

To:
Planning Policy Team
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

FROM POULTON PARISH COUNCIL
poultonclerk@gmail.com

Cotswold District Council - Local Plan Review Regulation 18 – Consultation

Executive Summary – Poulton Residents’ Key Concerns

- Infrastructure Deficit: Poulton lacks essential services—public transport, schools, healthcare, shops—making it unsuitable for significant development.
- Transport Limitations: No viable public transport; reliance on cars increases congestion, emissions, and road safety risks.
- Flooding & Sewage Risks: Existing issues with flooding and inadequate sewage capacity; further development would worsen these problems.
- Scale of Proposed Growth: Adding 30 dwellings (17% increase) is unsustainable given current infrastructure and environmental constraints.
- Environmental & Heritage Impact: Development near conservation areas and open spaces would harm rural character and Cotswold landscape.
- Affordable Housing Concerns: New housing often unaffordable for locals; risk of properties being bought by outsiders or used for Airbnb.
- Planning Process Issues: Lack of meaningful early engagement with Parish Councils; local knowledge on flooding and infrastructure often ignored.
- Preference for Strategic Growth: Support for focusing development in main service centres or large strategic sites (Scenario 3 or modified Scenario 5a) to enable infrastructure-led planning.
- Opposition to Dispersed Development: Small-scale allocations in villages seen as inefficient, environmentally damaging, and contrary to sustainability goals.

Challenge of the Overall Target for the Cotswold.

A very robust challenge to the overall target for the Cotswolds needs to be made.

Central Government must reconsider the unrealistic figures being placed on the Cotswold District.

All parties, including the Cotswold District Council Planning team and Councillors, appear to be in agreement that the overall target of 18,650 homes, that has been imposed on the Cotswolds, is too high. It places a disproportionate burden on the District as compared to other parts of the country.

There appear to be two main reasons for this:

1. The top-down methodology and algorithm used by Central Government to drive the allocation is flawed, and certainly inappropriate for regions like the Cotswolds
2. No adjustment has been made to take into account the fact that 84% of the land area, within the Cotswold District Council, is designated part of the Cotswold National Landscape (previously AONB), and therefore is effectively out of bounds for any material new housing development. This has resulted in the vast majority of the target needing to be fulfilled in just 16% of the area which will inevitably lead to unsustainable development.

While we agree that it is important for CDC Planning to take ownership of creating a new Local Plan to accommodate the new target, and to consult fully with local residents as they are doing, we believe that *in parallel* there should be a separate process to put forward a robust legal challenge of the imposed targets back to the National Government.

We are concerned that action to date in this regard has not been robust or urgent enough.

CDC appears to have been relatively passive to date compared to other Councils who have engaged legal teams and are seeking King's Counsel's opinion. From what we understand, CDC's approach to date has amounted to sending two letters, one to Angela Rayner and one to Steve Read (and they are still awaiting a response from the latter).

Comments such as "we are keeping a close eye on how East Hampshire are getting along with their appeal" feel a little passive, and "we will be seeking Counsel's input at a later date", does not have enough urgency. These targets need to be challenged and appealed robustly as soon as possible before it is too late to have any chance of getting them amended.

We would like to see CDC adopting a more aggressive and proactive approach to appealing this target. They should urgently be working closely with other Councils who are in a similar situation; sharing learnings and collaborating to show a united front, by teaming up together to share the costs of engaging a top Kings Counsel, aggressively lobbying MPs, ministers and other interest groups.

The Proposals in General

Development should be focussed in areas where there is established infrastructure in terms of employment, primary and secondary schools, good public and school transport, a good supply of shops, medical facilities, recreational facilities etc. None of this applies to Poulton and a majority of similarly sized villages. Public transport to and from small villages to places like Cirencester, Cheltenham, Gloucester and Swindon is non-existent or rudimentary especially in the evenings and at weekends. Compare this to the regular availability of buses in Oxfordshire from smaller villages into Oxford itself, allowing connections by rail to London.

Under these proposals there is a real danger that a development corridor will be created along the A419 between Cricklade and Cirencester. Such ribbon development is undesirable.

Historically towns expand outwards from their centre because all the services are already there. Villages decline because they do not have adequate services and their sustainability is never enhanced. They become dormitory areas, with increasing numbers of second homes.

Development proposals should take in to consideration the environmental impact of increased traffic pollution when regular public transport is not available to a settlement. Too often planning applications contain fictitious and impractical comment on employment opportunities, facilities and transport links in small villages (for example the idea that one can safely and easily cycle, at any age and in any weather, into larger centres and that there are readily available opportunities in the business units in a village).

In many respects truly affordable or rentable housing (as has been built in Bibury) should only be considered in small rural communities, as too often new and available housing is unaffordable to local families and is bought by people from outside of the area, the higher income earners, the retired and Airbnb operators.

Enlarging the non-sustainable settlements creates the negative issues listed above. As it is a question of scale, it is more practical and cost effective to offer and improve facilities in the larger centres

than in several small villages. Enlarging smaller communities is considerably more problematic than adapting larger towns and anyone moving into a small village inevitably has to use a car to access necessary facilities.

Concentrating housing in the large towns, which have greater employment opportunities, will markedly limit the inevitable increased pressure on the highway network, and the already congested local roads, from being used for commuting to work, for accessing retail centres, schools and leisure facilities. It will also provide more immediate access to the main roads connecting to other major towns and the motorway routes.

Expanding the larger towns allows for an economy of scale in terms of improving vital services such as sewage and water, schools, medical facilities, transport within the town etc.

For the above reasons development should be focussed on large towns and not by increasing housing in unsustainable communities. This threatens the countryside, the rural nature of villages and the characteristics they contribute to the Cotswold vernacular.

Larger-scale developments present a valuable opportunity to deploy Section 106 contributions in a more strategic and impactful manner. Unlike smaller, dispersed schemes, major developments can support comprehensive infrastructure packages that address multiple community needs in a coordinated way. This includes:

Transport Upgrades:

- Transport infrastructure is a critical concern for rural villages like Poulton. However, small-scale developments that add only 2–5 new bus users do not generate sufficient demand to make a village bus service economically viable. Public transport providers require a critical mass of regular users to sustain operations, and without this, services remain infrequent, underused, or financially unsustainable.

As a result, residents continue to rely on private vehicles, increasing traffic volumes, carbon emissions, and road safety risks, especially in areas with narrow lanes and limited parking. To address this, Section 106 contributions from larger developments, as opposed to small developments, can be used to:

- Fund targeted transport interventions, such as demand-responsive services or community transport schemes.
- Improve active travel infrastructure, including safe walking and cycling routes to nearby service centres.
- Support mobility hubs or shared transport options that reduce car dependency and improve connectivity.

Broader Infrastructure Benefits:

Beyond transport, strategic Section 106 deployment can support:

- Education and healthcare: Funding for new or expanded schools, GP surgeries, and other essential services.
- Community amenities: Provision of green spaces, community centres, and recreational facilities tailored to local needs.
- Utility resilience: Investment in water, drainage, and broadband infrastructure that benefits both new and existing residents.

By concentrating development in fewer, larger sites, the Council can ensure that Section 106 contributions are pooled and targeted to deliver meaningful infrastructure improvements, rather than being diluted across multiple small schemes with limited local benefit. This approach also enables

forward planning, aligning infrastructure delivery with housing growth timelines and ensuring long-term sustainability.

Following a more targeted process means that by 2043 Cotswold District will be a resilient, inclusive, and forward-looking rural district that has successfully responded to the climate crisis, conserved and enhanced the landscape, delivered sustainable communities, and supported a vibrant, low-carbon economy.

In conclusion developing in small villages tends to be speculative and not organised and integrated encouraging landowners to seek permission to build in a piecemeal and unstructured manner, often without significant prior consultation with inhabitants.

The Proposals in Relation to Poulton

There are, of course, in any village, areas appropriate for small development but certain sites, for example in Poulton those around the conservation areas and open spaces (e.g. Englands, The Butts), which if developed would destroy the rural feel and appearance of the village, are unsuitable. The nature of Poulton is such that it is not suited to “estate style” building.

There are major considerations for any development on the impact of flooding where building in one part of the village impacts on another and also where development is allowed on land which is known to have flooding issues. This is very relevant to Poulton. When one of our councillors attended a flooding meeting and commented on the fact that two of the properties had flooded on the development at Wheelers Rise and that it has resulted in water reaching the bridge over the A417, at such a rate that it has eroded the bed of the watercourse, someone from the planning department said “well maybe we should have listened to you.” By that time it was too late.

Flooding in Poulton is focussed in Ranbury, from the Ashbrook and around the bridge on the A417, in Stoney Pool and at the northern end of Bell Lane.

Planners and planning inspectors must take more note of local concerns when considering applications and not force through development, especially in our smaller communities where residents have greater knowledge of problems than do officers.

Discussions and decisions are taken about potential building sites without any reference to Parish Councils, who know their communities better than anyone else. Parish Councils are constantly aware and conscious of conservation, flooding issues, traffic, sewage problems etc. This approach is wrong and Parish Councils should be consulted in the first instance and can point inspectors to the most suitable sites for development. Too many discussions lack transparency. The benefit of local knowledge should not be ignored or underestimated, as has been the case too often in the past.

This is a real concern in Poulton, because all the water from the north of the village, runs to the Ashbrook and to the “bottleneck” at the bridge. No development should be permitted to the north because of increasing the risk of flooding.

The other major issue is the insufficient capacity of the sewage system which becomes overloaded during periods of high rainfall and causes sewage overspill and interruption of toilet use. Nothing has changed in Poulton in relation to this since the flooding of 2007. It just continues to happen. The situation at the Lot Lane – Cricklade Street junction and in the centre of the village has been well documented in the past.

Flooding and sewage issues, and a failure to address both effectively, if at all, means that constructing thirty houses in Poulton is not viable and will impact adversely on other households. Add to this the inability of the Ampney St Peter works to cope with the current load from Poulton, Meysey Hampton, Ampney Crucis and the other surrounding villages we ask what arrangements are

being made to handle the sewage from further development, notably the proposal to build 660 additional houses in Ampney Crucis.

The additional thirty dwellings being proposed represents a 17% increase which is currently unsustainable in terms of transport, sewage and flooding and would need very careful consideration as to which sites can be used for any increase, however small.

Villages must be involved at an early stage in any planning application rather than at the point when the application becomes confrontational. In terms of the villages it is those that live there who are in the best position to consider how development can best be handled and where within their communities.

Dialogue with Parish Councils must be active and not just a “tick-box” exercise and, if effective, is preferable to confrontation. Potential sites can be identified in every community and we need to move away from speculative applications and become more structured in approach.

New housing needs to be accompanied by the necessary infrastructure (transport, education, sewage, healthcare, Wi-Fi etc.) which is lacking in Poulton. Poulton is designated as a non-sustainable community and the Parish Council questions why the proposed development is not spread more evenly across such villages

It is hard to understand why Poulton is identified for more housing when villages like Southrop, Kempsford and Meysey Hampton, all of which have primary schools, have a zero allocation. There can be no reason why towns and villages in the Cotswold National Landscape cannot take a bit more of the additional burden in order to spread the load more equitably.

Parts of villages, including in Poulton, are unsuitable for development because of flood zones, impacts on landscape, protected habitats, historic buildings etc., as well as for sustainability and general accessibility factors.

The refusal to build housing on the old industrial site at Sunhill typifies a failure in using a brown field site and a the lack of structure in decisions. Such decisions need to be reviewed and if the Local Plan is to be “green to the core” opportunities like this must not be overlooked. Likewise why have planners permitted so much holiday home development, around old gravel pits in Fairford and the Water Park, when these areas could be used for permanent housing?

In summary opportunities for development in Poulton are limited and constrained by:

- Flood management which is almost non-existent
- Poor digital infrastructure
- Inadequate sewage infrastructure
- No education or healthcare facilities
- Poor public transport links and the fact that cycling into the larger centres is not feasible for the majority of residents (dangerous roads/distance/age profile of residents)

The Questions

Which of the above scenarios has your preference? Why do you prefer this option?

The District Council is obviously trying to guide us towards scenario five but greater weighting should be given to the aim of scenario three where facilities, local transport (where people can also walk to work) and basic infrastructure (sewage systems etc.) can be more easily expanded. This must surely be more cost effective than having to do the same in ten or twenty non-sustainable settlements. Scenario 3 would focus the vast majority of future development (beyond existing

commitments) at main service centres. These main service centres offer a broad range of services and facilities, good public transport accessibility and provide a mix of job opportunities. Under this scenario, proportionately less development (beyond existing commitments) would take place in Principal Settlements that are not Main Service Centres. These Principal Settlements would retain a development boundary, inside which the principle of development would continue to be supported. However, they would not receive any allocations for additional housing growth.

The District Council's preferred development strategy is scenario five as it builds on the current adopted strategy which has successfully delivered the development needs of the adopted Local Plan period until the introduction of the new housing target in December 2024. It ensures that the creation of new homes, employment and infrastructure is targeted in the most sustainable locations for development with the best services, facilities, employment opportunities and transport connectivity.

We discuss our preferred option in the conclusion below.

Should the Council consider locating development in unsustainable locations to meet the government housing target? Please explain.

No. Development should be targeted where facilities are available – shops, transport links to other centres, employment, education and health hubs. Focus should be on areas where these are already established and where an increased population can support further commercial and social development. To not do so will have a greater impact on the environment in terms of traffic movements, both from a pollution and traffic management point of view. It makes economic sense to improve facilities in sustainable centres rather than building small developments in many unsustainable centres, all of which will not be able to provide the same level of amenities.

To what extent would you support increasing housing density in developments (such as smaller houses and gardens, more flats or higher buildings) to help meet the full housing target? Please also explain why.

This is acceptable in an urban environment. Three or four story blocks of flats and three story houses, which would take up less space than a two story house with equivalent accommodation, are suitable in towns but not villages. Looking at the major locations in this area they are not suited to tower blocks which are only appropriate in a city situation.

Are there any other matters beyond conventional housing that have not been listed here that you think should be considered in the Development Strategy for the updated Local Plan?

Parish Councils should have more say as to where houses are built in their communities. Too often their voices are not listened to, as was the case here with the Wheelers Rise development on land which was carpeted in springs. These were disrupted which has resulted in other properties being threatened with a greater risk of flooding. This broke a basic principle of planning permission in that development should not be permitted in areas which will increase the risk of flooding elsewhere. There are sites in all small villages which are suitable for development but it is only people with local knowledge who can determine where to build with regard to flooding, sewerage and locations in relation to the nature of a village. We are not listened to!

Our Preferred Option

The District Council must consider an option that combines the strategic principles of Scenario 5 with a minimum allocation threshold. Scenario 5a has been developed to address this gap. **It retains the benefits of Scenario 5—focusing growth in sustainable locations and introducing strategic sites—while ensuring that new allocations are only made where a minimum of 100**

dwellings can be delivered. This approach avoids inefficient, fragmented growth and supports infrastructure-led planning.

The Parish Council proposes a modified version of Scenario 5 (5a) that is more aligned to Scenario 3, which focuses on main service centres.

All new housing allocations should be restricted to settlements where a minimum of 100 dwellings can be delivered and that smaller allocations (10 to 40 homes) in rural villages should be removed and redistributed to Principal Settlements and strategic sites.

As previously indicated this will enable funding by developers of meaningful infrastructure in terms of transport, education, healthcare, utilities and Wi-Fi. Spending small amounts to achieve, what would be more limited facilities, in a number of smaller communities, will not achieve the same significant benefits.

By using larger sites developers can provide affordable housing in large numbers and hit biodiversity net gain, design and social housing targets.

Adding 20 to 40 houses in villages does not create enough demand for viable public transport, which is already insufficient. Cars remain the only practical option with the resultant effect on congestion and the environment.

Larger developments allow for delivering infrastructure at scale (water supply, sewage, schools, healthcare and utilities) which is not afforded to or affordable in small villages. This is true sustainable growth.

Importantly Scenario 5a will reduce pressure on the rural landscape and heritage assets (Cotswold villages have a high number of listed buildings and defined conservation areas) and follows national policy in supporting sustainable development and infrastructure-led planning thereby meeting housing needs and avoiding erratic development

Potential development in Poulton

The Council feels that because of the paucity of facilities in Poulton and the major issues with flooding and sewage, both of which greatly impact on residents' quality of life and well-being, no further development should take place here. At the very least, thirty houses is too many.

In the event that housing is forced upon us we list below the constraints that should be placed on development and our comments on areas of concern within the village.

No development should take place until the sewage issues in the village are addressed effectively which, despite many years of discussion, never happens.

Flooding in the village also requires major rectification.

In view of the proposals for Cirencester, Fairford and Lechlade the situation regarding traffic passing through the village must be addressed as part of any plan. The volume of traffic has further increased since the building of additional housing in Fairford and speeds have been and still are a major safety factor for residents and drivers. Improvements to the A417 needs serious consideration with respect to establishing significant speed control measures.

Thames Water must commit to, and install, new infrastructure and Highways, Cotswold District Council and the Environment Agency must remove the flooding risk to the village before any further building commences.

Development should not take place:

- In the Conservation Areas and in any green spaces surrounding it
- In the flood plain, areas which flood, and on any sites which exacerbate the impact of flooding elsewhere (see Poulton – surface water flows and flooding)
- In areas which will impact on listed buildings and their settings
- In areas which will impact on the intrinsic nature and appearance of the village. These are notably the fields around the conservation area in Ranbury, the Ashbrook and the rising land to the north which is a highly rural landscape, and the area to the east of the Butts with views across to Meysey Hampton. These areas provide an attractive setting to and play an important part in views from the settlement.

Additionally, there is little point in building high worth properties, such as in Wheelers Rise where the larger properties were marketed at about £900,000 and the smaller ones at £450,000, when there is a genuine need for low cost affordable housing.

The non-sustainable nature of Poulton precludes it from significant future development and any possibility of this has to be very carefully considered and potential sites fully scrutinised in consultation with the Parish Council.

Decisions must be led by the community and not by arbitrary approaches by planning departments to landowners, much of which appears to take place outside of the public realm. This is erroneous and results in poor outcomes based on incorrect assumptions. Early consultation is key.

Parish Councils have a crucial role in identifying suitable sites, which will not exacerbate the existing problems within the village. Above all they need to be listened to as they are considerably more knowledgeable in respect of the state of their communities than are other agencies. We are aware of the strength and weaknesses. This would lead to a much greater transparency.

Development in unsuitable locations must be avoided at all costs and any building must be integrated in such a way as to have the least disruption to the village, its character, its way of life and its inhabitants.

If and once the thirty target, up to and before 2043, has been achieved, including by moving some of the allowance to other neighbouring non-sustainable and non-principal settlements (e.g. if the brown field site at Sunhill in Meysey Hampton were to be developed) no further development should be permitted.

There is a need for development to be considered in such a way that planning can be structured and not open to a succession of applications resulting in an even greater and unplanned expansion of a small non-sustainable village.

It must be borne in mind that thirty houses need to be built over eighteen years (1.6 houses per annum) and that some of our allocation should be taken up in other nearby non-sustainable locations, especially those with primary schools. All non-principal settlements should be expected to take some of the load, however small.

We have always attempted to take a rational approach to development and the disadvantages that might arise and expect the planners to take note of the value of local knowledge which, unfortunately, has, in some circumstances, been ignored in the past.

This Council feels that there are plots of land which, if landowners are approached directly, would be available. This would require a more positive engagement with the Parish Council by the

planners. This approach may not be suitable for larger towns but smaller communities are much more aware of suitability, positive and negative, within their own communities.

We believe that it is key that planners discuss potential development sites with Parish Councils from the very outset of any proposal being initiated. Early involvement is vital in reaching a sensible and suitable consensus. This is imperative in ensuring that the very nature of villages remains undamaged.

Conclusion

This Council believes that the only way to achieve the rather unrealistic targets set by Central Government is to increase the size of the established principal settlements, including those in the ANOB. This would protect the rurality of the South Cotswolds, the ANOB and the traditional villages.

Use can then be made of the established infrastructure in terms of employment and facilities such as easier access to major routes, established retail areas, schools, medical facilities, local public transport etc. and by improving the same. This will be more cost-effective on a per head of population basis. This would include improvement on sewage and flooding issues which, in Poulton (and other non-principal settlements), has had very little input especially in relation to Thames Water resolving current problems.

It is surprising that Central Government is not seriously considering the establishment of new towns to overcome the housing shortage. This was the case with Harlow after the Second World War and Milton Keynes in the sixties. This would be more manageable, allowing for the creation of new employment hubs, and preferable to the erratic destruction of swathes of countryside.

In the past the Council has missed opportunities to develop on brown field sites such as, for larger developments, on Kemble Aerodrome and on a smaller scale the old Agricultural Supply site at Sunhill. This needs to be rethought as does the excessive numbers of holiday homes which have been allowed to be built in the Cotswold Water Park. These should be re-designated as permanent homes which many of them, in reality, are. This would impact on the target.

Housing numbers have generally been increased by the enlargement of existing conurbations. Stratton St Margaret was not part of Swindon sixty years ago until the town “reached” it, Twickenham was not part of London one hundred years ago until London “reached” it. Unfortunately villages like Preston which are close to a principal settlement will get enveloped by Cirencester, but it is happening already. There is a logical reason for this and that is, as we have highlighted above, facilities are already there, can be reached easily and can be expanded in a cost-effective manner.

We must reiterate that, in the case of small villages, an early collaborative approach with Parish Councils is essential in reaching successful outcomes, which are satisfactory to the community.

The proposals are unacceptable, across the area, on the grounds of:

- Impact on the environment, landscapes and heritage assets
- Traffic, public transport and the inability of the road network to support increased volumes.
- Inadequate sewage infrastructure
- Worsening of drainage and flood risks
- Deficient infrastructure in terms of employment, education and health
- Damage caused to rural communities as a result of the proposed urbanisation
- The unrealistic targets being set for the Cotswold District

Addendum

1 (i) and (ii). Maps of Poulton

Key:

Boundary of conservation area marked red

Open spaces in Ranbury (A, B and C) hatched black

Open spaces at The Butts hatched green

1. Bridge over The Ashbrook on the A417

2. North end of Bell Lane and land around Poulton Chase

3. Land at the corner of the A417 adjacent to the bus shelter

4. Area around the Conservation Area in Ranbury

5. The Butts

2. Map of Poulton

Flow of surface water (indicated by red arrows) and areas of flooding (hatched)

3. Map of Poulton

Flood Plain in blue

4. Photographs of flooding in Ranbury

A. Field marked C in Conservation Area map

B. Field marked B in Conservation Area map

C. The bridge showing water “backing up” upstream, in flood conditions

D. The entry track (from the A417) into field B, adjacent to the sewage pumping station

5. Photographs of flooding north end of Bell Lane and around Poulton Chase

6. Map of Sewage in Poulton

Areas of sewage overspill and back-up (marked purple)

Sewage flows within Poulton indicated by arrows

Pumping stations marked brown

7. Photographs of sewage overspill

8 (i) (ii) (iii) and (iv). Photographs of Ranbury Open Spaces

9 (i) (ii) and (iii). Photographs of The Butts Open Spaces