

MORETON-IN-MARSH TOWN COUNCIL

	<p style="text-align: center;">COUNCIL MEETING MINUTES Date: Tuesday 2nd April 2024 Time: 6:30PM</p> <p>Venue: Council Offices, Old Town, Moreton-in-Marsh GL56 0LW Telephone: 01608 651448 E clerk@moretoninmarshtowncouncil.gov.uk www.moretoninmarshtowncouncil.gov.uk</p>
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Present: Cllrs M Berry (chair), E Viviani, J Blackbeard, M Beresford, R Eastoe.

In attendance: S Hart, Clerk; T Maull, Deputy Clerk.

ITEM	TITLE
1.	<p>Apologies Apologies received from Cllrs D Curry, F Matthews Absent Cllrs O Jobson, S Brokenshire, M Swift, M Danks</p>
2.	<p>Declarations of Interests and Dispensations a) There were no declarations of interests from councillors on items on the agenda. b) There were no requests for dispensation relating to items on the agenda or made in writing relating to pecuniary interests.</p>
3.	There were no reports from County and District Councillors.
4.	<p>Public Participation There were no members of the public.</p>
5.	<p>Minutes a) the minutes of 19th March 2024 were DEFERRED.</p>
6.	<p>Planning Applications a) Comments were AGREED on the following applications: i. Ref no: 24/00614/FUL - Little Orchard Church Street Moreton-In-Marsh Gloucestershire GL56 0LN Demolition of central chimney stack and reinstatement of roof No objection. ii. Ref no: 24/00635/FUL - Little Orchard Church Street Moreton-In-Marsh Gloucestershire GL56 0LN Erection of front porch and greenhouse to the side No objection.</p>
7.	<p>Local Plan a) A response and covering letter to the District Council's Local Plan Consultations was DECIDED and it was AGREED to add the documents to the website along with the questions raised by residents (at the public meeting hosted by the town council). See Annex A Recorded vote - For: Cllrs Eastoe, Berry and Viviani; Against: None b) It was NOTED that a summary of the Town Council's response might also be useful to residents. Cllr Beresford to submit a draft for council approval.</p>
8.	There were no items to note or for future consideration.
9.	The date of the next meeting was NOTED as April 16 th 2024.
10.	The meeting closed at 8:35pm.

Signed

Date.....

Annex A



Moreton-in-Marsh Town Council

Old Town, Moreton-in-Marsh,
Gloucestershire, GL56 0LW

clerk@moretoninmarshtowncouncil.gov.uk

Tel. 01608 651448

April 3rd 2024

Re: Local Plan Consultation Regulation 18; Feb-Apr 2024

Dear Forward Planning Team,

Please find enclosed 11 separate documents relating to both the Local Plan consultation questions and relevant policy updates and supporting documents.

The concerns of the Towns residents and those living in the surrounding area have been significant, resulting in the need for an additional meeting hosted by yourselves at the Fire Service College (FSC - a site to be considered in the Local Plan Update) and a Parish Meeting hosted by the Town Council. Proposals for development at the FSC in the Updated Local Plan to 2031 and the suggested development strategy for Moreton in Marsh have resulted in disquiet in the Town.

Moreton in Marsh Town Council believes that the opportunity to engage at an earlier stage might have aided CDC in commencing the Regulation 18 Consultation process to meet the suggestion outlined in the National Planning Policy Framework (NPPF) Chapter 3 paragraph 16c:

- **Plans Should:**
be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.

The consultation itself has proved difficult for residents to voice their concerns. The 394 page document containing Local Plan Consultation Draft Policies Tracked Changes, requiring it to be read in conjunction with the Local Plan Development Strategy Options

and Preferred Strategy Option Topic Paper and the Executive Summary Consultation Instructions and Questions document seems to fall short of the expectations set out in CDCs Statement of Community Involvement: *Extract page 6 CDC Statement of Community Involvement January 2024: Consultation publications will be clear and concise and will not include avoidable jargon, without understanding the complexities of any decision.*

As a supporting document, the Integrated Impact Assessment (IIA) Cotswold LPU Interim IIA report 2024, at the current stage of plan making, suggests delivering growth in sustainable locations as a key tenet. In terms of Moreton in Marsh, it is incredible to believe the impact of significantly increasing population density will have no impact in terms of access to healthcare and employment even though reference is made to healthy places and specialist housing... Given the reference to improved flood management measures yet omitting the River Evenlode, subsequently mentioned in an updated version of the report made during the formal consultation period, further undermines the credibility of the Initial Impact Assessment and its scored, underpinning Appraisal Findings.

Expecting residents to answer questions such as question 15 relating directly to Moreton in Marsh without providing sufficient information such as a map or sight of the 2022 Strategic Housing Economic Land Availability Assessment (SHELAA) is only one example of a shortfall in this consultation. Indeed, as a number of issues specifically related to proposals for Moreton in Marsh have emerged in response to this consultation, the Council request that CDC engage in a further, specific consultation exercise, prior to Regulation 19 commencement.

If CDC intend to implement the Development Strategy to run from 2026 to 2041, the Town Council proposes that the current proposed development at the FSC is postponed pending inclusion into a resourced, fully developed Masterplan specifically determined for Moreton in Marsh prior to 2026.

Please regard this letter as part of the consultation process and acknowledge its acceptance and respond accordingly.

In respect of the Council's submission and thoughts on the policies and Local Plan Update, we look forward to seeing updated versions as a result of the consultation exercise, prior to Regulation 19.

Yours sincerely

Sarah Hart

Clerk and Responsible Financial Officer (on behalf of Moreton-in-Marsh Town Council).

The easiest way to engage with the Local Plan consultation is to go online at your.cotswold.gov.uk

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Complete all sections in **black ink**

Contact Details: Complete in BLOCK CAPITALS

<p>Name: Moreton in Marsh Town Council</p> <p>Address:</p> <p>Old Town Moreton-in-Marsh GL56 0LW</p> <p>Email*: clerk@moretoninmarshtowncouncil.gov.uk</p> <p>Telephone: 01608 651448</p> <p><i>*To be used in future correspondence, if completed</i></p>	<p>Agent's Name and Address, if applicable*</p> <p>Email*:</p> <p>Telephone:</p>
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Comments:

<p>Which document are you commenting on? <i>Please tick as appropriate.</i></p> <p>Or state other here: Development Strategy Vision and Objectives</p>	<p>Local Plan Update (draft policies; and vision, options and development strategy topic paper)</p>	<p>Masterplan for Cirencester Town Centre</p>
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Which part of the Document are you commenting on? e.g. *question 3, chapter 5, policy CCI, etc.*

My comment relates to:

Development Strategy Vision and Objectives

PLEASE USE A SEPARATE FORM FOR EACH COMMENT

Please use this box to indicate your answer preference.

The consultation asks questions and for your comments.

Dev Strat Q1/2 **No** A Vision is not the compliance to Objectives. A vision is an aspirational statement describing where the organisation/administration is going and what it will look like when it gets there. Something like:

“CDC aims to improve the economic, health and social wellbeing of the residents of the district whilst maintaining and enhancing the natural and built environments.”

Dev Strat Qs 3/4 **No**

“Deliver environmental and biodiversity net gain” is a statutory requirement on developers.

This CDC statement does not add anything as to how it seeks to ensure biodiversity net gain is delivered as close to the development and the environment that will be impacted by the direct loss of environmental amenity and biodiversity. Otherwise it is as useful an objective as saying that CDC will follow Health and Safety law.

“Protect the open countryside against sporadic development, while also avoiding coalescence of settlements, particularly around Cirencester.”

This statement does NOT protect the open countryside from “strategic” development as proposed in the plan for Moreton in Marsh with such development getting very close to coalescing with Longborough and Lower Lemington.

“Provide an adequate supply of quality housing, of appropriate types and tenures (particularly social rented housing), to at least meet objectively assessed needs.”

This objective needs to reference an appropriate SHELLA whereby the provision of housing type is linked to the identified housing requirement in a particular location. As it is written, it is entirely possible to “over supply” a type of development in the wrong place leading to worsening social exclusion and hardship.

“Supporting the local economy to transition to a low carbon future and enabling the creation of more high quality jobs in the District, which meet local employment needs.”

The phrase “high quality jobs” needs to be defined so that the objective can be appropriately measured.

“Enabling our residents to work more locally.”

This is a laudable objective but it does undermine the strategy of focusing development on “transport hubs”, none of which link the north to the south of the county.

“Maintaining Cirencester’s key employment and service role.”

The continual focus on Cirencester is an easy objective to promote but it consigns those settlements in the north of the county to perpetual hardship and difficulty in accessing local authority services and support. Any further development on the north of the county must come with aspects of the District’s services provision moved to the north.

“Locating most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.”

“Sustainable” development must take into account the effect of development on the environment to include flood and air quality.

“Requiring new development to be zero carbon and supporting the sympathetic retrofit of historic buildings.”

Without building regulations changing, how can CDC ensure this is achieved for all new development of whatever size?

“Supporting the provision of renewable energy schemes”

This needs to be enhanced by stating that development leading to a settlement of over 1000 houses should be accompanied with a local energy scheme to power the entire settlement +50%

Dev Strat Qs 5/6 **No**

Scenario 3 not considered adequately. The District is served by a failing water company, Thames Water. They have failed to deliver on their investment commitments 3 times to date and there is nothing to suggest they will be able to meet any commitments for a major development anywhere in the district within the plan timescale. By distributing the required development among the principal settlements it will reduce the risk of failure at one over-burdened settlement.

Scenario 5 not considered adequately. CDC have expressed an interest in a Garden Village. The Town and Country Planning Association, that CDC profess to follow, define a garden village as:

- a 'new discrete settlement, and not an extension of an existing town or village. This does not exclude proposals where there are already a few existing homes';(This point excludes Moreton as a Garden Village)
- local authority led, with support from the community and the Local Enterprise Partnership; (This point excludes Moreton as a Garden Village)
- 'well designed', 'high-quality' and 'attractive'; and
- embedding key Garden City principles to develop communities that 'stand out from the ordinary' and do not 'use 'garden' as a convenient label'.

There are places that could be considered as a Garden Village:

- Kemble: to develop the under-utilised railway station for the county and realise the economic opportunities the largest private airfield in the UK presents.
- Bledington: to develop around the nearby railway station at Kingham
- A site in the north of the district towards Evenlode/Adlestrop

Dev Strat Qs 7/8 **Yes** Scenarios 3 and 5 should be considered.

Dev Strat Qs 9/10 **No** The selection of scenarios for consultation were made prior to CDC councillors sight of the Initial Impact Assessment Document. Why was Scenario 3 discounted?

Q 13 Tick list

- Improved sustainable transport - **Yes**
- New Rd taking Traffic away from the T Centre- The road running southwest from the Fire Service College will not relieve any traffic away from the town centre. Any development that will have residents travelling west to Evesham/ Broadway/ Tewkesbury will add to the existing mini-roundabouts in the centre of the town. These roundabouts have already been assessed as being at over 96% of capacity before the recent Evenlode Road and Dunstall Farm developments. Any further development will bring the centre of town to gridlock and unacceptable air pollution.
- Delivery of a Transport Hub next to Rail Station and Improved transport connections – Stratford Upon Avon
- **Yes** A re-instatement of bus services cut over recent years to enable N/S connections within the district would be a huge improvement.
The re-instatement of a train line to Stratford would be welcome but it is difficult to see how CDC can have an effect. MIMTC supported this on 5/5/2021

- Comprehensive provision of wastewater treatment – **Yes** Naturally. We are constantly told any development will not be able to make up for the failings of the past. Please explain how this is supposed to be remedied.
- Ensuring development doesn't increase River Evenlode flooding **YES** CDC policy has failed in the past. What guarantees are there that concreting over so much agricultural land will not exacerbate flooding both at Moreton and down stream?
- Additional Primary School (possibly 2 new schools)- **NO**. Existing primary school has spare capacity and birth rate predictions will reduce pressure on places.
- New secondary school (5000 additional houses – longer term vision beyond 2041) - **NO** Totally unnecessary
- Leisure facility improvements – **Yes** Always welcome but only if available to Moreton residents at standard Leisure centre Times (6am-10pm) and operated by an organisation independent of Capita.
- Town Centre improvements – central area- **Yes** This is already in progress through the Town Council
- Business Hub to support start-ups - **Yes** Reference has already been made to “High Quality” jobs. This needs to be defined before designing the type of buildings required. It should not focus on warehousing and distribution as this will only exacerbate the traffic through the town.
- Community centre provision – **What Where and When?**
- Library improvements- **Yes**
- Green Infrastructure improved additional green spaces - **Yes** Cycling safely in Moreton is difficult and many people are put off. New green infrastructure is required to accommodate existing developments along the Evenlode Road and Fosse Way at Dunstall Farm

Dev Strat Q14 - Flood Management, SuDs Management, Community renewable energy project

Dev Strat Q 15 Tick list

- Divert existing through traffic away from Town Centre – Why only existing traffic? It should divert all traffic away from the town centre.
- It does not need to divert existing traffic away from the T Centre – **No**
- The road is not used by HGV (i.e. HGVs would continue to pass through T Centre - **No**
- The road is used by all types of vehicles including HGV – **Yes**
- The route extends the whole way round the eastern side of Moreton connecting the A429 to the North and South of the Town via A44 – **Yes**
- The route incorporates the northeastern part of Moreton only connecting the A429 to A44 – **No**
- The route incorporates the southeastern part of Moreton only connecting A429 to A44 – **No**
- The route is located along the outside edge of future planned development /the town – **Without an understanding of the SHELAA how is this possible to answer?**
- The route is located internally within future planned development - **Without an understanding of the SHELAA how is this possible to answer?**
- The road has a low vehicle speed (e.g. 20-30mph)- **The classification of road would determine potential speeds? How can this question be valid?**

- The road has a higher vehicle speed (e.g. 40 or 50mph)- **The classification of road would determine potential speeds? How can this question be valid?**
- A segregated pedestrian/cycle lane is provided - **Yes**
- The route is lined by trees - **Yes**

Dev Strat Q 16 Suggested policy options do not include East-West considerations to alleviate congested mini roundabouts but proposed policy will exacerbate current issues

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See above

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Local Plan Update:

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2024

<p>Local Plan Consultation Forward Planning Team Cotswold District Council Trinity Road Cirencester GL7 1PX</p>	<p>11:59pm on Sunday 7th April 2024</p>
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My comment relates to:

As many of the Local Plan Update Policies have to be read in conjunction with this paper, Moreton Town Council will provide a view in addition to answering questions in the consultation document separately.

PLEASE USE A SEPARATE FORM FOR EACH COMMENT

Please use this box to indicate your answer preference.

Executive summary point 1.3 bullet 2

Extract: For example, more homes may be required to increase affordable housing delivery or fewer homes may be required to protect assets or areas of particular importance (e.g. the Cotswolds National Landscape).

If you propose to update the Local Plan to 2031 increasing the percentage of affordable homes from 40% to 50% it is hard to see why more homes would be required?

Extract Exec Summary point 1.3 bullet 3: *Around 5,150 dwellings' worth of housing land supply for the extended plan period has already been identified.*

CDC has yet to disclose the outcome of the SHELAA 2022 where presumably this land was identified. It would be helpful to share this with Town Councils who responded to the 2022 consultation.

Extract Exec summary 1.3 bullet 5: *The adopted Local Plan includes 14% more housing land supply than the housing requirement to provide flexibility in case any sites were not delivered as expected.*

This is the reason why Moreton in Marsh Town Council cannot understand the need to include upwards of 310 houses on the Fire Service College (FSC) site immediately in the Updated Local Plan proposal.

Extract Exec Summary 1.9: *Additional non-strategic site allocations for different types of development would be made at the Principal Settlements whilst ensuring that the scale and extent of development within the Cotswolds National Landscape (formerly the Cotswolds Area of Outstanding Natural Beauty) remains limited and that development is directed away from areas with higher flood risk. In addition, given that Moreton-in-Marsh is a transport hub, which has a railway station; good provision of services, facilities and employment; and has various sites outside the Cotswold National Landscape, the town would become a focus for strategic-scale growth of over 1,500 additional dwellings and additional land for employment*

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development. A longer-term vision, including additional development, may be required to deliver some infrastructure items such as a secondary school.

As half of the Town of Moreton in Marsh sits in the Cotswold National Landscape it is inevitable that the scale of proposed development will adversely impact on the National landscape and in particular the surrounding areas of the North Cotswolds.

Moreton Town Council agrees that development should be directed away from areas with higher flood risk. Cotswold District Council Level 1 Strategic Flood Risk Assessment 2023 identifies Moreton in Marsh as being High Risk of Flooding as does Thames Water Ground Impact System Management Information Plan. Where SuDs connections are made to existing infrastructure the pressure increases causing increased use of a Land Treatment Area (LTA) for sewerage and discharge into the river Evenlode leading to increased flood risk to homes in Moreton and downstream to Bledington. Strategic scale growth suggested for Moreton in Marsh without a suitable specifically detailed impact assessment is not planning, without a detailed assessment, it will be a failure of the Local Planning Authority to plan effectively.

6. Preferred Development Strategy and Broad Locations for Growth

Extract Point 6.7

Moreton-in-Marsh is a transport hub, which includes a railway station. There are various sites located to the south, east and north of the town that are available for development and that are located outside the Cotswolds National Landscape and areas at higher risk of flooding. These sites would likely have access to the level of services, facilities and employment opportunities of a Main Service Centre. It is estimated that a combination of these development plots could deliver over 1,500 additional homes by 2041. Moreton-in-Marsh would therefore be identified as a broad location for strategic scale growth (Scenario 6). This approach would enable further development in the town to be planned comprehensively (e.g. transport, water / wastewater, education, etc.). In addition, unlike single large strategic sites of 500+ dwellings(15), which typically have long development lead-in times, the combination of the smaller development parcels on offer would enable shorter lead-in times. A longer-term vision, including additional development, may be required to deliver some infrastructure items such as a secondary school.

MTC looks forward to the establishment of a Transport Hub at its Railway Station.

As previously stated, half of the Town is situated in the Cotswold National Landscape, the other half in the Special Landscape Area. To suggest that land within a single parish boundary can be subject to separate policy would probably fail an equalities impact assessment. The Special Landscape Area (SLA), designation provides protection for locally significant and attractive landscapes that are of comparable quality to Areas of Outstanding Natural Beauty (AONB). They

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should be protected and enhanced, particularly through the planning process. All the SLAs in the district border the Cotswolds AONB.

Suggesting that one location in Cotswold District takes half of the District's housing requirement over a ten-year period is a poor option unless the residents of Moreton see such development in the context of both District and County Council plans. If access to education, employment, highways, and public transport opportunities are to be delivered in support of strategic scale growth, the public will need to be convinced otherwise Moreton in Marsh will simply be subject to more of the same incremental development.

Noting the point made in the Employment Development policy EC1

9.1.3. Cotswold District Council recognises that, whilst GFirst's Strategic Economic Plan (SEP) does not consider the District to be the key focus for economic growth in the County, it is committed to promoting growth and enhancement of the Gloucestershire economy. The competitive advantage of larger surrounding towns, such as Swindon, Cheltenham and Gloucester is recognised in the relevant Strategic Economic Plans, which identify them as key locations for growth. However, with a highly skilled population and key business assets, Cotswold offers a unique business location that offers a high quality of life in an outstanding natural and historic environment. It also has access to the strategic rail network at Kemble and Moreton-in-Marsh. The Local Plan seeks to support strong and sustainable economic growth while recognising that the District...

Whilst the Local Planning Authority accepts the situation outlined above it should be noted that the needs of both the current and future population of Moreton reside within Gloucestershire and are equally entitled to the services provided by the County Council such as education, employment, highways and transport. Access to Employment opportunities should not be viewed simply in the context of the District and, as an approach, it is limited and unacceptable. As previously stated, development will need to be considered in the context of both District and County Council plans.

Suggesting that 1,500 homes and listing Moreton in Marsh as a settlement suitable for strategic growth will avoid the impact of incremental development and that **'This approach would enable the town to be planned comprehensively'** is not credible without the investment into a specific and masterplan for Moreton developed before 2026. Only proposing to comprehensively plan following significant development is to ignore the impact of 1,500 homes on the town and its residents, indeed it will be a dereliction of the Local Planning Authorities duty to its current and future residents.

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<p>Which part of the Document are you commenting on? e.g. <i>question 3, chapter 5, policy CCI, etc.</i></p> <p>My comment relates to:</p> <p>Policy SD1c Policy SD2 6 SD 4 Health and Wellbeing</p>
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The consultation asks questions and for your comments.

In order to ensure BNG is retained a hierarchy needs to be established as follows by amending point SD1c: Settlement (priority 1), District (priority 2), County (priority 3) in support of SD2 point 6.

SD4 Health and wellbeing. MTC does believe that the Local Plan should promote health and wellbeing not just for residential development but also for other uses such as commercial and employment proposals. The Cotswold Business Park situated in Moreton in Marsh is a good example of how a development can encourage commercial and employment opportunities, enhancing the environment without compromising the setting.

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My comment relates to:

CC1 LPU Q5/6

CC2a Renewable energy

Q7

LPU Q8

LPU Q9

LPU Q10/11

CC2b Onshore wind

LPU Q12

LPU Q13/14

CC2d Rooftop and ground mounted solar panels

LPU Q15

LPU Q16

LPU Q17/18

LPU Q19

CC3 Net Zero Carbon New Buildings

LPU Q20/21

PLEASE USE A SEPARATE FORM FOR EACH COMMENT

Please use this box to indicate your answer preference.

The consultation asks questions and for your comments.

Q5/6 MTC **supports** improvements being made to dwellings that seek permission to extend in order to try not to exacerbate existing problems.

CC2a Renewable energy

Q7 MTC **supports** a renewable energy policy framework **however please note:** CC2a policy point 3 in respect of Battery Storage systems. Whilst MTC supports the policy in respect of the visual impact of battery storage systems it is the **safety** of such installations policy needs to include. In

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the absence of regulation, proposals for energy storage systems linked to the National Grid should follow National Fire Chiefs Council (NFCC) planning guidelines.

LPU Q8 MTC **supports** deployment of renewable electricity generation without giving rise to unacceptable landscape of other harm.

LPU Q9 MTC **strongly supports** the principle of renewable energy development in the Cotswold National Landscape on the basis that the benefits of such development do not outweigh harm to the designated area or its setting.

LPU Q10/11 MTC is **neutral** in respect of the balance to be struck with fossil fuels where a proposal cannot be met by zero carbon alternatives.

CC2b Onshore Wind

LPU Q12 As the policy is incomplete MTC remains **neutral**.

LPU Q13 MTC **supports** community owned wind projects.

LPUQ14 MTC would **support** wind schemes in developments and existing industrial estates and also new industrial estates. The consultation wording seems to exclude the possibility of establishing a wind scheme in a new industrial estate.

CC2c Rooftop and ground mounted solar panels

LPUQ15/16 MTC **objects** as it would prefer to support a rooftop first approach.

LPUQ17/18 MTC would **support** community led energy schemes which provide for community benefit for residents of the Town.

LPU Q19 **Nil**

CC3 Net Zero Carbon New Buildings

LPU Q20/21 MTC believes that CDC should Continue to propose higher local requirements, where justified, in order to be considered 'Green to the Core'.

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Contact Details: Complete in BLOCK CAPITALS

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Address: Old Town	

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<p>Moreton-in-Marsh GL56 0LW</p> <p>Email*: clerk@moretoninmarshtowncouncil.gov.uk Telephone: 01608 651448</p> <p><i>*To be used in future correspondence, if completed</i></p>	<p>Email*: Telephone:</p>
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Comments:

<p>Which document are you commenting on? <i>Please tick as appropriate.</i></p> <p><i>Or state other here:</i> Local Plan Update Delivering the Strategy</p> <p>S18 Moreton in Marsh</p>	<p>Local Plan Update (draft policies; and vision, options and development strategy topic paper)</p>	<p>Masterplan for Cirencester Town Centre</p>
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<p>Which part of the Document are you commenting on? e.g. <i>question 3, chapter 5, policy CCI, etc.</i></p> <p>My comment relates to:</p> <p>LPU Q22</p> <p>Policy S18 Moreton in Marsh</p> <p>Noting policy S18 Moreton in Marsh to be: This policy proposal should be read alongside the Development Strategy Options and Preferred Option Topic Paper (CDC, January 2024), which considers development needs up to 2041 and options for how these can be delivered (including a proposal for 1,500+ additional dwellings at Moreton-in-Marsh).</p>
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MTC will comment on Options and Preferred Options Topic Paper CDC January 2024.

PLEASE USE A SEPARATE FORM FOR EACH COMMENT

Please use this box to indicate your answer preference.

The consultation asks questions and for your comments.

LPU Q22 MTC regards surface water management, improved Sewerage Infrastructure and an East/West A44 solution to alleviate mini roundabout congestion as being 3 key requirements for Moreton alongside improved transport connections.

LPU Q23 Nil

S18 – As there are no specific consultation questions in respect of the Local Plan Update Policy S18 Moreton, MTC provides its comments as follows:

7.21.1

The bus service provision does not enable students to access further education opportunities in Cirencester or to attend college/university in Cheltenham. This is not an example of ‘good bus services.’

The bus service provision prevents access to employment opportunities in Cirencester/Cheltenham and other parts of Gloucestershire. This is not an example of ‘good bus services.’

7.21.2 Moreton has a good employment base (about 2,000 jobs), with a higher than average proportion of those jobs in growth employment sectors and a good balance of jobs to workers. Please cite your reference for this point and define the growth employment sectors.

Moreton is not sustainable in respect of its two congested mini roundabouts taking traffic East West crossing the A429, reflected in point 7.21.5.

7.21.3 Whilst the Fire Service College (FSC) may have indicated a willingness to work with the wider community with the aim of making its facilities more widely available than has been the case, operations of the FSC limit access to the leisure facility. Experience has shown the desire for security has outweighed the aim of working with the wider community as, for example, Park Run

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was prevented from undertaking its activity within the safe environment of the FSC free of road traffic. MTC looks forward to the explanation of how proposals will emerge under policy EC4 point 5e. as an earlier point in EC4 suggests the following: (the replacement sports hall's facilities would be made available to the community under the same existing arrangement).

7.21.4 Why does further housing development reflect potential for employment to increase?

7.21.5 The retail provision in the Town Centre 'currently functioning as an important service centre' is fragile and dependent on applications for change of use from retail to residential. The idea that new development will take account of the provision of parking facilities and congestion issues in the centre of the town is incorrect under the policy suggested in S18.

7.21.9. States: Evidence presented in the Water Cycle Study (August 2015) indicates that some upgrading of the wastewater treatment works and sewerage infrastructure will be required in order for new development to be accommodated.

Moreton is still awaiting upgrades to its wastewater infrastructure and sewerage treatment works and it is unclear when this will be in place before 2030. To suggest further development in the Local Plan Update is premature at this time.

Whilst Cotswold District Council (CDC) seeks to actively support the delivery of a primary school and the regeneration and development of facilities at the FSC, it is unclear how the development of an indicative net capacity of 310 dwellings, a new neighbourhood centre, including a convenience store, a replacement sports centre, a hotel and public house situated on the FSC site will support the town centre retail and local tourist accommodation provision. Nor will the idea of a route, protected in the Local Plan for a new road connecting the A44 to the A429 to the north and south of Moreton reduce the traffic currently using the A44 to move East/West via the two mini roundabouts. Pont 7.21.12 details 'a route protected in the Local Plan' if this is the case why is the route not visible? Why are residents expected to respond to the inclusion of this Local Plan Update policy without visibility of an existing protected road route? Where can residents see this protected route in the Local Plan?

Noting the wording below, stated at the start of policy S18:

This policy proposal should be read alongside the Development Strategy Options and Preferred Option Topic Paper (CDC, January 2024), which considers development needs up to 2041 and options for how these can be delivered (including a proposal for 1,500+ additional dwellings at Moreton-in-Marsh).

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Given the significance of the requirement for S18 to be read in conjunction with the Development Strategy Options and Preferred Options Topic Paper, MTC believes a new and separate consultation, specific to Moreton in Marsh needs to be undertaken as part of Regulation 18.

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My comment relates to:

Policies H2, H4

PLEASE USE A SEPARATE FORM FOR EACH COMMENT

Please use this box to indicate your answer preference.

The consultation asks questions and for your comments.

LPU Q35 **YES Policy H2.** MTC believe the increase in affordable housing from 30% to 40% on brownfield sites and from 40% to 50% on all other sites is too much. The percentages need to remain as they are in current policy as this is more than adequate to meet housing needs.

LPU Q35 **YES Policy H4** Point 8.4.8. MTC believe 3 months from date of first marketing is not long enough – it should at least be 6 months.

LPU Q36 **YES** Windfall sites should be considered for affordable social rental housing.

LPU Q37/38 **No** MTC Believe Traveller sites should not be included within larger developments because the word Traveller implies transitory.

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My comment relates to:

Economy Retail and Tourism

PLEASE USE A SEPARATE FORM FOR EACH COMMENT

Please use this box to indicate your answer preference.

The consultation asks questions and for your comments.

LPU Q39/40 MTC is unsure if **all** new homes should require home working space but some would enable flexible needs to be met.

LPU Q41/42 **YES** Co-working spaces within larger developments provide access to work within easy reach.

LPU Q43/44 EC 4 Fire Service College (FSC) **NO** MTC believes proposed development at the FSC whilst it may assist the business, development in advance of relevant infrastructure upgrades, particularly in respect of water and sewerage treatment, is premature.

Policy EC4

The preamble to the policy suggests the following:

...whilst replacing the life-expired sports hall with its first floor swimming pool (the replacement sports hall's facilities would be made available to the community under the same existing arrangement). The existing arrangement limits use by residents.

And yet Policy at point 5 e

...explain how the proposals will safeguard and ensure maximum accessibility and integration between the community leisure uses and playing fields on the site, and their available use for local residents;

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9.4.22 The site is over 100 hectares on the edge of Moreton-in-Marsh. It is hugely significant to the town's future. Consequently, the development of the site needs to be planned in a holistic manner to secure the long-term future of the College and achieve benefits to the local community. For example, the College has recreational facilities that are not available in Moreton-in-Marsh. The Master Plan should aim to secure public access to these facilities on a permanent basis.

MTC believe these points illustrate that the proposed development will bring little benefit to the residents of Moreton in Marsh as stated in the LPU response to policy S18 and any development of the FSC site is premature at this time.

It seems that CDC is favouring Capita's business requirements prior to resolution of the infrastructure issues facing Moreton and its residents.

LPU Q47/48 **NO** as policy EC4 needs to be reviewed again.

Employment Development Policy EC 1

9.1.3. Cotswold District Council recognises that, whilst GFirst's Strategic Economic Plan (SEP) does not consider the District to be the key focus for economic growth in the County, it is committed to promoting growth and enhancement of the Gloucestershire economy. The competitive advantage of larger surrounding towns, such as Swindon, Cheltenham and Gloucester is recognised in the relevant Strategic Economic Plans, which identify them as key locations for growth. However, with a highly skilled population and key business assets, Cotswold offers a unique business location that offers a high quality of life in an outstanding natural and historic environment. It also has access to the strategic rail network at Kemble and Moreton-in-Marsh. The Local Plan seeks to support strong and sustainable economic growth while recognising that the District...

Whilst the Local Planning Authority accepts the situation outlined above it should be noted that the needs of both the current and future population of Moreton reside within Gloucestershire and are equally entitled to the services provided by the County Council such as education, employment, highways and transport. Development will need to be considered in the context of both District and County Council plans. Access to Employment opportunities should not be viewed simply in the context of the District and, as an approach, it is limited and unacceptable.

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<p>Please use this box to indicate your answer preference.</p>

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The consultation asks questions and for your comments.

LPU Q51/52 MTC agree with the policy as long as the option for residents to form their own Charitable Trust or resident owned management company is included.

LPU Q53/54 MTC to Dark Skies supported through lighting considerations in policy EN16

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The consultation asks questions and for your comments.

LPU Q55/56 The top infrastructure issues for Moreton in Marsh are: Flood Management, Water and wastewater Management and Public Transport

MTC notes the indication in respect of Moreton in Marsh and policy INF1: The proposed update to this policy should be read alongside the Development Strategy Options and Preferred Option Topic Paper (CDC, January 2024).

MTC also notes the following point 11.1.7 and will make comment in response to the Development Strategy Options and Preferred Options Topic Paper.

11.1.7. Cotswold District Council is in a disadvantaged position whereby a large proportion of its objectively assessed need (OAN) will be met by committed / delivered development. As such, this development cannot be required retrospectively to contribute to the infrastructure identified in the IDP. This particularly affects the Principal Settlements of Fairford, Mickleton, Moreton-in-Marsh and Tetbury

Given the significance of the requirement for INF1 to be read in conjunction with the Development Strategy Options and Preferred Options Topic Paper, MTC believes a new and separate consultation, specific to Moreton in Marsh needs to be undertaken as part of Regulation 18.

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CC5 Flood Management

CC6 Water Management Infrastructure

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Please use this box to indicate your answer preference.

The consultation asks questions and for your comments.

CC5 Flood Management

MTC support policy CC5 and notes point 5b.5.1 citing the NPPF:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, ... Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere”.

CC6 Water Management Infrastructure

Policy point 1

Where such infrastructure is required, it must be in place prior to the occupation of the development, or, if it is demonstrated that delivery within that timetable is not possible, within a timeframe that has first been agreed by the LPA. (vi) Proposals will be subject to conditions to ensure that the first and/or subsequent occupancy is aligned with the delivery of the necessary infrastructure upgrades; (vii)

MTC notes the policy wording, however reference vii from Thames Water includes: ‘...which result in the need for off-site upgrades...’ Should this wording be included in the policy?

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vii Thames Water Representation example policy clause – used in part (I&O Reg 18 consultation, 2021) We recommend the Local Plan include the following policy: “Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”; NPPF 2023, para 11; SFRA L1 draft also recommends the phasing of development.

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What happens next:

Your comments will be taken into consideration when preparing the next stage of the draft Local Plan Update. You will be notified when this is available for public consultation.

The easiest way to engage with the Local Plan consultation is to go online at your.cotswold.gov.uk

However, we appreciate that some people prefer to respond using a more traditional comment form.

If this is your preference, then please use this form to set out your comments on the Local Plan consultation document. To enable your comments to be taken into consideration it is important to state the relevant QUESTION OR PARAGRAPH / SECTION/ DOCUMENT that you are referring to.

Please use a separate form for each comment. You can download a copy of the form from <https://www.cotswold.gov.uk/planning-and-building/planning-policy/evidence-base-and-monitoring/>, photocopy this form or you can obtain further copies from Cotswold District Council.

Cotswold District Council
LOCAL PLAN UPDATE CONSULTATION
2024

Which part of the Document are you commenting on? e.g. *question 3, chapter 5, policy CCI, etc.*

My comment relates to:

Responding to Climate Change and Nature Recovery point 5.1.2 linked to Policy point SD1c, SD1 point 6 and policies CC7 point 3, EN7, EN8 & EN9 and proposed Appendix H

PLEASE USE A SEPARATE FORM FOR EACH COMMENT

Please use this box to indicate your answer preference.

The consultation asks questions and for your comments.

5.1.2 MTC supports points under the 4th bullet and notes the intention to update Appendix H Strategic Principles for Green Infrastructure in Gloucestershire to be included or updated in next Local Plan consultation, however the final point under the 4th bullet is unclear.

CDC has signed up to the Gloucestershire Nature and Climate Fund (GNCF) linked to biodiversity net gain (BNG) principles and spatial operating strategy.

Policy (EN7, EN8, EN9) needs to be clearer about developer contributions to BNG and links to the CDC Green Infrastructure Strategy December 2023 and GNCF in order to ensure BNG is retained in a hierarchy needs to be established as follows by amending point SD1c: Settlement (priority 1), District (priority 2), County (priority 3) in support of SD1point 6.

CC7 point 3 A BNG spatial operating strategy combined or overlaid with a spatial development strategy within the District would at least enable residents to understand how their environment is being planned and managed in support of nature recovery, wellbeing and climate emergency.

Please state **reasons** why you are commenting on this part of the document, using a continuation sheet if necessary. Your comments will have much greater weight if they are supported by evidence.

Responding to Climate Change and Nature Recovery point 5.1.2 linked to Policy point SD1c, SD1point 6 and link to policies EN7, EN8, EN9 and proposed Appendix H

Please set out any alternatives or changes you are seeking, using a continuation sheet if necessary.

In order to ensure BNG is retained a hierarchy needs to be established as follows by amending point SD1c: Settlement (priority 1), District (priority 2), County (priority 3) in support of SD1 point 6.

Noting the intention to update Appendix H Strategic Principles for Green Infrastructure in Gloucestershire to be included or updated in next Local Plan consultation, A BNG spatial operating strategy combined or overlaid with a spatial development strategy within the District would at least enable residents to understand how their environment is being planned and managed in support of nature recovery, wellbeing and climate emergency.

To help us process your response more quickly, it is preferable that you email your completed comment form(s) to:

Local.Plan@cotswold.gov.uk

You can also post your comment form(s) to:

Local Plan Consultation
Forward Planning Team
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

For your response to be valid, comment forms must be received by the Council no later than:

**Cirencester Town Centre masterplan:
11:59pm on Sunday 7th April 2024**

**Local Plan Update:
11:59pm on Sunday 7th April 2024**

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