

Cotswold District Local Plan 2011 – 2031 (Partial Update)

Town and Country Planning (Local Planning) Regulations 2012

A Regulation 18 “Issues and Options” consultation document

Part 1: Introduction

- 1.1 Although the Cotswold District Local Plan 2011 – 2031 was adopted as recently as 2018, Local Plans need to be periodically reviewed to keep them up to date. Housing requirements, for example, must now be reviewed at least once every five years. This does not necessarily entail a full-scale review – effectively a replacement Local Plan – but can be a targeted update focussing on specific issues. It is the latter that the Council has resolved to undertake.
- 1.2 Whether a full review or an update is undertaken, the process is the same. In simple terms there is an initial stage where “issues and options” are discussed with stakeholders (including the public) followed by a further public consultation on a draft updated Local Plan, which is also publicly consulted upon. Following those two stages, the next step is an Examination in Public where a government Inspector looks into the soundness¹ and legal compliance of what’s proposed and considers representations made in response to the formal consultations. At each stage there is an opportunity for stakeholders to participate in the process and have their views heard.
- 1.3 This consultation paper relates to the initial Regulation 18 “issues and options” stage – so we’re right at the start of the process. Details on participation and consultation arrangements and how to get involved are given on page 2.
- 1.4 There may be issues that you feel we should be tackling but which we’re not proposing to include in this Local Plan update. The main reason for that is usually because some issues may be more appropriately addressed in a full-scale Local Plan Review. We’ve identified in the topic papers several issues that fall into this category. Let us know if you think we should be widening the scope of the Local Plan update.
- 1.5 Updating a Local Plan tends to fall broadly into one of two categories. Updates can be needed because legislation has changed or because important new data or evidence has emerged that means an existing policy is weakened or even unsound – these can broadly be termed “technical updates”. Updates can also address issues that have emerged or intensified since the Local Plan was adopted that really must be tackled without delay and which are either not covered by existing policy or existing policy is no longer adequate.
- 1.6 An example of a key issue in the second category derives from the Council’s declarations of Climate Change and Ecological Emergencies. In reflecting these declarations in its [Corporate Plan](#)², the Council has committed to making its Local Plan “Green To The Core” with an aim

¹ A technical term that is based on the principles set out in the National Planning Policy Framework (paragraph 34). A plan must be Positively Prepared; Justified; Effective; and Consistent with National Policy.

² The Cotswold District Council Corporate Plan 2020-2024 (<https://www.cotswold.gov.uk/media/rldwcm/corporate-strategy-2020.pdf>)

to “Develop an updated local plan that delivers our corporate priorities and promotes both carbon neutral development and infrastructure”. Stated actions include “Draft new policies and updating existing policies to give effect to new council strategies, such as the economic recovery strategy, the climate and ecological emergency action plans and the renewable energy strategy.”

- 1.7 The Local Plan update proposals relating to the Corporate Plan commitments are set out in Topic Paper 1 *Responding To The Climate Crisis* and in some other Topic Papers. This consultation document comprises eighteen such Topic Papers that put forward the issues as the Council currently sees them and proposes options for how to tackle them through the Local Plan update. You should regard these as starting points for discussion. No firm decisions have been made about the precise range of issues or the proposed solutions, although clearly tackling the climate change emergency is an example of an issue the council is deeply committed to addressing.
- 1.8 Each Topic Paper is derived from an evidence paper that is available to read online by clicking on the hyperlink embedded at the beginning of the Topic Paper **[available shortly]**.
- 1.9 The council encourages as many people as possible to participate in the discussion and help to inform the next stage of the process as outlined earlier. In taking part in the discussion it is important to bear the last step of the process – the Examination – in mind. The Inspector will be focusing on whether any proposed change is sound, and one key consideration for her/him will be whether there is evidence to back it up. So if you do suggest new issues or solutions please remember that we need to be confident we can robustly and justifiably support them at Examination.

Part 2: Topic Papers

1. [Responding to the Climate Crisis](#)
2. [Accessibility of New Housing Development](#)
3. [Biodiversity](#)
4. [Design](#)
5. [Economy and Employment](#)
6. [Green Infrastructure](#)
7. [Health, Social and Cultural Wellbeing](#)
8. [Historic Environment](#)
9. [Housing Affordability](#)
10. [Housing Need, Requirement, Land Supply and Delivery](#)
11. [Infrastructure](#)
12. [Landscape](#)
13. [Natural Capital and Ecosystem Services](#)
14. [Neighbourhood Development Plans](#)
15. [Retail and Town Centres](#)
16. [Sustainable Tourism](#)
17. [Sustainable Transport and Air Quality](#)
18. [Water Quality, Water Resources and Flooding](#)

Part 3: How to participate

- 3.1 Each Topic Paper has a series of questions. You aren't restricted to answering the questions and can raise other relevant issues if you want to. Please take a little time to read through the paper(s) you're interested in before you respond – some of the questions you have may be answered in the text.
- 3.2 Public consultation on this stage, more formally known as the Regulation 18 stage, normally lasts a period of six weeks. Comments received during the consultation are considered and used to inform the next stage of plan preparation.
- 3.3 For further information about Local Plan consultation and next steps the [Statement of Community Involvement](#) (SCI) outlines how you can get involved.
- 3.4 **This round of consultation and participation will end at close of business on XX XX 2021.** Please ensure your representations are with us by then. Unless there are exceptional circumstances we will not accept late representations because this will affect the overall timetable for the Local Plan update and is unfair on those who've adhered to the deadline.

Part 4: Glossary of technical terms/abbreviations

[To follow]

Part 5: Contacts

- 5.1 Hard copies of the documents are available to view at all district libraries as well as the council offices at Trinity Road, Cirencester and the Moreton in Marsh office. Hard copies can be obtained on request by contacting the Council's customer services team on 01285 623000 or email customer.services@cotswold.gov.uk. Please note charges may apply.

Forward Planning Team
Cotswold District Council
Local.plan@cotswold.gov.uk

- 5.2 Any individual or organisation may request to be added to the Local Plan consultee database by contacting Local.Plan@cotswold.gov.uk or telephoning 01285 623000.

Topic Paper: Responding to the Climate Crisis

1.0 Introduction

1.1 National policy makes clear that *“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions [...] and support renewable and low carbon energy and associated infrastructure”*.

1.2 Reflecting these concerns and in taking action following its declaration of Climate Change and Ecological Emergencies, [Cotswold District Council’s Corporate Plan](#) includes objectives to:

- review its local plan to make it ‘green to the core’ - *develop an updated local plan that delivers our corporate priorities and promotes both carbon neutral development and infrastructure,[...] including new climate crisis policies and standards that contribute to a carbon neutral society*
- achieve a reduction in carbon emissions for the district
- increase renewable energy generation within the district
- take a leadership role on the ecological emergency and nature recovery in the Cotswolds

1.3 Objective 6 of the adopted [Cotswold District Local Plan](#) aims to reduce the environmental impact of development and vulnerability to the impacts of climate change by:

a. Maximising water and energy efficiency, promoting the use of renewable energy sources and sustainable construction methods, and reducing pollution and waste.

b. Supporting the principle of waste minimisation.

c. Locating development away from areas identified as being at high risk from any form of flooding or from areas where development would increase flood risk to others.

1.4 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)

2.0 The Issues

2.1 Objective 6 of the adopted Local Plan goes some of the way to meeting the Climate Change emergency from a planning perspective. But it is essentially reactive rather than proactive. Its context is one of reducing the environmental impact of development and its vulnerability to the effects of climate change rather than taking positive steps to tackle the emergency through, for instance, promoting the development of stand-alone renewable energy generation. The objective therefore needs to be revised. Options are suggested at Part 3 below.

- 2.2 Coupled with the revised objective, while the current Local Plan has a range of policies that clearly relate to climate change (INF7 Green Infrastructure and the water-related policies EN14, EN15 and INF8, for instance) it lacks a strategic policy that pulls the various threads together to present an integrated approach. Options for a strategic policy also are suggested in Section 3.
- 2.3 Paragraph 155 of the NPPG says that *to help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources*. The plan should also consider identifying suitable areas for renewable and low carbon energy sources. Policy INF10 does not set out a “positive strategy” and the Local Plan does not identify suitable areas for renewable energy development. Options in this respect are likewise set out in Section 3.
- 2.4 Setting the shortcomings of the adopted Local Plan to one side, the issues fall broadly into two interrelated categories.
- 2.5 The principal focus is on **climate change mitigation** – that is, measures that contribute to slowing, peaking and then reversing the emission of ‘greenhouse gases’ to the atmosphere, to minimise further climate destabilisation. Mitigation measures can be divided into:
- reducing and ultimately ceasing the emission of greenhouse gases – that is, principally, carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O) - from activities in the district, including activity such as consuming mains electricity where the source of CO₂ emissions lies outside the district; and
 - increasing the rate of removal of CO₂ from the atmosphere – that is, sequestering atmospheric carbon into carbon ‘sinks’ usually in the form of biomass and soil carbon.
- 2.6 The secondary focus is on **climate change impacts and adaptation** – that is, understanding the present and likely future impacts on the district caused by unavoidable climate destabilisation – for example heat, drought, flooding, and building heave/subsidence – and planning the measures that need to be taken to adapt to, and mitigate the risks of, those impacts.

Mitigation

Electricity generation (see section 5.1 of the Topic Paper)

- 2.7 At present, most electricity consumed in the district is generated elsewhere in the country, or in the EU and imported through interconnectors. Currently electricity consumption in the district is responsible for around 16% of total carbon emissions (most of the rest coming from burning fossil fuels in the form of vehicle fuel and gas and oil for heating buildings). The electricity challenge is made much greater by the need to dramatically increase electricity consumption by shifting road transport and heating for homes and larger buildings away from fossil fuels to electricity.

- 2.8 The National Grid Future Energy Scenarios report³ states the need for the UK to add at least 3GW of wind and 1.4GW solar each year between 2020 and 2050 (executive summary, key message 3).
- 2.9 For Cotswold District, using the National Grid Future Energy Scenario “Consumer Transformation” suggests a growth in electricity demand (domestic and non-domestic combined) from about 430GWh to over 815GWh.
- 2.10 A large amount of the necessary change to the UK’s electricity generation will have no impact on Cotswold District – for example the huge increase in offshore wind that the sixth carbon budget’s ‘balanced pathway’ calls for. Nonetheless certain aspects of the electricity transformation will need to be accommodated within the district. The most (technically) viable forms of renewable energy generation in the district are wind, solar and biomass.

Displacing fossil fuel consumption for heating (see Section 5.2 of the Topic Paper)

- 2.11 Cotswold District’s total gas consumption (2019)⁴ was 402GWh (domestic) and 149GWh (non-domestic). Over 54% of Cotswold District properties are not served by mains gas⁵. The District’s domestic consumption of heating oil (2018)⁶ was about 120GWh (about 30% of the energy consumed in the form of gas – reflecting the large number of off-gas properties), and commercial consumption was about 227GWh (higher than the consumption of gas).
- 2.12 To reach net zero carbon emissions, the District must reduce fossil fuel consumption to zero. The options for achieving this in buildings (for both space heating and water heating) are, broadly, to:
- replace gas and oil with direct electric heating (e.g. immersion heaters and electric boilers) – using electricity in this way is more or less 100% efficient, but presently extremely expensive;
 - replace gas and oil with electric-driven heat pumps (typically air source and ground source) – using electricity in this way is, in a well designed and operated system, around 300% efficient, meaning each kWh of electricity consumed will deliver around 3kWh of heat;
 - substitute natural (fossil) gas with methane derived from biological sources, such as anaerobic digestion of farm, industrial and domestic wastes;
 - substitute natural gas with an alternative gas such as hydrogen, generated from renewable electricity; and
 - substitute heating oil, in principle and to only a very limited extent, with so-called synthetic bio-oils – that is, liquid fuels derived from biological sources such as waste wood. It is very unlikely that this will be a cost effective way to heat premises in the future.

³ <https://www.nationalgrideso.com/document/173821/download>

⁴ <https://www.gov.uk/government/statistical-data-sets/gas-sales-and-numbers-of-customers-by-region-and-local-authority>

⁵ <https://www.nongasmap.org.uk/>

⁶ <https://www.gov.uk/government/statistics/sub-national-residual-fuel-consumption-2005-to-2018>

- 2.13 With an assumed coefficient of performance (CoP) of 3, replacing the District's current gas and oil demand for heating (that is, around 900GWh) would require additional electricity supply of around 300GWh/year. This would be subsumed within the overall growth of electricity demand described earlier.

Adaptation

- 2.14 UK Climate Projections (UKCP) is a continuous programme of work led by the Met Office Hadley Centre, which aims to give some foresight of the likely effects of climate destabilisation on the UK's weather, at local scale. Having regard to the most recent published update (July 2021) the matters of concern nationally and for the district are increases in flooding, heatwaves, drought and wildfires.

Flooding

- 2.15 Pluvial and fluvial flood events are likely to become more common. There can be no certainty over the severity of events, but it is likely that rainfall intensity may increase.
- 2.16 It may be appropriate to require developers to design surface water runoff, permeable surfaces, water attenuation etc, using assumptions of much higher intensity and more sustained rainfall events than are currently accounted for. Soakaway design for rainwater runoff from individual dwellings may need to assume a much higher rainfall volume than is currently the case.
- 2.17 In respect of the assessment of flood risk and suitability for development, in order to guard against future destruction of property and economic value, it may be necessary for the existing Environment Agency flood risk assessments to be updated to show flood risks re-calibrated to the kind of extreme rainfall events that will be more likely in the future.
- 2.18 The existing Local Plan policies regarding flooding are considered to be fit for purpose and sound. The principal evidence base in relation to flood risk - the Strategic Flood Risk Assessment (SFRA) Parts 1 and 2 - is in the process of being updated by specialist consultants and the Environment Agency is engaged in the process. If any amendments to policy are required as a result of the updated SFRA they will of course be made.

Heat Stress

- 2.19 Heatwaves are set to become more commonplace, with health risks to many. From the perspective of minimising excess energy consumption, passive measures (e.g. insulation, reducing solar gain, nighttime purging etc) should be pursued before air conditioning. Installation of air conditioning units may require planning permission. In respect of new-build, some design adaptations may affect the external appearance of new buildings, and design policies will need to accommodate this. Public areas of new developments - green infrastructure - may require features to reduce temperature at ground level such as tree planting.

Wildfire

- 2.20 Large forest, woodland and heathland fires are still relatively rare in the UK, but sustained drought, high temperatures, low humidity and high wind are likely to increase the risk in

future. It will be important to bear this risk in mind when planning how close new build dwellings should be to existing or newly planted woodland.

Drought

- 2.21 Climate change will increase the likelihood of less rainfall in summer months, which may lead to drought conditions. For new build developments it may be appropriate for planning conditions to impose stricter water efficiency requirements than are currently embodied by requirement G2 (water efficiency) of building regulations part G.
- 2.22 Sustained low rainfall or drought conditions may lead to heave and shrinkage of clay rich soils in a limited part of the District, which has the potential to lead to damage to the foundations and structure of buildings.

3.0 The Options

Option 1 - Do nothing

- 3.1 This is always an option in any situation. It is unacceptable here not least because if the plan fails to bring forward a positive strategy for Renewable Energy as required by the NPPF it risks being found unsound at Examination.

Option 2 - take forward a suite of amendments to meet the issues and challenges set out at Section 2

The current Local Plan

- 3.2 Revised objectives for the updated Local Plan could include:
- compliance with the requirements of the NPPF (paragraphs 148 – 169) in respect of addressing the challenge of climate change, flooding and coastal change.
 - conformity with the guidance set out in the National Planning Practice Guidance on climate change⁷ to ensure the update to the local plan is sound.
 - reflect the objectives and intent of the Council's existing declarations, policies, strategies and plans regarding the climate and ecological emergencies.
 - conformity with the requirements of the Climate Change Act 2008⁸ and more recent government policies and strategies.
 - in setting policy, to draw on and be consistent with official research, guidance and recommendations given to Government by the Climate Change Committee⁹.
 - creation of a policy foundation for district-wide mitigation and adaptation actions to be implemented at a scale and pace that is:

⁷ <https://www.gov.uk/guidance/climate-change>

⁸ Primarily, by interpreting in a logical and defensible way how the requirements of the Act relates to the District, showing how the District may contribute proportionally to the national achievement of net zero carbon emissions by 2050 at the latest

⁹ The independent advisory body established under the Climate Change Act 2008

a) commensurate with the gravity of the climate and ecological crises, and consistent with the goal of limiting global heating to not more than 2.0°C, and striving for not more than 1.5°C, above pre-industrial levels, as embodied in the Paris Agreement; and

b) consistent with the 6th carbon budget, adopted by government in April 2021¹⁰.

3.3 A new strategic Local Plan policy could be based on the concept of the “tilted balance”. That is, the application of any and all of the Local Plan policies in decision taking should have an inherent bias towards ensuring that issues relating to the climate change and ecological emergencies are appropriately addressed, having regard to the scale and nature of the proposal. Climate change mitigation and adaptation are therefore inescapable considerations running through the entire Local Plan, making it “green to the core”.

3.4 The updated Local Plan should enact the land-use recommendation of the forthcoming Renewable Energy Strategy, identifying land suitable to deliver the generation capacity indicated. The Renewable Energy Strategy will be publicly consulted upon concurrently with consultation on the Local Plan update.

Mitigation: electricity

3.5 In respect of Local Plan policy, several approaches are possible in defining a target for, or acceptable level of, renewable electricity generation:

- Defining a target by scaling the required national growth in onshore renewable generation to the level of the District on the basis of land area, population, GVA or other agreed appropriate metric;
- Defining an acceptable level of generation through an objective assessment of the realistic technical potential for renewable electricity generation in the District, based on technical resource availability suitably scaled back by landscape and other relevant constraints; and
- Defining a target based on the projected future electricity demand in the district – which could be scaled up by an ambition for the district to be a ‘net exporter’ of energy, or scaled back by a concern that the protected landscape characteristic of much of the district limits the district’s capacity for new renewable generation, compared to equivalent rural districts without such sensitive landscape classification.

3.6 Regarding storage, distribution and use of electricity, policy objectives could be:

- To encourage and facilitate the installation of such electricity infrastructure (relating to, for example, distribution, storage, demand side management) that is necessary to enable the transformation to a zero carbon electricity sector, accepting a level of local disruption that is commensurate with the urgency and importance of the objective.

3.7 Regarding planning requirements for new developments, policy objectives could be:

¹⁰ Principally, for Cotswold District to contribute fully to following the recommended pathway of a 78% reduction in UK territorial emissions between 1990 and 2035

- To require new individual dwellings or larger developments to incorporate on-site renewable energy generation (principally solar), with annual energy generation equivalent to the building's total annual energy use¹¹.
- (If on-site renewable energy generation is technically or otherwise not possible), to require new individual dwellings or larger developments to invest in equivalent renewable generation equivalent to the building's total annual energy use at an off-site location (a so-called 'allowable solutions' policy).

3.8 Regarding planning requirements for stand-alone renewable energy generation, policy objectives could be:

- (Recognising the potential for renewable energy investment to create tangible value to 'host' communities), to particularly support renewable energy generation proposals that are led by, or meet the needs of, local communities. This could mean developments that are conceived and/or promoted within the community within which the development will be undertaken, and provide long term and inclusive socio-economic and/or environmental benefits which are accessible to all members of the community.^{12 and 13}
- In order to maximise the local economic and carbon value of renewable energy generation), to particularly support proposals that are co-located with energy users, and those that demonstrate innovation.
- Recognising the need for renewable energy generation to enhance and improve ecological quality, to particularly support proposals that can demonstrate not merely minimum harm, but produce biodiversity net gain, carbon sequestration, or other local ecological benefits.

Mitigation: displacing fossil fuel consumption for heating

3.9 Recognising that the UK's housing has poor energy performance, and that 80% of the dwellings that will exist in 2050 have already been built today, where the alteration or extension of an existing building is subject to planning permission, planning policy in this context could include the following requirements in proportion with the scale of the proposal:

- For existing premises currently heated by fossil fuels: to require / encourage heat pump technology, and facilitate the most rapid possible transition from fossil fuel heating to high efficiency electric heating.
- For existing premises of all types: to encourage and facilitate the installation of measures to reduce heat demand to the maximum practical extent ('deep retrofit'), in order to minimise the capital cost and electricity consumption of replacement heating methods.

¹¹ eg <https://www.leti.london/cedg>

¹² See for example Cornwall Council's Renewable Energy Informal Planning Advice, 2016: <https://www.cornwall.gov.uk/media/3ngmulk1/cornwall-renewable-energy-planning-advice-march-2016.pdf>

¹³ See for example Cornwall Council's Adopted Local Plan, Policy 14 (renewable and low carbon energy): <https://www.cornwall.gov.uk/media/ozhj5k0z/adopted-local-plan-strategic-policies-2016.pdf>

- For existing premises of all types: to encourage and facilitate the installation of on-site renewable energy generation (predominantly solar PV and solar water heating), which will contribute to the maximum practical extent to the heat energy demand of the building.
- 3.10 Recognising the cost effectiveness of building in net zero carbon performance from the start, rather than retrofitting later, and furthermore recognising the necessity for new build to achieve net zero carbon performance at the earliest possible date, planning policy for new buildings could include:
- To require zero combustion of fossil fuels (for either heating or cooking) from the earliest possible date, with heating to be provided predominantly by high efficiency electric means (heat pumps).
 - To require the installation of on-site renewable energy generation whose annual output will be equivalent to at least the building's expected annual total of regulated and unregulated energy demand.
 - To require that all new buildings are net zero carbon in both construction and operation, using suitable definitions such as those provided by the UK Green Building Council¹⁴ or the LETI Net Zero Design Guide¹⁵ (or equivalent).
 - For new experimental technologies capable of displacing fossil fuels for heating: to encourage and accommodate the exploration, research and commercialisation of new technologies and techniques, even when locally disruptive, to reflect the importance of encouraging the rapid evaluation of all potential candidate technologies for decarbonising heat.

Adaptation

- 3.11 The Local Plan already contains robust policies relating to flooding. It is not proposed to amend those in this update. In terms of heat stress, drought and wildfire the suggestions made at Part 2 above regarding, for example, water efficiency, proximity to woodland and design adaptations can all be the subject of amendments to update existing Local Plan policies.

4.0 Questions

Q1: Do you agree with the preferred option(s)?

Q2: We're all going to have to accept significant changes in how we live our lives to adapt to the Climate Change Emergency and to mitigate its effects. Rank these seven key issues in order of difficulty for you (1 being the most challenging) and give brief reasons for your ranking:

- 1) using your car less and walking or cycling more
- 2) heating your home from non-fossil-fuel sources (like an air source heat pump)

¹⁴ <https://ukgbc.s3.eu-west-2.amazonaws.com/wp-content/uploads/2019/04/05150856/Net-Zero-Carbon-Buildings-A-framework-definition.pdf>

¹⁵ <https://www.leti.london/cedg>

- 3) improving the energy performance of your home
- 4) accepting renewable energy close to where you live?
- 5) focus housing away from poorly accessed settlements and the countryside;
- 6) not so many car parking spaces outside your house?
- 7) owning one house?

Are there any other issues that are missing from this list of options? **[RANK QUESTION]**

Q3: Cotswold District aims to be carbon neutral by 2045. To achieve this we need both to use less non-renewable energy and generate much more renewable energy than we do at present. One way of meeting our targets is to put wind turbines in those parts of the district where they'll be most efficient and effective. Although there are key planning criteria that would need to be met, the Cotswolds Area of Outstanding Natural Beauty is an obvious area of search for suitable sites. On a scale of 1 -10 (1 being the most supportive) what's your response to that idea? Please explain why?

Q4: National Policy requires renewable energy and low carbon proposals (in particular wind turbines) to secure community support. What would make you more supportive of a local renewable energy scheme? For example, if schemes directly benefit the local community.

[SCORE QUESTION]

Q5: Would you support a proposition in the Local Plan that required an energy performance improvement of the entire building when it is proposed to extend or refurbish the building (Climate Change Statement)? Please explain why. **[INSERT YES / NO TICK BOX. INSERT**

COMMENT BOX FOR 'PLEASE EXPLAIN WHY' QUESTION]

Q6: Do you support ground mounted solar panels ('solar farms') being much more common in the district?

Q7: Should the Local Plan go above and beyond Building Regulations, which only seek to make development low carbon ready as opposed to Net Zero Carbon? **[INSERT YES / NO**

TICK BOX. INSERT COMMENT BOX FOR 'PLEASE EXPLAIN WHY' QUESTION]

Would you support zero carbon housing if it also meant homes had a less traditional design?

Q8: On a scale of 1 (= I don't want to see any change at all to the district) through to 10 (= I'm happy to accommodate any change necessary, no matter how large) how ready do you feel to accept changes to the 'look and feel' of the district in response to the imperative of climate change? Please explain why. **[SCORE QUESTION + INSERT COMMENT BOX FOR**

'PLEASE EXPLAIN WHY' QUESTION]

Q9: Should a strategic policy be added to the Local Plan requiring all development to respond positively to the climate change emergency and to the ecological emergency? The policy would set out compliance criteria and be a 'green thread' running through the entire Local Plan. It would give proportionate additional weight to these considerations when determining planning applications. **[INSERT SLIDER GAME ABOUT HOW FAR PEOPLE ARE**

WILLING TO COMPROMISE TO ACHIEVE NET ZERO - TO BE PROVIDED BY CHRIS CROOKALL-FALLON]

Q10: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Accessibility of New Housing Development

1.0 Introduction

- 1.1 This topic paper seeks to provide greater definition and clarity to the adopted Local Plan objective to “Locat(e) most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.” The aim is to develop a set of accessibility metrics, with reference to objective measures, that can be used to guide the location of new development – and potentially highlight the need for new services or better access to existing ones – to minimise dependency on private vehicles.
- 1.2 We are doing this to achieve local and national government targets to reduce carbon emissions and to deliver on our corporate promises to make our local plan “green to the core”, help residents and businesses maintain good health and wellbeing and support businesses to grow in a green, sustainable manner.
- 1.3 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: **[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE]**

2.0 The issues

- 2.1 The UK Government has signed up to a commitment to cut total carbon emissions by 78% by 2035 and 100% by 2050 to try to prevent catastrophic climate change. Cotswold District Council has set its own target to cut carbon emissions to net zero by 2045.
- 2.2 Most economic/industry sectors in the UK have made good progress in cutting carbon emissions over the last 30 years. Unfortunately, this is not the case with transport, where domestic emissions have barely reduced and remain well above the levels required to meet our commitments. Evidence from past research tells us that people are more likely to walk, cycle or use public transport when the places they need to go regularly can be reached quickly and conveniently from their homes without using a car. Thus, we recognise that where we locate new housing developments has a strong bearing on the transport choices residents make.
- 2.3 Other options to support people to reduce car dependency are covered in more detail in the Transport and Air Quality topic paper. The Responding to the Climate Crisis topic paper provides more detail on the climate change science and targets that are driving the need for these changes.

3.0 The options

- 3.1 The adopted Local Plan already contains objectives to reduce car use by:
 - a. Locating most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.
 - b. Supporting improvements in public transport, walking/cycling networks.
- 3.2 It also contains some policies, e.g. D1, D2 and INF3 to deliver these objectives. So the process set out below is intended to provide definition to the existing policies, and to extend them as necessary where evidence, policy or strategy regarding

decarbonising transport has moved on since the adoption of the Plan. The approach will also inform the decision of which sites should be allocated in the Local Plan.

A New Approach

We propose to assess and score each potential new development site based on how long it would take someone living there to walk or catch the bus to everyday facilities, services, education and employment. If it takes too long, we know that more people are likely to drive instead. The times people are usually willing to travel to different places varies depending on what that place is. For example, people are usually happy to walk further to a secondary school than a primary school. We've based our proposed journey time scores on data from the Department for Transport about how long people in the UK normally travel to such places and compared that with other sources of information about journey time and mode of transport.

Core Services

"Core services" are services and facilities that most people will need to access frequently in their day to day lives. We propose that new housing developments should make sure that people can get to each of these services within a reasonable time by walking and/or using public transport as follows:

Table 1: Core services and journey times

Service	Local Journey time bands (mins by walk/bus)		
	<15 mins	15-30 mins	>30mins
Employment			
Primary school¹⁶			
Secondary school			
GP			
Hospital			
Food store			

For the Core Services, potential development sites that score red for any service are deemed to require improvement (in terms of access, service provision or other mitigating measures) before a site would be considered suitable for allocation in the Local Plan.

Primary and Secondary Services

In addition to the Core Services, we have also used national policies, strategies, metrics and locally available information to identify a set of services and facilities we

¹⁶ Primary school thresholds turn amber again after 30 mins travel time, as children under 8 are provided with free home to school transport if the distance they have to travel is greater than 2 miles (3 miles for children over 8).

have defined as Primary and Secondary Services. Primary Services are not as fundamental to sustaining modern life as the Core Services, but are nonetheless services that most people need to access regularly to maintain good health, wellbeing, community and personal life. Secondary Services are those which many people will wish to access to maintain a good quality of life. They are services people will tend to visit less frequently. They may stay for longer when they do.

Primary Services	Secondary Services
Sports fields Play areas Post offices Banks Pharmacies Nurseries Libraries Community halls Places of Worship	Dentists Allotments Leisure Centres Pubs FE Colleges

Scores for access to Primary and Secondary Services give a broader view of the expected transport sustainability of development sites. Sites that are well connected to a range of local services by foot and public transport are less likely to generate high levels of vehicle traffic as people will be more able to access their regular services without needing a car.

We propose to score Primary Services as follows:

- Score 2 for each service within 15 mins walk/bus time; and
- Score 1 for each service within 15-30 mins walk/bus time.

Secondary services score 1 for each service within 30 mins walk/bus time.

The scores for Primary and Secondary Services indicate where access or service improvements should be sought through development. A site that scores low on access to the majority of the indicator services should seek to provide improvement or mitigation. A site that scores well against a broad range of Primary and Secondary Service indicators may be able to offset less favourable performance in other areas.

4.0 Questions

Q1: Do you think it is appropriate that the Local Plan should prioritise development in areas that have good access to essential services without needing to drive?

Q2: Do you agree that an accessibility test should form part of Policy DS3? Note: Policy DS3 applies to small-scale residential development in Non-Principal Settlements¹⁷.

Q3: Do you think the “Core Services” have been appropriately identified? Is there anything you would remove/add to the list?

Q4: Do you think the Primary and Secondary Services have been appropriately identified? Is there anything you would remove/add to the list? Which services are most important to you in your everyday life?

Q5: Do you think the time bands for Core, Primary and Secondary Services are realistic? Do they reflect how long you would be willing to walk or use the bus to access these services?

Note: the time bands for Core, Primary and Secondary Services are shown in sections 3.1 and 3.2 of this topic paper.

Please use the boxes below to indicate how long you would be willing to walk and/or use public transport to get to the following places:

	Acceptable Journey time by walk + bus							
	N/A. I don't need to access this service	Up to 10 mins	Up to 20 mins	Up to 30 mins	Up to 40 mins	Up to 50 mins	Up to 60 mins	More than 60 mins
Workplace								
Primary School								
Secondary School								
GP								
Hospital								
Food shop								
Town centre								
Sports field								
Play area								

¹⁷ Policy DS3 can be viewed in the adopted Cotswold District Local Plan 2011-2031 at this link: <https://www.cotswold.gov.uk/media/k2kjqv3b/cotswold-district-local-plan-2011-2031-adopted-3-august-2018-web-version.pdf>

Post office								
Banks								
Pharmacies								
Nursery								
Library								
Community hall								
Place of Worship								
Dentist								
Allotment								
Leisure Centre								
Pub								
FE College								

Q6: If we apply these standards to new housing developments, it may mean that we are able to deliver less housing in Cotswold, or that housing development may be more concentrated in fewer locations with good access to facilities and services. Do you think this is appropriate or would another approach be preferable?

What balance of priority would you give to providing sufficient new housing to meet the District's identified housing need vs. making sure new housing is delivered in accessible locations?

[INSERT PRIORITY SLIDER BELOW QUESTION WHEN IT APPEARS IN THE CONSULTATION SYSTEM]

Q7: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Biodiversity

1.0 Introduction

- 1.1 Biodiversity is the variety of life on Earth – the variety of ecosystems or habitats, of species and of the genetic diversity they contain. We value wildlife in its own right but biodiversity also underpins much of the economic and social benefit we gain from nature¹⁸.
- 1.2 The adopted Local Plan contains several policies relating to biodiversity. It seeks to conserve and enhance the natural environment, of which biodiversity is an integral part.
- 1.3 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: **[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE]**

2.0 The Issues

- 2.1 Since the adoption of the Local Plan, several important issues have arisen. National planning policy has been updated and, most notably in respect of biodiversity, there is now a clearer requirement for biodiversity net gain¹⁹. The Government also published the 25 year Environment Plan, which makes recommendations on how biodiversity can be enhanced, including through a Nature Recovery Network. [The Environment Act 2021](#)²⁰ - which is the legislative framework for the 25 year Environment Plan makes biodiversity net gain and nature recovery strategies mandatory. The Act also increases the biodiversity duty of local authorities, by making sure Biodiversity Net Gain is set at a minimum of 10%.
- 2.2 Cotswold District Council declared a [Climate Change Emergency in July 2019 and an Ecological Emergency in July 2020](#)²¹. The Council's Ecological Emergency Action Plan makes various commitments towards improving biodiversity. The Council's Corporate Plan 2020-2024 also commits to making the local plan 'Green to the Core'.
- 2.3 Nature Recovery Network mapping has been undertaken and a Local Nature Recovery Strategy is being produced. There have also been various changes to designations in the District, including the re-notification of the Cotswold Water Park Site of Special Scientific Interest to significantly increase its size and further assessment of the Special Areas of Conservation at North Meadow and Clattinger Farm and Cotswolds Beechwoods. The Covid-19 pandemic has also put pressure on biodiversity, which requires further consideration in the Local Plan.
- 2.4 A Local Plan review found that the policies relating to biodiversity should be partially updated to take consideration of these issues.

¹⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

¹⁹ NPPF (2021) paragraph 174b

²⁰ <https://bills.parliament.uk/bills/2593>

²¹ <https://www.cotswold.gov.uk/environment/climate-action/cotswold-climate-and-ecological-emergencies/>

2.5 The subject of Biodiversity interlinks with several other Local Plan topic papers such as Climate Change, Design, Green Infrastructure and Water.

3.0 The Options

3.1 There are various options available to update the Local Plan in respect of the above issues:

- The Local Plan could require a higher percentage of biodiversity net gain than the 10% minimum that has been mandated by the Environment Act.
- The Local Plan could seek to plug gaps in the Nature Recovery Network through the development of sites and through off-site biodiversity net gains.
- The Local Plan could seek to further protect important wildlife sites from increased pollution from cars, increased recreational pressure, etc., for example, by providing more high quality and accessible open spaces where provision is lacking and delivering modal shift away from private automobiles.
- The Local Plan could incorporate a levy, which requires all new developments to contribute towards biodiversity enhancements where viable.

4.0 Questions

Q1: The Environment Act requires a minimum 10% biodiversity net gain from development proposals. Local Plans can require higher than 10% but this has to be weighed in the balance of delivering other policy objectives. Should developments in Cotswold District achieve more than 10%? Do you think there should be a fixed percentage or should it vary in relation to the size, location or type of development?

Q2: Should the Local Plan limit the percentage of biodiversity net gain that can be delivered off-site (Yes / No)? Should the Local Plan limit how far away from a development site that the biodiversity net gains can be delivered (choices: On-site only; directly adjacent to development; up to 1km; within District; beyond District?)

Q3: Should applications for developments of a certain scale or that are located within a strategically important part of the Nature Recovery Network be required to be accompanied by a Nature Recovery Network plan?

Q4: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Design

1.0 Introduction

- 1.1 The design of development is an important component of the planning process. At a national level the government is promoting the importance of 'beauty' and the need to deliver 'well designed places'²².
- 1.2 The following ten design characteristics contribute towards a well-designed place.



- 1.3 The adopted Local Plan makes various references to design and its importance to the natural built and historic environments (Local Plan objectives 1 and 6). Reference is also made to promoting sustainable construction methods to help mitigate and adapt to climate change.
- 1.4 The Local Plan contains a specific design policy - Policy EN2: *Design of the Built and Natural Environment*. This directs the reader to the Cotswold Design Code located at Appendix D of the Local Plan. The design code helps to ensure that the local context is fully considered when determining planning applications.
- 1.5 National policy is set out in part 12 of the National Planning Policy Framework ([NPPF](#)). National guidance is contained within Planning Practice Guidance ([PPG](#)) and is supplemented by additional guidance contained within the National Design Guide (2019) and the National Model Design Code (2021). The latter provides detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design in the National Design Guide.

²² Planning for the Future (2020) - A government consultation on proposals for reform of the planning system in England <https://www.gov.uk/government/consultations/planning-for-the-future>

- 1.6 Cotswold District Council Corporate Strategy contains a specific action to “Develop design codes that focus on climate change and protect people from overheating risk”.
- 1.7 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: **[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE]**

2.0 The issues

- 2.1 The Cotswold Design Code is the principal local plan policy and source of advice on how to achieve good design in the Cotswolds especially in terms of architectural styles and Green Infrastructure. Since its adoption in Aug 2018 the Code has been used to good effect and it continues to provide a firm basis upon which to determine planning applications. Nevertheless the Sustainability Appraisal scoping document and Local Plan review identified the need to update the Council’s Design policy and code.
- 2.2 A review of Local Plan policies concluded that the following amendments were needed:
- design and building standards will play an increasing vital role in the adaptation and mitigation of the climate emergency;
 - the NPPF directs the Council to provide maximum clarity about design expectations at an early stage, and plans should use visual tools such as design guides and codes;
 - the Local Plan partial update will need to consider more detailed design policies as the NPPF places greater emphasis on place shaping;
 - the Local Plan should consider how the council can provide an effective framework to guide town and parish councils preparing Neighbourhood Plans to draft design codes and guides that provide guidance at a local scale and avoid duplicating district and national level principles.
- 2.3 The Design Code’s aim remains consistent with national policy and with the Council’s corporate aims. However and in general terms, the Local Plan Review raised concerns that design policies are not proactively responding to known issues in a timely manner or sufficiently emphasising the role of the design code in place shaping. The issues are set out in the Topic Paper but examples are:
- reducing the energy consumption and carbon emissions for new buildings and supporting residents to retrofit their traditionally built Cotswold homes to achieve similar standards whilst respecting local character and heritage;
 - creating space for people to walk and cycle more, potentially by reducing space currently devoted to vehicles;
 - responding to the Council’s commitment to promoting healthier homes and neighborhoods;
 - protecting our air, water, landscape and descendants from the impacts of pollution and climate change we will need to explore clean methods of energy generation, such as wind turbines and solar panels; and

- responding to changes in national planning policy and guidance which is emphasising the importance of delivering beauty through the local planning system.
- 2.4 Other Topic Papers relevant to Design are: Historic Environment; Climate Change; Transport / Accessibility; Green Infrastructure; Natural Capital; and Biodiversity

3.0 The options

- 3.1 The issues highlight the interconnectedness of sustainable development and good design - one can not be achieved without the other. The options reflect this synergy and are considered to respond well to identified issues and corporate actions.
- 3.2 Specific policy response could include:
- 1) **Present a new strategic policy** that incorporates the United Nations' 17 Sustainable Development Goals²³. The purpose of the policy would be to emphasise the interconnectedness and interdependence of these issues; and require that all proposals be fully compliant with their requirements;
 - 2) **Present a new Sustainable Development Checklist and Statement** that sets out the standards that applicants are expected to demonstrate their compliance with and require applicants to evidence how proposals meet the standards, respectively;
 - 3) **Richer detail for new site allocations ('S' Policies)**. New site allocations would benefit from greater detail on the design influences, access arrangements and necessary infrastructure within the policy to provide more clarity and expectation to the development management process.
 - 4) **Introduce a new building standards policy** that requires new buildings to be zero carbon, in terms of the construction and life time use.
 - 5) **Partially update the Cotswold Design Code** to improve the visual quality of the guidance, without freightening the guidance with pages of information and avoiding repetition of national guidance; and improve consistency with the National Design Guide's ten characteristics of good places.

Options

Option 1 - do nothing. This is always an option in any situation. In this case it is unacceptable. The Local Plan review has identified that policy amendments together with new policies are required to make the local plan green to the core.

Option 2 - Commit to the five policy responses listed above that collectively deliver zero carbon development within the plan period. The parameters of this option are self-explanatory and respond to the issues considered above.

Option 3 - Commit to the five policy responses listed above but align policies to government policy which promote a slower and longer transition towards zero carbon development.

Preferred option

²³ The United Nations' 17 Sustainable Development Goals <https://sdgs.un.org/goals>

Option 2 is the preferred option.

4.0 Questions – tell us what you think

BINARY QUESTION. Q1: Do you agree with the preferred option and the five suggested policy responses? If not, why? Are there other policy responses? **[INSERT YES / NO TICK BOX. INSERT COMMENT BOX FOR 'PLEASE EXPLAIN WHY' QUESTION]**

BINARY QUESTION. Q2: Would you support a proposition in the Local Plan that required an energy performance improvement of the entire building when it is proposed to extend or refurbish the building (Climate Change Statement)? **[INSERT YES / NO TICK BOX. INSERT COMMENT BOX FOR 'PLEASE EXPLAIN WHY' QUESTION]**

BINARY QUESTION. Q3: Would you support the Council in approving development that takes a modern interpretation of the traditional Cotswold design to achieve zero or low carbon development? **[INSERT YES / NO TICK BOX. INSERT COMMENT BOX FOR 'PLEASE EXPLAIN WHY' QUESTION]**

Q4: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Economy and Employment

1.0 Introduction

1.1 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)

1.2 The [National Planning Policy Framework](#) (NPPF) makes clear the government's requirement that "planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt" and that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."²⁴

1.3 The Council's economic ambitions for Cotswold District reflect this requirement. They are encapsulated in the proposed revisions to Objective 3 of the Local Plan:

a. Support the local economy and enable the creation of more high quality jobs in the District, which help young people to have rewarding careers locally.

b. Encourage the vitality and viability of town and village centres as places for shopping, work, leisure, cultural and community activities, including maintaining Cirencester's key employment and service role.

c. Support sustainable tourism in ways that enable the District to act as a tourist destination which spreads the benefits of tourism throughout the District rather than being concentrated in 'honeypot' areas.

1.4 Some key statistics:

- the local economy is a net importer of labour into the District - 2,000 people (pre-pandemic);
- job density is the highest in the South West;
- productivity is 17% higher than the national average and the highest in the South West;
- 90% of businesses are microbusinesses employing 9 people or fewer - over 5,500 in total; and
- double the national average of people working at home - 13.3% - 7th highest in England (pre-pandemic).

2.0 The issues

2.1 The economy is in the midst of dynamic change. It is important when considering updates to the Local Plan to bear this context in mind. It introduces uncertainty and consequent difficulty in formulation and revision of planning policy. The relevant changes include:

- increased online shopping;

²⁴ NPPF (2021) paragraph 81

- Brexit;
- changes in social and working habits as a result of the Covid-19 pandemic;
- legislative change related to Class E of the Use Classes Order; and
- the impact of climate change adaptation and mitigation.

2.2 Setting aside retail and town centres and Tourism (see separate Topic Papers) the adopted Local Plan has six policies relating to [Economy and Employment](#):

- Employment Development (POLICY EC1)
- Safeguarding Employment Sites (POLICY EC2)
- Proposals for all types of Employment-Generating Uses (POLICY EC3)
- Special Policy Areas (POLICY EC4)
- Rural Diversification (POLICY EC5)
- Conversion of Rural Buildings (POLICY EC6)

2.3 The review of the adopted Local Plan has concluded these policies remain broadly sound although additions and amendments need to be considered to address some of the following issues, questions and opportunities:

- The Local Plan contains a B1 land and floorspace requirement and various references to B1 uses within the policies. It also contains an A1 floorspace requirement. Given the A1 and B1 use classes have been revoked and that changes of use can now take place between uses in the new Class E without needing planning permission, an update to the Local Plan is needed to respond to these issues.
- Despite the planning system still purporting to be “plan-led”, the ability for uses within Class E to change to Class C3 (dwelling houses) as permitted development²⁵ is a significant threat to the safeguarding of existing employment sites (Policy EC2) and to the ability of the council to effectively control commercial development within Class E.
- Relatedly, national policy on retaining employment sites and the market attractiveness of delivering housing in Cotswold mean there is pressure on some employment sites to become housing.
- The housing element of mixed use developments is often built first but the employment is rarely delivered. Viability / lack of demand is often the reason cited for not delivering employment developments. The Local Plan could be updated to condition that employment development must be delivered simultaneously with housing on mixed use schemes.
- *Gloucestershire Economic Needs Assessment identifies substantial need for new employment development in the Cotswold District. There appear to be some challenges delivering this need - rents do not support speculative development and demand has been weaker in smaller and more remote areas. There is also the risk of*

²⁵ There are exemptions including Conservation Areas and Listed Buildings, and the ability to change use is subject to a prior approval process.

allocating employment development in Class E which could subsequently become housing “by the back door”.

- *There is strong demand for industrial/warehousing especially in and around Cirencester. This may well increase when the A417 Missing Link project is completed, reducing journey times between Gloucester and Cirencester and, probably more crucially, between the M5 and M4. The employment land elements of the Steadings development should help to meet this demand.*
- *For many years Cotswold District has seen a high and increasing rate of in-commuting and out-commuting. House prices in the district are such that many people cannot afford to live close to where they work so have to travel - something which is not desirable from a climate change perspective or in attracting new businesses. Flexible working and home working mean that more people can commute less often to work. Home working also means that demand for office space is reduced. It has also created a demand for flexible/serviced offices, not just in larger towns like Cirencester but even in some of our villages.*
- *Climate change represents both a challenge, in how we mitigate its effects and reduce the carbon footprint of businesses, but also an opportunity in terms of how we can make the Cotswold District a centre for green technology businesses.*
- *The pace of technological change - for example, Artificial Intelligence (AI) - is great and we need to ensure that the District is in a position to take advantage of it by ensuring we have the appropriate skills and infrastructure in place, as well as the right premises to attract technology companies. The Applied Digital Skills Centre at Cirencester College, which is currently under construction, is an example of the type of initiative we need to keep pace with technological change.*
- *Key local sectors include agritech/food and drink production/innovation, cyber/digital and environmental technologies. The landscape of the Cotswolds makes it an attractive place for environmentally conscious businesses and the Council is keen to ensure the recovery from the Coronavirus pandemic is a green one.*
- *The Cotswolds brand, with its images of rolling hills and chocolate box villages, is a great asset from a tourism perspective but does not represent the full picture of the District and its business community. The perception that the area is not diverse and does not contain a wide range of leisure facilities (e.g. cinemas and nightclubs) can make it difficult for businesses to attract staff, particularly young people in, for example, the digital and finance sectors. The loss of young people from the area was a key weakness identified by the Gloucestershire Vision 2050 initiative, which noted in 2018 that Gloucestershire suffered a net loss of 400 young people from the County each year.*

2.4 It is important to note that not all these issues can be addressed in an update of the Local Plan. The more long-term and strategic issues (italicised) will be considered when a full review of the Local Plan is undertaken in due course.

3.0 The options

Option 1 - Do nothing. This is always an option in any circumstance, but in this case is unacceptable. For the Local Plan Update to be found sound when it is examined it will at the very least be necessary to amend Policy EC2 so that it accords with the revised Use Classes Order.

Option 2 - revise the extant policies and supporting text solely to ensure they are technically compliant with legislative changes and the revised NPPF.

Option 3 - revise extant policies from a technical viewpoint (Option 2) and amend existing or introduce new policy to:

(a) ensure that the employment element of mixed-use schemes is developed coterminously with the housing element;

(b) introduce a presumption in favour of viable employment development that demonstrably is part of the “green” economy;

(c) identify areas considered to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;

(d) explore the feasibility of using Article 4 Directions to control the ability of Class E development to change to Class C3 (dwelling houses) in specific parts of the district, including safeguarded employment sites that may feature a significant proportion of Class E uses; and

(e) for larger development sites, require that the proposal is accompanied by an Employment and Skills Plan that shows how the development will materially contribute to helping the local economy be more self-sufficient and sustainable.

Preferred option(s)

- 3.1 Option 3 is the preferred option. Legislative change is a significant challenge to the Local Plan’s employment strategy and “greening” the Local Plan requires clear direction in that regard.

4.0 Questions – tell us what you think

Q1: What do you think of the options set out above?

Q2: Working patterns are changing. Is there a need to provide workspaces closer to home? Should we require new housing developments to provide or contribute towards providing flexible workspace in or close to those developments? Do you agree new houses should provide spaces and infrastructure for home working? Could existing community buildings like village halls have a role to play in this?

Q3: Do you support the use of legal requirements to ensure the delivery of employment development on mixed-use schemes at the same time as the housing element? If not, why?

[TICK BOX: (YES / NO). ADD COMMENT BOX BELOW]

Q4: How else can we use local planning policy to support green business activity and the local economy? Do you have any specific ideas on how we deliver the LEP's draft Local Industrial Strategy?

Q5: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Green Infrastructure

1.0 Introduction

- 1.1 Green Infrastructure (GI) is defined as “A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity”
- 1.2 National policy requires local plans to have a GI strategy and make provision for GI²⁶. It recognises the importance of GI in achieving healthy, inclusive and safe places²⁷. It also recognises the important function GI has in tackling climate change²⁸, as well as conserving and enhancing the natural environment where a strategic approach to maintaining and enhancing networks of habitats and GI is required²⁹. National policy also recognises the role GI can play in improving air quality³⁰.
- 1.3 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)

2.0 The Issues

- 2.1 The adopted Local Plan contains contains various policies that directly or indirectly relate to GI³¹. A review of Local Plan found that some policies relating to GI would benefit from being updated to reflect the revised National Planning Policy Framework (NPPF), commitments on GI in the government’s 25 year Environment Plan and the [Environment Act 2021](#)³². An update to Natural England’s open space standards is also expected soon, so there is an opportunity to align the Local Plan’s GI policies with them.
- 2.2 Cotswold District Council’s Corporate Strategy (2020-2024) seeks to make the Local Plan ‘Green to the Core’, respond to the climate crisis, improve health and wellbeing and enable a vibrant economy. Additionally, the Council has declared a Climate Change Emergency and an Ecologic Emergency. The Ecological Emergency includes a commitment to produce a GI strategy, which has now been completed. The local

²⁶ NPPF (2021) paragraph 20

²⁷ NPPF (2021) paragraph 92c

²⁸ NPPF (2021) paragraph 154a

²⁹ NPPF (2021) paragraph 175

³⁰ NPPF (2021) paragraph 186

³¹ For example, Policy INF4: Social and Community Infrastructure; Policy INF7: Green Infrastructure; and Policy INF8: Water Management Infrastructure

³² <https://bills.parliament.uk/bills/2593>

plan should help deliver the actions and aspirations within the GI strategy. The Council has also committed to using the Building with Nature Standard to a greater extent than it does at present.

- 2.3 The Covid-19 pandemic has also put pressure on Green Infrastructure. The increase in people accessing the countryside has created new challenges, including management of sites, litter, more wear on footpaths, etc.
- 2.4 GI interlinks with several other Local Plan topic papers such as Climate Change; Design; Health, Social and Cultural Wellbeing; Transport; and Water.

3.0 The Options

- 3.1 **Option 1** - Do nothing. Always an option in any situation, but unacceptable here. The Local Plan needs to accord with national policy. GI is an important component in making the updated Local Plan “green to the core”. The actions set out in Option 2 are all necessary.
- 3.2 **Option 2** - Update the Local Plan to reflect:
- Cotswold District Council’s Climate Change Emergency and Ecological Emergency declarations and the Council’s Corporate Plan;
 - Cotswold District Council’s Green Infrastructure Strategy;
 - the updated national planning policy and guidance;
 - the Building with Nature Benchmark/Standard;
 - the 25 year Environment Plan and the Environment Act 2021; and
 - Natural England’s revised National Open Space Standards.

4.0 Questions

Q1: The GI Strategy identifies that the District does not have enough access to open spaces at both the local and District-wide level. Do you think sites should be allocated within the local plan for the provision of country parks and further local community parks? Can you suggest any locations for a country park or a local community park?

Q2: In new developments, would you prefer a bigger garden or better access to shared open spaces such as parks, allotments, playgrounds, etc.?

Q3: What GI features are most important to you in new developments and what would deliver the most benefits for people and the environment:

Pick your top three choices from this list:

- Creating new pedestrian and cycle routes or enhancing existing routes. These would be off-road or traffic-free routes and we would try to link settlements

(within and outside the district), e.g. by re-using disused railway lines and canals.

- Features within development sites to reduce flooding, prevent droughts and deliver biodiversity and amenity enhancements.
- Better management of streams and rivers to increase water quality, reduce flood risk and generate renewable energy.
- Creating fully accessible circular walks around towns and villages.
- Securing better long term management and community involvement of new or enhanced GI within all new developments.
- More play opportunities with a particular emphasis on natural play.
- Sufficient provision of allotments in all towns and villages;
- Stopping developments being clogged up with cars parked everywhere.

Q4: Should developments deliver GI that meets the [Building with Nature Standard GI standard](#)³³, or equivalent as a way of ensuring that high quality GI is provided within new developments? Should this apply to all developments or only to developments over a certain scale? And what scale should that be?

Q5: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

³³ The Building with Nature Standard and benchmark supports the delivery of high quality GI at all stages in the development process including policy, design, planning, implementation, construction and long-term management. The Benchmark breaks down GI using the key themes of Wellbeing, Water and Wildlife

Topic Paper: Health, Social and Cultural Wellbeing

1.0 Introduction

- 1.1 Health, social and cultural and wellbeing are complex and wide-ranging issues - they span practically every Local Plan policy and extend well beyond the influence of town planning. Cotswold District generally has good health, social and cultural wellbeing compared to much of the UK. However, the District has particular issues that need to be addressed and planned for.
- 1.2 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)

2.0 The Issues

- 2.1 Cotswold has an aging population. Social isolation and loneliness are growing concerns and 16.1% of the District's residents have a long-term health problem or disability³⁴.
- 2.2 Food bank usage in the Cirencester food bank area³⁵ grew by 131% between 2018 and 2021. There is also an upward trend in obesity and mental health problems across the District.
- 2.3 The quality of housing is also linked to health. The District has some overcrowded housing and there is also a large number of poorly heated and / or insulated properties. Solving this problem would help the 9% of the District's households who live in 'fuel poverty'³⁶, whilst also taking action against climate change.
- 2.4 Health can also be improved through active travel. However, the district currently has a high reliance on private automobiles. The rural nature of the district means that many of the District's communities have limited access to essential services and / or active travel options. However, a balance has to be struck, as housing is sometimes needed in less accessible locations to sustain existing services and to enable people, particularly younger people, to live in the area they have strong connections to.
- 2.5 Since the adoption of the Local Plan, Covid-19 has shone a spotlight on health, social and cultural wellbeing inequalities and the Council has declared a climate change emergency. It is therefore right to revisit the Local Plan on these issues to understand whether the balance has shifted between providing housing in rural areas or providing housing in locations with better access to services and active travel options.

3.0 The Options

³⁴ 2011 Census

³⁵ Cirencester with Tetbury and Fairford

³⁶ Department for Energy and Climate Change (2016)

- 3.1 National policy and guidance recognise the importance of health, social and cultural and wellbeing and the role that planning policies can play to make improvements. Cotswold District Council's Corporate Plan³⁷ also seeks to encourage resilient, well-connected and active communities that take responsibility for their own health and wellbeing goals.
- 3.2 The Local Plan already supports health, social and cultural wellbeing in various ways, but there are opportunities to do more. For example:
- The Local Plan could require all new housing to be zero carbon to overcome fuel poverty issues and enabling more people to live in warm and healthier homes (as explained further in the Climate Change topic paper).
 - The Local Plan objectives can be expanded to ensure that new developments and sites support positive health outcomes and the delivery of local strategies³⁸ that seek to improve health, social and cultural wellbeing and inequalities, as well as only permitting developments with limited access to services in exceptional circumstances and delivering more active and sustainable forms of travel.
 - The Local Plan³⁹ could (i) incorporate the updated needs for different types of housing for older people resulting from the Gloucestershire Local Housing Needs Assessment and the Gloucestershire Older People Care Home Strategy; and (ii) include a requirement for types of accessible and adaptable housing, as identified in the Gloucestershire Local Housing Needs Assessment.
 - The Cotswold Infrastructure Delivery Plan and Policies SA1-SA3 and INF1 could be updated to reflect the need for additional health care facilities and asset-based/place-based community development, such as the development of designated community spaces (indoor and outdoor) and funding to facilitate 'Community Building' in new developments.
 - The local plan could require new developments to contribute towards improving peoples' access to good food (e.g. the incorporation of allotments and community kitchens into developments).
 - The Cotswold Design Code could be updated to take further consideration of 'Inclusive Design' principles contained within the PPG on Housing for Older and Disabled People and RTPI Guide on Dementia. It could also be updated to better create environments that encourage the use of healthy, active travel choices.
 - The Local Plan could align with the new Leisure Strategy to secure improved, more accessible, flexible and inclusive services.
 - Policies DS3 and H3 could be updated to provide further clarity on what is meant by sustainable access to jobs, services and facilities (as explained further in the Transport topic paper).

³⁷ <https://www.cotswold.gov.uk/media/rldwcmb/corporate-strategy-2020.pdf>

³⁸ e.g. [Gloucestershire Joint Health and Wellbeing Strategy \(2020 to 2030\)](#)

³⁹ This refers to Local Plan Policy H4

- The Green Infrastructure policy could be updated to better enable people to live more active lifestyles with improved mental health with improved access to better food (as explained further in the Green Infrastructure topic paper).
- The Sustainable Transport policy could be updated to help deliver more active transport options, which will benefit peoples' physical and mental health (as explained further in the Transport topic paper).

4.0 Questions

Q1: Are the proposed policy changes justified within the Local Plan partial update? Please explain why.

Q2: Are there any additional policy changes that could help to improve health, social and cultural wellbeing and inequalities in Cotswold District?

Q3: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Historic Environment

1.0 Introduction

- 1.1 The historic environment of Cotswold District is of national significance and is one of its key assets. The adopted Local Plan's objectives in this respect are to:
- a. Conserve and enhance the high quality, local distinctiveness and diversity of the natural and historic environment; and
 - b. Ensure that new development is of high quality and sustainable design, which reflects local character and distinctiveness, is appropriately sited, and provides attractive and inclusive environments
- 1.2 [Local Plan chapter 10](#) "Built, Natural and Historic Environment" contains seven policies relating specifically to the historic environment.
- 1.3 National policy is set out in part 16 of the National Planning Policy Framework ([NPPF](#)). National guidance is contained within Planning Practice Guidance ([PPG](#)).
- 1.4 [Cotswold District Council Corporate Strategy](#) has no aims or actions relating specifically to the historic environment.
- 1.5 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)

2.0 The issues

- 2.1 A review of Local Plan policies concluded that the following relatively minor amendments were needed in respect of two of the policies:
- Policy EN12 Historic Environment: Non-designated Heritage Assets
- 2.2 The policy states that "*Proposals for demolition or total loss of a non-designated heritage asset will be subject to a balanced assessment ...*". NPPF (para 203) states that: "*... a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*".
- Policy EN13 Historic Environment: The Conversion of Non-Domestic Historic Buildings
- 2.3 The phrase '*proportionate to the significance of the asset*' does not accord with NPPF para 202 in respect of less than substantial harm to designated heritage assets and the need to weigh impact against public benefits.
- 2.4 The review also noted that having regard to the Climate Change and Ecological Emergencies declared by the council, the following issues need to be incorporated into a new policy:
- when changes are made to heritage assets, the potential impacts of climate change, e.g. increased storm events with higher rainfall, should be fully considered

- when retrofitting heritage assets to increase energy efficiency, including insulation and energy generation, the full implications of those changes should be considered, using a "whole-building" approach. The choice of energy efficiency measures should be guided to ensure that measures that both maximise energy efficiency and minimise any potential impacts on the significance of the heritage asset are prioritised.

2.5 The Sustainability Appraisal (SA) Scoping Report says that the key sustainability issues for this topic area include:

- ensuring that heritage assets are managed and maintained appropriately;
- managing change which protects and enhances the historic environment for future generations while meeting the needs of current occupiers and users, for example the move from retail uses;
- using the historic environment as an "inspiration" for the design of new developments;
- the need to consider the impacts of climate change on the historic environment;
- the impact of the proposed change affecting Use Class E - allowing change to Class C3 (dwelling houses) as permitted development - although it should be noted that listed buildings and buildings within Scheduled Monuments are not affected by this change.

2.6 Paragraph 185 of the NPPF requires the council to set out in its plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

2.7 Historic England has issued guidance relating to the historic environment in local plans The guidance includes advice relating to the preparation of the strategy referred to in the NPPF.

2.8 The requirements of NPPF paragraph 185 and the Historic England (HE) guidance are fairly clear. Although it refers in several places to the Council's "Historic Environment Strategy", the Local Plan does not set out a "positive strategy" in the form recommended by the HE guidance.

2.9 Other Topic Papers relevant to the historic environment are:

- Design/Built Environment
- Climate Change

3.0 The Options

3.1 As noted above, the policy amendments recommended by the review of the Local Plan together with the recommendation that a new policy is prepared in response to the Climate Change Emergency are relatively modest and do not raise any significant issues.

3.2 In respect of the NPPF requirement that the Plan sets out a positive strategy for the historic environment, several points are worth noting:

- 3.3 Firstly, the existing CDC HE Strategy pre-dates the Historic England guidance. At the time the CDC HE Strategy was being prepared there was no clear guidance on what “a positive strategy for the conservation and enjoyment of the historic environment” actually entailed. Although it would be unfair to label the CDC HE Strategy as “wrong” within the context of its preparation, subsequently issued guidance has placed a different emphasis and interpretation on the NPPF requirement.
- 3.4 Secondly, it is important to bear in mind that when the current Local Plan was examined in 2017/2018 its approach to the Historic Environment was not found to be unsound. There has been no change in relevant national planning policy in the intervening period.
- 3.5 Thirdly, the task at hand is to update the Local Plan to bring it into line with key changes in national policy and to take account of other significant planning considerations affecting the Plan since its adoption in 2018. While it is acknowledged that the adopted Local Plan does not set out a “positive strategy” precisely as envisaged in the HE guidance, it is also the case that to integrate such an approach into the Local Plan would entail its deconstruction and rebuilding to ensure that a strategy of that nature was properly embedded. It is not something that can simply be “bolted on”.
- 3.6 Having regard to these considerations and to the need to acquire the necessary supporting evidence - for which there is no allocated budget - it is considered that this is a matter for a subsequent full review of the Local Plan rather than this partial update.

4.0 Options

Option 1 - do nothing.

This is always an option in any situation. In this case it is unacceptable. The Local Plan review has identified that policy amendments together with a new policy are needed.

Option 2 -

- i. Commit to preparing a “positive strategy” for inclusion in the next full review of the Local Plan;
- ii. Update the existing Plan policies having regard to the Local Plan Review; and
- iii. Prepare new policy to address the safeguarding of heritage assets while mitigating and adapting to the Climate Change Emergency.

The parameters of this option are self-explanatory and respond to the issues considered above.

Option 3 - together with parameters ii and iii of Option 2, following HE guidance, prepare a “positive strategy” as required by the NPPF.

This option is identical to Option 2 but it commits the council to preparing a “positive strategy” as part of the Local Plan Update. For the reasons set out above, this is not considered to be a viable or appropriate option.

Preferred option(s)

- 4.1 **Option 2** - is the preferred option.

5.0 Questions – tell us what you think

Q1: Do you agree that the preparation of a “Positive Strategy for the Historic Environment” is, for the reasons set out above, better addressed in a full review of the Local Plan rather than in this partial update?

Q2: Like everything else, our historic buildings will be affected as we respond to the Climate Change Emergency. Do you agree with the measures we’re proposing to ensure that our designated buildings are safeguarded as we mitigate and adapt to the effects of climate change? Are there any other measures you think we should consider?

Q3: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Housing Affordability

1.0 Introduction

- 1.1 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)
- 1.2 Cotswold District has an acute housing affordability issue. Many people, particularly younger people, are unable to afford a home close to where they work, grew up or have a close connection to. This means people have to travel further, particularly to get to work. The housing affordability issue is also having a harmful impact on the local economy and the viability of some services.
- 1.3 The district has an aging population and if young people are unable to live here, this issue is exacerbated. The district's average household size is also getting smaller⁴⁰ - larger houses are generally more expensive and they're increasingly not what people need or can afford.

2.0 The Issues

- 2.1 National policy requires Local Plans to provide a strategy to deliver affordable housing, as well as for the size, type and tenure of housing needed for different groups in the community. Affordable housing should be built alongside market housing to create mixed and balanced communities.
- 2.2 National policy also requires Local Plans to protect and enhance the district's nationally designated landscape and its high quality built and natural environment. The district is heavily constrained in all these regards. A balance has to be struck between achieving sustainable development with regard to delivering affordable housing and all the benefits this can bring and the need to protect the district's sensitive environment.
- 2.3 The adopted Local Plan has an affordable housing delivery strategy and the district is over-delivering on its Local Plan affordable housing requirement. However, the long-running trend of worsening housing affordability has continued. As of 2021, Cotswold District is the least affordable place to live in Gloucestershire and is more unaffordable than any of the surrounding local authority areas.
- 2.4 Solving the housing affordability issue is not just a local issue. There is a national housing crisis, which the government acknowledges. However, there are various national policies and issues outside the Council's control that have fuelled house price increases or have made housing affordability worse. For example:
- Wages have not kept pace with house prices;
 - The cost of food, energy and other household bills have increased, leaving less money to afford a suitable home;

⁴⁰Average household size in Cotswold District is 2.28 people per house in 2021 but this is set to decrease to 2.18 by 2041.

- The Right to Buy scheme has extended well-beyond its original purpose and has left a shortage of social-rented housing nationally, but especially so in Cotswold District;
- Not enough social-rented housing has been built in recent years across the country;
- Both low interest rates and the increased ability of people being able to get a mortgage have fuelled an increase in house prices;
- Stamp Duty holidays have effectively given people more money to spend on buying a home and have driven up demand, which in turn has driven up house prices;
- Land banking (i.e. land being used as a financial asset to increase share prices rather than to deliver housing) and developers purposefully 'drip-feeding' new homes into the market to ensure house prices remain high to maximise profits;
- Second home ownership, buy to let and holiday lets have removed housing from the market that could otherwise be made available to those who want to own a home, and the resulting increased demand within a reduced pool of housing stock inflates house prices; and
- The Covid-19 pandemic has put additional pressure on housing markets, particularly in Cotswold District. Increased home working has enabled people to live further afield and commute to work on a less regular basis. The lockdowns highlighted the importance of having a garden or access to high quality open space, as well as a large enough house to live and work in. This has created a so-called 'race for space' with many people vacating urban areas in seeking housing in places like Cotswold District. Covid-19 has led more people to undertake a holiday or weekend break in the UK. Private landlords can typically make as much money from a single week of renting a property for holiday accommodation as they can in a month for conventional housing. This is removing private rented accommodation from the market, which leaves a reduced pool of houses to choose from and increased demand and rental prices.

2.5 Building more and more houses to reduce house prices (or “Build, Build, Build”, as Boris Johnson puts it) does not work, particularly in Cotswold District. There is much evidence to support this. Cotswold District has delivered significantly more housing than has been required in recent years, yet housing affordability has continued to worsen. Cotswold District Council will continue to lobby the government on these issues, as we did in our [response to the Planning for the Future White Paper](#).

2.6 There are, however, things that the Council can do to improve housing affordability. Cotswold District Council’s Corporate Plan (2020-2024) aims to provide more ‘genuinely affordable homes’, with an emphasis on social rented housing and a focus on provision for young people, military veterans and families. Additionally, the Council wants to tackle fuel poverty and climate change by ensuring that all new housing is energy efficient and carbon neutral, which will have long-lasting improvements on being able to afford a home. Enabling people to live close to where they work, grew up or have a close connection to also reduces the need to travel and the costs involved, which again helps people to afford a home.

2.7 Cotswold District Council is actively pursuing a partnership with an affordable housing provider to deliver more affordable housing, particularly social rented housing, and refurbish

or rebuild existing stock. This includes maximising opportunities presented by the Council's own assets, as well as working with partners and developers to maximise opportunities.

3.0 Options

3.1 There are also various Local Plan policy changes that may help to improve housing affordability. The following list is unavoidably technical and does not attempt to provide every solution. However, these are some things the Council could consider doing.

- The Local Plan could allocate more sites over and above the housing requirement to deliver more affordable housing.
- An accessibility to services test could be introduced to open market housing developments in more rural settlements⁴¹. Where the test is failed, development would only be permitted in exceptional circumstances, such as a 100% affordable housing development.
- One of the determining factors in the choice of sites could be the number or type of market or affordable homes that would be delivered⁴².
- Smaller homes are generally more affordable, so a policy requirement could be introduced for a higher proportion of 1, 2 and 3 bedroom market houses, and fewer 4 and 5 bedroom houses.
- The percentage requirement for affordable housing on housing development sites could be increased, although this may affect the delivery of other types of infrastructure. A balanced strategy would be needed.
- Recent national policy changes enable Local Plans to require affordable housing and / or money to deliver affordable homes elsewhere on smaller development sites than is currently required in the adopted Local Plan. The Local Plan could be updated to reflect this.
- There are different types of affordable housing, with social rented housing being the most affordable but also the most expensive to build. The Local Plan specifies how much of each affordable housing type should be provided within a development. This requirement could be adjusted to deliver more or less of a particular type of affordable home.
- A loophole currently exists that enables developers to submit several smaller developments on a larger site, which in isolation do not exceed the affordable housing requirement threshold, but cumulatively would otherwise require affordable housing. This loophole could be closed off.

⁴¹ Those applicable to Local Plan Policy DS3

⁴² Note - the Council is also required to prioritise the reuse of brownfield sites, which would likely provide fewer affordable homes due to viability issues

- The Local Plan policies could be adjusted to enable more affordable housing to be delivered on Rural Exception Sites⁴³ to make more of these opportunities when they arise.
- The Local Plan could allow 100% affordable housing sites, small or large, adjacent to the development boundaries of Principal Settlements, which are currently not allowed, particularly within the Cotswolds Area of Outstanding Natural Beauty.
- The Local Plan could include a policy that restricts second home ownership within new developments.

4.0 Questions – tell us what you think

Q1: Are the suggested policy changes beneficial and deliverable? Please explain why or any alternative solutions that could be used.

Q2: Can you suggest any further policy changes that could maximise the delivery of affordable housing, whilst also achieving sustainable development with regard to issues such as the need to protect the high quality built and natural environment and reduce the need to drive?

Q3: Should the local plan restrict second home ownership in new developments? Should this be all new housing that is built or a proportion of new housing? And how do you think this would benefit or make worse housing affordability in Cotswold District?

Q4: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

⁴³ Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. They seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Topic Paper: Housing Need, Requirement, Land Supply and Delivery

1.0 Introduction

- 1.1 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)
- 1.2 National policy requires local planning authorities to understand and plan for housing needs in their area. It also requires local planning authorities to maintain a deliverable five year housing land supply to provide a continual pipeline of development sites. Furthermore, a 'Housing Delivery Test' must be passed to ensure that the required number of homes is actually delivered.

2.0 The Issues

- 2.1 Cotswold District Council adopted a Local Plan in August 2018, which set the District's housing requirement to be 8,400 dwellings for the Plan period 2011 to 2031 (an average of 420 dwellings a year). The Local Plan also identifies a need for up to 14 pitches for gypsies and travellers, as well as a need for 665 sheltered and extracare housing units (dwellings) and 580 nursing and residential bedspaces. The Plan allocates sites across the district and has further policies to ensure that the housing requirements are fully delivered and a five year housing land supply is continually maintained.
- 2.2 National policy specifies that housing requirements are a minimum, not a maximum. Furthermore, national policy does not allow restrictions on the timing of when sites can be developed. Cotswold District has extremely high demand for housing. These factors led to an extreme peak in housing delivery early in the Local Plan period. 66% of the 8,400 dwelling requirement has already been built in the first 10 years of the plan period. In three consecutive years between 2016 to 2019, annual housing completions reached 755, 910 and 806 dwellings respectively.
- 2.3 To counteract extreme over-delivery, the Local Plan contains a mechanism to ensure that the requirement against which the five year housing land supply and the Housing Delivery Test are measured factors in any over-delivery from earlier in the Local Plan period. As of April 2021, the remaining annual housing requirement for the plan period stood at 282 dwellings. Based on the current housing requirement and Local Plan policies, the remaining supply of housing sites is expected to be more than sufficient to maintain a five year housing land supply and enable the District to continue to pass the Housing Delivery Test. Similarly, the policies for gypsies and travellers and specialist accommodation are also currently on track for delivering the needs identified in the Local Plan.
- 2.4 Despite this, a significant change in circumstance has taken place recently that now requires an update to the Local Plan. Since the adoption of the Local Plan in August 2018, new rules have been introduced to national policy that require housing needs (for new new dwellings) to be reassessed at least once every five years. Furthermore, the calculation of housing need is now provided to all local authority areas by national guidance - so every authority's

requirement is calculated using the same methodology. Cotswold District Council's minimum housing need is 490 dwellings per annum.

- 2.5 There is also new evidence on the specialist accommodation needs of older people, which also assesses the needs of different groups of people. Updated evidence on gypsy, traveller and travelling showpeople accommodation needs has also been commissioned.
- 2.6 At this point, it is worth highlighting the difference between a 'housing need' and a 'housing requirement'.
- The government's standard method calculation of housing need (for new dwellings) is based on household projections, which are adjusted to take account of the affordability of housing in an area. A cap on the housing need is also provided.
 - The housing need is normally used as the basis for calculating the housing requirement (for new dwellings). The housing requirement also takes into consideration whether the number given by the housing need should be increased or decreased to account for other variables, such as providing more affordable housing, environmental constraints, the availability of sites, the impact of large infrastructure projects, whether any unmet needs of neighbouring authorities should be provided for, and so on. Consideration can also be given to whether there is an exceptional circumstance for using an alternative approach to the standard method to calculate the minimum local housing need.
- 2.7 National policy requires that unless the housing requirement is reassessed and adopted within the five year anniversary of the adoption of the Local Plan (i.e. 3 August 2023), the standard method calculation of 490 dwellings per annum should be used as the requirement against which the five year housing land supply and Housing Delivery Test are measured.
- 2.8 There is currently an insufficient housing land supply to deliver 490 dwellings a year between 2023 and 2031. It is currently estimated that this increase would require the allocation of sites capable of delivering around 700 to 900 additional dwellings by 2031. The adopted Local Plan must be updated to ensure that the District continues to maintain a deliverable five year housing land supply and passes the Housing Delivery Test.

3.0 The Options

- 3.1 It is considered that there are two available options to respond to this specific issue and both have their pros and cons:
- i. Revert to standard method housing need calculation as the basis for determining the requirements against which the five year housing land supply and Housing Delivery Test are measured. Allocate additional sites in the Local Plan to maintain a five year housing land supply and pass the Housing Delivery Test.
 - ii. Review and update the Local Plan housing requirement for the remainder of the Local Plan period. Allocate additional sites to maintain a five year housing land supply and pass the Housing Delivery Test. The Council proposed this approach during the Examination of the adopted Local Plan and it was accepted as sound by the Planning Inspector.

- 3.2 Option 1 would be simpler in one respect, as the housing requirement would not need to be re-examined. However, it would not guard the District from the extreme spikes in housing delivery that have occurred in previous years. Unlike the current situation or Option 2, the 490 dwelling per annum minimum housing need would continually be used as the basis for calculating the requirement against which the five year supply and Housing Delivery test are measured. So if the District delivered over 900 dwellings again, this would not reduce the 490 dwelling per annum figure in subsequent years and further land would have to be identified so that the District continues to maintain a five year housing land supply and pass the Housing Delivery Test.
- 3.3 Another concern with Option 1 is that the housing need is directly linked to the standard method calculation, which is provided by national guidance. This is currently based on 2014-household projections, which are widely recognised to be outdated. National guidance can be updated at any time and updates can take immediate effect. So the District could on one day have a comfortable five year supply, but if an updated housing need calculation were to increase the District's housing need the District could overnight suddenly find itself in a position where it does not have a five year housing land supply. Furthermore, given the timescales involved with plan-led development, it would take some time and expense to put the situation right.
- 3.4 A recent government consultation suggested that the District's minimum housing need should increase to 1,209 dwellings. This was subsequently aborted by the government, but it demonstrates the gravity of what could happen.
- 3.5 Option 2 would explore whether various factors should increase or decrease the 490 dwelling annual figure to provide a housing requirement up to 2031. This is more complicated than Option 1 and would require examination in public. However, Option 2 would be less susceptible to change than Option 1. It would fix the housing requirement for five years. It would secure the housing requirement from needing to be updated should the standard method of calculation change.
- 3.6 Option 2 would also enable the district to continue to average out any peaks or troughs in housing delivery over the remainder of the Local Plan period. This would mean there would be more certainty that the Local Plan housing supply would be sufficient to deliver the housing requirement. It would also reduce the risk of needing to update the Local Plan again or permit off-plan development to continue to maintain a five year housing land supply, which would otherwise occur if Option 1 was chosen.
- 3.7 National policy requires strategic policies to look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure⁴⁴. If the housing requirement was reassessed, it is reasonable to ask why the housing requirement should not also look ahead to a 15 year period from adoption. In answer, the Local Plan is being partially updated within a limited scope. It does not seek to extend the plan period beyond 2031, which would require a full Local Plan update. Housing requirements identified in Local Plans now have to be reassessed once every five years. Option 2 would seek to update the housing

⁴⁴ NPPF (2021) paragraph 22

requirement for the next five-year period. Once adopted, a full Local Plan review would likely commence to provide a housing requirement beyond 2031.

- 3.8 For these reasons, Option 2 is considered to be the most appropriate option on the basis that it reduces the risk of oversupply. In a district such as Cotswold where developable land is at a premium, where property prices and the potential profits from development are very high, and because of the environmental sensitivities of the District, there is a compelling need to keep unplanned growth in check and resist the pressure to allow more development than is planned for. The reasons include issues relating to environmental impact, infrastructure capability and the capacity of services to cope.
- 3.9 Both Option 1 and Option 2 require the allocation of additional sites in the Local Plan. The Cotswold District Strategic Housing and Economic Land Availability Assessment Review (2021) (SHELAA) assessed potential development sites and created a shortlist of sites that can be taken forward for further more detailed assessment.
- 3.10 The shortlist of sites is able to deliver the anticipated 700-900 dwelling requirement several times over, so not every site would be allocated for development in the Local Plan Partial Update. Further sites may also be submitted and considered for allocation that have not yet been assessed in the SHELAA.
- 3.11 The Local Plan may need to be updated to accommodate any additional needs of gypsies, travellers and travelling showpeople as a result of recently commissioned evidence. Similarly, the Local Plan policy on specialist accommodation for older people may also need to be updated to reflect more recent evidence, as well as being broadened to factor in the specialist accommodation needs of other groups of people.

4.0 Questions

Q1: Is there an exceptional circumstance for Cotswold District to use an alternative approach to the standard method to calculate the minimum local housing need?⁴⁵

Q2: Do you agree or disagree that Option 2 is the most appropriate option for the District to continue to deliver its housing requirement, maintain a five year housing land supply and pass the Housing Delivery Test? Please explain why.

Q3: The Cotswold District Strategic Housing and Economic Land Availability Assessment Review (2021) identifies a shortlist of potential residential development sites⁴⁶. Do you support the findings? Please explain your answer with reference to any factual inaccuracies or missing information from site assessments that might lead to an alternative conclusion. Please include the reference number of the site(s) your response relates to. **[GEOSPATIAL QUESTION - INCLUDE MAP SHOWING SHELAA 2021 SITES. ENABLE PEOPLE TO DROP PINS]**

⁴⁵ Note, as set out in national guidance, any alternative methodology would need to be demonstrated through robust evidence, be based on realistic assumptions of demographic growth and must not rely on using household projections more recently published than the 2014-based household projections.

⁴⁶ The Cotswold District Strategic Housing and Economic Land Availability Assessment Review (2021) can be accessed at the following links:

<https://www.cotswold.gov.uk/planning-and-building/planning-policy/strategic-housing-and-economic-land-availability-assessment/>
<https://www.cotswold.gov.uk/planning-and-building/planning-policy/evidence-base-and-monitoring/>

WITH COMMENTS ON THE SITES. INCLUDE MANDATORY FIELD WITHIN THE COMMENT BOX THAT REQUIRES RESPONDENTS TO PROVIDE THE SHELAA SITE REFERENCE NUMBER]

Q4: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Infrastructure

1.0 Introduction

- 1.1 Infrastructure is the basic systems and services that a country or organisation uses in order to work effectively⁴⁷. This includes systems such as energy, digital and water supply networks, wastewater treatment, transport, flood defences, education and health and social care. It also includes services such as play areas, open spaces, parks and green spaces, cultural and sports facilities and district heating schemes. National policy also defines wind and solar energy generation and carbon capture and storage installations as infrastructure.
- 1.2 Given the breadth of infrastructure as a topic area, various infrastructure issues are covered in other Local Plan topic papers⁴⁸.
- 1.3 Infrastructure is a fundamental aspect of sustainable development. The adopted Local Plan has policies that list 'critical and essential infrastructure' required to deliver the Local Plan growth strategy. It also contains more general infrastructure policies that handle infrastructure provision resulting from developments. The Local Plan infrastructure policies are informed by an Infrastructure Delivery Plan (IDP)⁴⁹ and are supported by an adopted Community Infrastructure Levy (CIL)⁵⁰.
- 1.4 Cotswold District Council declared a Climate Change Emergency in July 2019 and an Ecological Emergency in July 2020⁵¹. The Council's Corporate Plan (2020-2024) also seeks to make the Local Plan 'green to the core'. The provision of infrastructure in the right place and the right time can deliver multiple corporate aims. The Corporate Plan also seeks to deliver more genuinely affordable housing, particularly social-rented housing.
- 1.5 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: **[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE]**

2.0 The Issues

- 2.1 Additional critical and essential infrastructure may be required to accommodate additional planned growth resulting from the Local Plan partial update, as well as to respond to the climate change and ecological crises.
- 2.2 There are several major infrastructure projects planned in the district, including the upscaling RAF Fairford to accommodate an increase in United States Air Force activities, the

⁴⁷ Cambridge Dictionary - <https://dictionary.cambridge.org/dictionary/english/infrastructure>

⁴⁸ These include the topic papers on Accessibility of New Housing Developments; Economy; Green Infrastructure; Health, Social and Cultural Wellbeing; Natural Capital & Ecosystem Services; Responding to the Climate Crisis; Sustainable Transport and Air Quality; and Water

⁴⁹ [Cotswold District Council Infrastructure Delivery Plan \(Arup, April 2016\)](#)

⁵⁰ CIL is a charge placed on development, such as new homes and extensions to homes according to their floor area. The money generated through the levy contributes to the funding of infrastructure to support development growth in Cotswold District. Further information can be viewed here: <https://www.cotswold.gov.uk/planning-and-building/community-infrastructure-levy>

⁵¹ <https://www.cotswold.gov.uk/environment/climate-action/cotswold-climate-and-ecological-emergencies/>

A417 Missing Link⁵² and a water supply line from the River Severn water catchment to the River Thames water catchment. These may also result in additional Local Plan infrastructure requirements.

- 2.3 There is a changing approach towards highway upgrades, which are increasingly being considered as a last resort where improvements to sustainable transport infrastructure and services cannot resolve the issue.
- 2.4 The timing of infrastructure is also critical - something which could more clearly be defined in the Local Plan. For example, the early delivery of walking, cycling and public transport infrastructure can increase use of these modes of transport and decrease car use. This is to do with how travel habits are formed. The installation of some infrastructure can also be much easier and more cost-effective if it is done as part of a development, rather than after development has taken place.
- 2.5 The IDP is now five years old. Some infrastructure items have been, or are due to be, delivered. Some infrastructure requirements have changed. The IDP would benefit from being updated, which may require an update to the list of critical and essential infrastructure identified in the Local Plan.
- 2.6 There has been difficulty delivering several pieces of critical and essential infrastructure identified in the adopted Local Plan (e.g. locating a suitable site for the replacement doctor's surgery in Tetbury). There may be opportunities to deliver such items through the allocation of further sites for residential development if required infrastructure is delivered within the site allocation.
- 2.7 The District has an infrastructure funding gap, which is the gap between the cost of identified critical and essential infrastructure and how much money is expected to be generated from CIL. It is normal for local authorities to have an infrastructure funding gap and CIL can only be adopted if one exists. The funding gap is made up by S106 agreements, grants and other funding sources. Around a quarter of the funds needed to deliver the required critical and essential infrastructure are expected from CIL alone, although CIL funds can be used as leverage to secure other funding.
- 2.8 Additional evidence is now available that may justify a higher or lower CIL rate. The CIL rate is subject to a viability test, which assesses whether developments will be viable when all other Local Plan policies are applied.
- 2.9 Due to viability reasons, there is likely to be a trade-off between increasing the CIL rate and increasing the affordable housing requirement from developments.
- 2.10 Cotswold District Council is not the delivery body for nearly all critical and essential infrastructure projects. Gloucestershire County Council, as the lead education, highways and transport authority, delivers most items, although some infrastructure such as the water and wastewater is delivered by other providers. Infrastructure delivery is a Duty to Cooperate issue. A Memorandum of Understanding may be required with infrastructure providers to

⁵² Further information on the A417 Missing Link project can be accessed here: <https://highwaysengland.co.uk/our-work/south-west/a417-missing-link/>

set out how and when infrastructure will be delivered, especially if infrastructure delivery affects the timing of delivery of development sites.

3.0 The Options

3.1 There are several options to where infrastructure policies can be updated to help make the Local Plan green to the core:

- Option 1 - increase or decrease the CIL rate taking account of new evidence, such as Infrastructure Funding Statements and an updated Whole Plan Viability Assessment.
- Option 2 - Deliver more genuinely affordable housing, particularly social rented housing, or seek higher contributions towards bridging the infrastructure funding gap.
- Option 3 - Allocate additional sites within the Local Plan in order to secure on-site delivery of required critical or essential infrastructure items. The provision of such items could be a determining factor in which sites are allocated.
- Option 4 - expand the infrastructure policy to provide clarity on the timing and location of infrastructure delivery. This could also be set out in site design briefs included in site allocation policies.

4.0 Questions

Q1: Tell us what infrastructure is required in your area?

Note: not all infrastructure requests can be delivered through the Local Plan. However, where this is not possible, information gathered from this question can be relayed to other Council-led strategies, external organisations, as well as providing evidence for Neighbourhood Plans.

[INSERT OPTIONS LIST: carbon sequestration, education facility, emergency service facility, flood management, Green Infrastructure, highway upgrade, health facility, other transport infrastructure, renewable energy, sports or play facility, walking or cycling infrastructure, water supply or wastewater treatment, other.]

[INCLUDE MAP OF THE DISTRICT ALLOWING PEOPLE TO DROP A PIN AND COMMENT ON INFRASTRUCTURE REQUIRED IN DIFFERENT LOCATIONS]

Q2: What infrastructure could most help make the Local Plan 'Green to the Core'?

Q3: Should the Council prioritise choosing sites for development in the Local Plan that can deliver critical and essential infrastructure needs, even if the site is otherwise less suitable?

Q4: Do you consider the delivery of critical and essential infrastructure needed to support the Local Plan growth strategy and / or meet the challenges posed by the Climate Change Emergency to be an exceptional circumstance to allow such development in the Cotswolds Area of Outstanding Natural Beauty? Please explain why.

Q5: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Landscape

1.0 Introduction

- 1.1 Cotswold District has a highly valued landscape, recognised by a range of national and local designations. A high quality landscape does not only have aesthetic value but also plays a key role in health and wellbeing, the local economy, tackling the climate and ecological emergencies, as well as providing a clear sense of place to local communities and visitors. Much of Cotswold District is designated as an area of outstanding natural beauty (AONB).
- 1.2 The National Planning Policy Framework (NPPF) requires planning policies and decisions to protect and enhance valued landscapes, and recognise the intrinsic character and beauty of the countryside. The importance of the AONB is also recognised. Major development should be refused in the AONB except in exceptional circumstances and where it can be demonstrated it is in the public interest. The NPPF also supports a proactive approach to climate change mitigation and adaptation and encourages the use of renewable and low carbon energy.
- 1.3 Landscape planning policies can generally be seen in two ways;
- as protecting and enhancing the existing landscape and/or
 - as helping to create new high quality landscape (such as in Green Infrastructure, and design policies which are the subject of other topic papers in this series).
- 1.4 A key challenge for the landscape is presented by the imperative to meaningfully engage with the climate change and biodiversity emergencies declared by the council. The provision of renewable energy facilities to help achieve the net zero carbon target will almost inevitably look to sites within the landscape, and this will require careful balancing of what are likely to be conflicting planning considerations.
- 1.5 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: **[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE]**

2.0 The issues

- 2.1 The [Review of the Local Plan](#) concluded that the landscape policies (EN4, EN5, EN6), did not require further update. However the declaration of a Climate and Ecological Emergency by the Council and the [Council's Corporate Plan](#) objective - making the Cotswold District Local Plan 'Green to the Core' - mean that Local Plan policies must all cumulatively assist in delivering this objective.
- 2.2 There are competing and often conflicting requirements between future development pressure (such as housing, economic growth) and the need to protect and enhance the natural environment. There is also the challenge of how to adapt to and mitigate the impacts of climate change and ecological emergencies in a designated landscape. These are examples of the need to consider proposals in the 'planning balance' that is characteristic of the planning system (see the Climate Change topic paper for more on this).

- 2.3 The impact of climate change on the landscape is likely to be far reaching. There will be changes in temperature causing drought and areas of flooding, increase in pests and diseases, changes to habitats, and farming practices, as well as renewable energy schemes and other new technologies. Both the NPPF and the adopted Local Plan are supportive in principle of renewable energy projects and energy efficient design. These are the subject of other topic papers.
- 2.4 Over the next twenty years therefore, a range of new developments may come forward, where achieving positive outcomes for the landscape will be even more challenging. There may be more instances where the public benefits of a proposal, such as in addressing the climate emergency, are finely balanced against the requirements to conserving and enhancing the landscape. A more strategic perspective may need to be taken which goes beyond local concerns - climate change is a global problem and solutions need to be considered in that context.
- 2.5 In such circumstances every effort will be made to mitigate impacts on the landscape at both local and wider scales. The creation and enhancement of on and off site green infrastructure will play a key role (see Green Infrastructure topic paper) together with other benefits such as recreation, water management and nature recovery.
- 2.6 Other related topic papers include:
- Green Infrastructure
 - Biodiversity
 - Natural Capital
 - Renewable Energy/ Climate Change
 - Design

3.0 The Options

- 3.1 The challenge for the planning system is to deliver sustainable development; conserve and enhance the landscape, and also make a significant contribution to both mitigating and adapting to climate change and the ecological emergency.
- Option 1** – retain policies as they are, ‘do nothing’
- 3.2 The landscape ‘protection’ policies should be retained in their existing format. The policies accord with the existing strategic objective of the Local Plan (1a) and are considered robust and fit for purpose (Local Plan Review, see above). GI, design and other policies, which overlap with landscape, however may need further change.
- 3.3 Existing policy allows consideration of, for example, some renewable energy developments – the degree of acceptable harm is proportional to the importance (e.g. designation) of that landscape. This is particularly vital within the nationally designated AONB, where there is a presumption against major development other than in ‘exceptional circumstances’ and where it can be demonstrated that the development is in the public interest.
- 3.4 The landscape and other policies in the current local plan *already* enable the decision-maker to balance the level of harm/adverse impact against the public benefits of the development and, in line with NPPF, to determine whether or not the proposal constitutes major development. However, the adopted Local Plan does not have a positive strategy for the

provision of renewable energy facilities as required by paragraph 155 of the NPPF. This strategy is currently in preparation and it may have an influence on the balance of considerations regarding development affecting the aesthetic qualities of the landscape.

Option 2: As Option 1, but amend and add to the supporting text

- 3.5 In addition to Option 1. Amend the supporting text to include more reference to the linkages between this topic and others such as biodiversity, green infrastructure and climate change (Natural England, SA Scoping Comment, 2021) perhaps link to the forthcoming Renewable Energy Strategy (to provide additional guidance) or other relevant evidence, and to help ensure the landscape is taken into account in a clearly holistic way.
- 3.6 Add to the supporting text to make it clear that the existing policy already considers 'exceptional circumstances' including climate change/ ecological emergency when considering proposals in the planning balance.
- 3.7 By retaining the landscape policies broadly as they are, they remain a counter-weight to increased pressure for development and can be considered on a case by case basis in the planning balance.

Option 3 – a more climate-led landscape policy?

- 3.8 Investigate further policy options to be as 'green to the core' as possible, in light of the Corporate Strategy and declared emergencies.
- 3.9 There are significant challenges, conflicts and opportunities in how to approach climate change mitigation, while also being consistent with national policy and designations to conserve and protect the landscape.
- 3.10 The key issue is finding the balance between protecting very important landscapes and their potential degradation by climate change with the need to adapt to, and mitigate the causes, of climate change in a beneficial 'value added' approach. We could include or amend policy to:
- Require development to; provide trees and protect soils, provide flood storage areas, and walking/cycle routes as appropriate to the scale of the development.
 - Be more encouraging of appropriately scaled renewable energy development in the countryside, including wind turbines. Identify suitable locations for such development - allocate specific sites and/or broader "areas of search" where they might be appropriate. Consider larger scale RE within and outside of the AONB, and safeguarding areas outside of the AONB for the delivery of wind energy and large scale solar energy provision.
 - Consider the siting of renewable energy technologies in the landscape in a sequential way (least suitable to most suitable) based on agreed assessment criteria, for example biomass energy (from crops or woodland) is likely to have less impact on landscape.

- 3.11 Additional evidence and time may be required to bridge the gap between further possible policy proposals/ recommendations and update to Local Plan. This option may only be possible in a full review of the Local Plan.

Preferred option(s)

- 3.12 The preferred option is Option 3, if consistent with national policy, this is likely to be the most 'value added' approach but may take longer and need more evidence. In the short term Option 2 may prove to be more realistic for this Update.

4.0 Questions – tell us what you think

Q1: Do you agree with the preferred option? Please explain why?

Q2: Does Local Plan Objective 1a (landscape) need to be updated? For example, to reference a more holistic approach, *'to achieve/ support the maximum multiple benefits of the landscape, such as recreation, water management, and biodiversity'*? Should the objective reference the need to balance the aesthetic aspects of the landscape with the need to mitigate and adapt to climate change?

Note: this issue is also discussed in the Natural Capital and Ecosystem Services topic paper

Q3: Should the Local Plan actively promote Renewable Energy developments in the District?
If yes:

- i. Should the Local Plan identify broad locations where Renewable Energy developments would be suitable, such as wind turbines and large scale solar farms?
- ii. Should locations in the Cotswolds AONB be considered for Renewable Energy developments, particularly wind turbines?
- iii. If broad locations are not identified for Renewable Energy developments, should the Local Plan instead include a criteria based policy with a threshold on the size, type or location of proposals?
- iv. If broad locations are not identified for Renewable Energy developments, should the Local Plan instead include a sequential approach policy to identify the location of Renewable Energy developments?

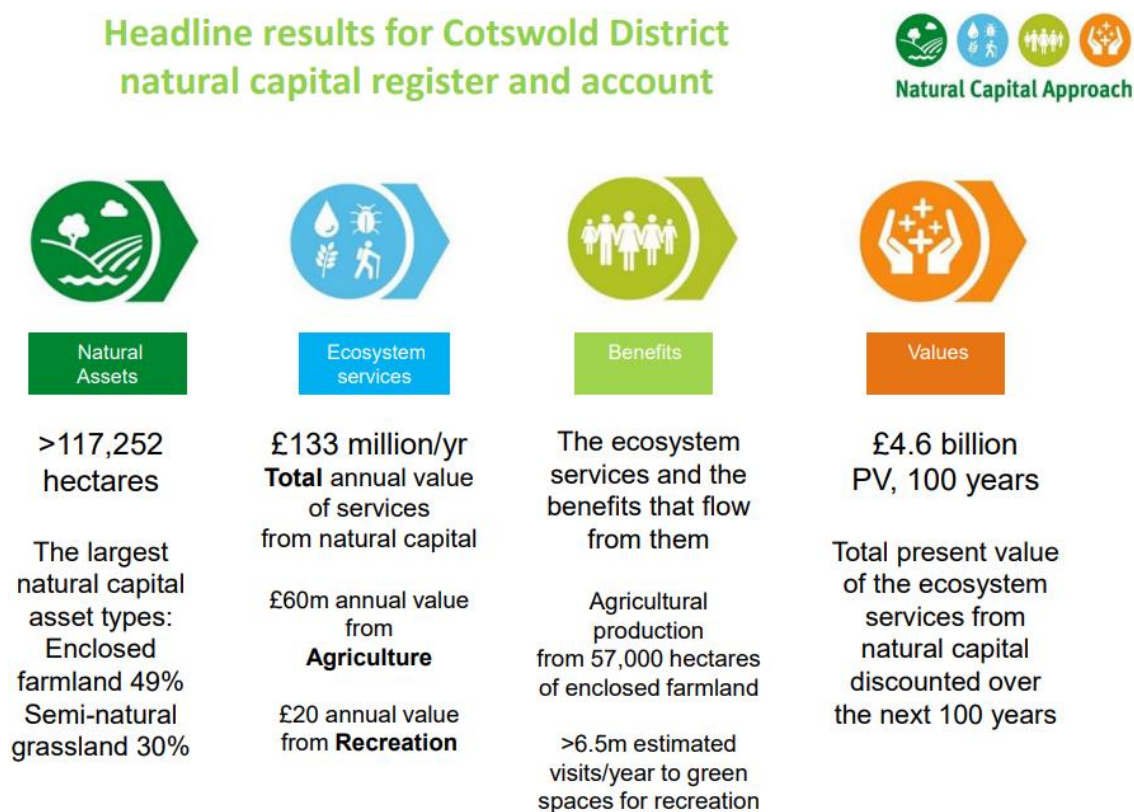
Note: this issue is also discussed in the Responding to the Climate Emergency Topic Paper

Q4: Have any relevant issues or options to the landscape been missed? We would be particularly keen to hear of any further ideas that could help respond to the climate change and ecological emergencies whilst also balancing the need to protect and enhance the District's sensitive landscape.

Topic Paper: Natural Capital and Ecosystem Services

1.0 Introduction

- 1.1 Natural capital is “the world’s stocks of natural assets, which include geology, soil, air, water and all living things”.⁵³ It is from this natural capital that humans derive a wide range of services, often called ecosystem services, which make human life possible.
- 1.2 The subject of natural capital spans into several other Local Plan topic papers. In particular, recommendations around enhancing natural capital policies are also included in the topic papers on Biodiversity; Climate Change; Green Infrastructure; Health, Social and Cultural Wellbeing; Transport; and Water.
- 1.3 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: **[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE]**



- 1.4 The diagram above provides an estimated financial value of several types of natural capital and ecosystem services in Cotswold District in 2021. The figures are thought to be a substantial underestimate, as not all types of natural capital and ecosystem services have been assessed and factored into the sums. However, the figures show how even a partial view of natural capital and ecosystem services has a substantial monetary worth. Furthermore, where natural capital and ecosystem services have too often been overlooked

⁵³ <https://naturalcapitalforum.com/>

in the past due to a lack of quantifiable data, this data can now have a particularly important function in the planning and development process.

- 1.5 National policy also recognises the value of natural capital and ecosystem services. It requires local plans to enhance natural capital at a catchment or landscape scale across local authority boundaries.⁵⁴ The National Planning Practice Guidance also requires the delivery of environmental net gain to reduce pressure on and achieve overall improvements in natural capital, ecosystem services and the benefits they deliver.⁵⁵
- 1.6 The adopted Local Plan has limited references to natural capital and ecosystem services, although its policies inadvertently support both to some degree through policies on flood risk prevention, water management, Green Infrastructure provision, climate change adaptation and mitigation, and so on. There is, however, potential for the Local Plan to be more explicit about natural capital and ecosystem services and better incorporate this thinking into land use planning within the District.

2.0 The Issues

2.1 Since the adoption of the Local Plan:

- Cotswold District Council declared a [Climate Change Emergency in July 2019 and an Ecological Emergency in July 2020](#)⁵⁶. The Council's Ecological Emergency Action Plan makes various commitments towards natural capital improvements. The Council's Corporate Plan 2020-2024 also commits to making the local plan 'Green to the Core'.
- The Government has published its 25 year Environment Plan. [The Environment Act 2021](#)⁵⁷, which is the legislative framework for the 25 year Environment Plan, boosts the importance of natural capital and ecosystem services and further increases the need to update the Local Plan.
- A review of the Local Plan confirmed that the Local Plan would benefit from being updated in respect of its policies on natural capital and ecosystems services.
- In response to these commitments, there is a need to update the Local Plan and potentially recognise natural capital and ecosystem services as a standalone policy.
- There are tools available for assessing natural capital and ecosystem services but there remains some ambiguity about how they should be assessed at a local level. This can be clarified if further detail is provided in the Local Plan.
- The principle of Biodiversity Net Gain has now been established. This has many similarities with natural capital and ecosystem services. There is an opportunity to

⁵⁴ NPPF (2021) paragraph 175

⁵⁵ Planning Practice Guidance: Natural Environment: Paragraph: 028 Reference ID: 8-028-20190721

⁵⁶ <https://www.cotswold.gov.uk/environment/climate-action/cotswold-climate-and-ecological-emergencies/>

⁵⁷ <https://bills.parliament.uk/bills/2593/publications>

provide a similar mechanism to Biodiversity Net Gain in the Local Plan but for natural capital and ecosystem services.

- There are various play-offs between different types of natural capital and ecosystem services. One such significant play-off, which the Council needs to consider further, is whether more trees should be planted for CO² sequestration and biodiversity enhancements, which would bring with it the cost of the trees abstracting water and impacting water supply networks, or whether the water supply networks should be protected and enhanced.

3.0 Questions – tell us what you think

Q1: How should natural capital and ecosystem services be assessed on development sites in Cotswold District before and after development has taken place?

Q2: Should the local plan require the natural capital value of a site after development to be not less than it was before development? This would be a similar principle to biodiversity net gain.

Q3: Should the Local Plan allow on-site natural capital and ecosystem decreases to be compensated for by off-site improvements?

Q4: Should natural capital and ecosystem services policy apply to all developments or only developments over a certain size?

Q5: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Neighbourhood Development Plans (NDPs)

1.0 Introduction

- 1.1 Town and Parish councils are empowered by law to prepare development plans for their local communities. Generally speaking these plans are conterminous with town or parish boundaries and they respond to non-strategic planning issues affecting local communities. These plans must be in general conformity^{58 59} with the District Council's adopted Local Plan. They should not look to duplicate policies contained within the adopted Local Plan or within the government's National Planning Policy Framework.
- 1.2 Sixteen neighbourhood areas have been designated (have defined their area boundaries) in Cotswold District, covering 18 parishes. Of these Lechlade-on-Thames, Tetbury with Tetbury Upton and Northleach with Eastington Neighbourhood Development Plans have all been made (the legal equivalent of being adopted). Several more are well advanced.
- 1.3 Neighbourhood planning has become an established route for progressing local and national development priorities – particularly housing and responding to climate change and arresting the loss of ecology / biodiversity. It is within this context that issues and possible options are considered below.
- 1.4 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: **[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE]**

2.0 The issues

Are Neighbourhood Plans responding to the climate and ecological crisis?

- 2.1 In blunt terms collective performance might be described as 'could do better'. In fairness the same could be said of the adopted Local Plan, from which neighbourhood plans derive policy direction. Proposals to address Local Plan shortcomings are set out in other Topic Papers, notably "Responding To The Climate Crisis".
- 2.2 There is an expanding range of policies and interventions that town and parish councils are using in their neighbourhood plans to respond to the climate crisis:
- walking and cycling audits are becoming increasingly common as local communities seek to reduce the dependence of the private motor vehicle and improve local quality;
 - preparing Design Codes to promote sustainable patterns of development at the very local level, these are particularly powerful when combined with site allocation policies. The challenge with design codes is not to duplicate national guidance and the Council's design guide. Another challenge is aligning it with an out of date

⁵⁸ <https://www.gov.uk/guidance/neighbourhood-planning--2#General-conformity-with-strategic-policies>

⁵⁹ <https://neighbourhoodplanning.org/toolkits-and-guidance/general-conformity-strategic-local-planning-policy/>

Manual for Streets guide, which is discussed in further detail in the design topic paper;

- allocating local green spaces, nature improvement areas, allotments, etc.; and
- identifying local infrastructure and prioritising the spending of the neighbourhood proportion of the Cotswold District Community Infrastructure Levy. Further information on this can be found in the Infrastructure topic paper.

How can neighbourhood plans be in general conformity with the Local Plan?

- 2.3 Neighbourhood plans have to be in conformity with the strategic policies of the local plan. The adopted Local Plan does not distinguish which of its policies are strategic. This plainly creates doubt and difficulty for neighbourhood plans and is a matter for the Local Plan update to address.
- 2.4 The LPA has resolved to make its local plan 'green to the core'. This is likely to entail creating a new strategic policy together with several amendments and additions to existing policies. Because neighbourhood plans complement and add further policies to the District's 'Development Plan'⁶⁰, they will need to be in general conformity with any new strategic policy regarding the climate change and ecological emergencies. Conformity is likely to entail a proactive rather than passive or neutral approach on the part of NDPs.

What is the Local Planning Authority's role in providing advice or assistance to those preparing neighbourhood plans?

- 2.5 Government has not sought to prescribe how local planning authorities should meet their 'duty to support' the preparation of NDPs. The Council's neighbourhood function⁶¹ largely focuses on ensuring both parties are following due process and that it acts as a critical friend on emerging NDP policy. It has not published guidance on how it will discharge its 'duty to support' requirement, which may affect the ability of town and parish councils to prepare timely neighbourhood plans. A solution to this problem is set out below.

3.0 The options

- 3.1 Potential responses are split between policy (local plan) and non-policy interventions. Policy interventions could consider:

1. making clear which Local Plan policies are strategic. This will aid the 'general conformity' process and enable town and parish councils to identify parts of the local plan that may have scope to be altered and added to at a local level;

⁶⁰ The 'Cotswold District Development Plan' is made up of Cotswold District Local Plan (2011-31), Mineral Local Plan for Gloucestershire (2018-32), Gloucestershire Waste Core Strategy (2012-27) and geographically relevant neighbourhood development plans.

⁶¹ The neighbourhood planning 'function' is coordinated from Community Planning, but requires significant input in time and expertise from other teams: notably Forward Planning and Heritage and Design (also representing the wider Development Management function), Electoral Services, and the Geographical Information Services team.

2. creating a new Neighbourhood Plan policy and /or updating existing policies to further clarify how neighbourhood plans can be in general conformity with the local plan; and
3. place a duty within the local plan, possibly as part of the above proposal or as the corollary of a new strategic policy (as recommended in the Biodiversity and Climate Change papers) that neighbourhood plan must respond to climate change and biodiversity issues. The test would have to be passed to be found in general conformity with the Local Plan.

3.2 Non-policy interventions could consider:

1. providing supplementary planning guidance (a) to clarify the level of non-financial support the council will provide to town and parish councils and (b) regarding conformity with a new strategic policy on meeting the challenges of the climate change and biodiversity emergencies; and
2. support Town and Parish Councils to better connect with one another to share knowledge and experience. This is already happening across the district and the Council could further support these networks and knowledge exchange building on the Council's recent Town and Parish Council forums model.

3.3 Alternative options would be to avoid preparing a new policy or new guidance but continue to provide *ad hoc* local guidance on procedural matters; and not to explicitly require or encourage Town and Parish Councils to prepare neighbourhood plans that respond to climate change and biodiversity matters.

3.4 National policy requires the Council to identify strategic policies of Local Plan and therefore this is no alternative.

Preferred option

- i Make clear which local plan policies are strategic and non-strategic.
- ii Create a new Neighbourhood Plan policy that sets out conditions that neighbourhood plans will need to pass to be in general conformity with the adopted Cotswold District Local Plan. The policy would also act as a “hook” for further guidance on procedural matters e.g. establishing the degree of support town and parish councils can expect from the Council.
- iii Encourage those preparing neighbourhood plans to respond to climate and ecological emergencies.

4.0 Questions – tell us what you think

Q1: Do you agree with these options? **[BINARY QUESTION. INSERT YES / NO TICK BOX. INSERT COMMENT BOX FOR 'PLEASE EXPLAIN WHY' QUESTION]**

Q2: What kind of proposals do you think could be included in your local neighbourhood plan to help meet the challenges of the Climate Change and Biodiversity Emergencies? **[OPEN QUESTION]**

Q3: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Retail and Town Centres

1.0 Introduction

- 1.1 [Chapter 9 of the adopted Cotswold District Local Plan](#) contains several policies relating to town centres and retail. The [Council's Corporate Plan](#) also is clear about its aspirations in this area. At national level, the National Planning Policy Framework ([NPPF](#)) and National Planning Policy Guidance ([NPPG](#)) set out relevant government policy and advice.
- 1.2 As is explained at section 2, there are several major issues now affecting town centres and retail. The upshot is that our current strategy for town centres and the policies accompanying it need to be revised to ensure the Local Plan remains sound and effective. Proposals in this respect are set out at section 3.
- 1.3 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)

2.0 The Issues

- 2.1 The problems facing town centres and retail are multiple and interrelated.
- 2.2 The effect of internet-based retailing on the traditional high street is well documented in the media and elsewhere. It is a developing situation that is resulting in the closure of significant numbers of shops including long-established national chains. Due to its evolving nature it is difficult at present to be certain how deep the effect will ultimately be or whether, for example, some town centres that have a “niche market” appeal will prove less susceptible.
- 2.3 The response to the Covid-19 pandemic encouraged more people to opt for internet shopping and this has accelerated the trend. Change in shopping habits is expected to endure.
- 2.4 Covid social distancing also required many people to work from home. The success of this has led many businesses to adopt more flexible working practices permanently, and it is anticipated that many firms will operate a “blended working” approach.
- 2.5 A decrease in office working could have a two-fold impact on town centres. It could affect footfall as office workers are a significant clientele for a wide range of “traditional high street” uses. And it may also reduce the need for office space in and around the town centres, which could be made available for other uses. This is likely to be another accelerant in the rate of high street change.
- 2.6 Another “known unknown” is the effect that Brexit is going to have on the economy over time. Whether or not this will materially affect our town centres remains to be seen.
- 2.7 In respect of national planning policy, the traditional role of retail as the town centre “anchor” use is no longer tenable. Although it is helpful that the NPPF supports broadening the range of “main town centre” uses, its continued reference to the sequential approach (centre, edge of centre, out of centre) perhaps harks back to earlier policy objectives - the

imperative to retain retailing as the key town centre use and prevent out of centre retail “parks” from threatening town centre prosperity. However, the sequential approach remains a very useful planning “tool” and it can be adapted to apply to a broader range of uses.

- 2.8 National planning policy is now also accelerating the rapid rate of change in town centres. Changes to the planning use class system Introduced a new Class E and Class F. In summary:
- Class A1 (retail), A2 (financial and professional services) and A3 (restaurants and cafes) were effectively combined into a new Class E(a,b,c).
 - A4 (drinking establishments) and A5 (hot food takeaways) uses became defined as ‘Sui Generis’.
 - B1 (office, research and development processes and light industrial uses) was revoked and has effectively been replaced with the new Class E(g).
 - D1 (non-residential institutions) has been split out and replaced by the new Classes E(e) (Provision of medical or health services) and Class E(f) (Creche, day nursery or day centre) and F1.
 - D2 (assembly and leisure) has been split out and replaced by the new Classes E(d) (indoor sport, recreation and fitness) and F2(c-d), as well as several newly defined ‘Sui Generis’ uses.
- 2.9 The introduction of the new Class E and F is designed to bring flexibility to town centres to help them evolve. In particular, planning permission is no longer required to switch between retail and some other main town centre uses. However, planning permission is also no longer required to switch between retail or main town centre uses to some non-main town centre uses. Cumulatively, it is expected that this change will degrade the purpose and effectiveness of the current Local Plan primary shopping area policy. It could also affect the historic character of local town centres which are an important component of their vibrancy and vitality.
- 2.10 A new permitted development right allowing the change of use from Class E to Class C3 (dwelling houses) came into force in August 2021⁶², meaning this type of development will also no longer require planning permission. There are some exemptions - such as listed buildings - but this change will if anything accelerate the phenomenon that is already taking place. An informal study of Cirencester town centre shows that about 50% of the ground and first floor premises that currently are within Class E have the potential to change to residential use without the need to make a planning application.
- 2.11 The ability to make this change of use is not limited to town centre premises in Class E. Any Class E premises, unless they are exempt, are susceptible.-This potentially undermines Local Plan policy EC x that seeks to safeguard existing employment sites.
- 2.12 It’s not all gloom and doom. Unlike many across the county many of the district’s town centres are so far not badly affected by the changing nature of the high street. Most already

⁶² <https://www.planningresource.co.uk/article/1711537/class-e-town-centre-to-residential-pd-right-effect-august-government-confirms>

have a wide diversity of uses, a strong tourism offer, niche markets and a high proportion of independent retailers. These provide a visitor experience that is not offered by internet shopping. But changes are already happening and will continue to happen. We have to plan for this so that we can capitalise on opportunities, continue to safeguard and build resilience and flexibility through town centre strategies. In this way we can seek to ensure that the District's town centres continue their critical role as community and commercial hubs.

2.13 Other relevant Topic Papers in respect of these issues include:

- Employment
- Tourism
- Design

3.0 The Options

3.1 Rather than attempting to put the genie back in the bottle by hanging on to an outmoded retail-centred strategy, the policy approach needs to be one that is fundamentally about diversification of town centre uses rather than relying on a single anchor use - retail - to hold everything together. Town centres are at the heart of a community, providing an identity and a vibrant hub around which the town revolves. The job of planners is to ensure that that remains so. Retail will always be a significant element of the town centre offer - more prominent in some towns than in others perhaps - but it can no longer be the primary policy focus.

Option 1 - do nothing.

3.2 This is always an option in any situation. In this case it is unacceptable. If positive steps are not taken to safeguard the vitality of our town centres in the face of the issues raised the Local Plan is not doing its job. We do, however, have to be realistic. Some of the legislative changes the government recently has introduced - particularly regarding Use Class E - leave the council with very little room for manoeuvre.

Option 2 - await greater economic stability and certainty before amending the policy approach in a full revision of the Local Plan.

3.3 Has its temptations and a case could be made for this approach, but it tends to beg the "how long is a piece of string" question and ultimately is as unacceptable as Option 1.

Option 3 - amend the existing policies to reduce the prominence of retail as the keystone of town centre policy while maintaining the sequential test for the development of "main town centre uses". Consider including certain classes of residential use as a locally-defined "main town centre use". Retain and amended "primary shopping area" delineation to ensure no conflict with NPPF requirements.

3.4 This is a step in the right direction. Reduction in the primacy of retail is what the evidence is pointing to (even if government still insists on the identification in the Local Plan of a "primary shopping area"). Retaining the sequential test to ensure that main town centre uses are directed, in the first instance, to town centres is crucial in safeguarding vitality and encouraging diversification and growth.

Option 4 - all of Option 3 together with new strategic policy that sets out a requirement for Neighbourhood Development Plans (NDPs) to consider preparation of town centre plans where their administrative area includes a key settlement as defined in the Local Plan. Alternatively include the “requirement to consider” in any NDP policy that is developed.

- 3.5 At present the Local Plan only has a town centre strategy for Cirencester. This is because Cirencester is by the far the largest town in the district. Taking account of the issues set out earlier, a case can be made for all the key settlements in the district at least to consider whether their town centre would benefit from having its own strategy. The purpose of this would be to guide development and to ensure that a balance of uses exists that is appropriate to the centre and that will help to ensure its continued health. It would be appropriate for the Local Plan to set out this out in a “strategic” policy although it is not strictly necessary - an NDP could opt to take this approach unilaterally.
- 3.6 Any new or revised Local Plan policy would make clear that preparation of a town centre strategy is not a mandatory requirement in terms of an NDP being in general conformity with the adopted Local Plan. Demonstration of consideration during NPD preparation of whether or not to prepare a strategy will be a requirement.

Preferred option

- 3.7 The preferred option is Option 4.

4.0 Questions

Q1: Have we missed any issues or options? Tell us what you think. If you suggest an alternative approach explain why and show how it is sound in planning terms.

Q2: Where a Neighbourhood Development Plan is being prepared or revised, should your town be required to consider incorporating within it a town centre strategy that helps safeguard its health and vitality and better enables it to respond flexibly to economic change?

Q3: Do you think there should be a more diverse mix of uses in your town centre? What would you like to see more of:

- Housing, including above shops or making better use of under-developed sites **[tick]**
- Leisure uses, such as bars, cafes, a cinema, restaurants, etc. **[tick]**
- Convenience goods retail, such as bakers, butchers, greengrocers, etc. **[tick]**
- Comparison goods retail, e.g. non-food goods such as clothes, books, etc. **[tick]**
- Retail services, such as hairdressers, launderettes, travel agents, opticians, etc. **[tick]**
- Financial and business services, such as banks, estate agents, offices, etc. **[tick]**
- Cultural facilities, such a museums, art installations, etc. **[tick]**

Q4: Are you concerned that changes of uses in town centres no longer require planning permission in your town and village centres (outside of AONB areas)? Do you think this will affect the vibrancy and vitality of Town Centres?

Topic Paper: Sustainable Transport and Air Quality

1.0 Introduction

- 1.1 The Topic Paper on Transport and Air Quality looks at what we can do in our Local Plan to make it easier for people to go about their daily lives and access the goods and services they need without having to depend on using private vehicles.
- 1.2 We are doing this to achieve local and national government targets to reduce carbon emissions and to deliver on our corporate promises to make our local plan “green to the core”, help residents and businesses maintain good health and wellbeing and support businesses to grow in a green, sustainable manner.
- 1.3 The Government also has specific targets around increasing cycling levels, increasing the proportion of primary school children walking to school and reducing deaths and injuries on the road. The changes we are considering in this paper will also contribute to those aims.
- 1.4 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)

2.0 The issues

- 2.1 The UK Government has signed up to a commitment to cut total carbon emissions by 78% by 2035 and 100% by 2050 to try to prevent catastrophic climate change. Cotswold District Council has set its own target to cut carbon emissions to net zero by 2045.
- 2.2 Most economic/industry sectors in the UK have made good progress in cutting carbon emissions over the last 30 years. Unfortunately, this is not the case with transport, where domestic emissions have barely reduced and remain well above the levels required to meet our commitments. To achieve the reductions we need, we need to consider all options to reduce our use of petrol and diesel powered vehicles. This is particularly challenging in Cotswold, where our dispersed, rural population and limited public transport options make driving the easiest choice for many journeys.
- 2.3 We need to consider this issue as part of our update to the Local Plan - and not just, for example, through transport planning - because we recognise that where we locate new developments has a strong bearing on what options people have to get to, from and through those developments. We also want to make sure that, when new developments are built, they contribute effectively to improving local walking, cycling and public transport infrastructure and services, and that the facilities provided on-site enable people to use those modes of travel easily.
- 2.4 The first of these issues - locating development in places that reduce dependence on cars and enable people to walk, cycle or catch the bus/train to where they need to go - is covered in more detail in the Topic Paper called “Accessibility of New Housing Development”. The Topic Paper called “Responding to the Climate Crisis” provides more detail on the climate change science and targets that are driving the need for these changes.

3.0 The options

3.1 The adopted Local Plan already contains objectives to reduce car use by:

- i. Locating most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.
- ii. Supporting improvements in public transport, walking/cycling networks.

3.2 It also contains some policies, e.g. D1, D2 and INF3 to deliver these objectives. So the options set out below are primarily intended to provide definition to the existing policies, and to extend them where necessary where evidence, policy or strategy regarding decarbonising transport has moved on since the adoption of the Plan - for example, the conversion to electric vehicles.

3.3 In practise, it is unlikely that these options will be discrete selections from which we can pick and choose. To achieve the decarbonisation of transport, we are likely to need to implement all of them to some degree - the speed, extent and prioritisation of each to be determined by the local situation. The speed and type of change that happens will also depend strongly on the changes people are willing and able to make for themselves.

Option 1: Introduce minimum accessibility requirements for new development sites

3.4 This option provides greater definition to objective i. above and seeks to establish criteria to determine whether or not a location is sustainable in transport terms. This option would see the introduction of an accessibility scoring system for potential development sites based on ease of access to key services and facilities by foot, bicycle or public transport, and identify improvements that could be made by development to facilitate these modes of travel.

Topic paper: Accessibility of New Housing Development explains the proposal in more detail.

Option 2: Introduce mode share targets for new development sites

3.5 Building on the principles of Option 1 and the existing Highway Development Management requirement for a Travel Plan for significant development sites (see Gloucestershire County Council's *Travel Plan Guide for Developers (July 2011)*), this option seeks to establish robust, binding targets to limit the generation of new vehicle trips from development sites. The Travel Plan would identify site-specific measures that can be implemented to limit the demand for vehicle travel and support the use of other modes. These measures would be implemented incrementally (using safeguarding sums held from the developer) in the event of excessive vehicle trip generation.

Option 3: Develop a Sustainable Transport Strategy for Cotswold

3.6 The current Local Plan looks to the Local Transport Plan (LTP) to provide direction regarding transport provision. As a county-wide strategy this can be limited on specific detail for Cotswold. A Cotswold District Sustainable Transport Strategy (STS) will build on the policies in the LTP to identify walking, cycling and public transport infrastructure improvements within and between key settlements: new developments can then contribute effectively to their delivery. In addition to infrastructure, the STS will identify "soft measures" - such as


information, incentives, promotion, training and support - that can encourage and enable people to use sustainable modes of transport.

3.7 Option 4: Embed key sustainable transport design principles in the Local Plan and ensure they are used to guide the design of new developments and their links to the wider travel network.

Building on principles contained in Gloucestershire County Council's *Manual for Gloucestershire's Streets*⁶³ highway design guidance and informed by recent and emerging government guidance and policy, we propose to bring significant sustainable transport design principles directly into the Local Plan to give additional weight and prominence to the concept of enabling travel on foot, by bicycle and by public transport to deliver government's active travel and carbon reduction targets. These principles include:

- a "hierarchy of road users" (illustrated below);
- the concept of permeability (also called "filtered permeability" or "modal permeability");
- recent guidance on cycle infrastructure design (LTN1/20);
- updated requirements regarding parking for all vehicles and charging infrastructure for electric vehicles (including micro-mobility vehicles such as eScooters and eBikes)

Table 3.2: User hierarchy

<p>Consider first</p>  <p>Consider last</p>	Pedestrians
	Cyclists
	Public transport users
	Specialist service vehicles (e.g. emergency services, waste, etc.)
	Other motor traffic

"Hierarchy of Road Users", from Manual for Streets (2007)

The Evidence Paper: Sustainable Transport and Air Quality provides a more detailed explanation of these approaches.

Preferred option(s)

3.8 In this paper, there isn't a single "preferred option" as such. It is likely we will need to pursue all options to some degree in order to achieve the necessary reductions in transport-related carbon emissions. Your feedback will help us decide how we prioritise each type of action and the degree to which we should implement them.

4.0 Questions – tell us what you think

Q1: Given transport's high contribution to the UK's total carbon emissions and other pollutants, how can we in Cotswold seek to reduce our use of petrol and diesel powered

⁶³ <https://www.gloucestershire.gov.uk/media/2099344/2020-july-mfsgs.pdf>

vehicles? To what extent do you think it is possible at the moment? What would help you to drive less often?

Q2: When car use was restricted during the COVID lockdowns, did you struggle to be able to get the things you needed? What things were difficult?

First half of your postcode: <i>If that's not possible then ask if they live in a town village or rural area.</i>				
	N/A. I don't need to access this service	Easy	Challenging, but possible	Difficult
Workplace				
Primary School				
Secondary School				
GP				
Hospital				
Food shop				
Town centre				
Sports field				
Play area				
Post office				
Banks				
Pharmacies				
Nursery				
Library				
Community hall				
Place of Worship				
Dentist				
Allotment				
Leisure Centre				

Pub				
FE College				

Q3: Do you feel that the walking, cycling and public transport networks in your area are sufficient for you to get to most places you need to go without a car? If not, are there any particular barriers, or improvements that need to be made? **[Explore adding a mapping option here, where people could pinpoint issues in the walking, cycling and PT environment. Note: this would be very similar to the consultation system for the Cirencester LCWIP and, if possible, I'd want to ensure the info collected here could be shared with GCC to inform that project too.]**

Q4: Would you be interested in contributing to a plan to improve sustainable transport options in Cotswold, or help us assess walking, cycling and public transport provision in your area? Add option to enter email address.

Q5: Do you think it is a good idea to try to build new places in such a way as to make it as easy as possible for people to get around without a car? To what extent would you be willing to accept longer journey times in a car to facilitate shorter journeys on foot or by bike? **[Options: Not at all/Up to 5 mins longer/Up to 10 mins longer/Up to 15 mins longer/Up to 20 mins longer/Up to 25 mins longer/Up to 30 mins longer/30 mins+ longer]**

Q6: Do you think it is reasonable to require developers to commit to managing vehicle traffic generated by their sites once built and to make improvements if it exceeds the volume agreed?

Q7: Do you agree that we should prioritise safe and convenient space for more vulnerable road users (e.g. pedestrians, cyclists, horse riders) when we design new places and roads? To what extent would you be willing to accept a reduction in space for driving or parking to make sure there was enough space for people to walk, cycle and scoot comfortably? **[Create checklist with Yes/No/Maybe/N/A options for the following: Reducing width of road lanes to create wider pavements or cycle paths; Removing additional vehicle lanes (e.g. 2 lanes down to 1) to create more space for walking and cycling, or add bus lanes; Reducing on-street parking spaces in residential areas; Reducing parking spaces in town centres; Reducing the size of the driveway and/or garage at your home]**

Q8: If you own a vehicle, would you consider switching it to an electric one? **[Options: I already have/Actively looking/Within the next 2 years/In the next 2-5 years/In 5 years+/No intention to do so/Cannot do so because of the following factor(s): *Add open text box with this option]**

Q9: Would you consider becoming part of a car club rather than owning your own individual car? **[Options: I already have/Actively seeking to join/As soon as one is available in my area/Within the next 2 years/In the next 2-5 years/In 5 years+/No intention to do so]**

Q10: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Sustainable Tourism

1.0 Introduction

- 1.1 As a popular and well-known visitor destination, tourism is a significant part of Cotswold District's economy and a key local employment sector.
- 1.2 In [2019 17%](#) of all jobs in the District were in tourism related sectors (figure 1). Most tourism employment relates to food and drink, and accommodation for visitors. ([Gloucestershire LIS, draft 2019](#)). The Local Plan ensures that the location of new tourism development is effectively and appropriately managed to protect the high quality natural and built environment of the District (Local Plan, para. 9.10.1, 9.10.4).

[The Economic Impact of Gloucestershire's Visitor Economy \(Cotswold District\) 2019](#)

£366 million	Total Visitor Related Spend
7,348	Estimated actual employment
17%	Proportion of all employment

£82 million	Retail
£52 million	Accommodation
£123 million	Food and drink
£50 million	Attractions and entertainment
£38 million	Transport and other
Making a direct expenditure of over £345 million in 2019	

- 1.3 **Sustainable** tourism is a key emerging issue for the sector. It goes beyond green tourism to encompass the environmental, economic and socio-cultural aspects of tourism development. Sustainable tourism practice includes ensuring that the well-being and cultural heritage of communities is protected. Activities may include supporting conservation projects, hiring local staff, sourcing locally-produced products, conserving energy and recycling. Sustainable tourism requires participation of stakeholders and is a long term process that needs to be monitored and adapted as required.
- 1.4 **On** a national and international scale, sustainable tourism is becoming increasingly significant as a result of the global climate crisis. The British Tourism Association (BTA) has begun work on a Sustainable Tourism Policy Paper due to be published in late 2021/early 2022.
- 1.5 **This** paper summarises the evidence and looks at the planning policy context for tourism in Cotswold District. It considers what changes, if any, should be incorporated into the Local Plan Partial Update, making recommendations for how existing planning policy might best

be amended. It also takes a longer, strategic view on the relationship between tourism and the climate change emergency, making recommendations as to how potential conflicts with certain key policy areas may best be approached in a subsequent full review of the Local Plan.

- 1.6 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)

2.0 The Issues

Strategic level - the context

- 2.1 Climate change and ecological emergencies have been declared by the Council, embedding climate emergency considerations in all work areas. The Council's Corporate Strategy 2020-2024 establishes a series of actions to respond to these emergencies including an objective to deliver actions contained in the Cotswolds Tourism Destination Management Plan (DMP), promoting Cotswold District as a high quality year-round destination and '*Increase tourism's contribution to the economic, social and environmental sustainability of our communities*'.
- 2.2 The Sustainability Appraisal (SA Scoping report) 2021 sets identifies key relevant issues as:
- limited range of public transport options, which affects the ability to both reach the destination and travel around sustainably.
 - uneven distribution of visitors throughout the year and across the district,. balancing the needs of visitors and locals to avoid conflict and retain a sense of place.
 - potential environmental damage e.g. erosion caused by increased visitor numbers.
- 2.3 The Cotswold District Council Green Economic Growth Strategy (2020) seeks to improve the quality of tourism and increase visitor spend, building on the 'experience' of our towns and linking it with other local businesses. It emphasises the Council's aspiration to move towards a sustainable visitor economy that encourages a wider geographical spread and promotes the area as an "all-year-round" destination rather than having a heavy concentration of visitors in the summer.
- 2.4 The October 2021 update of Cotswolds Tourism's Destination Management Plan for Tourism (DMP) places sustainability at the core of the DMO's priorities. Key sustainable tourism objectives include:
- increase usage of sustainable transport by visitors when travelling to and around the Cotswolds;
 - encourage businesses to adopt sustainable practices and to develop sustainable tourism messaging to all stakeholders and visitors;
 - encourage the use of local produce and suppliers to support the development of better local supply chains;
 - encourage a better geographical and seasonal spread of visitors to lessen the impact on the landscape and its residents; and
 - promote the co-benefits of active travel (walking and cycling) on health and wellbeing - as well as reducing carbon emissions.

- 2.5 Other relevant studies are discussed in the supporting evidence for this Topic paper including Gloucestershire Economic Needs Assessment 2020, the Gloucestershire Economic Recovery analysis paper and the Visit Gloucestershire 2021- 2024 strategy.

Strategic level - the issues

- 2.6 A central consideration is ensuring a balance between the economic and social benefits from visitor spend and the impacts that visitor numbers can have on the natural environment and resident communities, as well as the need to conserve and enhance the natural assets that play a critical role in attracting visitors in the first place. The inexorable impact of climate change and the need for action to mitigate and adapt to its effects is greatly increasing the pressure to find ways of sustainably managing or resolving these challenges.
- 2.7 The importance of the tourism sector for the district's economy is indisputable. However, recent studies (Gloucestershire Economic Recovery and Visit Gloucestershire for example - see supporting evidence) recognise the need to address the less desirable climate change impacts of tourism. These include air pollution and congestion from traffic. The critical need to address these issues (clearly not restricted to tourism) is altering the components of the balance that needs to be struck in reaching planning decisions. The planning challenge is to maintain and grow the tourism economy, implementing the council's objectives while developing and implementing measurable initiatives to increase its sustainability performance.
- 2.8 Options for addressing these strategic challenges are set out at Section 3 below.

Non-strategic level - the context

- 2.9 Adopted Local Plan policies support sustainable tourism by enabling new and extended tourism development, appropriate regeneration schemes, visitor attractions, cultural and leisure facilities that are appropriate to their location and enhance and protect the existing attractions within the District.
- 2.10 **Policy EC10** sets out the criteria for new or extended tourist facilities and visitor attractions. The policy supports the provision of enhanced and new facilities in appropriate locations.
- 2.11 **Policy EC11** requires tourist accommodation to be appropriately located and both policies recognise the environmental sensitivity of the District.

Non-strategic level - the issues

- 2.12 The Sustainability Appraisal (SA) Scoping Report 2021 considers the policies to generally be working well. It 'scoped out' tourism as a topic requiring further investigation. A tension was noted however in EC10 between clause b requiring tourist facilities to be well related to the main tourist routes and that of the concentration of tourism in 'honeypot' destinations. Similarly EC11 is essentially restrictive rather than enabling. Whilst having regard to the recognised environmental sensitivity of much of the district, it tends to conflict with statements, again in the supporting text, that emphasise the importance of tourism as "a key employment sector in the district" and its role in supporting key community assets. Local
- 2.13 Plan policy revisions could seek to improve the policies to better consider these tensions/ conflicts.

- 2.14 Whilst both policies are noted as fit for purpose, the Local Plan review 2019 recommends minor revisions are required in the short term for clarity:
- 2.15 “Policy EC10 - to clarify that new/extended tourist attractions should be viable without the provision of tourist accommodation. And that new tourist attractions should not include accommodation (in a more explicit way than at present), to prevent the argument that the new accommodation will form part of the tourist attraction (EC11 (4)) and is therefore acceptable.
- 2.16 Following on and in context of possible changes to EC10, Policy EC11 should be more explicit when policy applies to improve clarity on when accommodation, in connection with an attraction, will be supported e.g. when extensions to existing hotels/serviced accommodation facilities apply.”
- 2.17 This topic paper has links with several other topic papers including Transport, Meeting the Climate Challenge, Landscape, Town Centres & Retail, and Economy and Employment.

3.0 The Options

- 3.1 Given time constraints of a partial update and because they have different requirements, it is not possible to deliver both the strategic and non-strategic dimensions simultaneously. Therefore the policy response is that there are two objectives: one to deal with in the short term (in the Local Plan partial update), and a longer term option (Local Plan review) once a sustainable strategic tourism strategy is in place. This could also be linked into Local Plan Economic Objective 3d.
- 3.2 **Short-term (non-strategic) approach** – clarity is needed for development management as identified in the Local Plan Review 2019 and in the Sustainability Appraisal (see above). The solution is to amend and update the policies accordingly. This may also include a version where the supporting text is also amended to include reference to the Corporate Plan’s objective of a ‘green to the core’ Local Plan.
- 3.3 **Longer-term (strategic) approach** – the overarching issue is that of unintentional conflict i.e. those topic areas which at a strategic level are potentially in conflict with the current role of tourism in the District. This is partly due to the emerging paradigm shift triggered by the need to mitigate and adapt to climate change. As noted above, the recommended way towards a solution is that a sustainable tourism strategy is needed to discuss and strive to reconcile the conflicts and challenges. This will take time and will not be available for the Local Plan Update. A full Local Plan review would in due course be able to deliver the planning elements of the strategy.
- 3.4 Forward Planning and Tourism officers have discussed this approach and agreed to work closely together to deliver it.

Preferred option(s)

(a) Amend adopted policies for clarity in line with Local Plan Review and Sustainability Appraisal recommendations, and continue to ensure tourism development protects, and is appropriate in, the natural and built environment.

(b) Propose in the partial update that a sustainable tourism strategy is prepared, with planning actions/outputs taken forward in the future full Local Plan review. Amend supporting text to reflect the “green to the core” aspiration.

4.0 Questions – tell us what you think

Q1: Do you agree with the preferred option, and if not, why not?

Q2: What does “sustainable tourism” mean to you?

Q3: How do we balance the need to access visitor destinations in rural locations with other policy objectives such as the need to reduce private car use/ carbon emissions?

Q4: Should there be more places or direction in the Local Plan, for example, identifying areas and/or routes to facilitate sustainable tourism growth?

Q5: Visitor spend already has a key role in supporting local high streets but are there new facilities you would like to see that would also appeal to visitors and which visitor spend would make more viable?

Q6: Should there be more indoor or all-weather attractions and/or serviced-accommodation to enhance the year-round tourism offer? If so, where?

Q7: Should we try to ensure that tourism and its benefits are spread more equally across the District rather than concentrated in “honeypot” locations? What are your ideas about how we can do this?

Q8: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

Topic Paper: Water Quality, Water Resources and Flooding

1.0 Introduction

- 1.1 In future, Cotswold District will experience a higher temperature climate, more extreme weather and adverse weather-related events. These are likely to include flooding especially in the wider river valleys. An increase in surface water flooding is also likely. Flooding from groundwater sources may also occur.
- 1.2 Hotter, drier summers may exacerbate low river flows and concentrate pollutant loads from wastewater effluents including agricultural run-off, affecting water quality. Increase in water demand also adds pressure to existing water resources in an already 'seriously water stressed' area.
- 1.3 The existing Local Plan policies are sound in making adequate provision to enable management of the effects of development and climate change on the water environment. They are compliant with national policy and rest upon a comprehensive evidence base that includes a Strategic Flood Risk Assessment (Level 1 and 2), a [Water Cycle Study](#) and application of a sequential, risk based approach (the Sequential Test) to the location of development. But it is considered in light of the need to mitigate and adapt to the increasing effects of climate change that the policies could be more robust and proactive. Greater detail is set out in the accompanying Topic Paper.
- 1.4 Further technical detail on this topic paper is provided in a supporting evidence paper, which can be accessed at the following link: [\[INSERT HYPERLINK TO EVIDENCE PAPER BEFORE PAPER GOES LIVE\]](#)
- 1.5 Related Topic Papers include: Green Infrastructure; Design; Natural Capital and Ecosystem Services.

2.0 The issues

- 2.1 There is likely to be increasing conflict between climate change impacts and future development demands. Increased development will put pressure on water resources. Areas of the District that are at risk of flooding and increased flood risk, alongside the increased risk of storm events and dry periods, will also put pressure on water quality due to increased levels of run-off or lack of dilution.
- 2.2 In the longer term land may be required for future flood storage and more natural methods of flood management. These include the creation or re-establishment of natural features such as tree planting or hedge lines or changes to land management that will reduce flood risk in the catchment, attenuate flood waters or capture pollutants.
- 2.3 Flood water storage areas are designed to hold back excess water during a flood. They will become even more essential as the effects of climate change increase. They reduce the volume of water travelling downstream and consequently reduce the risk of a watercourse overflowing in downstream locations. Potential flood storage areas in the future should be safeguarded from development. Two have already been identified near Cirencester in discussion with the Environment Agency (EA). It is possible that given updated climate

change allowances the EA could recommend implementing these areas sooner rather than later.

2.4 Climate change is expected to significantly change rainfall patterns in the United Kingdom. Flooding is expected to be more frequent, to a greater extent, deeper and faster.

2.5 To increase resilience to flooding, allowances for climate change should be considered in flood risk assessments. (Previously river flows were predicted to increase by 20%).

River basin district	Allowance category	Total potential change anticipated for the '2080s' (2070 to 2115)
Thames	Upper end	70%
	Higher central	35%
	Central	25%
Severn	Upper end	70%
	Higher central	35%
	Central	25%

Source: Figure 2 Climate Change Allowances (% increase in river flow) SFRA 2016

2.6 The **Sustainability Appraisal (SA) Scoping Report** 2021 recommends that action is required to address:

- Fluvial flooding: On larger main rivers in wider valleys such as the River Churn and the River Thames mapping indicates a noticeable increase in the mapped flood extent. Smaller watercourses in Cotswold tend to be in areas of steeper topography with quite confined floodplains, and in these cases increases in flow do not result in a significant increase in flood extent.
- Surface water flooding: climate change is predicted to increase rainfall intensity in the future by up to 30%. This will increase the likelihood and frequency of surface water flooding, particularly in impermeable urban areas, and areas that are already susceptible such as Moreton in Marsh and Fairford.
- Groundwater flooding: The effect of climate change on groundwater flooding, and those watercourses where groundwater has a large influence on winter flood flows (such as the River Churn), is more uncertain. Milder wetter winters may increase the frequency of groundwater flooding incidents in areas that are already susceptible. However, warmer drier summers may counteract this effect by drawing down groundwater levels more during the summer months

2.7 At national level, flood risk is high on the government's planning agenda. It is comprehensively addressed in the [National Planning Policy Framework](#) at Chapter 14 *Meeting the challenge of climate change, flooding and coastal change*, and also in [Planning Practice Guidance on Flood Risk and Coastal Change](#) and [Meeting our Future Water Needs](#). The [Environment Act](#) 2019-2021 has four priority areas: biodiversity, air quality, water and waste, while the [Planning For the Future](#) White Paper (July 2020) noticeably mentions flood risk ahead of other environmental challenges such as drought and coastal erosion.

At regional level, available evidence includes:

- [Thames River Basin Management Plans](#) (Environment Agency 2015);

- [Thames Water Resources Management Plan 2019](#); and
 - As Lead Local Flood Authority, Gloucestershire County Council CC has produced a Surface Water Management Plan, Technical guidance on sustainable urban drainage or SuDS design, a Preliminary Flood Risk Assessment ([PFRA 2013](#)), and has a statutory duty to develop and maintain a Local Flood Risk Management Strategy ([LFRMS](#)).
- 2.8 Locally, from a land-use planning perspective the need to effectively manage flood risk has long been a significant and well-recognised issue. [Local Plan Strategic Objective 6 Climate Change and Flood Risk](#) is to:
- 2.9 *Reduce the environmental impact of development and vulnerability to the impacts of climate change by....Maximising water and energy efficiency, promoting the use of renewable energy sources and sustainable construction methods, and reducing pollution and waste [and] Locating development away from areas identified as being at high risk from any form of flooding or from areas where development would increase flood risk to others.*
- 2.10 This objective and the policies (INF8 and EN14) aimed at delivering it remain sound in a “technical” planning sense. But the policies need to be strengthened so that we are better able to adapt to and mitigate the impacts of Climate Change.

3.0 The options

- 3.1 Management of the water environment is an integral part of the wider need for climate change adaptation and mitigation. As such it is closely related with other policy areas that are increasing in importance such as Green Infrastructure (GI) and Natural Capital. An obvious first step towards making the Local Plan more robust is to clearly link the related policies so that taken together they provide an integrated and robust response to all aspects of the climate change emergency - for example mapped areas to reduce flood risk in future (climate change allowances) and improve natural flood/pollution/storage measures (See GI and Natural Capital Topic Papers).
- 3.2 In specific terms, and as Option 1, the existing water management policies could be supplemented and amended thus:
- i. Introduce a requirement to use ‘Flood zone map 3a+CC ‘ in flood risk assessments. Propose that the flood risk zone mapping is updated to take into account the most recent climate change predictions and introduce a policy requirement to submit flood risk assessment using/within the climate change buffer areas.
 - ii. Retrofitting of SUDs when appropriate. Areas to be identified where it may be possible to suggest this (e.g. high risk areas), and where there are opportunities in already consented development to minimize flood risk and water pollution.
 - iii. Surface water flooding - use EA data/mapping of surface water flooding and flows to revise and adopt a Surface Water Drainage constraint map to be required in policy to be used in FRAs. Surface water flood risk to be clearly considered as having equal importance with fluvial risk.
 - iv. Promote more natural methods of flood management (link with GI strategy) for drainage and flood storage, improved water quality and recreation and wildlife, for example tree

planting within the river/drainage catchment of the development. Or require a financial contribution from developers.

- v. Policies to be flexible for drought or flood risk and see water resources as a benefit for humans and wildlife, tourism/ recreation, and flood prevention
 - vi. Provide more land to be safeguarded for future potential flood storage areas
 - vii. Improve how design/ layout of buildings can contribute to improved water quality and reduce flood risk. eg properties to be more resilient to flooding (air brick covers), rainwater capture for more efficient use of water. Major /large scale residential development could be accompanied by an Energy Statement which demonstrates a low level of water consumption
- 3.3 As an alternative approach, **Option 2** is that the existing Local Plan policies remain unchanged but the supporting text is amended to be more explicit about climate change adaptation and emphasise a more holistic linkage with Green Infrastructure. Possible text could be:

‘Development will need to be located and designed to cope with the potential adverse impacts of climate change such as flood risk and water scarcity incorporating sustainable drainage systems where possible, green infrastructure and increasing permeable surfaces, water harvesting and layouts that accommodate waste water recycling for example.

Adapting to the likely impacts of climate change includes locating development away from areas at high risk of flooding, and also protecting our water resources and water quality’

3.4 Preferred option(s)

The preferred option is Option 1. Option 2 will only make changes to the supporting text. Although it serves to contextualise and explain, supporting text is not policy. If climate change is to be tackled, we must be bold. In reality it will in all likelihood be possible to combine the best elements of both options.

4.0 Questions – tell us what you think

Q1: Do you agree with the preferred option? Please explain why.

Q2: Is there any information / key issues we have missed?

Q3: What other ways can we improve flood prevention/ water efficiency / reduce water demand?

Q4: To mitigate and adapt to the Climate Change Emergency we may have to increase the planning restrictions on development in areas subject to flooding - what do you think about that?

Q5: Are there areas close to where you live that flood more often?

Q6: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?