



Have your say in our Local Plan Regulation 19 consultation - Have your say: Regulation 19 Consultation

Instructions

- Write as **clearly** as you can— these forms might be scanned
- Write your answers in the same language as this form

Personal data

We will submit your input to Cotswold District Council's online participation platform. If you want to receive updates relevant to your input by email, please fill out the following fields on this page and we will create an account for you. Your data will not be public and will only be used by Cotswold District Council. If you do not agree for us to use your personal data in this way, you can leave them empty.

First name(s) (optional)

Kevin

Last name (optional)

Fletcher

Email address (optional)

cllr.kevin.fletcher@mickletonparishcouncil.gov.uk

☒ By checking this box I consent to my data being used to create an account on Cotswold District Council's participation platform.

(Box checked)

Section A: Have your say in our Local Plan Regulation 19 consultation

The purpose of this consultation is to gain your feedback on the soundness and legal compliance of our Local Plan.

Please note: each survey entry should comment on **one aspect** of the plan. **If you would like to comment on more than one aspect of the Local Plan, you will need to complete a separate survey for each topic.**

Data Protection: We will only use your personal information gathered for the specific purposes of the Local Plan. We will not give information about you to anyone else or use information about you for any other purpose, unless the law allows us to. The comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan development process. Unfortunately, we cannot accept confidential or anonymous responses. [Further privacy information can be found on our website.](#)

1. Are you responding to this question as a private individual, or on someone else's behalf?

**Only choose one option.*

- ☐ A) I am responding as myself
- ☐ B) I am responding on behalf of another person (x Option B selected)

*If you answered **A** for Question 1, go to **Section C** next.*

*If you answered **B** for Question 1, go to **Section B** next.*

Section B

2. Please provide the name of the person on who's behalf you are commenting

3. Please provide the organisation of the person on who's behalf you are commenting

Mickleton Parish Council

Section C

4. To which part of the Local Plan does your comment relate?

Please provide the chapter, map, policy number or appendix and the page number on which it is located.

Core Policy 19, Site 9 on pages 118 and 119 of the Local Plan and pages 41-43 of Appendix B (Site Development Frameworks for Strategic Site Allocations).

5. Do you consider the Local Plan is legally compliant and sound?

If you would like to comment on more than one aspect of the Local Plan, you will need to complete a separate survey for each topic.

**Only choose one option.*

☐ A) Yes

☐ B) No xx (No selected)

Section D

6. Please give details of why you consider the Local Plan is/is not legally compliant or sound. (optional)

If you would like to comment on more than one aspect of the Local Plan, you will need to complete a separate survey for each topic.

1) Introduction

By way of background, in the Local Plan Review Preferred Options Consultation November 2025 (the Regulation 18 stage), Mickleton was put forward as a proposed principal settlement with a total housing allocation of 589 of which 439 were additional non strategic site allocations and 143 were windfalls (see page 21 of that Local Plan Review).

Following the conclusion of the Regulation 18 consultation, Mickleton was redesignated as a strategic site and its housing allocation was increased to 1387 (excluding windfalls) comprising a strategic site allocation of 1238 houses and a non strategic site allocation of 149 houses. This represents an incredible 216% increase in the housing allocation from that which was put forward to the residents of the village during the Regulation 18 consultation.

Mickleton currently has approximately 954 houses so an additional 1387 houses represents an increase of 145% over the period of the Local Plan.

This significant change in strategy following the conclusion of the Regulation 18 consultation was driven solely by the fact that a large block of land to the north of the village became available following a call for sites and that land is less constrained as it falls outside the Cotswold National Landscape.

It is our contention however that the redesignation of Mickleton from a principal settlement to a strategic site is not an appropriate strategy when considered against reasonable alternatives and therefore is not "justified". Furthermore, we would argue that the Plan is not deliverable over its period and is therefore not "effective". Accordingly the Local Plan is not sound.

2) Inappropriate Strategy

The redesignation of Mickleton as a strategic site is not an appropriate strategy for the reasons set out below. These are inherent problems due to the location of Mickleton – they cannot be solved merely by a promise to construct infrastructure.:

(A) Traffic

Mickleton is poorly located in the relation to the major road network with the main access points to the A46 in the north and west, the A429 to the east and the A44 to the south all being between 6 and 11 miles away. Furthermore most of them can only be reached by travelling along minor country roads and through rural villages, and in the case of the A46 to the north, only via single lane bridges over the River Avon at Welford-on-Avon or Bidford-on-Avon or through Stratford-upon-Avon

The B4632 through the centre of the village is already heavily congested with over 4000 vehicles a day (over 500 vehicles an hour at peak times) using that road. The High Street is in a designated conservation area lined by many Grade 2 listed properties, and a recently discovered subterranean water network which runs just below the surface of the High Street is the subject of a Non-Designated Heritage Asset application. In many places the road is reduced to single file by parked cars.

The South Warwickshire Local Plan produced by Stratford-upon-Avon and Warwick District Councils (currently subject to a Regulation 19 consultation) proposes the development of at least 4500 houses at Long Marston Airfield over the next 24 years increasing to a minimum of 10300 thereafter. There is also ongoing development at Meon Vale. Both of these developments are located off the B4632 within Warwickshire yet are only a few miles outside Mickleton and traffic emanating from them will need to come through the centre of Mickleton village in order to reach Evesham and the A46/A44 going south. This will have a significant impact on traffic volumes through the village and on the surrounding roads.

The traffic assessments which have been considered when redesignating Mickleton as a strategic site only take into account the impact arising from the proposed development in the village. They do not properly consider the significant cumulative impact on the roads arising from the adjacent cross border developments at Long Marston Airfield and Meon Vale. This indicates a failure to take a proper cross border strategic approach when considering the effect of development on traffic volumes.

Furthermore, although the Local Plan provides for a primary road through the proposed development to the west of the village off Broadway Road connecting to Broad Marston Road, there is no continuation of that primary road through the proposed development to the north of the village connecting with Stratford Road and the proposed new school and local centre. This means that traffic travelling between the west and north of the village (and vice versa) will need to come through the High Street. Surely it would make more strategic sense to incorporate one primary relief road connecting the two proposed developments and linking Broadway Road and Stratford Road which may help to divert some traffic off the High Street and avoid the creation of a short cut through the estate roads.

All of this is strong evidence that insufficient consideration has been given to the effect which the proposed developments will have on traffic volumes through the centre of the village and on the local road network.

(B) Public Transport

The nearest train station is at Honeybourne and the route operating from there only serves Malvern, Worcester, Oxford, Reading and London plus minor stations in between. There is no public transport from Mickleton to Honeybourne train station and Appendix B of the Local Plan (pages 41-43) which sets out proposed improvements to public transport does not indicate that any such service will be provided. In reality, the only practical way of getting to that train station is by car through minor country roads and even then the car parking facilities at the station are very limited. For residents who rely heavily on train transport, Honeybourne offers a very limited service with extremely poor access.

The nearest train stations for other destinations, particularly the major employment centres at

Birmingham and Coventry, are located at Stratford-upon-Avon , Warwick Parkway and Leamington Spa all of which are between 9 and 19 miles away. There is a bus service to Stratford (although not to the train station) but no service to Warwick Parkway or Leamington Spa. In reality virtually all residents will use their car to get to these stations.

The reality is that Mickleton is not well located for residents who wish to reach their destinations by train and very few of them therefore choose to use rail travel on a regular basis.

(C) Employment

The nearest centres of employment to Mickleton are at Stratford-upon-Avon and Evesham, both of which are over 8 miles away with limited employment opportunities. More major centres of employment are much further away at Worcester, Cheltenham, Gloucester, Oxford. Coventry and Birmingham.

There is a reference in the Local Plan to employment opportunities arising from the proposed developments at Meon Vale and Long Marston Airfield. In reality the number and type of jobs which will be available at these locations will be very limited and unlikely to offer viable employment opportunities for the vast majority of new Mickleton residents. Furthermore, there will be huge numbers of new residents coming into the new houses at Meon Vale and Long Marston Airfield who will also be looking for employment so the competition for the few jobs which might be available on these developments will be significant.

Mickleton is therefore extremely poorly situated for access to employment. A recent village survey found that 80% of employed residents commuted to their places of work, with almost half of those travelling over 10 miles and over 30% travelling over 20 miles.

This was in fact recognised in the Cotswold District Settlement Role and Function Study – November 2025 (pages 33-35) which was commissioned by Cotswold District Council as part of the Regulation 18 consultation. Here Mickleton scored poorly for employment and economic activity compared with many other settlements in the region with a high employment density, meaning that Mickleton was designated as an exporter of workers with consequential increase in commuting.

No proposals have been included in the Local Plan for new employment in Mickleton (other than that associated with the proposed new infrastructure) so even though Mickleton has been redesignated as a strategic site no attempt has been made to improve the local employment situation.

The Government's policy is to adopt a workplace based approach to development focusing development on locations where residents can be close to their places of work. The decision to include Mickleton as a strategic site with a large housing allocation is therefore completely at odds with this policy.

(D) Character

Mickleton is a rural village with around 950 houses and 2350 residents. The Local Plan proposes an additional 1387 houses which would increase the population to over 5000. Mickleton would cease to be a village and instead become a small dormitory town.

This would fundamentally change the nature and character of the area both from an aesthetic and cultural standpoint with huge areas of farmland being taken over for development and well over 50% of the residents being new to the area. It would no longer be a Cotswold village and instead become a dormitory town for residents, many of whom will have to commute considerable distance to work.

We consider this to be an excessive and disproportionate increase in housing driven purely by land availability and not appropriate given the nature and location of the village. The Local Plan fails to provide evidence of an objective assessment that the village can absorb growth on this scale without

destroying its character and landscape.

(E) Conclusion

Mickleton is poorly located in relation to the major road network and is facing severe congestion through its historic High Street as a result of extensive development at Meon Vale and Long Marston Airfield. It does not have a train station and there is no public transport to the nearest one. The village is poorly located for employment with most employed residents having to commute considerable distances to reach major employment centres.

Yet despite all of these inherent drawbacks it has been identified as a strategic site with a proposal to more than double the housing in the village over the next 17 years – a disproportionate increase bearing in mind all other factors which would irreversibly damage its character and landscape.

There is only one reason for this which is that land is available and it falls outside the Cotswold National Landscape. But you cannot base a sensible planning strategy solely on availability of land. Strategic sites should have good access to the major road network in order to avoid overloading the local road network. They should be convenient for centres of employment with good public transport links to reduce commuting and should be planned in a way which does not fundamentally alter the character of the settlement. It is quite clear that none of these key criteria have been taken into account in redesignating Mickleton as a strategic site. This is not in line with Government policy regarding selection of sites for major development.

Therefore, for the reasons given, it is our contention that Mickleton is not a suitable location for a strategic site. The redesignation of the village from a principal settlement to a strategic site with the consequential large increase in housing allocation is not an appropriate strategy when judged against other alternatives, is not justified and therefore not sound.

3) **Not Deliverable**

The infrastructure proposed in the Local Plan for Mickleton is not deliverable over the period due to the following reasons: _

(A) Primary School and Local Centre

The Local Plan proposes the development of a new two form entry Primary School and a Local Centre although it is not specific about what services and amenities the Local Centre will provide.

The increase in housing proposed in the Local Plan would result in the population of Mickleton increasing to over 5000. To accommodate this number of residents there would need to be a significant increase in social infrastructure including, at the very least, a medical practice, a pharmacy, a new village hall (the current one has limited capacity), a post office plus relevant convenience retail outlets. Except for a small village hall, one convenience store and a small delicatessen the village currently has none of these services and amenities and so the Local Centre would need to incorporate all of them as a minimum.

So who is going to fund the construction of a two form entry Primary School plus all of the buildings required in the Local Centre? Will the developers be willing to fund this or will the proposals be watered down once negotiations commence with the developers on planning applications? We strongly suspect that the developers will not be able or willing to fund all of the infrastructure which is required to support such a large growth in population and that therefore it will not be fully delivered.

Indeed this possibility is already highlighted in Core Policy 6; Infrastructure Delivery of the Local Plan (page 55) which indicates that if the developer can show that the infrastructure requirements would render the development unviable, then the Council will prioritise developer contributions for critical, essential and important infrastructure and/or defer developer contributions. So a marker has already been put down that infrastructure plans may not be guaranteed.

The justification for a large housing allocation in Mickleton is the promise to provide adequate

infrastructure to support the resulting large increase in population. If the necessary infrastructure cannot be delivered then that justification no longer exists. You cannot have one without the other.

Furthermore, Cotswold District Council has indicated that new developments on strategic sites will be zero rated for CIL and that proposed infrastructure will be funded purely from s106 contributions from developers. This makes it even more unlikely that the necessary funding will be made available for all the infrastructure required as it leaves more control over infrastructure spending between the local authority and the developers (increasing the likelihood of commitments being negotiated away) and takes away the ability for the local community to fund certain projects itself.

Also no timetable has been proposed in the Local Plan for the completion of the infrastructure. When will the new primary school and local centre be built relative to the new housing? Will the infrastructure be built in tandem with the new housing or will it follow many years later?

For example, there are currently three live planning applications on the land to the west of the village off Broadway Road and one on land to the east of the village at the back of Furrow Way. If all of these were developed then potentially around 400 new houses could be built. Currently there are no planning applications on the land to the north of the village where it is proposed that the new school and local centre will be sited. So if these new houses were built first would the new school and local centre be built at the same time to support the increase in population or would their development be postponed until such time as housing is constructed on the land to the north of the village which could be many years in the future given the staged approach to development proposed in the Local Plan? If so, then this would mean that the population of Mickleton could increase significantly but with no improvement to local education provision or other necessary services and amenities.

(B) Cycleways

The Local Plan (Appendix B – pages 41-43) indicates that a cycleway and/or shared pathway will be provided along Long Marston Road to facilitate segregated access to National Cycleway 5 allowing car free travel to Stratford-upon-Avon.

Although this would be a welcome addition to the village infrastructure, the reality is that in order to provide a safe segregated car-free travel route this would require the construction of a cycleway/pathway of around 3 miles in length from the centre of the village to Station Road in Long Marston which is the nearest access to the National Cycleway. This stretch of Long Marston Road is a narrow country lane and crosses the county boundaries of both Worcestershire and Warwickshire. The cost of constructing a dedicated cycleway or pathway of this length would be enormous and well beyond the affordability of most developers. It would also require cross border co-operation with two adjacent Highway authorities. We would doubt whether in practice it would be possible to construct it anyway on such a narrow country lane – there isn't the space available.

If the proposal is only to construct the cycleway/pathway for a short distance along Long Marston Road before reaching the Worcestershire border then it would not provide a safe segregated car-free route to Stratford-upon-Avon because the cycleway/pathway would not connect directly to the National Cycleway and it would be necessary to walk or cycle on the road for several miles to reach it.

So it is highly unlikely that this aspect of the Local Plan could ever be delivered.

(C) Conclusion

It is our contention that the infrastructure proposed in the Local Plan, and in particular the new Primary School, Local Centre and cycleway/shared pathway along the Long Marston Road are not deliverable over the period due to the anticipated costs involved, lack of funding and, in the case of the cycleway/pathway, the practicalities of construction. Although it is conceivable that some form of

Local Centre may be provided, we do not believe that the funding will be available to provide for the range of facilities and amenities which we have highlighted and which would be essential requirements to support a population of over 5000.

As such the Local Plan is not effective and therefore not sound.

Section E

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified. (optional)

Please note, in your representation you should provide succinctly all the evidence and information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.**

We recognise that Cotswold District Council has a large housing target and that around 80% of the land in its region is within the Cotswold National Landscape and therefore constrained. We acknowledge therefore that Mickleton should accept some future development.

Our argument for the reasons set out in this submission is that Mickleton should not have been redesignated as a strategic site following the conclusion of the Regulation 18 consultation and given a much larger housing allocation than the one which was proposed during that consultation.

We would suggest therefore that Mickleton should revert back to being a principal settlement as proposed during the Regulation 18 consultation and the housing allocation reduced to numbers which ideally are below and certainly do not exceed those which were indicated at that time – that is a non strategic allocation of no more than 439 houses.

Development should be focused mainly on the site to the west of the village off Broadway Road. The block of land to the north of the village between Stratford Road and Broad Marston Road should not be developed and should be retained as agricultural land. This would increase the buffer of agricultural land between the edge of the village to the north and the large developments proposed at Meon Vale and beyond preventing development creep.

This would still increase the population of the village to over 3000 so there would be a need for significant infrastructure investment – in particular a new primary school, a medical practice, pharmacy and post office as well as improvements to pathways and cycleways within the village. Development of housing should therefore be phased so as to ensure that the infrastructure required to support the population growth is built in tandem with the housing and planning consents should not be granted until developers have given legally binding commitments to fund the construction of that infrastructure. We would suggest that this is a sensible planning strategy which benefits existing residents as well as those seeking to move into the new properties.

Although increasing the population of the village by 50% over the next 17 years is still a significant increase, it should have less impact on the character of the village than the current proposals where the population would more than double over that period.

This proposal does not solve the inherent problems which we have highlighted such as access to the major road network, traffic congestion in the village centre, inadequate public transport and poor access to employment. But in our view this proposal is a more appropriate strategy for the development of Mickleton bearing in mind those limitations.

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8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (optional)

**Only choose one option.*

- ☒ A) Yes xx (Yes selected)
- ☐ B) No

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary (optional)

There have been significant changes in the Local Plan since the conclusion of the Regulation 18 consultation with Mickleton being redesignated from a principal settlement to a strategic site and its housing allocation (excluding windfalls) increased by 216% from 439 to 1387. There has been no adequate opportunity to comment on or challenge this as the Regulation 18 consultation was based on a completely different set of proposals. Participation in a hearing session would allow the opportunity to explain our objections and proposals in more detail.

*If you answered **B** for Question 8, you **do not** need to answer any further questions.*