

 COTSWOLD DISTRICT COUNCIL	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET – 13 MAY 2021
Report Number	AGENDA ITEM 9
Subject	PARTIAL UPDATE OF THE ADOPTED LOCAL PLAN – PROJECT UPDATE
Wards affected	ALL
Accountable member	Cllr Rachel Coxcoon Cabinet Member for Planning Policy, Climate Change and Energy Email: Rachel.coxcoon@cotswold.gov.uk
Accountable officer	James Brain, Forward Planning Manager Tel: 01285 623549 Email: james.brain@publicagroup.uk
Summary/Purpose	To provide an update on the project to partially update the Cotswold District Local Plan. The Report also includes an updated Local Development Scheme (timetable of work), a request to drawdown funding and a request to approve a draft Green Infrastructure Strategy for public consultation.
Annexes	ANNEX A – Cotswold District Council Local Development Scheme (2021 to 2024) ANNEX B – Draft Cotswold District Green Infrastructure Strategy 2021
Recommendation/s	That Cabinet: (a) Approve Local Development Scheme 2021 to 2024 (ANNEX A); (b) Approves drawdown of £21,000 from reserves to programmes of work identified in para 4.3; and (c) Approve the Draft Cotswold District Green Infrastructure Strategy for a six week public consultation (ANNEX B).
Corporate priorities	<ul style="list-style-type: none"> • Presenting a Local Plan which is green to the core; • Responding to the challenges presented by the climate change and ecological emergencies; • delivering good quality social rented homes;
Key Decision	YES
Exempt	NO

<p>Consultees/ Consultation</p>	<p>Local Plan partial update project: Members of the Local Plan Programme Board.</p> <p>Green Infrastructure Strategy: The Draft Strategy has been reviewed by Dr Gemma Jerome, Director of Building with Nature. Officers ran a six week key stakeholder technical consultation in August and September 2020. A draft of the Strategy was emailed to the main environmental organisations and Officers within Publica. Each of the 17 main principal settlements (as defined by the Council's Local Plan) Town and Parish Councils in the District were consulted during the preparation of the Strategy. Comments informed and influenced the Strategy.</p>
-------------------------------------	---

1. BACKGROUND

- 1.1.** At a meeting of Full Council on Wednesday 3 June 2020, Cotswold District Council Members agreed to undertake a partial update of the Local Plan. The update focuses only on issues that need modification within the plan period (to 2031) and does not invite consultation and examination on matters beyond the plan period.
- 1.2.** Subsequent to the meeting of Council, on Thursday 6 August 2020, the Government published two planning consultations, one of which being the Planning for the Future White Paper, which together proposed wide-reaching changes to the planning system. This included a proposed increase to the housing need of Cotswold District from 490 to 1,209 dwellings per annum.
- 1.3.** On 2 November 2020, Cabinet agree to pause the formal / regulatory plan making process until there was clarity on the White Paper and transitional arrangements from the old system to the new, and consequent changes to the NPPF and NPPG.
- 1.4.** On 20 February 2021, the Government confirmed that a revised housing need calculation would be used instead of the one consulted upon, which would mean Cotswold District's future housing need would continue to be 490 dwellings per annum.

2. WORK PROGRAMME UPDATE

- 2.1.** A key factor influencing the project pause in November 2020 was the prospect of having to accommodate significantly higher levels of housing growth in the District. The Government has now made clear the District's housing need for the next ten years and it has returned to a level consistent with historic figures. In simple terms the Government reengineered the method to direct more growth towards cities and urban conurbations. As a result the Council is well placed to continue with its programme of work partially to update the Local Plan.
- 2.2.** A Local Development Scheme (LDS) sets a timetable for preparing development plan documents. The Cotswold District LDS (ANNEX A) sets out a timetable for the partial update of the Cotswold District Local Plan project together with a timetable for the Cirencester Town Centre Masterplan and Developer Contributions Supplementary Planning Documents.
- 2.3.** Subject to the approval of Members, the LDS will be published on the Council's website and also made available at the Council's main offices and various 'deposit' locations across the District.

3. GREEN INFRASTRUCTURE (GI) STRATEGY

- 3.1.** The National Planning Policy Framework (NPPF) defines green infrastructure as:
"A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities".
- 3.2.** The GI Strategy forms part of the Local Plan evidence base and other Council strategies. It responds to the Council's Climate and Ecological emergencies and corporate priorities to improve health and wellbeing. It will also assist the Council to prepare and respond to the actions that will be necessary when the Environment Bill is enacted.
- 3.3.** The purpose of the GI strategy is to assist in the creation of sustainable places to live, which are resilient to climate change and the challenges it brings. Wellbeing, Water and Wildlife

assets form the three strands of GI. These assets or lack of, inform the GI priorities and possible actions.

3.4. The GI Strategy (Annex B) replaces the extant GI Strategy published in 2017. The updated version responds to several significant changes that have occurred nationally and locally since 2017. For example:

- Green Infrastructure has become more widely recognised for its cross cutting benefits for enhancing the environment and improving people's wellbeing;
- It reflects recent Government advice and policy and advancements made at a national and county level; and
- It responds to the Council's Corporate Strategy priorities.

3.5. The Covid 19 pandemic has further highlighted the importance of nature and access to local green spaces for peoples' health and wellbeing. The national lockdown demonstrated the fragile balance between increased demand for access to the countryside and what was available on the doorstep. A number of studies conducted in 2020 by national organisations, including Natural England and the National Trust, confirms this.

3.6. The GI Strategy finds that the existing amount of accessible open spaces in the District is less than adequate, despite the fact that the Cotswold District is one of the largest rural districts in England. The strategy provides guidance, actions and priorities to address this imbalance.

3.7. A key part of the GI Strategy is the maps, which accompany it. The maps provide a visual guide to the Wellbeing, Water and Wildlife assets in the District with focus on the District's 17 principal settlements (as defined by the policy DSI of the Local Plan). There are approximately 60 maps, which make a strictly paper version difficult to navigate. Therefore, an interactive electronic version of the Strategy is being prepared. The style borrows heavily from other interactive planning documents such as the Local Plan¹ and the Cirencester Town Centre Health Check².

3.8. The audience for this Strategy includes a wide range of stakeholders from developers to Town and Parish Councils, land owners/managers, environmental organisations and the general public/community groups.

4. FINANCIAL IMPLICATIONS

4.1. The financial implications associated with preparing and updating a Local Plan were set out at the Council meeting held on Wednesday 3 June 2020. To recap, the costs can be considered against several discrete parts, principally updating the evidence base; policy writing; undertaking consultations (formal regulations and informal); preparation of the publication/submission plan; examination; adoption and legal challenge.

4.2. Expected costings for the Local Plan update have been considered as part of the Council's future budget setting process and details were provided in November Cabinet paper.

4.3. Subject to the approval of the LDS, approval is also sought to commission and initiate the following studies:

- Sustainability Appraisal (£35,000);

¹ <https://www.cotswold.gov.uk/media/k2kjqvq3b/cotswold-district-local-plan-2011-2031-adopted-3-august-2018-web-version.pdf>

² <https://cotswold.maps.arcgis.com/apps/MapSeries/index.html?appid=7f7ebd7bdf8f401faf96fd0beec09cd8>

- Habitats Regulation Assessment – including a North Meadow and Clattinger Farm Special Area of Conservation (SAC)³ Mitigation Strategy (£11,000);
- Carbon Audit / Climate Change Risk Assessment (£35,000); and
- Playing Pitch Strategy (£15,000).

4.4. In November 2020, Cabinet approved a drawdown of funding to prepare a Growth Zone Study / Urban Capacity / Strategic land search (£75,000). Now the Government has confirmed that the District's housing need is 490 dwellings per annum rather than 1,209 per annum, the need to identify strategic options for growth is not required at this stage. The previously allocated £75,000 of funding will be used to partially fund the studies set out at para 4.3 and therefore a funding allocation of £21,000 is being proposed.

Sustainability Appraisal and Habitats Regulation Assessment

4.5. A sustainability appraisal is a systematic process that must be carried out during the preparation of Local Plans. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

4.6. The Habitats Regulations require the Council to carry out an assessment to test if a plan or project proposal could significantly harm the designated features of a European site. On the advice of Natural England the Council is working with Swindon Borough Council and Wiltshire Council to commission and initiate a mitigation strategy at North Meadow and Clattinger Farm Special Area of Conservation. This strategy will support plan making activities across the three authorities as well support planning applications requiring a Habitat Regulation Assessment: Appropriate Assessment.

Carbon Audit / Climate Change Risk Assessment

4.7. The Government guides Local Planning Authorities to use the sustainability appraisal process to help shape appropriate responses to the statutory duty on climate change. It also highlights the benefits of carrying out a climate change risk assessment to support the Local Plan and sustainability process⁴. The Council has received technical advice indicating that a carbon audit is likely to be required to assist the Sustainability Appraisal process and to support the Council's ambition to embed climate change policies into the Local Plan.

Playing Pitch Strategy

4.8. Officers have recently engaged with Sport England to discuss the Local Plan update process. Sport England has confirmed that an update to the Council's Playing Pitch Strategy (PPS) is required and indicates there are two options:

1. Short Term Gap. This just updates the action plan contained within the Strategy (approx. £1,000); or
2. The Preferred Option. Update the PPS (approx. £15,000)

4.9. Sport England recommends selecting option 2.

4.10. Officers conclude that option 1 covers the basics and would be sufficient to support the Local Plan update at examination. However, the action plan would be based on increasingly

³ <https://sac.jncc.gov.uk/site/UK0016372>

⁴ NPPG Paragraph: 006 Reference ID: 6-006-20140306

<https://www.gov.uk/guidance/climate-change#how-can-the-challenges-of-climate-change-be-addressed-through-the-local-plan>

dated information. Generally speaking PPS have a shelf life of 3 years and the Council's PPS has reached its third anniversary at 2021.

- 4.11. Option 2, whilst more expensive, would provide an up to date position on need and it also provides an opportunity to align PPSs across West Oxfordshire and Forest of Dean. Increasing alignment of plan making activities and studies within Publica provides the opportunity to provide long term efficiencies in terms of officer resource, procurement and finance. The update would also support wider health and wellbeing ambitions contained within Corporate Plan and would complement the Council's recently published Leisure Action Plan. Furthermore and when considering opportunities for external and partnership investment, an up to date PPS would be a requirement of any investment from organisations such as the Football Foundation.

5. HUMAN RESOURCE IMPLICATIONS

- 5.1. The most significant implication is the ongoing effects of Covid-19. The delivery of projects will be delayed if members of the Forward Planning team are redeployed to assist wider Council Covid-19 activities. The Local Development Scheme includes a risk assessment that identifies risks to human resources and measures that could be employed to and/or are being employed to mitigate risks.

6. LEGAL IMPLICATIONS

- 6.1. The preparation of a Local Development Scheme is a requirement of the Planning and Compulsory Purchase Act 2004.
- 6.2. The GI Strategy does not raise any legal implications. It forms part of the Council's Local Plan evidence base and together with other evidence will help to ensure revised policies accord with the National Planning Policy Framework's tests of soundness.

7. RISK ASSESSMENT

- 7.1. The Local Development Scheme includes a risk assessment which contains commentary on measures that have been or can be taken to mitigate identified risks.
- 7.2. Rebooting the Local Plan update does not identify significant risks at this stage. However, evidence and / or changes to national policy may indicate that a full Local Plan update is required during the preparation of an updated local plan. The Local Plan Programme Board and Cabinet will be kept apprised of any such issues.

8. EQUALITIES IMPACT (IF REQUIRED)

- 8.1. The updated Local Plan will be supported by an Equalities Impact Assessment.

9. CLIMATE CHANGE IMPLICATIONS (IF REQUIRED)

- 9.1. The Council has declared a climate emergency which commits the Council to prepare an action plan to show how it will support the District to become carbon neutral. The Council has also committed to make the Local Plan green to its core. An update to the Local Plan and an updated will directly support local communities and businesses to mitigate and adapt to climate change.

10. ALTERNATIVE OPTIONS

- 10.1. Do not adopt the Local Development Scheme, refuse the request for drawdown of funding and refuse to approve the Green Infrastructure Strategy for consultation. This approach would directly affect the Council's ability to deliver an updated Local Plan and would be inconsistent with the Council's Corporate Plan/Strategy and emergency declarations.

11. BACKGROUND PAPERS

None