



Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 10 JULY 2025
Subject	Local Plan Update
Wards affected	All
Accountable member	Councillor Juliet Layton Deputy Leader of Cotswold District Council and Cabinet Member for Housing and Planning Email: Juliet.Layton@cotswold.gov.uk
Accountable officer	Geraldine LeCointe – Assistant Director of Planning Services Email: Geraldine.LeCointe@cotswold.gov.uk
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Summary/Purpose	To confirm the way forward for the Local Plan Update
Annexes	Local Plan Oversight Board Terms of Reference July 2025
Recommendation(s)	<p>That Cabinet recommends for Council to resolve merge the two ongoing Local Plan projects:</p> <ul style="list-style-type: none">• the partial update of the adopted Cotswold District Local Plan (2011-2031); and• the Development Strategy and Site Allocations Plan, <p>into a single comprehensive Full Local Plan Update in conjunction with incorporating work of the Gloucestershire Strategic Plan, where appropriate, with a view to submission in 2026 and adoption in 2027.</p> <p>That, if this is approved by Council, Cabinet resolves to:</p> <ol style="list-style-type: none">1. Update the Council’s Community Infrastructure Levy in parallel with the Local Plan process.



	<ol style="list-style-type: none">2. Invest in additional resources to accelerate the delivery of the Local Plan to enable the December 2026 submission deadline to be hit.3. Confirm the delivery of the Local Plan as a Council priority.4. Establish a Local Plan Oversight Board and confirm a new Terms of Reference.
Corporate priorities	<ul style="list-style-type: none">• Responding to the Climate Emergency• Delivering Housing• Supporting Communities• Supporting the Economy
Key Decision	YES
Exempt	NO
Consultees/ Consultation	Local Management Team



1. EXECUTIVE SUMMARY

- 1.1** Cotswold District Council began updating its Local Plan¹ in June 2020. Since then, significant progress has been made.
- 1.2** Initial work was primarily to make the adopted Local Plan 'Green to the Core' in response to the Council's climate change and ecological emergency declarations. In January 2024, the Council also began making preparations to deliver development requirements beyond 2031 (the end of the adopted Local Plan period).
- 1.3** Due to a deadline to submit Local Plans under the current planning regulations, which were considered to be more advantageous to the Council than the new planning regulations, and uncertainty around expected national planning policy changes at the time it was decided to keep the two Local Plan projects separate but progress them in parallel. The intention was to combine the two Local Plan projects into a single comprehensive Full Local Plan Update further down the line if it was possible to do so, allowing the Council to keep its options open and 'hedge its bets'.
- 1.4** Since then, the government has undertaken radical changes to national planning policies. These included:
- Introducing a new centralised calculation of the number of homes needed in each local planning authority area, which more than doubled the number of homes the government calculates to be needed in the district to 1,036 homes a year²; and
 - Extending the deadline to submit Local Plans to the Secretary of State for independent examination in public from June 2025 to December 2026.
- 1.5** As a result, Cotswold District no longer has a five-year housing land supply. The adopted Local Plan policies governing the supply of housing are now out-of-date and must be updated. There may still be justification to refuse planning applications for new homes. However, the harms of granting planning permission must now significantly and demonstrably outweigh the benefits. The 1,036 home a year target has potential to harm the district with an increase of unplanned developments. The

¹ Cotswold District Local Plan (2011 to 2031) – adopted 3 August 2018

² Note, this figure is updated annually to incorporate updated housing affordability data.



Council is already receiving a large increase in planning applications for new homes on greenfield sites next to towns and villages in the district.

1.6 Cotswold District is a truly special place, and the district has many “areas and assets of particular importance” that the Council must protect. For example, the district has:

- 80% of its land area within the Cotswolds National Landscape (a greater coverage by a National Landscape designation than any other district in England);
- 144 Conservation Areas (more than any other district in England);
- Over 5,000 entries on the statutory list of buildings of special architectural and historic interest (second after City of Westminster);
- 239 Scheduled ancient monuments;
- 32 registered historic parks and gardens;
- 38 Sites of Special Scientific Interest;
- Over 260 locally designated wildlife sites;
- 1 registered battlefield; and many more.

1.7 Further land is susceptible to high flood risk, where development should be avoided.

1.8 National planning policies specify that all these areas and assets of particular importance can justify a lower housing requirement in the adopted Local Plan than the 1,036 homes a year that the government calculates to be needed in the district. However, until a new Local Plan is adopted, the Council must continue to use the 1,036 home a year target as the basis for measuring its five-year housing land supply.

1.9 Local Government Reorganisation is also on the horizon. Cotswold is currently set to become part of a unitary authority in April 2028.

1.10 Council is not being asked to support a new Local Plan. It is being asked to combine the two ongoing Local Plan projects into a single comprehensive Full Local Plan Update – something which was always the intention to do. The key ask is that, in making this decision, Cabinet commits itself to prioritising and resourcing the Local Plan so that the updated Local Plan can be submitted for examination by December 2026.



1.11 This is an ambitious target, and its delivery will require some streamlining of the current Local Plan process, as well as investment in staff resources³. However, it also has significant benefits to the Council:

- i. The Council will be able to adopt its Local Plan and regain its five-year housing land supply as fast as possible.
- ii. The Council will have an adopted Local Plan that can be transferred to the new unitary authority, which will provide a long-lasting legacy for Cotswold District Council.
- iii. There is an opportunity to increase the amount of affordable housing, especially social rented housing, from developments, whilst also increasing the proportion of smaller and more affordable house types.
- iv. The district's areas and assets of particular importance will have greater protection, and these may provide justification to set a lower housing requirement in the Local Plan.
- v. The Council will be able to deduct any previous over-delivery of housing on its Local Plan housing requirement from the remaining requirement that its five year housing land supply is measured against.
- vi. The Council will be able to update its Community Infrastructure Levy to help secure infrastructure first development.

1.12 Aiming to deliver this target is also not without risk. For example, there have been various national policy consultations and rule changes that have already delayed the delivery of the Local Plan, and there may be further changes ahead. However, even if the Council does not submit the Local Plan by December 2026, all is not lost. There may be other opportunities including through the new government regulations to submit a Plan, particularly if government reorganisation is delayed. The important issue is that progression on the Plan needs to continue at pace to ensure that a legacy is set for Cotswold District that ensures development takes place in the right places with an infrastructure first approach.

³ Any necessary staff resources would be fixed term for two years. Any other additions are being made from the existing budget.



SUMMARY TIMELINE

Cotswold District Council began updating its Local Plan⁴ in June 2020. This report recommends the Council to continue updating its adopted Local Plan through the merger of the ongoing Partial Local Plan Update and the Development Strategy and Site Allocations Plan and progress a single, unified Local Plan to submission. With 80% of the district designated as National Landscape and a further 4% with other nationally protected characteristics or constraints, there may be justification for the Council to set a lower housing requirement figure, thus enabling the Council to locate development and its associated infrastructure in the right places.

- 2018: Plan adopted
- 2020: Decision to do partial review to make Plan green to core
- 2023: Review of housing requirement – no significant change to housing need so no need to update housing requirement
- 2024: Decision to do Site Allocations Document – Feb/March 2024 Reg 18 Issues and Options Consultation on DM policies & on Development Strategy
- December 2024: Government introduces new standard method for calculating housing need – significant change with Cotswold District Council now needing to provide 1,036 homes a year, triggering statutory requirement to update the Plan.
- April 2025: Planning Advisory Service (PAS) review – concludes it is critical for the Council to prioritise options that deliver an up-to-date Local Plan without delay.
- June 2025: Development management policies ‘green to core’ and substantially ready for Regulation 19 draft Plan consultation BUT site allocations required to meet new housing requirement figure. Now require further evidence for site allocations and selection of site allocations > further consultation required on approach to site selection in area – to take place in Autumn 2025
- Spring 2026: Consultation on Draft Plan and allocated sites
- December 2026: Submission of Local Plan for examination through existing regulations⁵ (the new regulations expected may provide an alternative route for submitting the Plan although there is currently only one option of submitting a Plan under the current regulations in December 2026)
- 2028: Adoption

⁴ Cotswold District Local Plan (2011 to 2031) – adopted 3 August 2018

⁵ Government response to the proposed plan-making reforms: consultation on implementation - GOV.UK
Government response to the proposed plan-making reforms: consultation on implementation - GOV.UK



2. BACKGROUND

2.1 Terminology: This report refers to several types of plan-making terms, so the following definitions provide a useful reference:

- **Adopted Cotswold District Local Plan 2011-2031 (the adopted Local Plan):** The extant plan used to determine planning applications.
- **Partial update of the Cotswold District Local Plan 2011-2031 (Partial Local Plan Plan):** The plan the council has been preparing to date. It updates parts of the adopted Local Plan, mostly the development management policies, and it does not extend the plan period or alter the development strategy.
- **Development strategy:** This is a core component a local plan. It specifies the quantum and location of development to meet identified needs.
- **Development Strategy and Site Allocations Plan:** Specifies the quantum and location of development in Cotswold District during the period 2026 to 2041.
- **Full Local Plan Update:** It combines the Partial Local Plan Update and the Development Strategy and Site Allocations Plan into a single comprehensive Full Local Plan Update that meets development needs beyond 2031. To achieve this the Full Local Plan Update would need to be submitted to the Secretary of State for independent examination in public by 31 December 2026.
- **New Style Plan:** The government is changing how future local plans are made. From 1 January 2027 authorities that haven't already submitted their draft local plan for independent examination in public will need to prepare and submit their local plan using new plan-making regulations. A New Style Plan would include a new/updated development strategy and a few development management policies of local importance that are not covered by the new National Development Management Policies (a new sister document to the National Planning Policy Framework, which the government proposes to consult on in 2025).

2.2 Progress on the Local Plan: The following sets out the timeline of work that has been undertaken on the Local Plan update so far:

- **August 2018:** Cotswold District Council adopts its Local Plan⁶.

⁶ [Cotswold District Local Plan \(2011-2031\)](#)



- **June 2020:** A review of all the adopted local plan policies⁷ was completed to assess whether they required updating. In response, the Council commenced a partial update of the adopted Local Plan (the Partial Local Plan Update), primarily to make the Local Plan 'Green to the Core' in response to the Council's climate change and ecological emergency declarations. The Partial Local Plan Update also responded to national planning policy changes and made improvements to the Local Plan in response to feedback from the Council's Development Management team from their experience of using the newly adopted Local Plan.
- **February / March 2022:** The Council undertook an initial consultation (known formally as a Regulation 18 consultation) on the Partial Local Plan Update to identify 'Issues and Options' that the Local Plan needed to respond to.
- **August 2023:** A further review of the adopted Local Plan housing requirement was completed to establish whether this required updating. A relatively small percentage increase of 4.95% was found to be well within the bounds of flexibility, and the change was not deemed to be "significant". It was concluded that the adopted Local Plan housing requirement did not require updating and could continue to be used as the basis for measuring the five-year housing land supply.
- **January 2024:** As there would soon be less than five years remaining of the Local Plan period, it was decided to proactively begin the process of planning for development requirements beyond 2031 before a lack of a five-year housing land supply became an issue. The Council therefore approved the commencement of a Development Strategy and Site Allocations Plan (2026-41). It was decided to keep the two Local Plan projects separate due to a government-imposed deadline of June 2025 to submit Local Plans to the Secretary of State for examination in public under the current Local Plan regulations. Plans submitted after this date would be examined under new planning regulations, which although the detail had not been published were believed to be less advantageous for the Council's aspirations. It was recommended to keep the situation under review in the hope of being able to

⁷ Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 makes it a legal requirement for planning authorities to review their local plan every five year.



combine the two Local Plan projects. It was highlighted that doing so would bring considerable financial savings.

- **February / March 2024:** The Council undertook consultations on both the 'Draft Policies' of the Partial Local Plan Update and 'Issues and Options' for the Development Strategy and Site Allocations Plan, the latter considering development options beyond 2031. This concluded that the Local Plan should focus development in and around the district's principal settlements and transport nodes, as well as exploring whether strategic scale development around Moreton-in-Marsh as a Principal Settlement with a railway station would be feasible. This strategy was based on the housing target of the previous government, which at that time was 493 homes a year.
- **December 2024:** The newly elected Government produced a revised version of the National Planning Policy Framework (December 2024) (the NPPF). The changes included a new, mandatory Standard Method for calculating the number of homes needed in each local planning authority area. Areas with the highest levels of unaffordable housing were given increased housebuilding targets. As a result, and due to high house prices in Cotswold District, the district received a more than 100% increase in its target. more than doubling of its target. The number of homes needed in the district is now calculated to be 1,036 homes a year. Due to this being a significant change, the NPPF requires an update to the local plan housing requirement. The national policy changes also extended the deadline from June 2025 to December 2026 to submit local plans to the Secretary of State for examination in public under the current planning regulations Authorities that do not meet the December 2026 submission deadline will need to prepare plans under the new planning regulations, although the detail of these is still awaited⁸.
- **March 2025:** The Planning Advisory Service completed a review of the Planning Service, which concluded that: *both internal and external stakeholders have expressed concerns regarding the progress of developing an up-to-date Local Plan. This delay poses risks not only to the delivery of key corporate objectives*

⁸ [Government response to the proposed plan-making reforms: consultation on implementation - GOV.UK](#) (note Chapter 2 and Chapter 6)



but also to the planning service itself, as not having an up-to-date Local Plan can lead to unplanned development. The council faces several important challenges that require a strategic focus and for which the Local Plan is an important delivery tool. These include an increase housing need in nationally mandated figures and the exploration of growth options for residential and economic development, all within the context of ongoing national changes to the planning system. An up-to-date Local Plan is essential for establishing the spatial framework for the area, ensuring development occurs in appropriate locations. Consequently, it is critical for the council to prioritise options that facilitate the creation of a comprehensive and up-to-date Local Plan without delay. Conducting an options appraisal and implementing robust project management and governance frameworks will be essential to this process.

- **July 2025:** The partially updated Local Plan policies and their evidence base are substantially complete in readiness for the final stage of public consultation (formally known as Regulation 19 consultation). The Development Strategy and Site Allocations Plan has undergone an Issues & Options (Regulation 18) consultation. Various evidence is completed or is in train, including a Settlement Role and Function Study to assess the sustainability of settlements; a Broad Locations Study and Strategic Housing and Economic Land Availability Assessment Update to identify sites; Moreton-in-Marsh Feasibility Study to assess the feasibility of development in Moreton; Infrastructure Delivery Plan to ensure the right infrastructure is provided to support developments; Housing and Economic Needs Assessment to ensure the Local Plan provides for the right homes and job types to support the district's population; a Town Centres Study to protect our town centres whilst enabling them to diversify and remain viable; and many more.

In summary, a substantial amount of work has already been completed or is underway on both Local Plan projects, which can be transferred into the single comprehensive Full Local Plan Update.

- 2.3** The proposed option in this report builds on the work completed since the Local Plan update commenced in 2020. It demonstrates that by merging the two ongoing Local Plan projects into a single comprehensive Full Local Plan Update, the Council will be able to submit a Local Plan for examination that is green to the core and that addresses



the district's significantly increased housing target. Once adopted, the Local Plan can be carried forward into the new Unitary Authority as the adopted Plan for the Cotswold District. This Plan would then be the Plan by which development applications are determined and will remain so until such time as the new unitary authority produces its own plan, which may take up to five years post vesting.⁹

3. MAIN POINTS

- 3.1** It is a statutory requirement for all local planning authorities to have an up-to-date local plan. A significant amount of work has already been completed to proactively deliver a single and comprehensive Full Local Plan Update through the two ongoing Local Plan projects. Given the government's significantly increased housing target for the district, which mean the Council can no longer use some of the most important policies from its adopted Plan to determine planning applications, an updated Local Plan is now urgently needed.
- 3.2** Paragraph 34 of the NPPF provides: *Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."*
- 3.3** Furthermore, members will be aware that due to the new Government housing figure, the Council no longer has a five-year housing land supply (5YHLS) of deliverable housing sites. The recently published 5YHLS report established that the Council has a 1.8 year supply. This means that the tilted balance in favour of granting planning permission to sustainable housing developments now applies. The balance is whether the harms 'significantly and demonstrably' outweigh the benefits of granting permission. This is where the decision-maker will afford varying degrees of weight to the harms and benefits associated with a proposed development (NPPF, paragraph 11d). The result is that the Council is already receiving a significant uplift in speculative applications for housing developments, and this can be expected to continue. Each

⁹ *Town and Country planning: The Transition Regulations make clear that a local development document (such as a development plan) adopted by a predecessor council prior to re-organisation shall continue to apply after reorganisation as if it had been adopted by the unitary authority in relation to the area the plan covers. Additionally, the new unitary must adopt its own local development plan within 5 years of the re-organisation date.*



application must now be considered on its merits, and with no 5YHLS, the presumption would be in favour of granting planning permission in unplanned locations.

- 3.4** National Landscapes are a location where the harm caused by the proposed development may significantly outweigh its benefits. However, it is a nuanced and subjective process, and not as clear-cut as one benefit outweighs one harm. Each would require a specific individual assessment to be undertaken, on a case-by-case basis.
- 3.5** The Council has enjoyed a long period with a low number of appeals, but this is likely to change because the Council no longer has an up-to-date Local Plan or a 5YHLS.

Additional benefits of fast tracking the Local Plan

- 3.6** Through updating the Local Plan, the Council has the opportunity to seek to reduce its housing requirement figure.
- 3.7** Paragraph 11 of the NPPF specifies that, "*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*
- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:*

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. (emphasis added)

Footnote 7: "*The policies referred to are those in this Framework (rather than those in development plans) relating to: **habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as***



Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change. (emphasis added to show the protected areas and assets of particular importance in Cotswold District that may justify a lower housing requirement).

- 3.8** This means that if a local planning authority has evidence to show that it cannot meet the government's housing requirement figure, then a reduced figure would be allowed if the Plan was found sound at examination. The Plan would then be adopted on that basis.
- 3.9** Officers are currently undertaking a Broad Locations study which looks at the constraints of the district and assesses where appropriate locations may be situated for new settlements or extensions to existing settlements.
- 3.10** Paragraph 189 of the NPPF provides that: *Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues.* Therefore, there can be no strategic sites within the National Landscape which covers 80% of the district.
- 3.11** This leaves 20% of the district. However, a further 4% is either land covered by other protected areas and assets of particular importance referred to in NPPF Footnote 7 or land which is already developed, leaving only 16% of the district as possible options for strategic sites. In addition, this remaining land will have further constraints which may limit development options (e.g. land not being available for development). Therefore, it is highly likely that the Cotswold District will not be able to provide for the full 1,036 homes per year in the district and that the Council would then have to provide for a reduced housing figure, whilst looking to other adjoining authorities to help in providing for the district's housing need; the Planning Policy and Infrastructure team has already reached out to other districts in this regard. Notably, Exmoor National Park Authority, which has the same status of protection in the NPPF as the Cotswolds National Landscape, successfully argued for a significantly reduced housing requirement when they adopted their plan in 2017, arguing that the National Park has the highest status of protection and therefore has exceptional circumstances.



Community Infrastructure Levy and Infrastructure Delivery Plan Update

- 3.12** 'Infrastructure First' is a prominent ambition of the Council. This approach to planning development provides an opportunity to improve the district's local infrastructure and the regeneration of our towns and villages, whilst expanding the modal shift from cars to public transport and active travel. This can be achieved by coordinating the Local Plan with infrastructure providers, enabling them to make long-term investment decisions and plan their delivery programmes based on the pipeline of development set out in the Council's Local Plan. Development that is not plan-led is less likely to benefit from this longer-term infrastructure planning and is unlikely to provide the infrastructure benefits that would be secured in an updated Local Plan. Local services, such as hospitals, doctors, schools, transport infrastructure and sewage treatment works would therefore be likely to be further stretched due to the lack of planned investment and new facilities.
- 3.13** Cotswold District is a highly desirable place to live and work, and our residents rightly expect that the infrastructure to meet their needs is delivered alongside economic and residential growth. Infrastructure must keep up the pace, so the Council can maintain truly sustainable, cohesive communities with their own identity. Sometimes our residents have mixed or less-positive feelings about development in their area, but they do appreciate the infrastructure improvements which flow from it. This is a positive outcome that the Council can provide to its residents.
- 3.14** To deliver on this promise, and to mitigate the impact of developments, the Council relies significantly on financial contributions from developers via the Community Infrastructure Levy (CIL).
- 3.15** CIL is a set charge on the developer per square metre of built development (with some exceptions). The rate of charge was last set in the Council's CIL Charging Schedule in 2018. This was based on a 2016 assessment¹⁰ of the infrastructure that was required to support the now adopted Local Plan. The cost of that infrastructure and the funding gap was also assessed. The Council's annual Infrastructure Funding Statement (IFS) monitors what has been delivered and what remains in the pipeline.
- 3.16** Whilst the Council's CIL rate is indexed to reflect the market, it does not (and cannot) reflect the changing overall cost of infrastructure or changing infrastructure needs. For

¹⁰ Cotswold District Infrastructure Delivery Plan (Arup, 2016)



example, infrastructure needs can change over time with the constant rate of growth. There can also be changing circumstances, such as the need to respond more urgently to climate change and reduce private car travel rising up the priority list.

3.17 Irrespective of this, planning for growth beyond 2031 will have additional infrastructure requirements. It is therefore fundamentally important that the district's infrastructure requirements for the new Local Plan period are reassessed, and that this assessment takes consideration of the district's current priorities. It is only by following this process that the Council can review its CIL rate of the charge.

3.18 The following actions are therefore proposed:

- Update the Infrastructure Delivery Plan (last updated 9 years ago); and
- Review the CIL charging schedule (last updated 7 years ago).

3.19 The cost of updating the Infrastructure Delivery Plan and Community Infrastructure Levy charging rate is built into the costings provided in the Financial Implications section. There are no existing deadlines for submitting the CIL Charging Schedule for examination. It is envisaged that new Charging Schedule would be consulted at Regulation 19 alongside the Local Plan and the submission of the CIL Charging Schedule will follow on from the submission of the Local Plan and the examination again will follow after. The same evidence will be required to support both CIL and the Local Plan. Previously, the CIL examination followed on after the local plan examination using the same Inspector.

Local Plan Update Timetable

3.20 Officers will not be starting from scratch when updating the Plan: the Local Plan update began in 2020 with the partial update of the adopted Local Plan's development management policies and this is now substantially complete, with these policies green to the core. This part of the plan is ready for a Regulation 19 consultation. Work on the Development Strategy and Site Allocations aspect of the Local Plan commenced in January 2024 and has already undergone a Regulation 18 consultation in February/March 2024 when a call for sites was undertaken. Various evidence base work has also already been completed or is nearing completion.

3.21 In terms of what is required going forwards, given the significant increase to the number of homes the government calculates to be needed in the district, a further



Regulation 18 consultation is required. As noted above, Officers are currently undertaking a Broad Locations Study which looks at the constraints of the district and assesses where appropriate locations may be situated for new settlements or extensions to existing settlements. It is intended that this study will have an Integrated Impact Assessment. A Settlement Role and Function Study is also being undertaken, and this consults our parishes on their facilities and looks at public transport to establish the sustainability of each settlement. From this Study, it is intended that a settlement hierarchy will be established to help in allocating a sustainable level of development across the district whilst considering constraints.

- 3.22** The Regulation 18 consultation will publish these documents alongside a consultation questionnaire to seek views on the most appropriate locations for development; another call for sites will also be undertaken. Further relevant pieces of evidence will be consulted on as and when they are ready including the updated Gypsy and Traveller Assessment, the Town Centre Study, and the Housing and Employment Needs Assessment. These will provide the necessary requirement figures for gypsy and travellers, retail and employment as well as the types of housing required.
- 3.23** Sites will then need to be assessed and allocated and appropriate evidence produced to support a draft Plan. A Regulation 19 consultation of the draft plan and its evidence can then be undertaken in Spring 2026 with a view to submission of the Local Plan to the Secretary of State for examination in December 2026.
- 3.24** In previous local plan consultations, processing the consultation responses has been a labour intensive and time-consuming, and this is a primary reason why local plans across the country take so long. This has been recognised by the government as an issue, and Cotswold District Council has been part of a government funded pilot scheme (Protech) to speed this process up through the use of AI. The Council now has specialist software (Go Vocal and Konveio) that uses AI to both input and then summarise consultation responses. This will bring a considerable time and cost savings compared to past consultations.
- 3.25** To deliver the Local Plan update by the required deadlines, the Local Plan project plan has been streamlined to include essential items and activities only. Similarly, the staff resources needed to accelerate the delivery the Local Plan have been considered. Details of funding these posts are set out in the financial implications of the report.



Governance

- 3.26** To ensure the delivery of the Local Plan remains on track, a Local Plan Oversight Board will be reinitiated. This will include a new Terms of Reference. Monthly updates will be provided to the Board to monitor progress and discuss any arising issues.
- 3.27** A detailed project plan for delivering the Local Plan by the December 2026 submission deadline has been drawn up, alongside a budget and risk register. This will be reviewed monthly and will be shared with the Board. A full time Planning Project Manager will be secured to progress the Plan at pace and minimise any risks.

Summary

- 3.28** In summary, Officers recommend that the work to date on the two ongoing Local Plan projects is merged into a single comprehensive Full Local Plan Update with the intention to go out to Regulation 18 consultation in Autumn 2025 and Regulation 19 consultation in Spring 2026, ahead of submitting the Plan in December 2026. A detailed timetable is available in section 5 and will need to be brought before Cabinet at a later date in the form of an updated Local Development Scheme. Although the timetable may seem ambitious and does contain risk, it needs to be remembered that a significant amount of work has already been completed since 2020, and the Council is already in a relatively advanced position. This is therefore an opportunity for the Council to build on its legacy; to set a deliverable housing requirement figure; to ensure the Plan is green to the core; to take ownership of the Plan without any Government intervention; and to provide an adopted Plan for the Unitary Authority with a five-year housing land supply which will protect the district against inappropriate, unplanned development and will in turn provide the necessary infrastructure required.
- 3.29** A risk register which looks at the risks of progressing the Plan is provided in section 8 with appropriate mitigation measures.

4. ALTERNATIVE OPTIONS

- 4.1** Cabinet may choose not to merge the two Local Plan projects or to look to join with other local planning authorities in the local plan update or to work alongside the other



Gloucestershire Authorities in drawing up a Gloucestershire Strategic Plan whilst updating the Local Plan; they may therefore choose to consider:

a) Joining with other Gloucestershire Planning Authorities

- i. The Strategic and Local Plan (SLP) Authorities (formerly known as the Joint Core Strategy Authorities) of Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, took a report to their Joint Advisory Board on 12 June 2025 to look at options of joining with other authorities to take the Plan forward. They have opted to progress the SLP with the three authorities only, whilst taking consideration of the Gloucestershire Strategic Plan.
- ii. Stroud District Council is currently in examination and has its Plan paused due to concerns with transport issues on the M5. They are looking to resolve these issues whilst at the same time exploring taking their plan forward with adjoining authorities.
- iii. Forest of Dean District Council does not adjoin Cotswold District and is looking to take their plan forward for submission in December 2026.

There are many risks with joining with these authorities:

- The need to agree a Plan across one or more authorities will take more time and increase the risk of not meeting the December 2026 deadline. For example, if joining with the SLP authorities, it will take several months to agree the Regulation 19 consultation by all three authorities of the SLP alone. In addition, there is then the need to collate all the consultation responses across three or more authorities, which again takes more time.
- There are numerous unresolved transport issues particularly along the M5 corridor and its junctions that must be overcome, both from the development planned in Tewkesbury through to the Tewkesbury Garden Town, but also in Stroud District, if we were to look to join in a Gloucestershire wide Plan. Stroud has recently had its examination paused due to such concerns.



- The budget of the SLP is £5.5 million over the next three years, which is substantially more than the budget for the delivering Cotswold Plan Update, even when split three ways.

or

b) Undertaking a Local Plan Review in tandem with and to accord with the Gloucestershire Strategic Plan where appropriate

Due to local government re-organisation, and the likelihood of joining with another or all the Gloucestershire Authorities to form a Unitary, the Gloucestershire councils are looking to work together to provide a Gloucestershire Strategic Plan. Cotswold District Council is committed to this process and there is therefore the option to update the Cotswold Local Plan whilst taking account of the Gloucestershire Strategic Plan. This may include, for example, a Gloucestershire wide vision and aligned strategic objectives for the respective Local Plans across Gloucestershire.

Irrespective of this option, the Council is already undertaking various joint evidence base studies with the other Gloucestershire councils, which not only builds a picture of Gloucestershire at a point in time in preparation for a Unitary but also saves on cost. This work can contribute to the Gloucestershire Strategic Plan. However, undertaking a Gloucestershire Strategic Plan will have its own resource and financial costs and implications.

or

c) Awaiting the new regulations to progress the Plan

At the time of writing the new regulations for progressing a Plan are yet to be revealed. Currently there is only one option in terms of submitting the Plan by December 2026. There may be other options in terms of submitting the Plan under the new regulations at a later date, and if government reorganisation gets delayed this may be a favourable option for the Council, particularly if there is delay in progressing the plan. PAS are providing workshops to advise on how to align evidence to ensure it complies with the new regulations, and council officers will be attending PAS's Southwest workshop in regard to this. This option may be appropriate to explore further in the future, but at present does



not provide the accelerated timetable option to progress the Plan at pace to ensure the Council has an up-to-date Plan and a 5YHLS.

or

d) Not undertaking a Plan Update

This is not a reasonable alternative option but has been included for completeness. The Government has made clear the intention to make rapid progress towards universal local plan coverage both through support and using Government's powers of intervention when needed. Within the new planning reforms, the Government introduced new powers for government intervention where progress on local plans is not being made, bringing in government officers and attributing the bill to the council in question. By not undertaking a review of the Plan, the Council runs the risk of reputational damage through government intervention, being overrun with unplanned development and appeals, and the possibility of judicial review of such a decision and being required to foot the bill for an external organisation delivering the Council's Local Plan.

4.2 A SWOT analysis for updating the Plan and the various options is provided in Table 1.



Table 1: SWOT analysis for updating the Local Plan

Strengths	Weaknesses
<ul style="list-style-type: none"> • The team began a partial update of the Local Plan in 2020, and much work has already been done. • Development Management policies are ready for Regulation 19 consultation. • Regulation 18 consultation on the development strategy and call for sites undertaken in 2024. • Much evidence work has been undertaken and jointly with the other Gloucestershire Authorities. 	<ul style="list-style-type: none"> • There is a need to undertake further evidence work to support the housing allocations. • There would be a need to update some evidence that is deemed out-of-date (more than 2 years old) or overtaken by events. • A lack of development opportunities due to the district’s constraints and lack of land suitable that is available for development.
Opportunities	Threats
<ul style="list-style-type: none"> • To provide evidence to set a realistically deliverable housing requirement for the district. • Developers are already coming forward with large scale strategic sites in areas that may be appropriate for development. • If we are already undertaking a Plan update, there may be other opportunities to progress the Plan through the new gateway assessment process, particularly if local government re-organisation is delayed. • To align with adjoining councils’ local plans and look to deliver the Council’s housing need figure through allocations in neighbouring authority plans through the duty to co-operate and memorandums of understanding. 	<ul style="list-style-type: none"> • Local plans often take a long time to progress and time, and risks will have to be carefully managed to ensure the Council meets the submission date of December 2026. • The Government may introduce new guidance or legislation which the Council may have to take account of. • Either the Council cannot agree with developers or multiple developers cannot agree with each other on the way forward to progress a strategic site. • Unresolvable objections from major stakeholders, such as Natural England, the Environment Agency and Historic England. • Consultants delaying the production of evidence. • Issues with major infrastructure providers which means we cannot provide the



<ul style="list-style-type: none">• To align the Council’s evidence with other Gloucestershire authorities to provide a strong evidence base for Gloucestershire for going into a Unitary Authority.• To align with the Gloucestershire strategic plan in particular with the vision and objectives.• The deadline for forming a Unitary Authority may change.• To create a long-lasting legacy for Cotswold District.	<p>necessary infrastructure to progress our housing sites.</p> <p>Threats if we do not review the Plan:</p> <ul style="list-style-type: none">• Costly appeals.• Unplanned development in inappropriate locations.• Lack of investment in infrastructure.• Government intervention.• Reputational damage.• Judicial review.• Special measures.
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5. Project Timeline

- 5.1** The Local Plan must be progressed at pace to achieve the December 2026 submission deadline. Updating the Plan started with the partial review in 2020, and all the development management policies are now substantially complete and ready for a Regulation 19 consultation. The update of the Development Strategy and sites began in 2024 with a consultation in February/March of that year. Further consultation on the development strategy and where sites are located is required due to the significant increase to the calculation of the number of homes needed in the district. Therefore, it is intended to undertake a further Regulation 18 (Issues and Options) consultation on the broad locations for development and the methodology for establishing a settlement hierarchy. This will take place in Autumn 2025.
- 5.2** Further evidence will need to be completed to support the draft Plan, and site allocations will need to be identified for development. These will be consulted on formerly at the Regulation 19 stage alongside the draft Plan. This consultation will take place in Spring 2026. The Local Plan will then be submitted to the Secretary of State for examination in December 2026.
- 5.3** Some of the required evidence base documents to be produced are dependent on other evidence; the viability assessment for example will be one of the last pieces of evidence to be completed, as all the sites and infrastructure will need to be identified before this work can be completed. After the Regulation 19 consultation and prior to

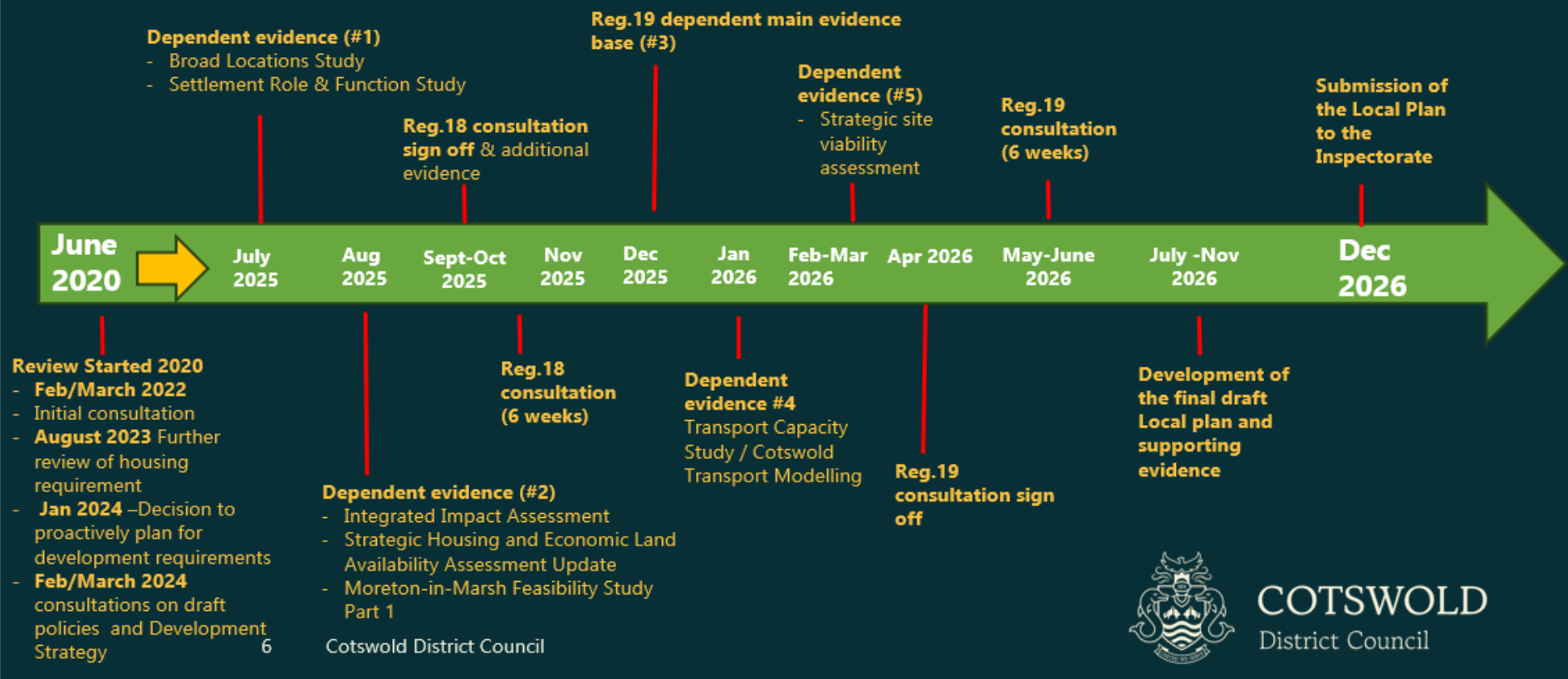


submission, time needs to be allowed to ensure the Council can address any issues raised from the consultation including a schedule of proposed modifications to the draft Plan and producing any necessary additional evidence.

- 5.4** Once the Plan is submitted, progress on the Plan is mainly in the control of the Planning Inspectorate. Further work can be expected throughout the examination process – e.g. responding to Matters, Issues and Questions (MIQs) from the Inspector and the public hearing sessions.
- 5.5** The Government is keen to progress Plans at pace and all Plans submitted under the current regulations will need to be submitted by December 2026. This timing will then allow the Plan to form the adopted Development Plan for the district under the new Unitary Authority.
- 5.6** Please see below the timetable from now until submission and from submission to adoption.



Local Plan Timeline





Local Plan timeline from submission to adoption





6. FINANCIAL IMPLICATIONS

Money spent to date and remaining reserve balance.

6.1 Since commencing the update of the adopted Local Plan in 2020, the Council has spent £762k on the Local Plan. This does include other work and commitments including on the Cirencester Town Centre Masterplan but does reflect the amount of work that has already been completed and demonstrates the level of financial commitment the Council has given to updating the Local Plan.

6.2 As of 1 April 2025, there was a remaining earmarked reserve of around £1 million to complete the Partial Local Plan Update and the Development Strategy and Site Allocations Plan with an estimated cost of £1.3 to £1.4 million.

6.3 Switching to a Full Local Plan Update brings a large cost saving of around £300,000 to £400,000 on the Local Plan process, bringing the projected spend back within the £1 million budget. In addition, the work done to date on the Partial Local Plan Update and the Development Strategy and Site Allocations Plan is not abortive work. It can also be translocated into the single comprehensive Full Local Plan Update without cost.

Cost savings from combining the two Local Plan projects and streamlining the Local Plan process.

6.4 The cost savings come from a range of factors, including:

- Requiring only one Local Plan examination instead of two;
- Avoiding the duplication of some evidence base documents (e.g. the viability assessment of the Local Plan policies);
- Streamlining the Local Plan process to doing only what is necessary;
- Needing to undertake only two additional public consultations before submitting the Local Plan for examination, instead of three;
- The use of AI to process and summarise Local Plan consultation responses; and
- Delivering the Local Plan more quickly (i.e. submitting both Local Plan projects by December 2026, instead of the current programme which prioritises the delivery of the Partial Local Plan Update followed by the Development Strategy and Site Allocations Plan after December 2026). This will avoid the cost of having to update / refresh some of the older evidence base documents.

Recent funding allocated / awarded for the delivery of the Local Plan



- 6.5** In February 2024, Cabinet resolved to add £500,000 to the Local Plan reserve. This was to ensure the next stages of the Local Plan preparation could be delivered in accordance with the timetable set out in the Cotswold District Local Plan Update report to Council in January 2024. It was highlighted in the January 2024 Council report that *"additional funding will be required should the council need to use the fall-back approach... [i.e. producing a single comprehensive Full Local Plan Update]. This may require up to an additional £500,000, although it is difficult to quantify at this stage as it requires far greater clarity on the new plan-making system. The new system is being advertised as being quicker and more efficient, but this remains to be seen in the absence of secondary legislation. Furthermore, the planning system will continue to operate within a legal framework, where planning judgements need to be justified / evidenced. This is often where the costs and resources sit."*
- 6.6** In February 2025, Cabinet resolved to add a further £250,000 to the Local Plan earmarked reserve. This was to ensure the next stages of the Local Plan preparation could be delivered following the update to the NPPF in December 2024.
- 6.7** In March 2025, the Council was awarded £227,962.50 of grant funding from the MHCLG's Local Plans Delivery Fund (Regulation 18). This funding was contingent on the Council submitting its Local Plan for examination by December 2026. The purpose of this funding is also to accelerate the delivery of the Council's Local Plan in response to the increased housing target.
- 6.8** In March 2025, the Council was awarded a further £70,000 of grant funding from the MHCLG's Green Belt Review Fund. A review of the Gloucester, Cheltenham and Tewkesbury Green Belt, which extends into Cotswold District, is now underway.
- Estimated costs of accelerating the delivery of the Local Plan Update*
- 6.9** The estimated costs for the Plan are provided in Table 2 below. Currently the Local Plan reserve stands at approximately £1 million and the projected spend on the Full Local Plan Update comes broadly within this allocation. This excludes any contingency and does not account for any additional spend resulting from needing to undertake stage 2 of the Moreton-in-Marsh Feasibility Study, which is currently estimated at £215,000.
- 6.10** Costs have been included in the Local Plan budget reserve for additional fixed-term posts to ensure the Plan can be developed at pace. This includes additional hours for



part-time staff in the team; administrative support and the re-provision of hours for other posts. The budget for any permanent posts will come from the existing establishment budget as part of a growth bid; within this we will seek to engage the services of an experienced full-time Project Manager, an Urban Designer and an additional Principal Policy Officer to secure the strategic sites and ensure we can progress the Plan at pace.

Table 2: Estimated remaining costs of delivering Full Local Plan Update

Evidence costs	£566,946*
Regulatory Consultations & Examination	£327,000
Additional staffing	£217,075
Local Plan Total	£1,111,021
Other including Cirencester Masterplan	£61,762
Local Plan + Other Total	£1,172,783
Income – Funding	£229,463
Total minus income	£943,320*
LOCAL PLAN RESERVE	£1,004,827
Expenditure 2020 to date	£761,782
Additional costs required if Moreton Feasibility Study Stage two is required	£215,000

*N.B. Awaiting further costs on the Infrastructure Delivery Plan Assessment

Note, figures exclude any contingency, and any additional expenditure required to progress a Gloucestershire Strategic Plan, as this is unknown to date.

- 6.11** The use of the Local Plan reserve will be kept under review to ensure sufficient funds are set aside to deliver the Local Plan. In doing so, as part of the 2026/27 budget setting process, the Deputy Chief Executive & Section 151 Officer will identify further one-off funding (following the review of earmarked reserves) to be held as a contingency should additional resources be required to accelerate the delivery of the Local Plan to meet the December 2026 submission deadline. In the event of the contingency budget being required, this will only be released subject to the agreement of the Section 151 Officer in consultation with the Leader, Deputy Leader, and Director of Communities and Place.



6.12

Costs of not having an up-to-date Local Plan and no five-year housing land supply

- 6.13** As noted in paragraph 4.1(d) above and 7.2 below, the Government has introduced new interventionist powers if a Plan is not progressed quickly enough. The Secretary of State can now prepare the Local Plan for the Council or direct the Council on the preparation of its Local Plan. In either case, this would almost certainly have an increased cost compared to the Council preparing its Local Plan in-house, and the Council would be required to foot the bill of the intervention (e.g. the use of consultants rather than officers to deliver the Local Plan).
- 6.14** It is estimated that the Local Plan Update will be adopted in December 2027, and it is likely that the Council will also regain its 5YHLS at this point. There will therefore be a period of around two and a half years when the Council does not have an up-to-date Local Plan or a 5YHLS. During this period, the Council can expect to receive an increase in speculative planning applications for new homes and appeals and this will incur additional costs for the Council.
- 6.15** Whilst there will be a corresponding increase in planning application fee income, there is expected to be an overall net resource and financial cost to the Council. This is both in terms of uplift in workload for the Development Management team to manage the increase in applications and appeals (e.g. this may require more agency workers), as well as the increased financial cost of appeals (e.g. the need for representation by specialist planning consultants, Counsel to defend the Council's decisions, and the risk of the Council being ordered to pay the appellant's costs).
- 6.16** The cost of appeals can vary depending on the issues being contested and whether a public inquiry is required. For comparison, there is currently a non-residential appeal relating to the Steadings which is likely to cost between £10-12,000. However, as an example; three appeals in Tewkesbury Borough, where the 5YHLS was contested, cost Tewkesbury Borough Council £500,000¹¹.
- 6.17** The last time Cotswold District Council did not have a 5YHLS in 2014, the Council was in danger of going into special measures due to the number of appeals lost. At that time, it was confirmed that there had been 11 planning appeals in the district during

¹¹ [BBC article: Gloucestershire will struggle to stop housing developments' \(8 October 2023\)](#)



2012 and 2013 with the total cost amounting to £257,368.¹² Although the Council regained its 5YHLS in April 2015 appeals continued as developers successfully argued that the Council did not have an up-to-date local plan in place. It was not until 2018 when the Plan was adopted that the appeals stopped.

- 6.18** Recent research indicates that between 2010 and 2017, there were at least 28 appeals, 18 of which were allowed, and two Judicial Reviews where the lack of a 5YHLS and / or an up-to-date local plan was a significant determining factor. The Council was required to pay the appellant's costs on several occasions.
- 6.19** In contrast, since the Local Plan was adopted in 2018, the Council's 5YHLS has not been challenged at appeal. A landmark appeal¹³ also found that, despite a development proposal being acceptable in all other respects and having considerable benefits, the Council having an up-to-date Local Plan and a 5YHLS meant the conflict with the adopted Local Plan development strategy and the plan-led approach was sufficient for the Inspector to uphold the Council's decision to refuse the application. The Council has subsequently received little challenge in this regard. Having an up-to-date Local Plan and a 5YHLS also provides a strong basis to refuse planning applications where there are other issues that weigh against granting planning permission.
- 6.20** If it is left to the new Unitary authority to produce the Council's Local Plan, it could be five further years from vesting day until the district has an adopted Local Plan (so over eight years in total from July 2025). During this extended period, the Council and the new Unitary Authority would continue to be open to speculative planning and an ongoing pipeline of appeals. It would be speculative to provide a cost estimate but, suffice to say, it is likely the cost would be much larger in the long-term than if the Council were to adopt its Local Plan as soon as possible.

7. LEGAL IMPLICATIONS

¹² <https://www.wiltsglosstandard.co.uk/news/11036676.cotswold-district-council-spends-250000-on-planning-appeals-in-the-district-over-the-last-two-years/>

¹³ Outline planning application for residential development of up to 40 dwellings (including details of access to be determined) at Moore Land, Collin Lane, Willersey, WR12 7PE (application ref: 17/04765/OUT; appeal ref: APP/F1610/W/19/3229031)



- 7.1** It is a statutory requirement for the Council to produce a Local Plan and keep it up to date¹⁴. Local Plans, prepared by a local planning authority in consultation with its community, set out a vision and a framework for the future development of an area. Once in place, Local Plans become part of the statutory development plan. The statutory development plan for the area is the starting point for determining local planning applications.
- 7.2** The Government has made clear the intention to make rapid progress towards universal local plan coverage both through support and using Government's powers of intervention when needed. Within the new planning reforms¹⁵, the Government introduced new powers for government intervention where progress on local plans is not being made, bringing in government officers and attributing the bill to the council in question. By not undertaking an update of the Plan quickly enough, the Council runs the risk of reputational damage through government intervention, being overrun with unplanned development and appeals, and the and the risk of intervention from the government.

¹⁴ Planning and Compulsory Purchase Act 2004 – Section 19

¹⁵ Planning and Compulsory Purchase Act 2004 – Section 27



8. RISK ASSESSMENT

Risk Assessment for progressing a Local Plan at pace.

Risks to take account of when progressing the Local Plan									
ID	Key risk	Likelihood	Impact	Risk score	Action to mitigate risk	Perceived mitigated likelihood	Perceived mitigated impact	Perceived mitigated risk score	
LPR01	Local Plans can take a long time to progress and time and risks will have to be carefully managed to ensure we meet the submission date of December 2026	4	4	16	The reserved budget accounts for additional resource inc. a Strategic Planning and Engagement Project Manager. In addition the project plan provides for contingency. Working with PINS and PAS to ensure we have an effective and efficient project plan.	3	4	12	
LPR02	The Government may introduce new guidance or legislation which we may have to take account of	4	4	16	The reserved budget accounts for additional resource and any change in government regulations may provide a different route for the Council secure the local plan.	4	3	12	
LPR03	Consultants delaying in the production of evidence	4	4	16	The reserved budget accounts for additional resource inc. a Strategic Planning and Engagement Project Manager. In addition the project plan provides for contingency.	3	4	12	
LPR04	Issues with our major infrastructure providers which means we cannot provide the necessary infrastructure to progress our housing sites	3	5	15	Early engagement and the employment of the Strategic Planning and Engagement Project Manager will reduce the impact of this.	3	4	12	
LPR05	Unresolvable objections from our major stakeholders of Natural England, the Environment Agency and Historic England	3	4	12	Early engagement and the employment of the Strategic Planning and Engagement Project Manager will reduce the impact of this.	3	3	9	
LPR06	Reg.18 responses may raise issues with the development strategy.	3	3	9	Going out to consultation early and dealing with responses as and when they are received.	3	2	6	
LPR07	Reg.19 responses raising issues with regard to soundness issues or legality for evidence or the plan	3	3	9	Early meeting with PINS and PAS and regular contact with Counsel. Allowing additional contingency time prior to submission.	2	2	4	
LPR08	Either we cannot agree with developers or multiple developers cannot agree with each other on the way forward to progress a strategic site	3	3	9	Adding contingency time within the Local Plan project plan and to agree Statements of Common Ground with developers which will acknowledge disagreements. The Inspector will have to recommend a way forward.	3	3	9	



Risk Assessment if a Local Plan is not progressed at pace.

Risks to take account of <i>not</i> progressing the Local Plan								
ID	Key risk	Likelihood	Impact	Risk score	Action to mitigate risk	Perceived mitigated likelihood	Perceived mitigated impact	Perceived mitigated risk score
NLPR1	Costly appeals	5	5	25	To develop a Local Plan at pace and make it a priority for the Council	5	3	15
NLPR2	Unplanned development in inappropriate locations	5	5	25		4	3	12
NLPR3	Lack of investment in infrastructure	5	5	25		4	3	12
NLPR5	Special measures	5	5	25		2	4	8
NLPR6	Government intervention with costs to the Council	5	5	25		1	2	2
NLPR7	Reputational damage	5	5	25		1	1	1
NLPR8	Judicial review	5	5	25		1	1	1



9. EQUALITIES IMPACT

9.1 The policies of the Plan will require an Integrated Impact Assessment (IIA). The purpose of an Integrated Impact Assessment (IIA) is to ensure we comply with the law, taking account of equality, human rights, children's rights and socioeconomic disadvantage (poverty) implications when making decisions. It also ensures decision makers are fully informed, at a formative stage in the decision making process.

9.2 This process will allow us to critically assess whether a 'proposal' has wider impacts beyond its intended outcomes and if it impacts differentially on different groups in our communities.

10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

10.1 The Council has declared a climate change emergency, which commits it to preparing an action plan to show how it will support the district to become carbon neutral. It has also declared an ecological emergency. The Council has also committed to make the Local Plan green to its core. An update to the Local Plan will directly support local communities and businesses to mitigate and adapt to climate change, whilst also making a positive response to the ecological emergency.

11. BACKGROUND PAPERS

[National Planning Policy Framework \(December 2024\) - GOV.UK](#)

Full Council Report (24 January 2024): Cotswold District Local Plan Update

(End)