THE RURAL PLANNING PRACTICE

Cotswold District Council Local Plan 2026-2043

Regulation 19 Response

On behalf of Preston Parish Council

PREPARED BY	The Rural Planning Practice
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Ilustrations

Illustration 1: Site location plan for ref. 24/02854/OUT

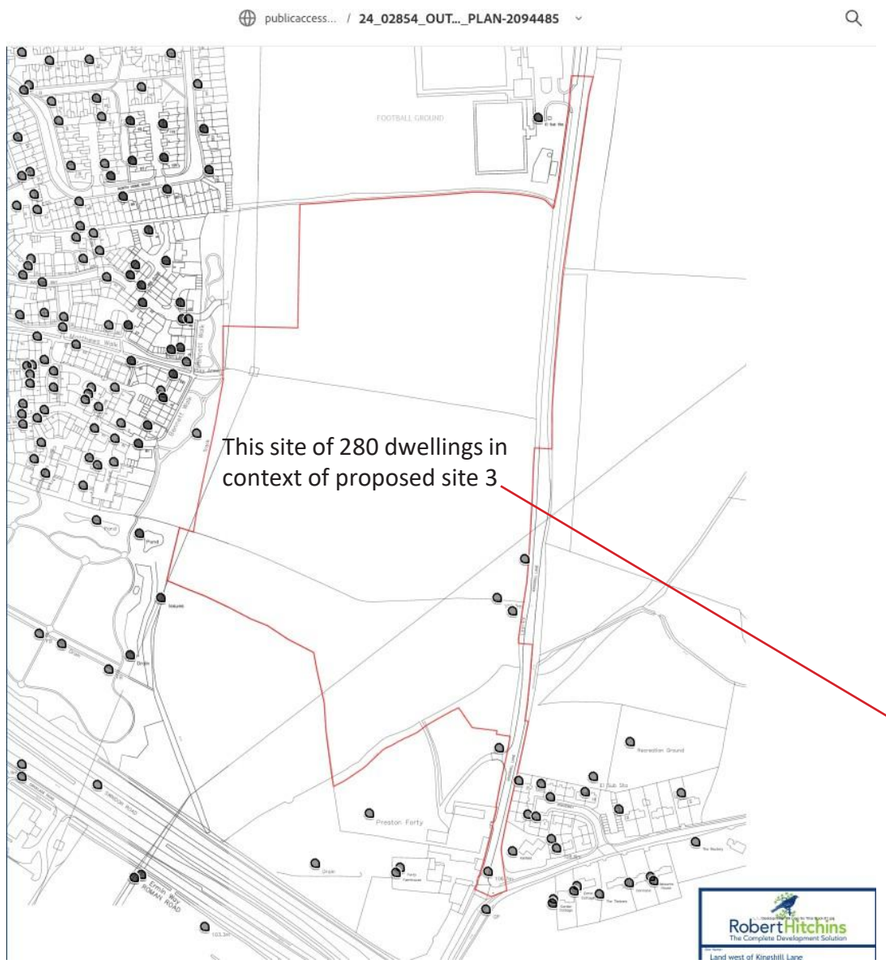


Illustration 2: Land east of Kingshill/ HELAA ref. C164a (Extract from Regulation 19 Plan Version)

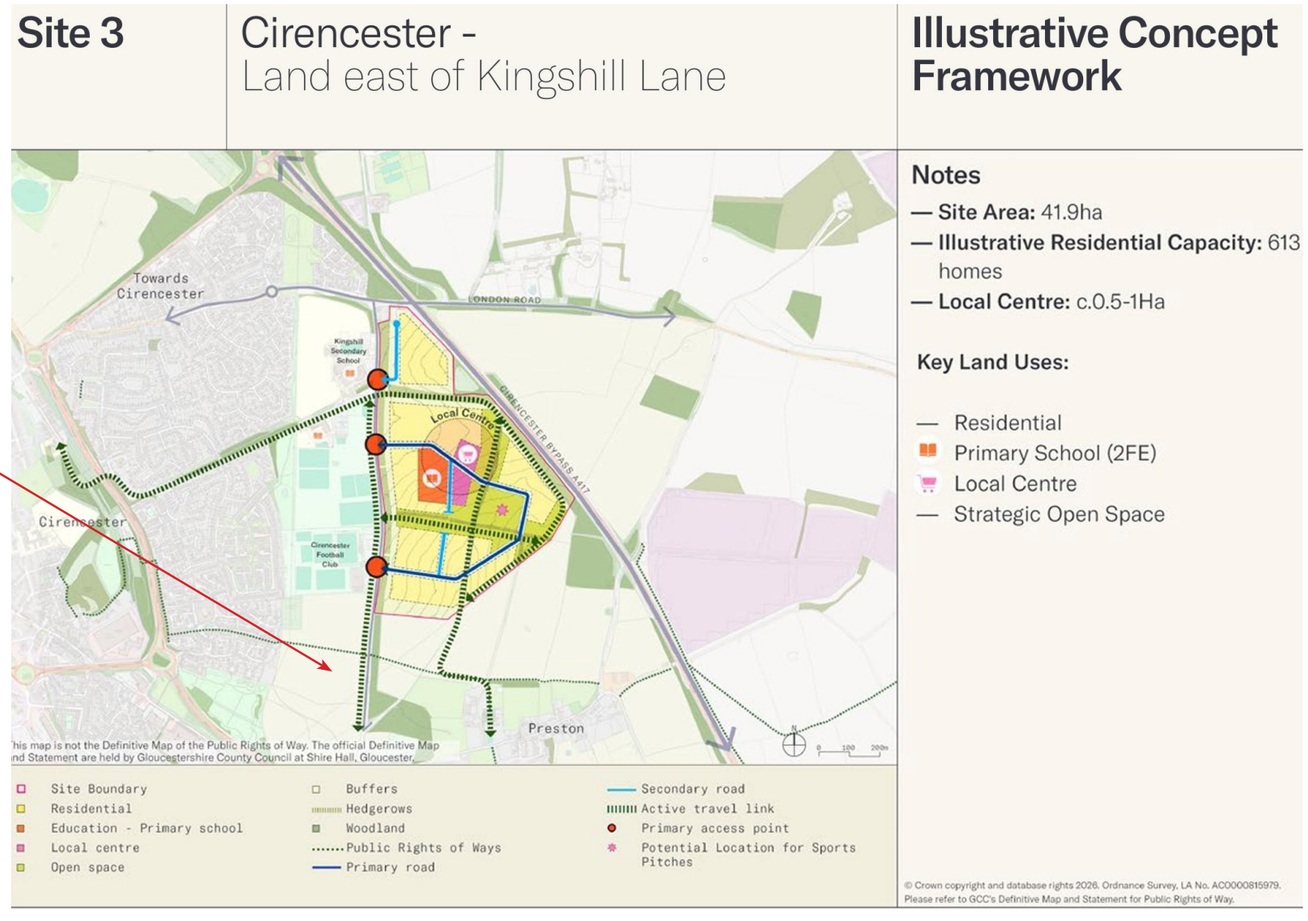
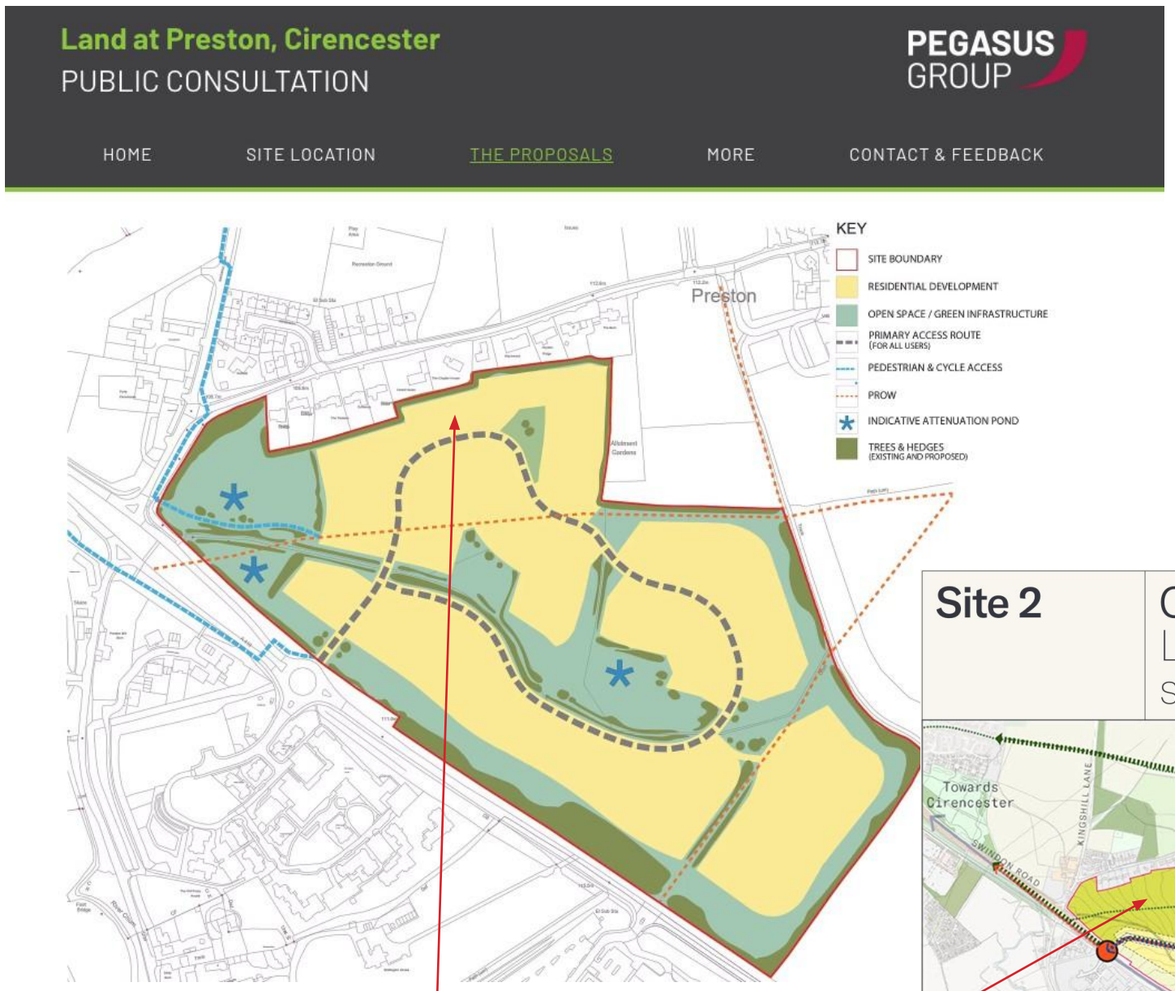
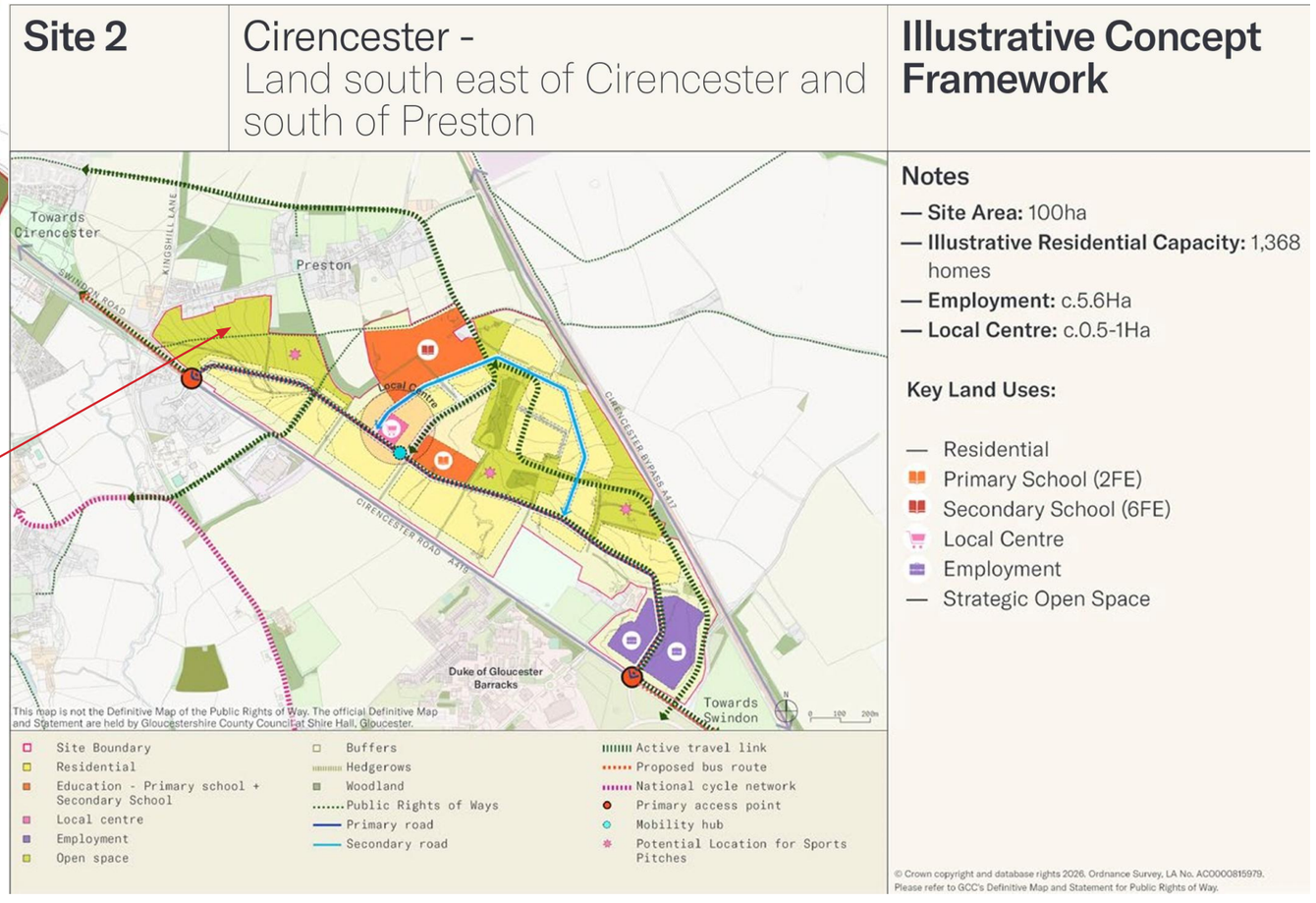


Illustration 3, left: Proposed site plan part of site to the South of Preston. Extract from https://www.landatpreston.co.uk/the-proposals (live at 15.10.2026)



Live proposals showing residential development throughout the area shown as open space on the illustrative concept framework

Illustration 4, below: Land south of Preston / HELAA ref. R519/650 (Extract from Regulation 19 Plan Version)



1. Introduction

1.1. This Regulation 19 representation is submitted by The Rural Planning Practice on behalf of Preston Parish Council.

1.2. The draft Local Plan states in Core Policy 7 that the Local Authority's over arching priorities for the Cirencester and Surrounding Villages Area are:

> *to secure the delivery of housing, jobs and infrastructure required through sustainable development; improve self-sufficiency for each settlement by enhancing its vitality and viability; as well as maximising opportunities for sustainable travel choices. (p.62)*

1.3. Preston Parish Council (PPC) has a number of concerns related to the allocation of land to the south of village as a large strategic site, particularly when the proposed level of development is taken together with the allocation to the east of Kingshill (lying to the north of Preston village) and the 280 dwelling development to the west of Kingshill Lane subject of reference 24/02854/OUT (approved) and currently subject of a application to allow all 280 dwellings to be affordable dwellings.

1.4. The PPC is also concerned that there is a live consultation being made by Pegasus regarding part of the site to the south of the village where the proposed development does not reflect the illustrative concept for the site shown in the draft Plan. In particular, the open space which provides much of a key buffer between the village and the development is shown as containing housing.

1.5. The PPC retains soundness and associated legal-compliance concerns.

2. Summary

2.1. Preston Parish Council considers that the strategic allocation south of Preston is not sound in its present form. The Council has not adequately demonstrated that the final allocation of 1,368 dwellings is justified, that its acknowledged heritage and landscape harm can be satisfactorily mitigated, or that the policy framework will effectively preserve Preston as a distinct historic village separate from Cirencester.

2.2. The Council's detailed Heritage Impact Assessment (prepared by Oxford Archaeology) identifies a proposal for 1,085 dwellings, while the Regulation 19 Plan allocates 1,368 dwellings.

2.3. The PPC also considers that the Regulation 19 evidence requires greater certainty about infrastructure funding, phasing and delivery, particularly where strategic growth will affect Preston's roads, community infrastructure and rural setting.

2.4. The PPC understands that some development within the Parish as a whole is inevitable given its location close to Cirencester and major transport routes. However, it questions whether the particular scale, form, infrastructure strategy and safeguards now proposed have been *adequately justified and made effectively.*

3. The Allocations and the affected place

3.1. The Regulation 19 Plan allocates approximately 100 hectares south of Preston for 1,368 homes, at least 5.6 hectares of employment land, a 2-form-entry primary school, a 6-form-entry secondary school, a local centre and substantial open-space provision. The Plan describes the scheme as a sustainable extension to Cirencester, although the land lies within Preston's immediate landscape, parish and heritage context.

3.2. The Plan also allocates 613 houses on land to the east of Kingshill Lane (north of Preston) plus a primary school and local centre.

3.3. Land for new GP surgery at Land East of Kingshill Lane is also considered a strategic infrastucture requirement.

3.4. Scant reference is made to the 280 dwellings for which there is outline permission, lying to the east of Kingshill and lying directly to the north east of the village.

3.5. Preston is a small, compact and broadly linear historic village of fewer than 100 houses. Its Conservation Area is centred on the Grade II* Church of All Saints and contains eight Grade II listed buildings.

3.6. The Local Planning Authority's (LPA) evidence identifies surrounding agricultural land, visible through gaps in the settlement, as part of the village's rural setting and as contributing to the legibility of its historic form and separate identity.

3.7. PPC is not convinced that sufficient measures are in place to ensure that a green buffer around the village is identified and its on-going protection assured.

4. Ground 1 - The allocation is not adequately justified

The detailed heritage assessment does not state that it assessed the final housing quantum

4.1. The detailed Oxford Archaeology HIA for land to the south of Preston identifies a proposal for 1,085 dwellings and 6.7 hectares of employment land. The Regulation 19 Plan instead allocates 1,368 dwellings and at least 5.6 hectares of employment land. The housing increase is 283 dwellings, approximately 26 per cent. The Site Development Framework uses a third formulation of approximately 1,400 homes and approximately 6 hectares of employment land.

4.2. This discrepancy is material because the HIA repeatedly identifies scale and extent as reasons why harm cannot be fully avoided. The evidence does not transparently show where the additional dwellings were placed, whether density increased within sensitive areas, whether the northern or north-western buffer changed, or whether the final cumulative assessment remains valid.

The evidence identifies unavoidable harm

4.3. The detailed HIA finds that the allocation would bring extensive built form into the landscape south of Preston Conservation Area; make the historic village plan less appreciable; erode its relationship with the remaining rural landscape; reduce its appreciation as a small rural settlement; and weaken separation from other development along the A419 corridor. It identifies less than substantial harm to Preston Conservation Area and listed buildings and states that the impact cannot be fully removed.

4.4. It also identifies potential substantial harm to archaeological remains without mitigation and records evidence of prehistoric funerary activity, Iron Age to Roman settlement, Roman cremations and historic agricultural features within the site.

Site selection and reasonable alternatives

4.5. The Site Selection Topic Paper acknowledges Preston's small scale, historic character, compact linear form and generally moderate-high landscape sensitivity, but gives R519/R650, the site to the south of Preston, the highest Clear Preferred rating. The operative conclusion does not transparently balance the unavoidable Conservation Area harm, the final housing quantum, cumulative coalescence with site to the north of Preston/ east of Kingshill or the implications of the medium to medium-high landscape sensitivity of site R650.

4.6. The full Integrated Impact Assessement (IIA) of July 2026 treats 1,368 homes south of Preston as a constant across all seven growth scenarios. It therefore does not compare the selected strategy with a materially smaller Preston allocation, a wider development-free gap, a different R519/R650 configuration, or redistribution of part of the capacity.

4.7. The Parish Council does not assert, without examination of the complete plan-making history, that the statutory alternatives duty has necessarily been breached; it submits that the Regulation 19 evidence does not clearly demonstrate why 1,368 homes, rather than a materially reduced option, is the most appropriate strategy. Particularly when taken as a whole with the development (proposed and approved) extending Kingshill, which in essence also extend Preston.

Diversity of site supply and the applicable small-sites requirement

4.8. The Regulation 19 Plan states that, under the transitional arrangements, it has been prepared and will be considered against the December 2024 NPPF. In the section Identifying land for Homes, Paragraph 73(a) of that Framework addresses small and medium sized sites requires local planning authorities to identify, through the development plan and brownfield registers, land capable of accommodating at least 10% of the housing requirement on sites no larger than one hectare, unless strong reasons demonstrate why that target cannot be achieved.

4.9. The Plan identifies a housing requirement of 17,918 dwellings. Ten per cent is therefore 1,791.8 dwellings, or approximately 1,792 dwellings. The published headline figure for new non-strategic allocations is 1,468 dwellings. That figure is approximately 8.2% of the housing requirement. Even if every one of those 1,468 dwellings were on sites no larger than one hectare, the new non-strategic allocations alone could not satisfy paragraph 73(a).

4.10. The PPC recognises that the national-policy target may also be met by other qualifying land identified through the development plan and brownfield registers, so this arithmetic does not by itself establish non-compliance.

4.11. The LPA's May 2025 Housing Land Supply Report states that over 10% of the Local Plan's allocations are sites less than one hectare. On its face, however, the national-policy test concerns land capable of accommodating at least 10% of the housing requirement, rather than simply the proportion or number of allocations below one hectare. The Regulation 19 evidence should therefore provide an auditable schedule identifying each site relied upon for paragraph 73(a), its area, dwelling capacity, source and contribution to the 10% requirement.

4.12. This is also relevant to reasonable alternatives. The IIA treats 1,368 dwellings south of Preston as a constant across all seven growth scenarios. The Parish Council does not suggest that housing should simply be displaced indiscriminately to other villages. It does, however, consider that the Council should demonstrate that a genuinely diverse portfolio of suitable, available and deliverable sites, including proportionate opportunities for smaller-site growth in sustainable settlements (which could realistically include sites within the National

Landscape), was considered before concluding that the scale now proposed at R519/650 is the most appropriate strategy.

4.13. The August 2026 NPPF Policy HO6 is relevant context in that it provides an indication of current Government thinking.

4.14. Policy HO6 strengthens the national emphasis on a diverse mix of sites by seeking at least 10% of the housing requirement on sites no larger than one hectare and a further 10% on sites between one and 2.5 hectares, alongside allocations supporting the vitality of rural communities and villages. The Framework also contains new national policies that are more supportive of certain forms of small scale development in and adjacent to settlements of all sizes.This direction of travel appears to recognise that by ruling out all but a few exceptions to development in small villages (primarily under the auspices of it not being sustainable) we affectively leave smaller villages to wither on the vine by reducing their ability to remain viable.

4.15. The August 2026 Framework's transitional arrangements indicate that this old-system Regulation 19 Plan should continue to be prepared under the December 2024 NPPF. The PPC does not rely on the additional HO6 medium-site quota as a binding soundness test for this Plan. It is nevertheless relevant context demonstrating the continuing national-policy direction towards diversification of site size and the suitability of proportionate village and edge of settlement growth across all settlement sizes.

Self-build and custom-build housing: concentration on strategic sites

4.16. The Regulation 19 Plan contains a new Core Policy 43: Self-build and Custom-build Housing. The supporting text states that the Housing and Economic Needs Assessment (HENA) identifies Cotswold as having the highest rate of demand for self-build and custom-build housing in Gloucestershire, identifying an arising need of 19 homes per annum, and demonstrates a need for 355 self/custom-build homes over the plan period to 2043, including a historic shortfall of 32 dwellings.

4.17. Core Policy 43 requires developments of 350 or more dwellings to provide 5% of serviced plots for self or custom build, subject to viability and site-specific considerations, unless the Council's Register justifies a lower provision. The policy therefore applies directly to R519/650. Applied to 1,368 dwellings, 5% is 68.4 plots. Applied to the 613-dwelling C164A / East of Kingshill Lane allocation, the equivalent figure is 30.65 plots - approximately 31. The two allocations could therefore be expected to make provision for roughly 99 to 100 serviced plots if the full 5% requirement is applied.

4.18. PPC acknowledges that the Plan's HENA evidence supports the Council's decision to seek provision on larger strategic sites. However, the Plan's own evidence of substantial self/custom-build need also reinforces the importance of demonstrating that the housing strategy provides a genuinely diverse and deliverable range of opportunities. Core Policy 43 deliberately confines the mandatory 5% requirement to sites of 350 or more dwellings, whereas the adopted Policy H1 currently applies a 5% expectation to proposals of more than 20 dwellings, subject to register evidence.

4.19. The new policy therefore represents a material change in the spatial mechanism by which self/custom-build opportunities would be secured.

4.20. The Parish Council considers that the Council should explain how reliance on strategic sites for mandatory self/custom-build provision interacts with the paragraph 73(a) small-sites requirement, rural housing opportunities and the reasonable-alternatives assessment. In particular, the evidence should demonstrate that

concentrating mandatory provision on large strategic sites will deliver the identified need in a timely manner, taking account of strategic-site lead-in periods, phasing, viability, marketing and the policy mechanism allowing provision to be reduced where the Register indicates lower demand. This is not an assertion that the statutory self-build duty is presently unmet; it is a plan-making question about whether the chosen delivery mechanism is justified and effective over the plan period.

5. Ground 2 - The allocation is not effective in relation to heritage, landscape and settlement separation

No measurable settlement-separation safeguard

5.1. The Site Development Framework refers to a robust landscape buffer, strategic open space, lower densities and protection of views. It does not define a minimum buffer width, map a permanent development-exclusion zone, establish maximum heights or densities at the sensitive edge, identify protected views, or state which urbanising uses are prohibited.

5.2. The lack of precision is notable because the same framework specifies numerical ecological buffers: approximately 5 metres beside hedgerows, at least 10 metres beside priority habitat and at least 15 metres beside ancient woodland. No equivalent measurable requirement protects Preston Conservation Area or settlement separation.

The proposed secondary school campus could urbanise the proposed buffer

5.3. The indicative framework for the site to the south of the village places the secondary-school parcel towards the northern part of the allocation. Although playing fields are intended to occupy its northern section and buildings are to be focused southward, a school campus will likely introduce buildings, parking, access roads, buses, fencing, lighting, sports equipment and noise. There is no buffer shown between the school development and the housing to its immediate north (specifically the dwelling Foxleaze).

5.4. The proposed policy does not expressly exclude those features from the heritage buffer or require the buffer to retain an open agricultural or genuinely rural character and yet this is of great importance to both villagers as a means to ensure that the setting of the village remains open and rural in character.

Cumulative mitigation is not secured

5.5. The HIA identifies the clearest cumulative effects in the district around Preston and southern Cirencester. It finds that R519/650 and C164A affect Preston Conservation Area and its rural setting from different directions and together increase the risk of perceived coalescence. All more so when the housing allowed by 24/02854/OUT is taken account of.

5.6. Rather, one site is seen as an extension to Kingshill while the ‘Land to the South of Preston’ is considered an extension to Cirencester. In reality, particularly if a meaningful buffer is not secured, the sites are actually extensions of Preston village.

5.7. The Plan does not require a single cumulative heritage, landscape and visual masterplan to be approved before either allocation proceeds, nor does it secure a coordinated minimum separation outcome.

5.8. PPC is therefore particularly concerned by the proposal put forward by Pegasus (as seen in the illustration on page 3 of this document) which show the green buffer between the site and the village as an area proposed for houses.

6. Ground 3 - Infrastructure funding and deliverability require greater certainty

Identifying infrastructure is not the same as securing delivery

6.1. PPC acknowledges that the Regulation 19 infrastructure evidence identifies substantial education, transport, open-space and other requirements associated with strategic growth.

6.2. However, identification and broad costing do not by themselves demonstrate that critical infrastructure is funded, deliverable and capable of being provided at the stage at which it becomes necessary.

6.3. The LPA's viability material should therefore be read alongside the allocation policy. Where the viability evidence indicates that not all identified infrastructure can necessarily be funded at the outset from the tested development economics, the Plan needs an effective mechanism for prioritisation, phasing, contingency and delivery rather than leaving essential mitigation to later negotiation.

South of Preston viability position

6.4. The Regulation 19 viability material reports an infrastructure requirement for South of Preston of approximately £25,746 per dwelling against approximately £24,900 per dwelling available for infrastructure in the tested appraisal. On those figures the modelled requirement is approximately £846 per dwelling higher than the identified resource. PPC treats this as an appraisal signal rather than as a fixed cash shortfall: the key issue is what happens if assumed value growth, re-profiling, third-party funding or other measures do not close the difference when infrastructure is required.

6.5. The Plan should distinguish clearly between infrastructure that is critical to commencement or occupation, infrastructure necessary to mitigate impacts, infrastructure that is desirable, funding that is committed, and funding that remains dependent upon future values or third parties.

6.6. Infrastructure must be delivered in step with development

6.7. The strategic-site policy should establish clear phasing and occupation triggers for critical infrastructure. This is particularly important for highway mitigation, education, active travel, drainage and utilities, community facilities, open space and play provision. Housing delivery should not become the fixed element of the allocation while necessary infrastructure becomes the variable element.

7. Ground 4 - Traffic and highways impacts

7.1. Traffic is a particular concern because Preston lies immediately adjacent to the proposed strategic growth and because its existing road network includes routes susceptible to additional traffic and inappropriate routing. Preston Neighbourhood Development Plan Policy 7 specifically addresses development likely to increase motorised traffic in the parish, particularly at the Toll Bar junction, Kingshill Lane and the village High Street, and addresses traffic speeds, noise and vibration, conflict with other road users and feelings of safety.

7.2. The Parish Council requests a cumulative transport assessment encompassing R519/650, C164A/East of

Kingshill Lane and other committed or planned development affecting this part of Cirencester. This should expressly examine traffic through Preston village, Kingshill Lane, Toll Bar/A419, Watermoor and other affected junctions, rat-running, displacement onto unsuitable roads, speeds, noise, pedestrian and cyclist safety and safe routes to schools and community facilities.

7.3. Where mitigation is demonstrated to be necessary, it should be costed, secured and subject to delivery triggers. Potential measures may include traffic calming, speed management, pedestrian crossings, footway and cycle improvements, junction works, measures discouraging inappropriate through-traffic and public-realm improvements, subject to the evidence and agreement of the highway authority.

7.4. PPC also seeks assurances that any mitigation measures should be assessed and decided upon based on the rural, agricultural character of the village and not be comprised of more urban appropriate features.

8. Ground 5 - Infrastructure, CIL and the made Preston Neighbourhood Plan

8.1. Policy 6 of the Preston Neighbourhood Plan provides an existing development-plan basis.

8.2. Policy 6 supports new or improved community infrastructure. For major development it requires consideration of how development may increase demand for community infrastructure, options for meeting that demand, evidence that the community or Parish Council has been consulted, and appropriate additional community infrastructure or support justified by that consultation.

8.3. The strategic allocation should therefore expressly require assessment of additional demand upon Preston's existing community assets, including play, recreation, village/community facilities, public open space and local walking and cycling connections, and secure appropriate provision or contributions where justified.

8.4. CIL and Section 106

8.5. PPC requests clarification of the proposed relationship between CIL, Section 106 obligations and direct infrastructure provision for the strategic allocations. The concern is not that Preston Parish Council has an automatic entitlement to a fixed percentage of Section 106 receipts - it does not. The concern is that if a strategic site is subject to a nil or reduced CIL rate because infrastructure is instead delivered directly or through planning obligations, the Plan should still demonstrate how locally necessary mitigation and community infrastructure will be identified, secured and delivered.

8.6. The Parish Council therefore seeks an explicit mechanism requiring meaningful engagement with PPC on locally significant transport and community-infrastructure measures before the relevant Section 106 and Section 278 packages are finalised.

9. Ground 6 - Consistency with heritage and design policy

9.1. The evidence identifies actual harm to designated heritage assets, not merely a need for good design. The allocation should identify the significance affected, reflect necessary safeguards in the allocation policy or masterplan, address cumulative effects and show how identified harm has been weighed against public benefits. Deferring the size and character of the green buffer, or other essential mitigation, to later applications risks allowing it to be diluted by design, infrastructure or viability decisions.

10. Ground 7 Preston's small-village status and the settlement hierarchy

10.1. The Settlement Role and Function Study gives Preston an initial score of 6, reflecting limited existing services. It then adds the local centre, schools, employment, bus provision and sports facilities promised by the allocation, raising the score to 14 and placing Preston among Principal Settlements. The full IIA, however, identifies Preston as a Non-Principal Settlement.

10.2. Future facilities can legitimately inform planning, but the methodology risks circularity: a very large allocation creates future services; those services elevate the settlement hierarchy; and the elevated position may then appear to support the scale of growth.

10.3. The LPA should distinguish clearly between the existing historic village and a proposed new neighbourhood intended functionally to grow Cirencester through the development of land within the Parish of Preston.

10.4. The settlement classifications (p.44-47 of the proposed Local Plan) are based on a system that

> *categorises settlements into four tiers based on their role and function, including their level of services and facilities provision and public transport accessibility. This ensures development is directed to the most appropriate locations, supporting long term social, economic and environmental wellbeing*

10.5. Preston is classified as a Principal Settlement, defined as

> *Principal Settlements are towns and larger villages with a strong service base and good accessibility. They provide the next most sustainable locations for growth after Cirencester. Focusing development here helps consolidate and enhance existing services and fosters more balanced communities across the District.*

10.6. The Settlement Role and Function Study of July 2026 notes that Preston does not have a service centre, a supermarket, a convenience store, bank or post office. It has one established employment site and a limited bus service. It is difficult to understand how Preston can be a large village or principal settlement in any common understanding of the what those terms mean.

10.7. It does have a small village hall, allotments and a sports field and play area (which have been treated separately in the study). It should be noted the HELAA site reference R634 (Land South of Blackthorns) is described as 'playing fields' when it is private land in the ownership of Blackthorns and used soley by the owners of Blackthorns, a private residence.

10.8. The accuracy of the scoring is questionable. As an example, Somerford Keynes (a small village with a modest 'amber' scoring site put forward for consideration) was deemed to have no play area (it has Neigh Bridge Country Park) and no employment site when it has a number of local employers adjacent to the village even when excluding employment at the various local lakes, there is the sculpture park and cafe and a range of businesses at Field Farm including a horticultural machinery supplier, brewery tap room and cafe. Somerford has nonetheless ended up catagorised as 'open countryside'.

11. Ground 8 Landscape evidence and evidence-quality concerns

11.1. The landscape assessment describes Preston as a small village of moderate-high sensitivity whose open countryside provides a clear distinction between built form and rural landscape. Site R650 is described as physically disconnected from Preston, prominent and expansive, reading as open countryside and having

medium to medium-high sensitivity. Development would introduce large-scale built form into a currently undeveloped tract not closely related to the settlement.

11.2. The Preston appendix also appears to misname All Saints as the Church of St Mary, describes it as Grade I rather than Grade II*, and refers in the C164A entry to Pendle rather than Preston Conservation Area. These may be editorial errors, but they justify correction and assurance that the site-specific assessment has been properly checked.

12. Legal-compliance matters requiring clarification

• Whether the Sustainability Appraisal/IIA explains why a materially reduced Preston option was not a reasonable alternative at Regulation 19 stage.

• Whether the final 1,368-dwelling scheme was subject to the same level of heritage assessment as the 1,085-dwelling scheme recorded in the detailed HIA.

• Whether consultation material clearly disclosed the unavoidable heritage harm and the mismatch in assessed development quantum.

• Whether the evidence base contains an up-to-date, adopted appraisal of Preston Conservation Area; the HIA states that no conservation-area appraisal had been produced.

• Whether the infrastructure evidence and viability work demonstrate a sufficiently certain delivery route for critical infrastructure and locally necessary mitigation.

• Whether the LPA has demonstrated paragraph 73(a) of the December 2024 NPPF by reference to dwelling capacity on qualifying sites, rather than the proportion or number of allocations, and whether the published site schedule is sufficiently clear to audit that calculation.

13. Requested modifications and assurances

- Reassess site R519/650 through an updated Heritage Impact Assessment addressing the final 1,368-dwelling proposal and its cumulative interaction with other large housing developments near the village, including both the proposed strategic sites and the development approved by 24/02854/OUT.
- Show the protected green buffer as a defined, permanent development-free area on the Policies Map and Site Development Framework.
- Specify a minimum buffer width supported by heritage, landscape and verified visual evidence.
- Exclude housing, school buildings, car parks, access roads, floodlighting, utility structures and other urbanising development from the protected buffer, except genuinely necessary low-impact recreational paths.
- Require the buffer to retain a rural, open and naturalistic character and prevent ordinary amenity landscaping from being treated as equivalent to the existing agricultural setting.
- Identify and protect important views to and from All Saints Church, the Conservation Area, historic approaches and relevant public rights of way.

- Specify maximum building heights, minimum setbacks and maximum edge densities for northern and north-western development parcels.
- Require a joint cumulative heritage, landscape, visual and transport framework for R519/650 and C164A before approval of the first application whose effects depend upon shared mitigation.
- Require preparation or adoption of a Preston Conservation Area appraisal and management plan before the first planning permission is granted.
- Explain and reconcile Preston's Non-Principal classification in the IIA with its prospective Principal classification in the Settlement Role and Function Study.
- Publish a clear reasons document explaining why materially smaller or differently configured Preston alternatives were rejected.
- Identify critical infrastructure separately from desirable infrastructure, with costs, funding sources, delivery responsibility and any residual funding gap stated transparently.
- Introduce clear phasing and occupation triggers so that development cannot materially outpace highway, education, drainage, active-travel, community, open-space and play infrastructure necessary to mitigate its effects.
- Require cumulative assessment of traffic impacts upon Preston village, Kingshill Lane, A419 and other affected routes, including rat-running, speed, noise, pedestrian and cyclist safety.
- Require justified local traffic-calming, highway-safety, pedestrian and cycle measures affecting Preston to be costed and secured through appropriate planning obligations, highway agreements or conditions.
- Require assessment of additional demand upon Preston community, recreation and play infrastructure in accordance with Preston NDP Policy 6, with necessary improvements, replacement provision or contributions secured.
- Require meaningful consultation with Preston Parish Council on locally significant infrastructure and mitigation before the relevant masterplan and Section 106/278 packages are finalised.
- Explain how locally necessary mitigation and community infrastructure will be secured if strategic-site CIL arrangements do not generate neighbourhood CIL receipts for the affected area.
- Provide a clear mechanism for coordinating and apportioning shared infrastructure between R519/650, C164A and wider Cirencester growth, including contingency if sites progress at different rates.
- Publish a Small Sites Compliance Statement identifying every site relied upon to satisfy paragraph 73(a) of the December 2024 NPPF, including site area, dwelling capacity, whether it is identified through the development plan or brownfield register, total qualifying capacity and the resulting percentage of the 17,918-dwelling housing requirement.
- Reconcile the published non-strategic allocation schedule, stated totals and any material changes so that the number of allocations, individual dwelling capacities and area subtotals can be independently audited.
- Explain how the consideration of small and medium-sized sites and proportionate opportunities for growth

in sustainable rural settlements informed the reasonable-alternatives assessment, including whether a materially reduced R519/650 allocation combined with a more diverse portfolio was tested. Particularly in those villages with similar levels of services and facilities to those at Preston.

- Explain, by reference to the HENA, Self-Build and Custom Build Register and housing trajectory, how Core Policy 43 will deliver the identified need for 355 self/custom-build homes over the plan period, including how delivery will be maintained if strategic sites are delayed or the 5% requirement is reduced on viability, site-specific or register-demand grounds.
- For R519/650, identify the expected quantum and broad phasing of serviced self/custom-build plots and ensure that those plots are incorporated into the comprehensive masterplan, infrastructure strategy and design code rather than left to an unspecified later phase.
- Explain why the Regulation 19 strategy confines mandatory self/custom-build provision to developments of 350 or more dwellings, including how this approach was assessed against reasonable alternatives involving a wider distribution of small and medium-sized sites and the previous Policy H1 mechanism applying to proposals of more than 20 dwellings.
- If the above safeguards and delivery mechanisms cannot be demonstrated to be effective, reconsider the scale/configuration of the allocation and redistribute any necessary housing capacity through properly assessed reasonable alternatives.

14. Suggested policy wording

14.1. Before the determination of any planning application, the Council shall approve a comprehensive masterplan for the whole allocation, coordinated with allocation C164A where cumulative effects or shared infrastructure arise, and informed by an updated cumulative Heritage Impact Assessment, Landscape and Visual Impact Assessment, verified visualisations and cumulative transport assessment. The masterplan shall define and secure a permanent development-free landscape buffer of no less than [DISTANCE TO BE ESTABLISHED BY EVIDENCE] between built or urbanising development and Preston Conservation Area/existing village. The buffer shall retain an open rural character and shall exclude buildings, car parking, principal access roads, floodlighting and other visually urbanising infrastructure. Development shall preserve Preston as a distinct historic settlement, protect identified views and avoid the perception of coalescence with Cirencester.

14.2. The infrastructure delivery strategy shall identify critical infrastructure, funding sources, delivery responsibility and occupation triggers. It shall demonstrate how cumulative highway impacts upon Preston, Kingshill Lane and Toll Bar/A419 will be mitigated; assess additional demand upon community infrastructure in accordance with Preston Neighbourhood Development Plan Policy 6; and secure necessary local transport, community, recreation and play measures through appropriate planning obligations, highway agreements, conditions or direct provision. Preston Parish Council shall be consulted on locally significant mitigation before the infrastructure package is finalised.

14.3. Before submission, the Council shall publish a Small Sites Compliance Statement demonstrating how paragraph 73(a) of the December 2024 NPPF is met by dwelling capacity on identified sites no larger than one hectare, and shall explain how a diverse portfolio of site sizes informed the choice and scale of the strategic allocations.

14.4. For R519/650, the masterplan and delivery strategy shall identify the quantum, location, servicing and phasing of self/custom-build plots required by Core Policy 43, demonstrate how they contribute to the District-wide identified need, and provide a contingency mechanism if delivery of those plots is delayed or reduced.

14.5. The bracketed buffer distance should be replaced by a figure derived from updated heritage and landscape evidence, not selected arbitrarily.

15. Conclusion

15.1. The Plan promises that Preston will remain a distinct settlement while allocating development intended functionally to grow Cirencester on land that contributes to Preston's rural setting. The specialist evidence says heritage harm cannot be fully avoided and identifies cumulative perceived coalescence. The final allocation is larger than the scheme expressly stated in the detailed HIA, while the proposed buffer remains undefined.

15.2. The infrastructure evidence adds further concerns about the effectiveness of the plan. PPC seeks certainty that critical infrastructure and locally necessary mitigation will be identified, funded, secured and delivered in step with housing, including measures addressing traffic and community impacts within Preston. This is consistent with the existing Preston Neighbourhood Development Plan, which already addresses community-infrastructure demand and traffic effects at Toll Bar, Kingshill Lane and the village High Street.

15.3. The housing evidence also identifies a need for 355 self/custom-build homes to 2043; Core Policy 43 would make R519/650 a significant contributor to that supply, so the allocation's masterplanning and phasing should show how those serviced plots will actually be delivered.

15.4. Without the requested reassessment, measurable safeguards, infrastructure-delivery mechanisms and transparent demonstration of the applicable small-sites requirement and reasonable alternatives, the allocation has not been shown to be justified or effective in its present form. The requested changes are directed at making the Plan more transparent, auditable and capable of securing the outcomes on which the allocation depends.

16. Principal evidence reviewed

- Regulation 19 Draft Cotswold District Local Plan 2026-2043.
- Appendix B: Site Development Frameworks.
- Site Selection Topic Paper, July 2026.
- Heritage Impact Assessment, July 2026 and appendices for R519/650.
- Landscape Assessment appendices - Preston.
- Integrated Impact Assessment, July 2026.
- Settlement Role and Function Study, July 2026.
- Infrastructure Delivery Schedule / infrastructure evidence, 2026.
- Viability Assessment and Viability Addendum Infrastructure Note, 2026.

• Preston Neighbourhood Development Plan, including Policies 6 and 7.

• National Planning Policy Framework, December 2024, paragraph 73(a) and relevant rural-housing policies.

• National Planning Policy Framework, August 2026, Policy HO6 and Annex A transitional arrangements (context only for this old-system Plan).

• Cotswold District Housing Land Supply Report, May 2025, paragraph 2.60.

Cotswold Housing and Economic Needs Assessment / HENA, 2026, including self-build and custom-build need evidence cited by Core Policy 43.

16.1. Evidence note: the separate Small Sites and Examiner Stress-Test Note prepared alongside this representation records the arithmetic and the limitations encountered in reconstructing the non-strategic allocation schedule. It is deliberately framed as a request for an auditable Council schedule rather than an unsupported assertion of numerical non-compliance.

17. Use of AI

17.1. The author of this document has used AI in its preparation in the following ways:

Following reading core documents, and discussing with the PPC key areas to potentially look at in more detail, AI (ChatGPT) was asked specific questions relating to the areas of concern and potential shortfalls in the Regulation 19 plan and the analysis behind it. In some instances this led to further questions and clarification.

The wording of the AI responses is within some of this document however the final version, layout and formatting has been undertaken by the author in consultation with PPC members.

Addendum 3rd November

Preston Parish Council wishes to submit the following map which indicates the line of ‘Green Buffer’ it wishes to see around the village of Preston. The Parish Council requests that the proposed buffer be afforded protection and that this protection be in a form that provides reassurance that the green buffer will maintained, as a minimum measure through a Memorandum of Understanding. The Parish Council also wishes to make clear its intention that the proposed green buffer as shown below will be included in the updated Preston Neighbourhood Plan.

Red line is proposed buffer - not to scale

Blue line is Parish boundary shown in relation to Preston Village

Preston Green Buffer Zone

