Natural Habitat Schemes	No comment.
NE2 Lesley	Wildlife Corridors	Criterion (a) ...planting and links. The policy would benefit from an example of what is meant by links. Criterion (b) needs clarity. What is expected, an example would be helpful. I see examples are given in paragraphs 10.18 and 10.9, but an example could be given in the policy for speed of reference. Suggested wording ...examples include but not limited to the wilding of edges play areas or verges.
NE3	Green Infrastructure Protection & Enhancement	It might be worth making reference to Natural England's GI Framework . Building with Nature is a good tool, but the publication of NE's standard in 2023 is more applicable.

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NE4	<p>Local Green Space Designations</p> <p>Lesley Davies, Planning Policy Officer and Harrison Bowley, Head of DM, have made these comments.</p>	<p>Not sure how this policy could work? This is something that should be covered by the emerging Local Plan.</p> <p>No objection in principle, are we satisfied this complies with the green space/green belt policies in the NPPF? It refers to special circumstances, is this sufficient?</p>
NE5	<p>Green Gaps</p> <p>Harrison Bowley, Head of DM, have made these comments.</p>	<p>This policy seems incredibly challenging to implement and potentially quite unreasonable. How could a development compensate for loss, does the compensation need to be the same amount of space? Same quality? Same location? – could this lead to Grampian style conditions for off-site landscaping works? The policy applies to any proposal resulting in the “loss of undeveloped land” between Cirencester and neighbouring parishes, but does not explain whether the loss must be harmful to settlement separation, landscape character, openness, identity or coalescence. If the purpose of the policy is to prevent coalescence or protect the undeveloped gap between settlements, then providing “replacement landscaped areas” elsewhere may not address the actual harm. Once the physical gap is lost, landscaping somewhere else does not necessarily preserve the function of the gap. Additionally, the policy does not say replacement landscaped areas must be equivalent in scale, location, function, quality, accessibility, permanence or ecological/landscape value.</p>
LE1	<p>Protect and Enhance Economic Activity</p>	<p>No comment.</p>
LE2	<p>Provision for Innovative Work Spaces, New and Small Businesses</p>	<p>No comment.</p>
LE3	<p>Skills Development</p>	<p>No comment.</p>
LE4	<p>New Employment Premises and Design Quality</p>	<p>No comment.</p>

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WBC1	<p>Air Quality</p> <p>Harrison Bowley, Head of DM, have made these comments.</p>	<p>Criterion a is too definitive. A policy should usually assess whether the proposal would cause unacceptable air quality impacts, rather than prohibit an entire type of development. National guidance expects air quality impacts to be considered based on the development and its location. Requiring all developers to monitor air quality, including particulates, could be excessive for minor development. National guidance says air quality assessments should be proportionate to the nature and scale of development and the likely impacts.</p>
WBC2	<p>Equal Access to Public Open Spaces for All</p>	<p>No comment.</p>
WBC3	<p>Access to Play Spaces</p> <p>Harrison Bowley, Head of DM, have made these comments.</p>	<p>Supportive of the objective. The policy does not specify whether provision should be on-site or off-site, how need is calculated, what “nearby” means, or what accessibility standard applies. National policy expects open space/play provision to be based on robust, up-to-date assessments of need, including quantity and quality deficits/surpluses. Requiring new play spaces to be maintained by the Town Council or a community management trust may be unreasonable if those bodies are unwilling or unable to take them on. It would be better to require a suitable long-term management and maintenance arrangement, without naming only two options. Any off-site contribution or maintenance payment must be necessary, directly related to the development, and fairly and reasonably related in scale and kind, this policy skips the demand/planning harm point and assumes a need arising from all development, which is could be problematic.</p>
WBC4	<p>Community Facilities</p> <p>Harrison Bowley, Head of DM, have made these comments.</p>	<p>Criterion a is not consistent with LP Policy INF2. Viability alone is too rigid and may leave community spaces more vulnerable. INF2 requires a demonstration of no need for a facility, this can protect facilities and sets a slightly higher bar for loss of facilities.</p>
WBC5	<p>Designing Out Crime</p> <p>Harrison Bowley, Head of DM, have made these comments.</p>	<p>No objection, although ‘Development Plans’ should be clearer – does this include householder development? Some householder developments don’t require a D&A, does the NDP propose introducing a local requirement?</p>
WBC6	<p>Light Pollution</p>	<p>No comment.</p>

WBC7	Noise Pollution	No comment.
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Comments from **Justin Ayton, Senior Conservation Officer:**

7.5.3 The important phases of the town identified jump from medieval to 19th-century industrial, missing out the 18th century entirely! The Georgian phase is very significant to the town & should be identified for completeness & consistency.

7.7 Surely the straight Roman roads that survive are worthy of a mention: the Decamanus (main east-west road) which survives in Querns Lane-Lewis Lane; furthermore, South Way is not a 20th-century creation, but a 20th-century recreation of part of the Cardo, the main Roman north-south road, which continues south along Tower Street.

7.10 The present, mediaeval & post mediaeval core is not the same place as the Roman core! This was very common, as due to the density of the town centres, large plots for churches were usually only available towards the edges of the towns; then, over time, as the town diminished following the withdrawal of the legions in 410, the functional centre of the town gradually migrated towards the main church. The Roman town was centred on the Forum, to the east of the junction between the Decamanus/Lewis Lane & the Cardo/Tower Street, some distance from its successor, the Market Place.

7.35 This paragraph upon NDHAs included the un-caveated, stand-alone sentence '*These types of assets can be removed or altered.*' I would hope that this is some form of typo, as it does not seem to accord with national or local guidance, or even the rest of the Neighbourhood Plan.

7.42 The assessment of NDHAs was not 'using' the HE criteria, but 'based on' (Local Plan, page 155). Again, the concern is that it could cause us problems if the neighbourhood plan is identifying NDHAs in a way that is inconsistent with the LPA, & potentially limiting our ability to consider whether buildings qualify on a case-by-case basis. Would be better to refer to Table 6 of the Local Plan.

7.43 The weighting on HE criteria is too strong. Better to refer to the criteria within the Local Plan, & make reference to the list not being definitive, & that additional NDHAs may be identified, in accordance with Table 6 of the Local Plan, on a case-by-case basis.

Comments from **Lesley Davies, Planning Policy Officer:**

Paragraph 10.2 – wording suggestion.

Cirencester is a town sitting on the fringes of the Cotswold National Landscape (CNL) , previously known as the Cotswold Area of Outstanding Beauty (AONB).

Paragraph 10.11 – Could also make reference to the Climate Change Emergency declared by CDC in 2019, if you feel appropriate. It might be mentioned in another paragraph!

<https://www.cotswold.gov.uk/environment/climate-action/cotswold-climate-and-ecological-emergencies/>

Paragraph 10.17 Helpful to add the date of the NPPF you are referring to.

Paragraph 10.24 – this feels more like a policy

Paragraph 10.29 – How would you go about extending these linkages?

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Paragraph 10.36 – Update reference to latest NPPF the 24 version – not too many changes, mostly paragraph numbering. The consultation for latest draft version of the NPPF published in 2025 has only recently closed March 26.

Paragraph 10.52 – source of information regarding numbers served by Shorncote sewage works would be helpful.