

YOUR
COTSWOLD
YOUR **PLAN**

CREATING A FUTURE
THAT IS GREEN TO THE CORE

A large circular graphic with a dark blue outer ring and a teal inner circle. The outer ring contains 18 small, circular icons, each with a white border and a blue background, depicting various themes such as nature, community, and infrastructure. The central teal circle contains the following text:

**Cotswold District Local
Plan 2011 – 2031 Partial
Update**

Summary of responses to the Town and
Country Planning (Local Planning)
Regulations 2012 Regulation 18 “Issues
and Options” consultation (4th
February 2022 to 20th March 2022)

Contents Page

- Executive Summary 3
- Feedback Highlights 4
- 1. Introduction 7
- 2. Responding to the Climate Crisis 10
- 3. Accessibility of New Housing Development 21
- 4. Biodiversity 32
- 5. Design 39
- 6. Economy and Employment 42
- 7. Green Infrastructure 48
- 8. Health, Social and Cultural Wellbeing 55
- 9. Historic Environment 58
- 10. Housing Affordability 61
- 11. Housing Need, Requirement, Supply and Delivery 63
- 12. Infrastructure 69
- 13. Landscape 73
- 14. Natural Capital and Ecosystem Services 78
- 15. Neighbourhood Planning 82
- 16. Retail and Town Centres 85
- 17. Sustainable Tourism 89
- 18. Sustainable Transport and Air Quality 95
- 19. Water Quality, Water Resources and Flooding 106
- 20. Other Issues 110

Appendix 1. Your Cotswold, Your Plan communications plan evaluation

Executive Summary

The Council has committed to updating partially its Local Plan to make it *green to the core*.

Between 4 February and 20 March 2022 we invited local residents, businesses and organisations to engage with an early stage consultation (*Your Cotswold, Your Plan*) that set out issues affecting the local planning system and possible solutions that could be implemented. We've listened to what you've said and this summary report reflects that.

Our social media campaign made over 190,000 impressions and over 7% of the district's population visited our consultation website. A postcard advertising the consultation and drop-in session in Cirencester and Moreton-in-Marsh was sent to 48,000 households. This resulted in approximately 2,900 individual contributions from 755 respondents.

This has provided us with a great deal of useful information, which will help us to formulate policies in the Local Plan partial update. It has guided us to useful evidence that can be used to help inform policies and has flagged issues with suggested policies that we can now consider further.

The core themes of responding to the climate and ecological emergencies were examined across 18 planning themes. There was a clear message - action is required as soon as possible. However, there were often concerns about costs on household budgets and development viability. There were also concerns about the practicalities of enforcing new and altered policies, especially where policy suggestions strayed into other regulatory areas (e.g. building regulations). Some respondents questioned the validity of carrying out a partial update rather than a full update of the Local Plan.

Perhaps the most interesting observation was people's views on building wind turbines within the Cotswolds National Landscape (the Area of Outstanding Natural Beauty); 49% were in support and 31% objected with the remainder unsure. The message was even clearer for ground mounted solar farms with 60% in support.

We trialled a new digital consultation system, Commonplace. This, together with other advertisements, led to an increase in engagement and awareness. However, some respondents explained the consultation was too complex and the system needed further refinement to make it more user-friendly.

There was a 29% increase in the number of subscribers to the local plan mailing list and there was a significant shift in people and Town and Parish Councils making comments online rather than sending email and letters. Planning agents, developers and statutory and non-statutory organisations continued to respond via letter and / or email, which takes officers longer to manually input onto the consultation system, respond to and analyse.

Overall, the consultation has been a great success. We would like to offer our thanks to everyone who participated in the consultation and for helping to shape the Local Plan and the future of Cotswold District.

Feedback Highlights



Responding to the Climate Crisis

Just under half supported wind turbines being located in the Cotswolds Area of Outstanding Natural Beauty and approximately 60% supported ground mounted solar panels ('solar farms') being much more common in the district.



Accessibility of New Housing Development

4 out of 5 people agreed to the principle of locating new developments within reach of important services and facilities without needing to drive.



Biodiversity

Over 4 out of 5 people agreed that we should achieve more than 10% biodiversity net gain.



Design

Approximately half agreed that the Council should take a modern interpretation of the traditional Cotswold design to achieve zero or low carbon development. 3 out 5 agreed new development should be zero carbon.



Economy and Employment

There was clear support for home working and also the use of existing community buildings - the development of multi-purpose local "hubs" for instance - to enable working closer to home.



Green Infrastructure

The following three types of Green Infrastructure were considered the most important to people and their communities: 1) Natural and Semi Natural Space, 2) Green Corridors and 3) Parks and Gardens.



Health, Social and Cultural Wellbeing

Better access to healthcare facilities and being able to walk and cycle to access services, facilities, employment and social events are the two things that people felt can most improve peoples' health and wellbeing.



Historic Environment

Nearly 3 out of 4 people support the proposed measures. There was a degree of irritation amongst some respondents who are willing to adapt historic buildings to make them more climate change resilient, but feel frustrated with what they see as "red tape" obstructing that.



Housing Affordability

3 out of 5 people agreed that suggested policy changes could help to boost affordable housing and make housing in the district more affordable. People also suggested other policies that focus on homes for young people and those wishing to downsize.



Housing Need, Requirement, Supply and Delivery

Nearly twice as many people than not thought that there is an exceptional circumstance to use an alternative method for calculating housing need. Those with a pro-development interest in the District generally responded that there were no exceptional circumstances or the figure should be higher.



Infrastructure

Feedback shows that electric vehicle charging, public transport and walking & cycling infrastructure could most help make the Local Plan 'Green to the Core'.



Landscape

Approx 3 out of 4 people agreed with the idea for a more climate-led landscape policy. One person explained 'Climate emergency trumps all other considerations in the end'.



Natural Capital and Ecoservice Systems

There was strong support to include a Biodiversity Net Gain style policy for natural capital and ecosystem services.



Neighbourhood Planning

Creating policies that specify design standards; creating new and protecting existing wildlife areas; promoting sustainable transport schemes; and supporting renewable energy schemes were key themes that people felt should be included in local neighbourhood plans.



Retail and Town Centres

People wanted to see more bakers, butchers, greengrocers, housing (above shops), cultural, food and entertainment venues, art installations, book shops, clothes shops and leisure facilities in their town and village centres.



Sustainable Tourism

We received various ideas on how to ensure that tourism and its benefits are spread more equally across the District. Ideas included: Reducing car parking provision in "honeypot" locations; and encourage coach companies to focus on areas.



Sustainable Transport and Air Quality

Approximately 3 out of 4 people said that they did not struggle to get things they needed when car use was restricted during the COVID lockdowns. However, the majority of people felt that that local walking, cycling and public transport networks are insufficient to go places without a car.



Water Quality and Resources and Flooding

We received various ideas on how to improve flood prevention / water quality / and reduce water demand. Planting trees and hedgerows was the most favoured followed by attenuation ponds, installing leaky dams, and restoring meandering rivers.

1. Introduction

This report provides a summary of the key findings of the *Your Cotswold, Your Plan: Issues and Options* consultation and identifies next steps that will be taken for each of the topic areas.

Engagement

The consultation was supported by a communication and social media engagement plan, which included creating a new Local Plan brand and an animated film¹ to increase awareness and to improve engagement. A summary of the engagement figures is provided on page 9 and an evaluation report is provided in Appendix 1, including a summary of methods and activities used to advertise the consultation.

YOUR COTSWOLD YOUR PLAN

CREATING A FUTURE
THAT IS GREEN TO THE CORE



We posted approximately 48,000 postcards advertising the Local Plan consultation and the two drop in events held in Cirencester and Moreton-in-Marsh. A copy of the postcard is provided on the next page.

They provided an opportunity for local residents, organisations, businesses and town and parish councillors to speak with our planning, transport and climate change officers and to learn more about the Council's ambitions to transition to a zero carbon future.

The drop-in events were split into two sessions.

- A public event from 2pm until 6:30pm, which included a range of printed materials, display boards and maps; and
- A Town and Parish Councillor event 7pm until 10pm, which included a presentation from District Councillors and Council officers; followed by Questions and Answers.

We saw over 80 people attending both public events.

¹ <https://www.youtube.com/watch?v=MrCCrJ6Tt1o>

YOUR
COTSWOLD
YOUR **PLAN**

CREATING A FUTURE
THAT IS GREEN TO THE CORE



We need to take action

to tackle the **climate and ecological emergencies**
and ensure there are enough homes for local people
now and in the future.

COTSWOLD DISTRICT LOCAL PLAN **(partial update) Issues and Options Consultation**

Friday 4th February until Sunday 20th March



COTSWOLD
DISTRICT COUNCIL

We have a new online consultation platform that makes it easier for you to let us know what you think. Please scan the QR code (using your phone's camera app) to take part in the consultation.



Alternatively you can access the consultation by visiting issuesandoptions.commonplace.is

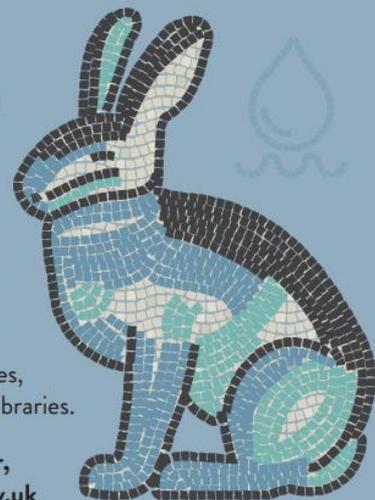
You can also come and talk to us about the proposals.

2nd March, 2pm - 6.30pm
Cotswold District Council Offices,
Trinity Road, Cirencester, GL7 1PX

9th March, 2pm - 6.30pm
Moreton-in-Marsh Area Centre, GL56 0AZ

Hard copies of the document are available to view at both Council Offices, Trinity Road, Cirencester and Moreton-in-Marsh as well as all District Libraries.

Forward Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX Telephone: 01285 623000 or email: localplan@cotswold.gov.uk



YOUR COTSWOLD YOUR PLAN

CREATING A FUTURE
THAT IS GREEN TO THE CORE



More than 2,900 representations, from 755 individuals and organisations

How people responded



636 online to the consultation website



119 by e-mail and letter



Six week Social media campaign



196,400 accounts reached



27,300 views

Subscription growth



29% growth in subscribers to the Local Plan and related projects. Up by 646 during the six week consultation

New Insights



Collect demographic and location data from those contributing



Monitor and track the number of visits to the site

6,500+ visits to the Consultation site



Background information

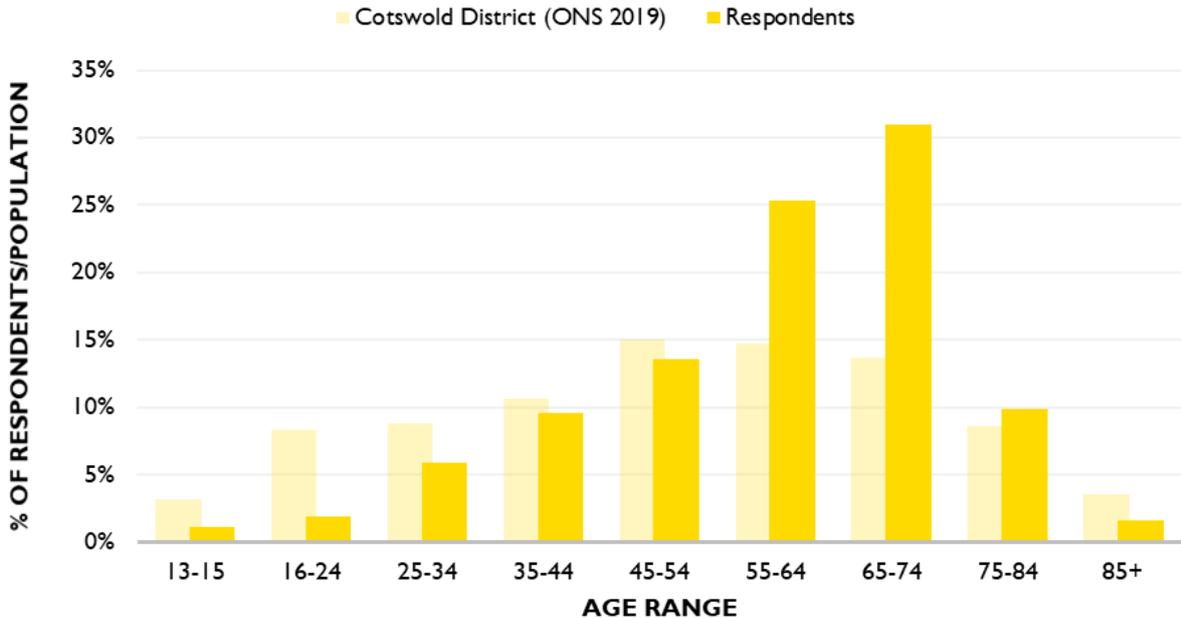
The consultation documentation is available to view on the Council’s website using the following links:

- The Issues and Options consultation paper, which includes the topic papers and questions, is available to download [here](#).
- One page summaries of each topic area are available [here](#).
- The evidence papers for each topic paper area, which contain further technical information, are available to download [here](#).
- Supporting technical evidence base documents and further supporting information about the consultation are available to view [here](#).
- You can also continue to see these documents and sign up to the Local Plan consultation database on the [consultation portal](#).

Comparison of respondents with population of Cotswold District

When reviewing the responses received through the Issues and Options consultation, it’s useful to consider how representative our respondents are of the wider population of Cotswold District.

Age profile of respondents compared to Cotswold District population (ONS 2019)



As can be seen, the proportion of people aged 55+ responding to the consultation was higher than the proportion of that age group in the Cotswold population, with a correspondingly lower degree of representation from younger age groups. Children under 13 were not explicitly included in the consultation.

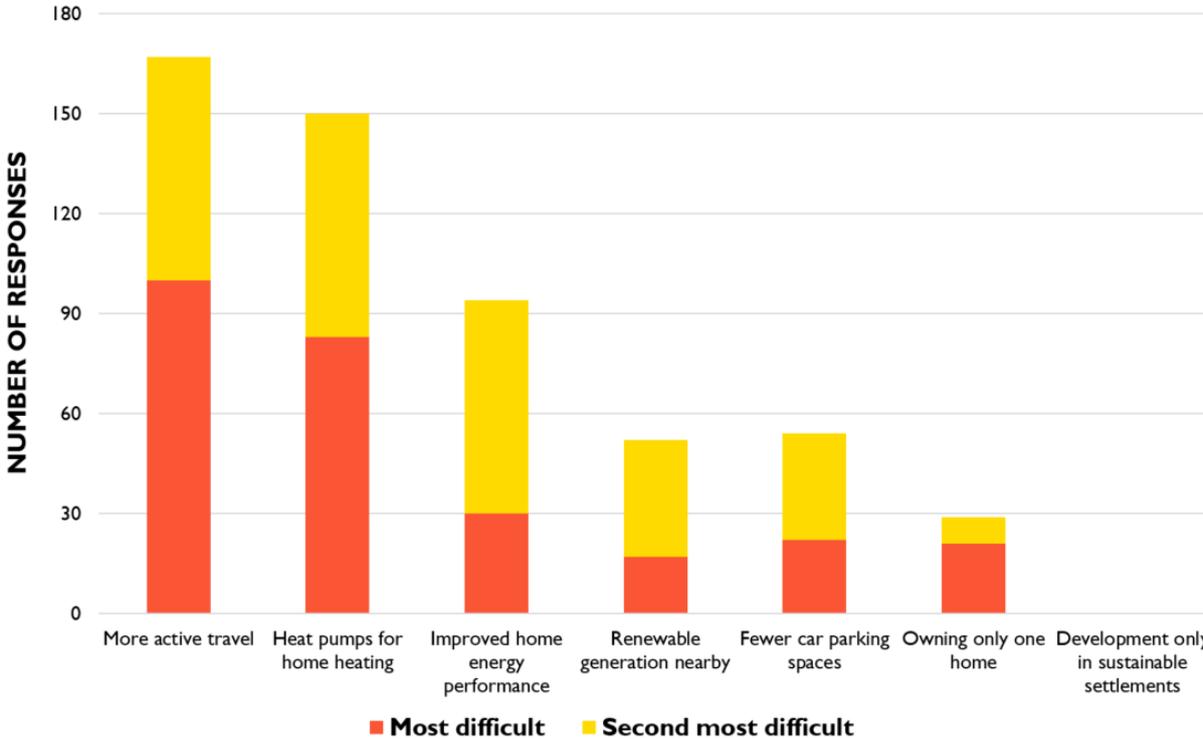
2. Responding to the Climate Crisis

The Council has declared a Climate Emergency and has committed to make the Local Plan green to the core. The topic paper asked ten questions that sought to find out people’s views on issues and possible options that could be taken forward in an updated local plan.

We asked: Q1a. We're all going to have to accept significant changes in how we live, to adapt to the Climate Change Emergency and to mitigate its effects. For you personally, which of the following seven possible changes would you find most unacceptable/difficult? (we asked you to rank them from most to least difficult)

- Heating your home from non-fossil-fuel sources (like an air source heat pump).
- Improving the energy performance of your home.
- Using your car less and walking or cycling more.
- Having fewer car parking spaces outside your house.
- Accepting renewable energy close to where you live.
- Focusing housing away from poorly accessed settlements and the countryside.
- Owning just one house.

You said: Of the 273 responses (77% of all respondents on the climate topic), the two changes most frequently ranked first as difficult or unacceptable were ‘Using your car less and walking or cycling more’ and ‘Heating your home from non-fossil-fuel sources (like an air source heat pump)’.



The three changes most frequently ranked second most difficult or unacceptable were the same as the first choice above, plus ‘Improving the energy performance of your home’.

‘Owning only one home’ was least problematic, and no respondent ranked ‘Focusing housing away from poorly accessed settlements and the countryside’ either first or second.

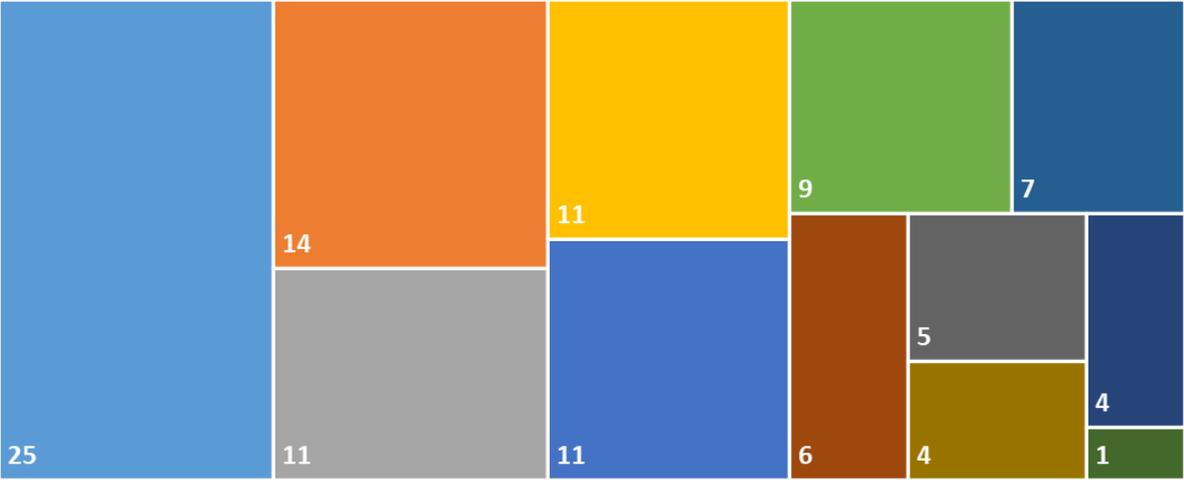
Officer comments: The responses are partly explained by respondents considering those actions ‘closest to home’ the hardest – in other words, actions that would (potentially) require changes in habits, behaviours or personal investment and home disruption to achieve. It is notable that more active travel was ranked more difficult than, for example, heat pumps, despite a large difference in the potential cost of making the two changes (one being mainly a simple behavioural change, and the other requiring significant financial investment). This seemingly surprising result may reflect respondents’ concerns about the perceived difficulty or risk of cycling on rural roads.

We asked: Q1b. Are there any other issues that are missing from this list of options?

You said: Whilst the primary question referenced changes that respondents would find personally difficult or unacceptable, responses to the follow-on question (“Are there any other issues that are

missing from this list of options?") were interpreted much more broadly, mainly pointing out a wide range of issues relevant to climate action that are to a large extent covered later in the survey.

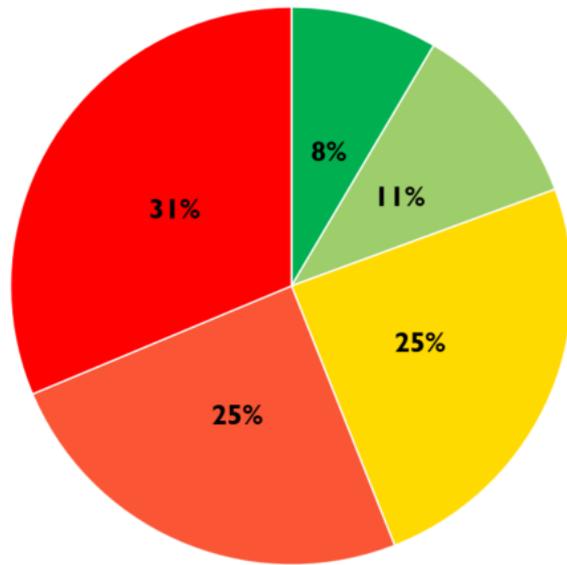
Some of the issues raised are important and interesting for the Council to note (e.g. respondents' identification of lifestyle, food, flying, local economic development etc), but will not have a bearing on the Local Plan update since they are not matters that are impacted by local planning policy.



- The role of public transport and active travel
- Location and nature of development, eg sustainability, density
- Objections to / skepticism of the need for / effectiveness of climate action
- Building / design issues (eg solar, embodied carbon, rainwater harvesting)
- Provision of electric vehicle charging infrastructure
- Economic issues eg recycling, circular economy, local sourcing, employment
- Lifestyle choices eg food, flying
- Concerns about cost / affordability
- Related issues, eg flooding, air pollution, renewables, trees
- Issues around listed and historic buildings
- Infrastructure and political issues, eg renewables, electricity supply, geopolitics
- Comments on structure, clarity or effectiveness of this consultation

* figures in the above graph indicate the number of respondents.

We asked: Q2a. On a scale of 1 (= I don't want to see any change at all to the district) through to 5 (= 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? and **Q2b.** Please explain why.

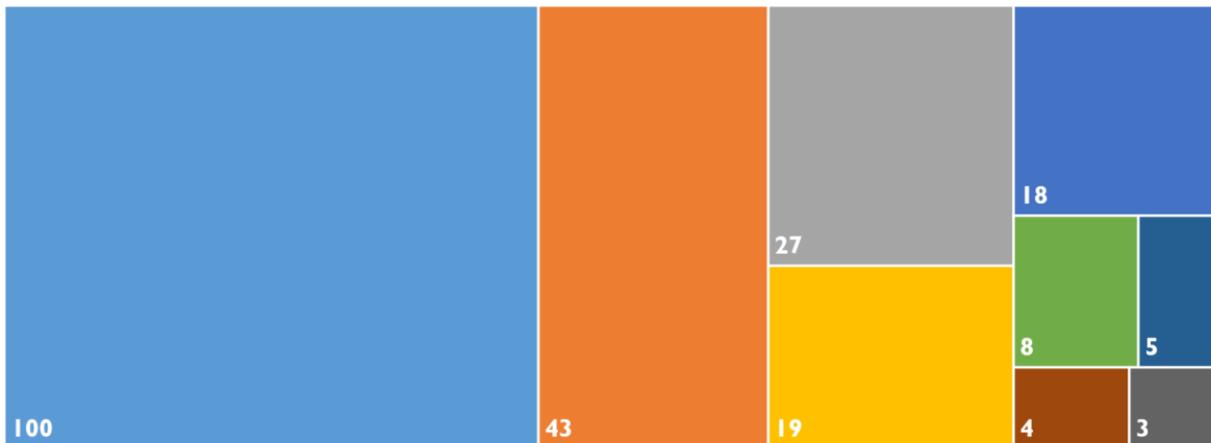


- 1 = unwilling to see any change at all to the district
- 2
- 3
- 4
- 5 = willing to accommodate any change necessary, no matter how large

You said: Of 284 respondents, well over half were willing to accommodate much or some change, and about a fifth were very or somewhat resistant.

232 respondents made additional comments to explain their view. We have divided responses into categories, according to the dominant points made in responses (acknowledging that some responses referred to more than one issue).

The bulk of respondents acknowledged that the depth of the climate crisis meant that changes will have to be made that would not be justified had the climate crisis not been such an urgent issue. Many also expressed the concern that potentially negative impacts (for example visual impact on protected townscapes or landscapes), arising from changes in response to the climate crisis, should be avoided or minimised.



- Actions are justified by the urgency of the climate crisis
- Accept that actions are necessary but negative impacts must be managed
- Skepticism over need for / effectiveness of climate action and Council's role
- Concerns over impacts on landscape / townscape
- Concerns over cost / affordability / fairness of required changes
- Cannot respond because insufficient information, question too wide, or too many unknowns
- Accept that changes are justified
- Concerns over practicality / achievability of the required changes
- Concerns over preservation of sustainable communities

* figures in the above graph indicate the number of respondents.

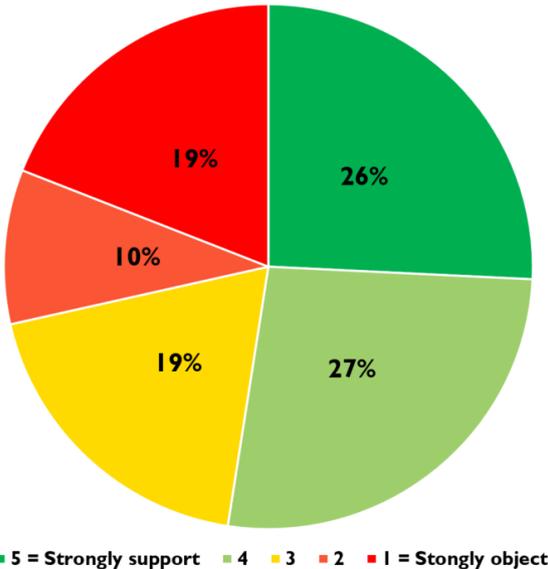
Officer comments: A small number of respondents felt that the questionnaire text, and the accompanying background paper, did not provide sufficient justification for the overarching assertion that the Local Plan should be 'green to the core' and should aim to reduce greenhouse gas emissions across the district. However, it was a deliberate decision not to provide a section in the background paper that recaps climate science or the conclusions of (e.g.) the Intergovernmental Panel on Climate

Change. This is because, as stated in the Council’s Climate Emergency Strategy of September 2020, the science is settled, there is no ambiguity about the need to reduce emissions, and the Council accepts the responsibility of the whole district to play a proportionate part in this international and national responsibility.

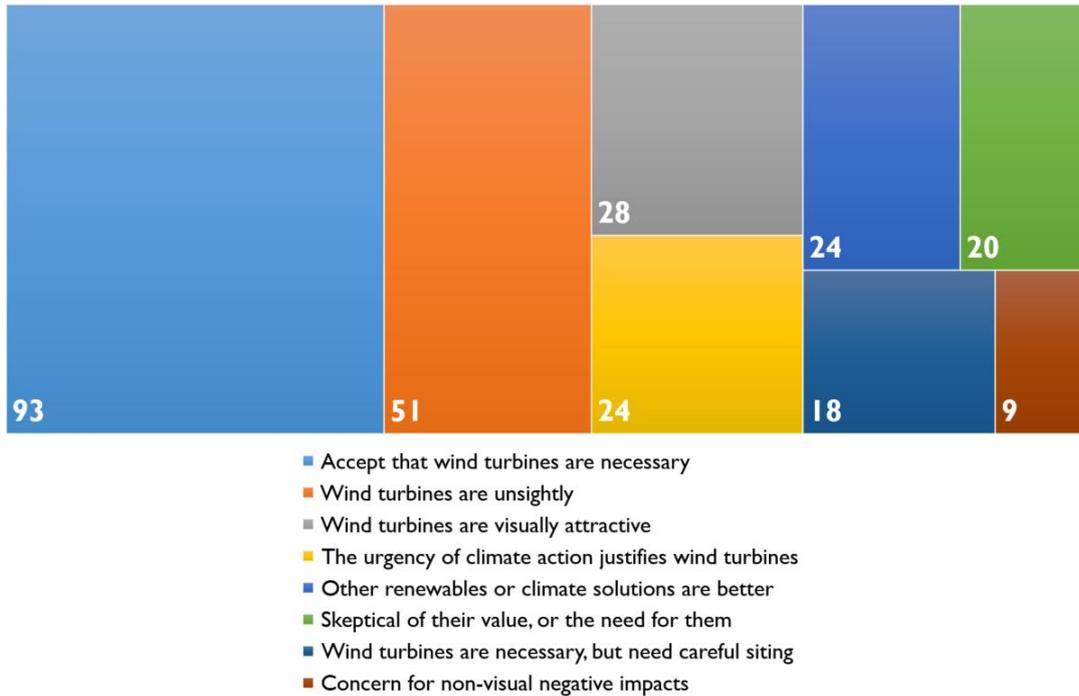
We asked: Q3a. Cotswold District aims to be carbon neutral by 2045. To achieve this we need both to use less non-renewable energy and generate much more renewable energy than we do at present. One way of meeting our targets is to put wind turbines in those parts of the district where they'll be most 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. Please indicate how you feel about the idea of wind turbines in the AONB.

You said: There were 326 responses to this question. Slightly more than half of respondents either supported or strongly supported wind turbines in the AONB, and slightly less than a third either objected or strongly objected.

Officer comments: We recognise that framing questions such as this can be problematic, not least since the question is non-specific. Some respondents may have answered “3” (ie, unsure) because the question does not specify how many, how large, and where such wind turbines might be sited, and their view of the acceptability of turbines would depend on these factors. Nonetheless at this early stage of consultation the question was deliberately kept broad, and subsequent questions provide some more granularity on this topic.



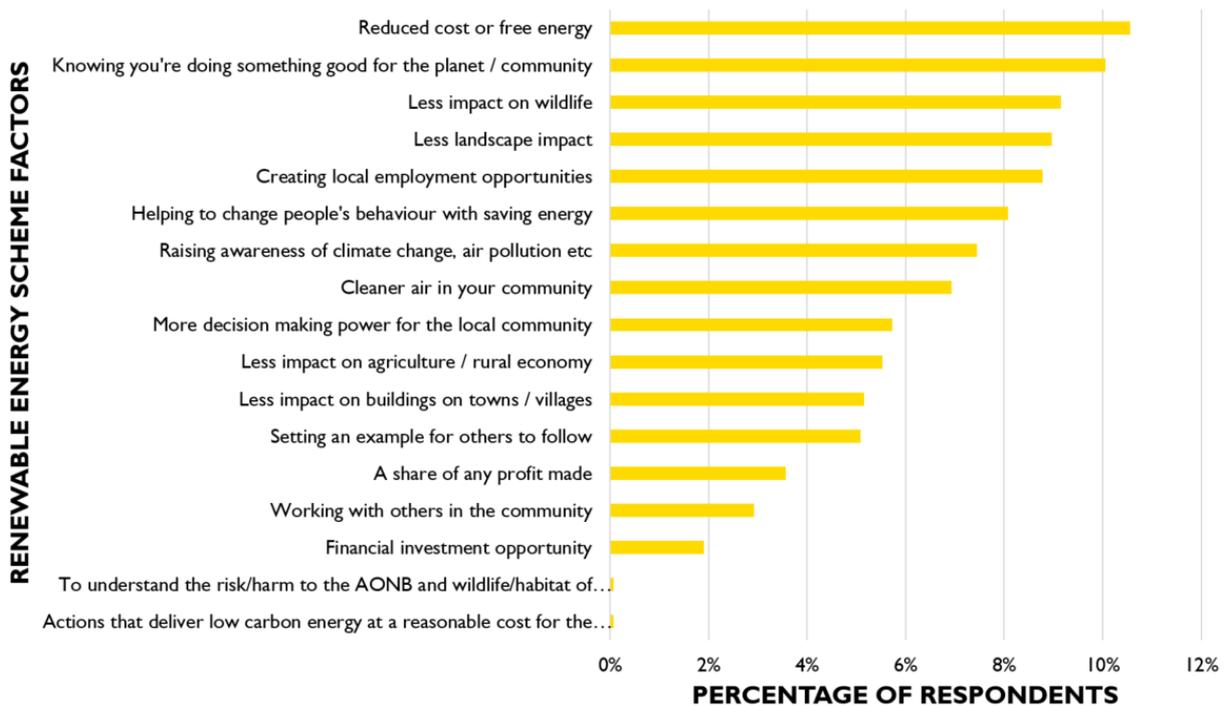
We asked: Q3b. Please explain why? **You said:** The Treemap below records the summary and number of types of responses given by the 274 respondents who provided comments to explain their view. There was some general acceptance that wind turbines are necessary and that the urgency of the climate crisis justifies their placement in the AONB. However, there was also concern about wind turbines being unsightly and suggestions that other renewables and climate solutions were better.



We asked: 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? We invited you to select as many factors as you wished from the following list, and to suggest any additional factors too:

- Less impact on wildlife?
- Financial investment opportunity?
- Working with others in the community?
- Helping to change people's behaviour with saving energy?
- A share of any profit made?
- Setting an example for others to follow?
- Creating local employment opportunities?
- Less impact on buildings on towns / villages?
- Reduced cost or free energy?
- Less impact on agriculture / rural economy?
- More decision making power for the local community?
- Cleaner air in your community?
- Raising awareness of climate change, air pollution etc?
- Less landscape impact?
- Knowing you're doing something good for the planet / community?

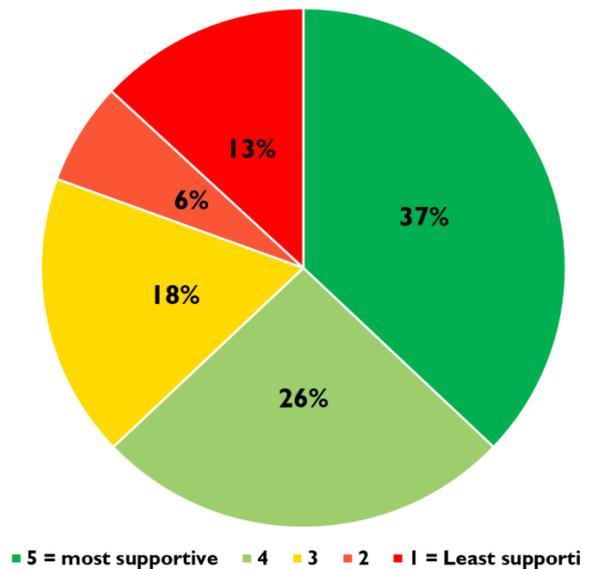
You said:



Officer comments: It is striking that the three financial factors are far apart. The most commonly chosen factor was “reduced cost or free energy”, but “a share of any profit made” (which is effectively equivalent), and “financial investment opportunity” rank very low. Financial compensation in the form of community funds for areas closest to new renewable energy generation schemes is a well-established good practice among renewables developers, but it is very hard (due to the way the electricity market is structured) to link individual households to discounted electricity supply from a renewable energy generation site in close proximity.

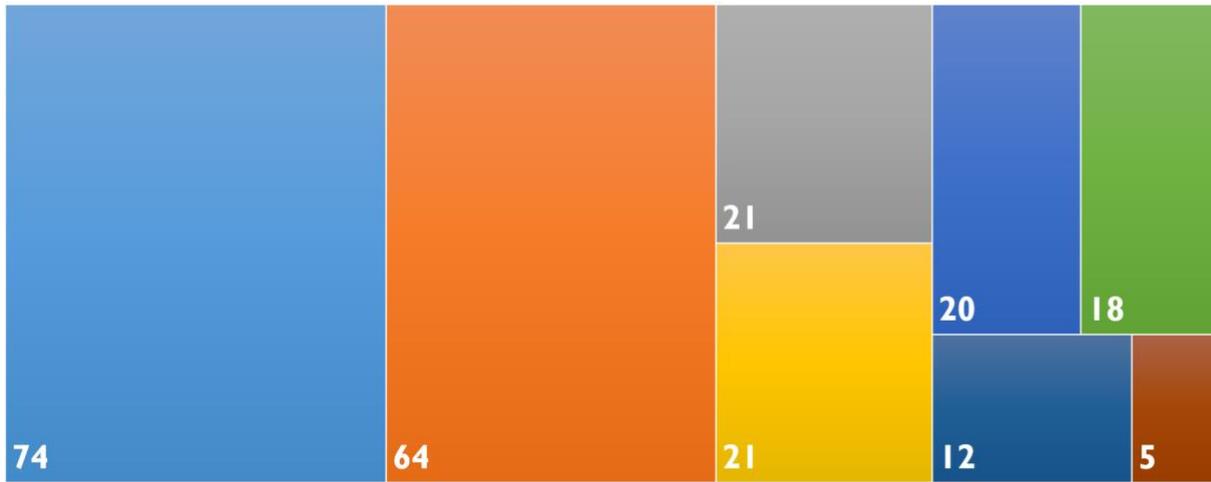
We asked: Q5a. How supportive would you be of ground mounted solar panels ('solar farms') being much more common in the district? We invited you to score this question between 1 and 5 (5 being the most supportive and 1 the least).

You said: Over 60% of the 283 respondents were either most supportive or somewhat supportive, and less than 20% were in the two non-supportive categories. It is interesting to compare this with Q3b, relating to wind turbines in the AONB, in which the supportive / non-supportive responses were roughly 50% and 30% respectively. This is likely to reflect respondents’ perceptions about the relative overall visual impact of each technology on the landscape.



We asked: Q5b. Please give reasons why you feel this way?

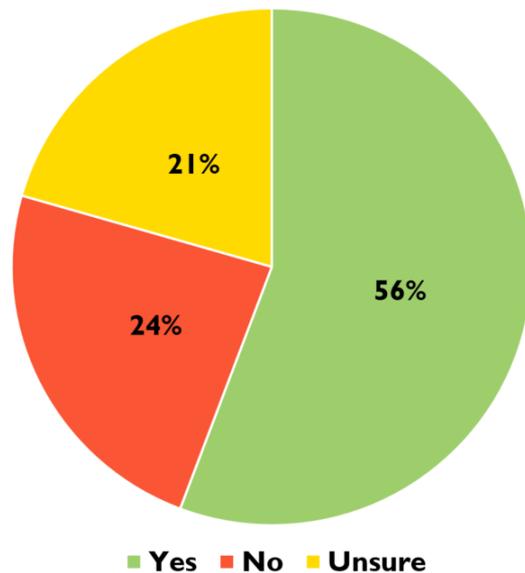
You said: 235 respondents provided comments, with the two largest categories of response (59% combined) indicated respondents’ acknowledgment of the urgency of responses to the climate crisis, and that the visual or other impacts of solar farms can be minimised through careful management.

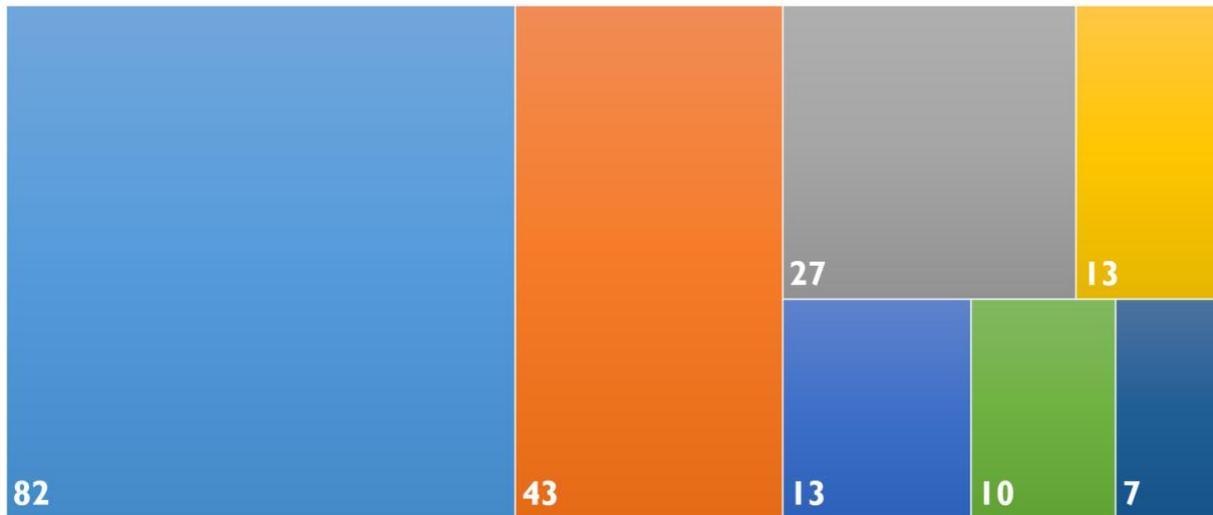


- Accept the need, but with caveats (eg land value, BNG, size, screening, community agreement)
- Visual / other impacts are modest / justified / can be managed
- Negative visual impact unacceptable
- Concerns over displacing agricultural / food production
- Prioritise solar on building
- Skeptical of justification / value / impacts / economics etc
- Better than wind turbines
- Prioritise other energy generation solutions, inc wind

We asked: Q6a. 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 (a Climate Change Statement)? and **Q6b.** Please explain why.

You said: The 253 responses to question 6a, and the 195 additional comments, demonstrated caution and pragmatism. The largest proportion of respondents acknowledged the need for stronger action on improving the carbon performance of existing homes, but many raised concerns about practical difficulties and prohibitive costs, and the potential for unintended consequences.



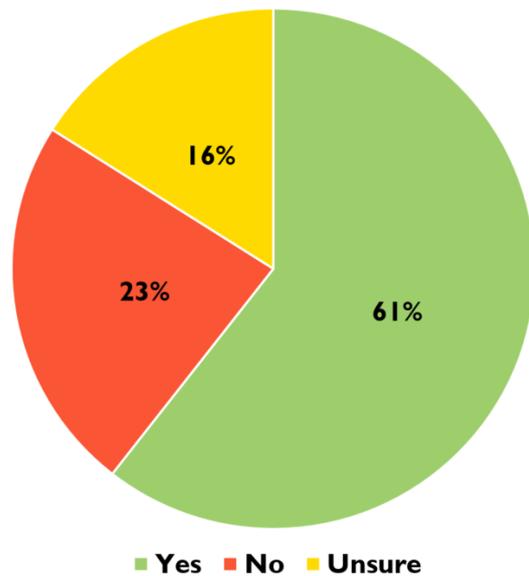


- Accept the need, some with caveats (eg affordability, support)
- Costs are likely to be prohibitive / unfair / unworkable without grant support
- Practical difficulties, particularly with historic buildings
- Skeptical of justification, motivation, effectiveness etc
- Requirement must be proportionate (scale, cost etc)
- Risk of unintended consequences (eg disrepair, economic impact, constraint on families)
- Proposal is unenforceable / unreasonable / inconsistent

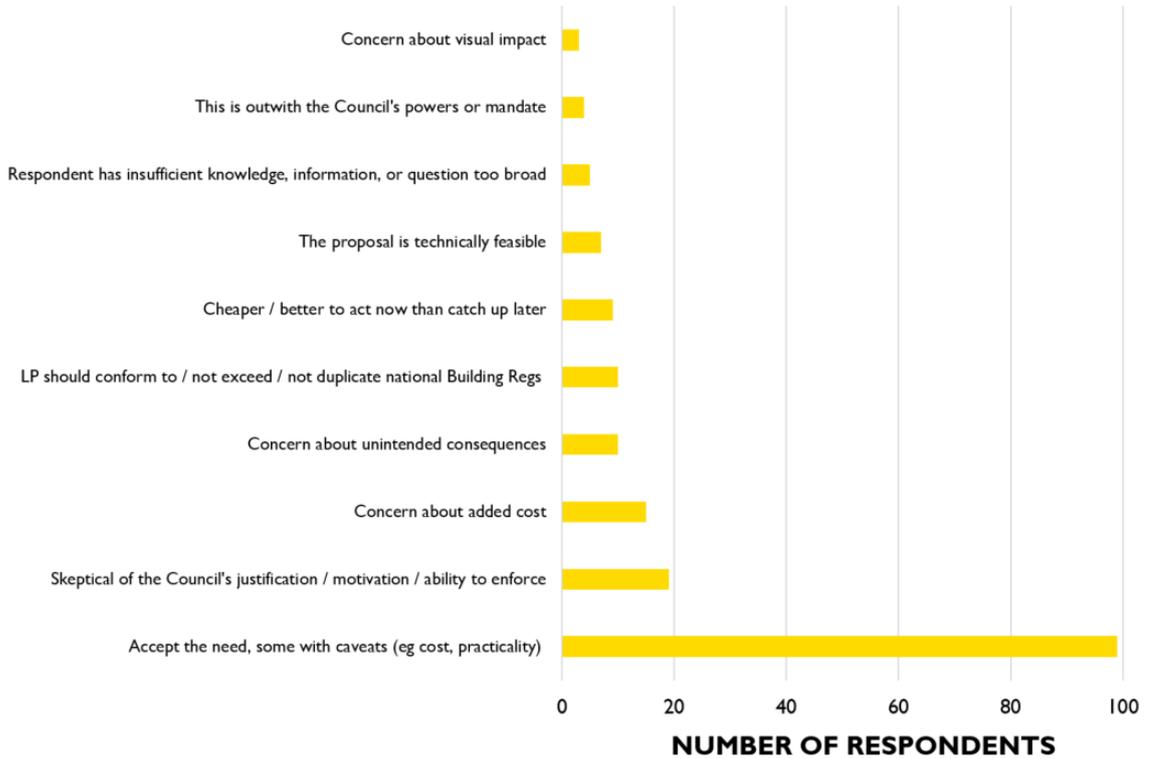
* figures in the above graph indicate the number of respondents.

We asked: Q7a. 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? and **Q7b.** Please explain why.

You said: Over 60% of the 256 respondents responded positively to the main question. The 181 respondents providing supplementary comments broadly accepted the need, driven by the climate crisis, to move faster than building regulations, and these responses are consistent with often-repeated comments made during drop-in sessions, to the effect “why aren’t all new houses required by law to have solar panels?”, where solar panels are often seen to be symbolic of a new house having a more careful, lower climate impact design.



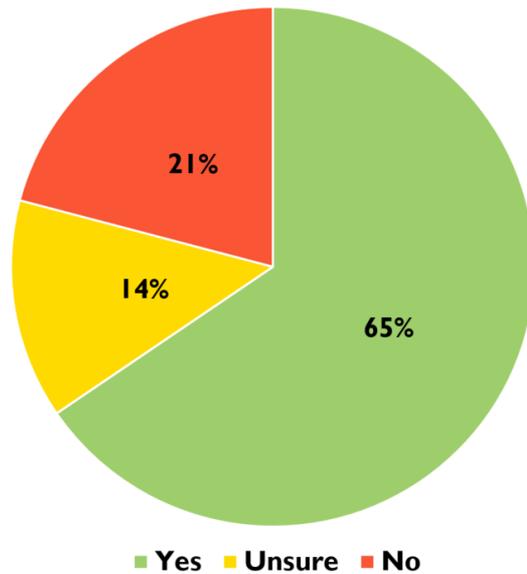
REASONS WHY LOCAL PLAN SHOULD GO BEYOND NET ZERO



We asked: Q7c. Would you support zero carbon housing if it also meant homes had a less traditional design?

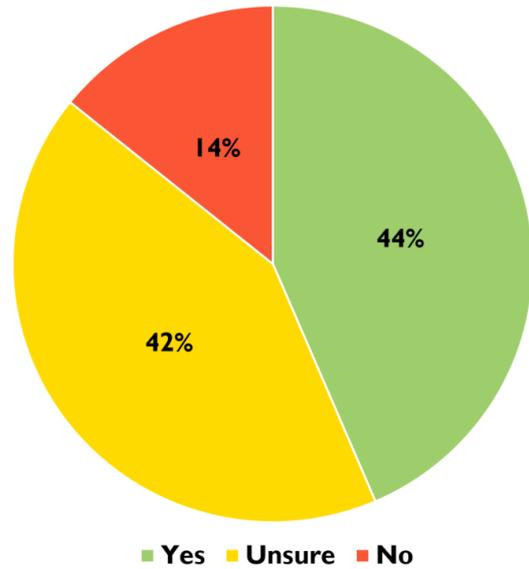
You said: There were 249 responses to this question with almost two thirds supporting less traditional design if it also meant delivering zero carbon homes.

Officer comments: This question is framed in deliberately broad terms. Respondents may have interpreted the phrase 'less traditional design' in very different ways, and we therefore recognise that responses must not be over-, or too simplistically, interpreted.

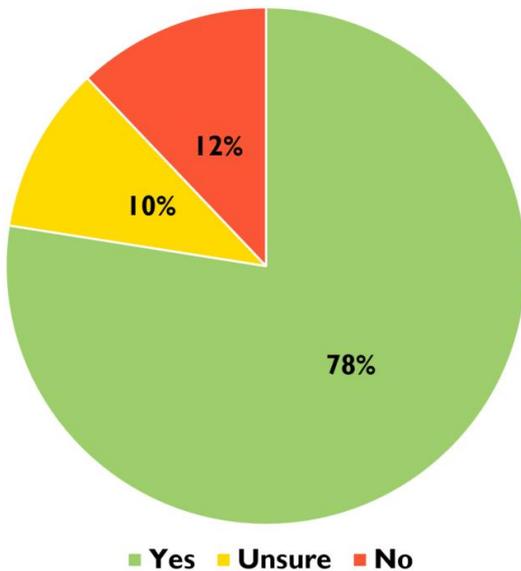


We asked: Q8. Do you agree with the preferred option(s)²?

You said: There were 225 responses to this question with roughly the same number of respondents supporting the preferred options as there were unsure.



We asked: Q9. A strategic policy could be added to the Local Plan requiring all development to respond positively to the climate change emergency and to the ecological emergency. The policy could set out compliance criteria and could be a 'green thread' running through the entire Local Plan giving additional weight to these considerations when determining planning applications. Should the Local Plan be updated to include this policy?



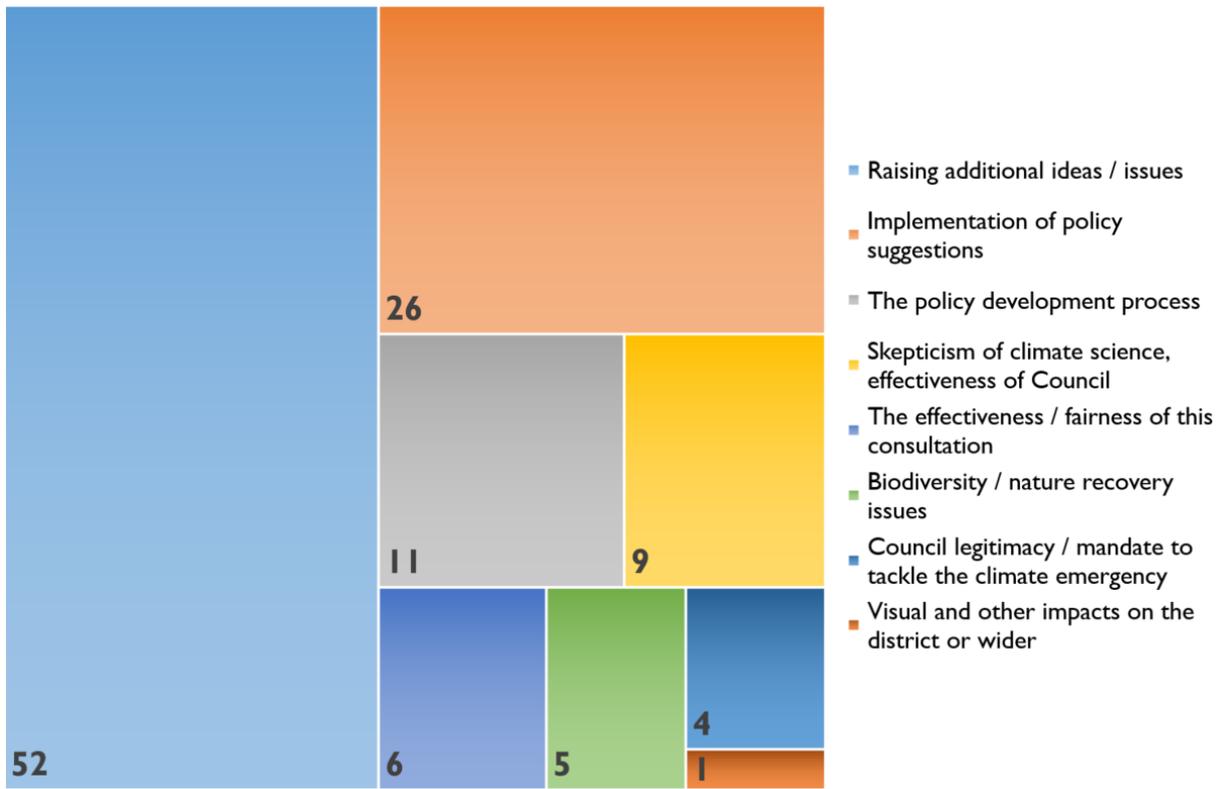
You said: There were 249 responses to this question with over three quarters agreeing that the local plan should include a strategic policy requiring all development to respond positively to the climate and ecological emergencies.

This is one of the clearest responses in this section of the consultation, and indicates strong support for the principle of a strategic policy providing a 'green thread' through the updated Local Plan. We might note that the question is framed in a very broad way, and the proposed policy as described is equally broad, making it easier for respondents to agree with the proposal.

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

You said: This chart categorises the broad topic headings of the 114 comments provided, but does not break down the comments, since individual comments were often highly specific, single issues. Whilst very useful for the Council to take into account, many issues raised by respondents were of a broader nature than can be influenced or controlled by a Local Plan.

² i.e. Option 2 - take forward a suite of amendments to meet the issues and challenges, as set out at Section 2 of the Topic Paper

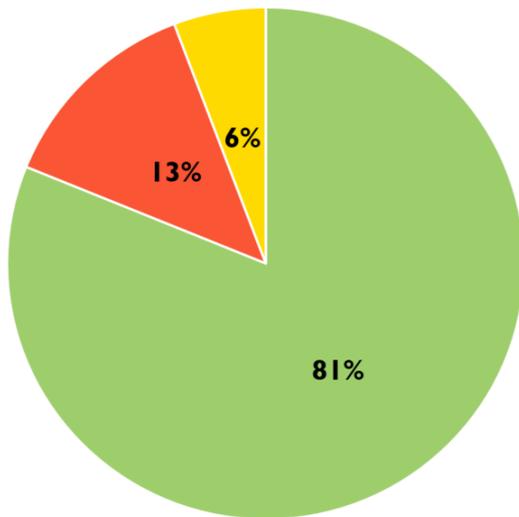


* figures in the above graph indicate the number of respondents.

3. Accessibility of New Housing Development

The Accessibility of New Housing Topic Paper received most of its responses through our online consultation. Several additional representations were received, mostly from developers, town/parish councils or other organisations. These representations tended to be much longer and did not necessarily follow the set consultation response structure. They are therefore not included in the graphical data, but a summary of the key issues raised and responses is included in the commentary.

We asked: 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?



■ Yes ■ No ■ Unsure

You said: Responses to the Accessibility of New Housing Developments topic paper revealed broad support for the principle of locating new developments within reach of important services and facilities without needing to drive.

Some respondents thought that an amount of further housing growth is needed in rural settlements, which have lower accessibility, to enable them to sustain local services and facilities and to maintain the vitality of those settlements.

Additionally, some respondents thought that whilst a sustainability scoring matrix based on accessibility to key services and facilities has an important role to play in the location of sustainable development, this

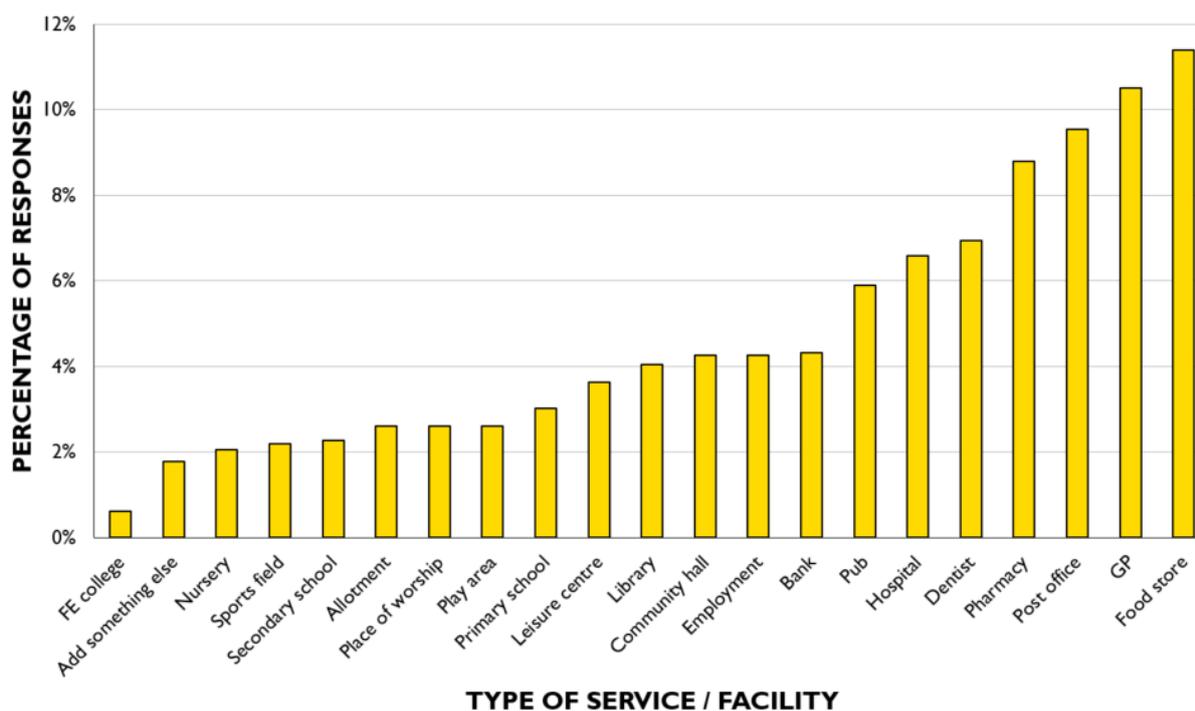
should not be used in isolation and wider consideration needs to be given on a settlement by settlement basis and also in relation to individual development sites. One comment noted that whilst accessibility is quite rightly a key consideration, it is only one component of sustainability.

There were also calls for the Council to engage with developers and/or promoter to establish whether any improvements can be made in terms of access to Core Services before sites are discounted.

We asked: Q2. Which services and facilities are most important to you in your everyday life?

You said: The top four most important services that respondents listed were a food store, a GP, a Post Office and a Pharmacy.

Officer comment: We note, however, that this may be reflective of a) the generally older demographic of respondents and b) the fact that some services e.g. schools and employment, are requirements only in certain phases of life (but highly important during those phases), whereas the need for food and healthcare remains more constant.



We asked: Q3. How long you would be willing to walk and/or use public transport to get to the following places [Core services]?

For this consultation, we proposed the following thresholds of acceptable journey times from potential developments to core services.

Core Service	Local Journey time bands (mins by walk/bus)		
	<15 mins	15-30 mins	>30mins
Employment	Green	Amber	Red
Primary school	Green	Red	Amber (3)
Secondary school	Green	Amber	Red
GP	Green	Red	Red
Hospital	Green	Green	Amber
Food store	Green	Red	Red

³ This option is amber because free school travel is provided beyond 2 miles (children under 8) or 3 miles (for children over 8), so many children who live beyond this distance from their closest school will catch the bus.

We then asked respondents to give their views for comparison.

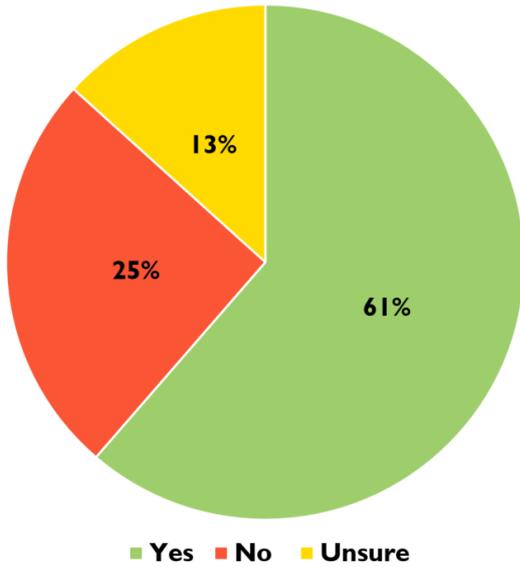
You said:



The results show broad alignment with our suggested thresholds, with 4 out of 5 people willing to walk/catch the bus for 20 minutes or longer to get to work, hospital or a secondary school. Acceptable walk/bus times dropped for GPs and primary schools, and less than half of respondents were willing to walk/bus more than 10 minutes to a food shop.

Officer comment: The feedback suggests it may be more appropriate to define our thresholds in 10 minute bandings rather than 15, and potentially increase the acceptable journey time for employment. This will be reviewed in line with our emerging transport strategy and targets.

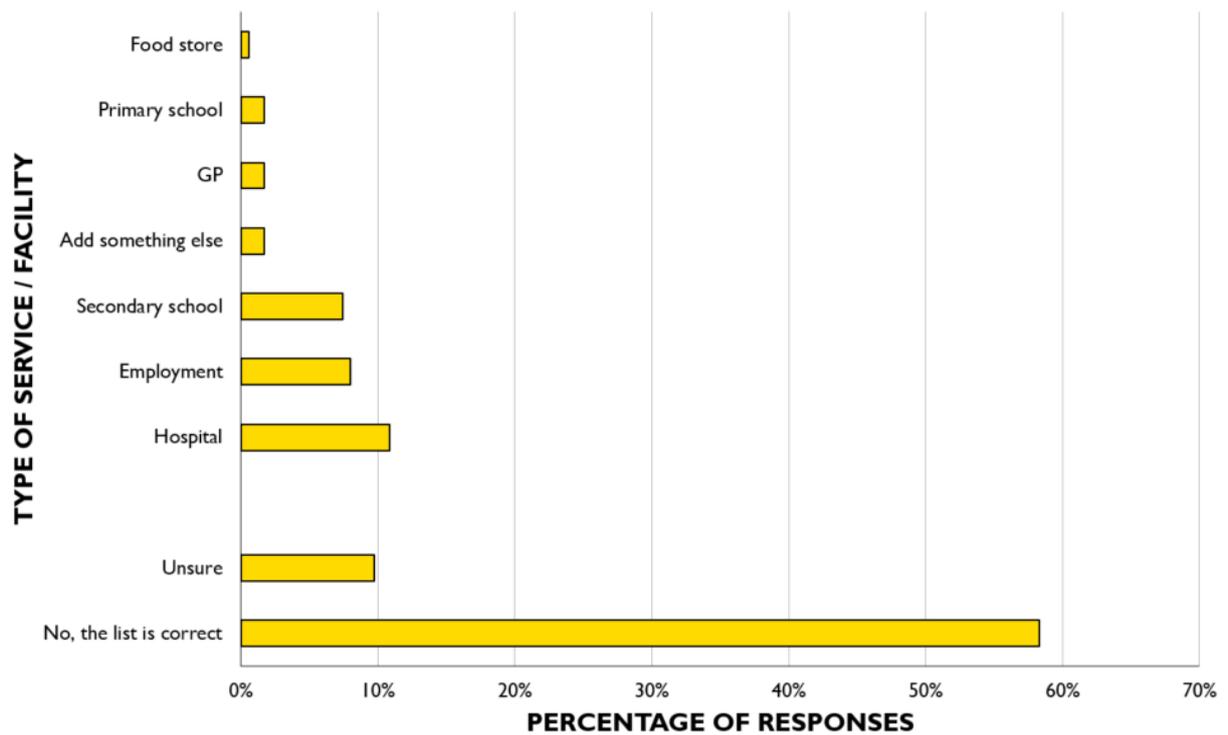
We asked: Q4a. Do you think the “Core Services” have been appropriately identified?



You said: There was general agreement with the services that had been defined as “Core Services”. Some questions were raised about whether some of the Core Services had been appropriately defined for Cotswold - for example whether it is reasonable to define an Employment site as consisting of at least 1,000 job opportunities or whether a lower figure should be used. Others questioned whether it was still correct to define Accessibility to a service as being intrinsically linked to attending a physical location, or whether the model of that service delivery was becoming more flexible/online (e.g. GP services). These representations will be considered in more detail during the next phase of development.

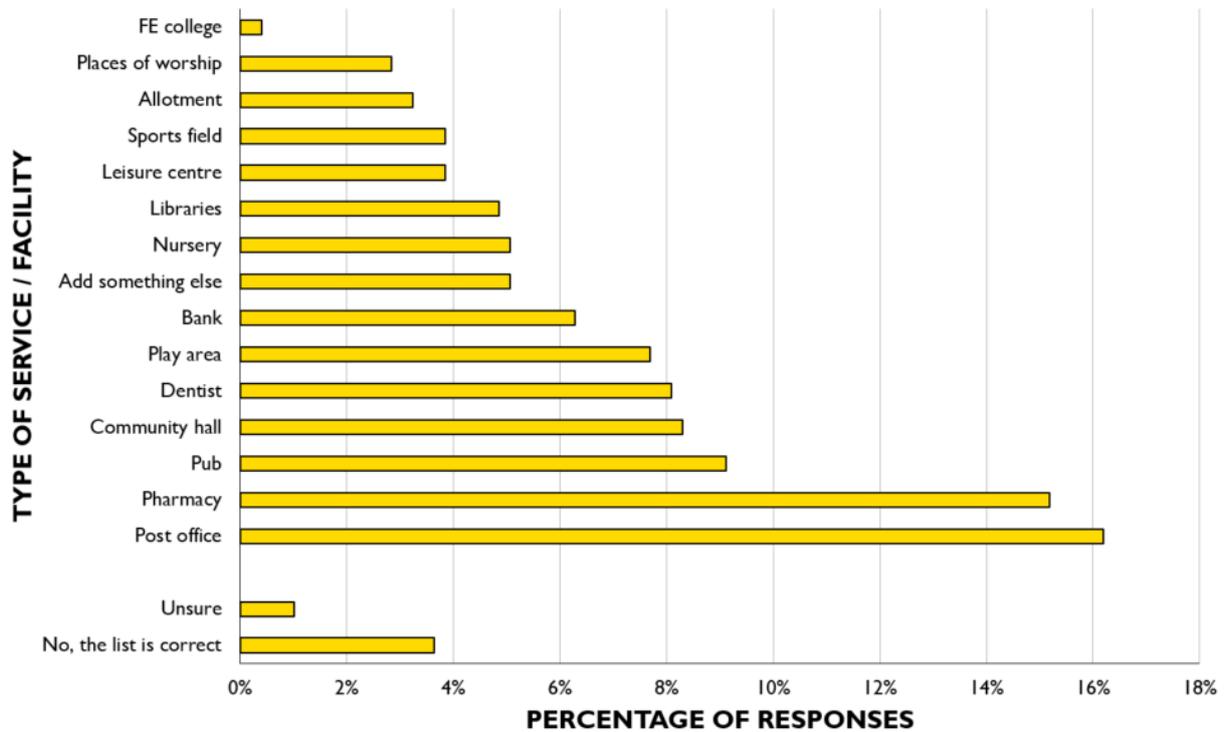
We asked: Q4b. Is there anything you would remove from the list of Core Services?

You said: Nearly 60% of respondents thought the list of Core Services was correct. A hospital was the most cited service that should be removed from the list of Core Services with over 10% of responses – a view that was mirrored in the written submissions.

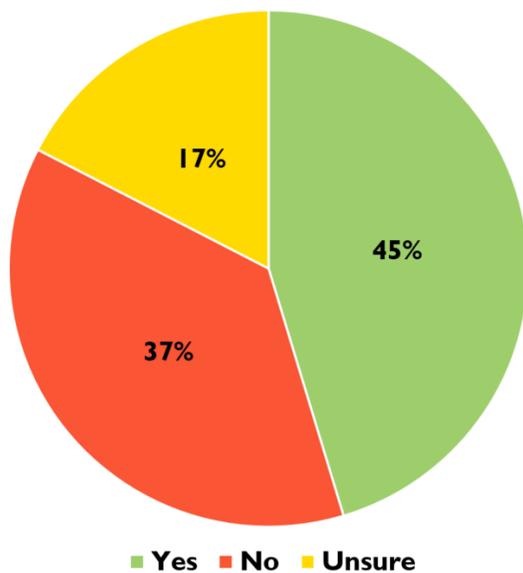


We asked: Q4c. Is there anything you would add to the list?

You said: The two standout services that respondents thought should be added to the list of Core Services were Post Offices and Pharmacies.

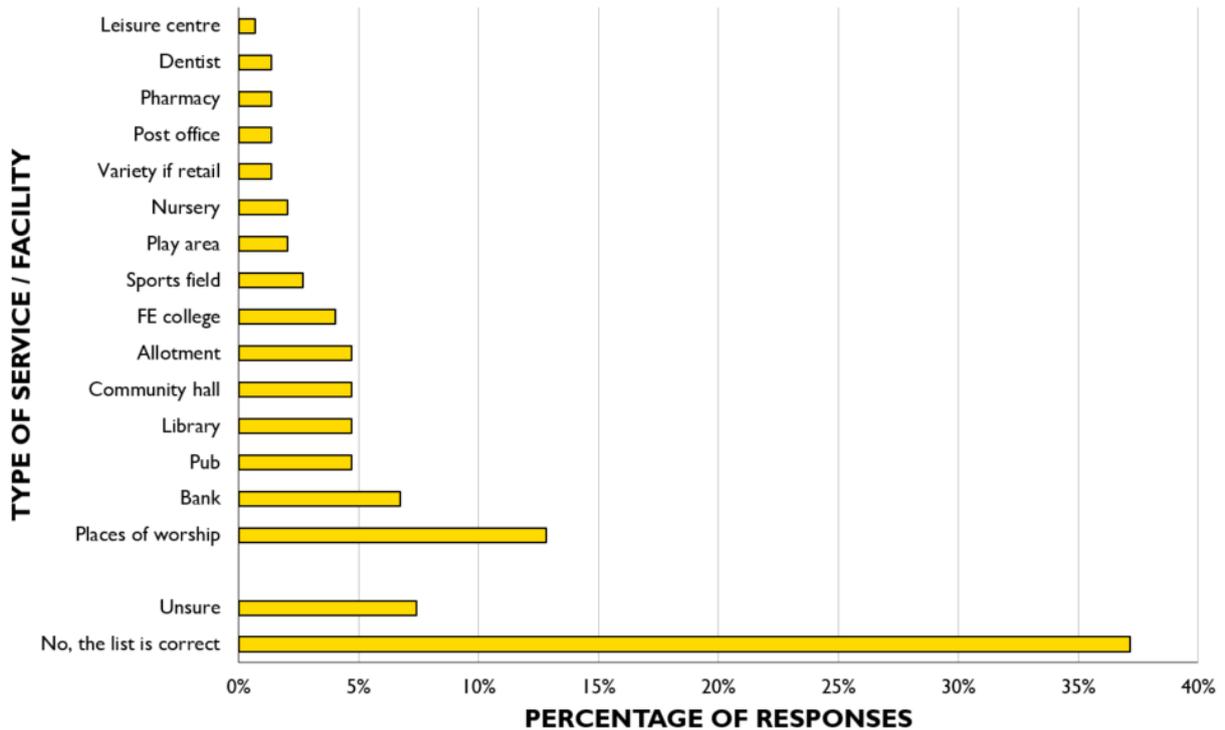


We asked: Q5a. Do you think the Primary and Secondary Services have been appropriately identified?

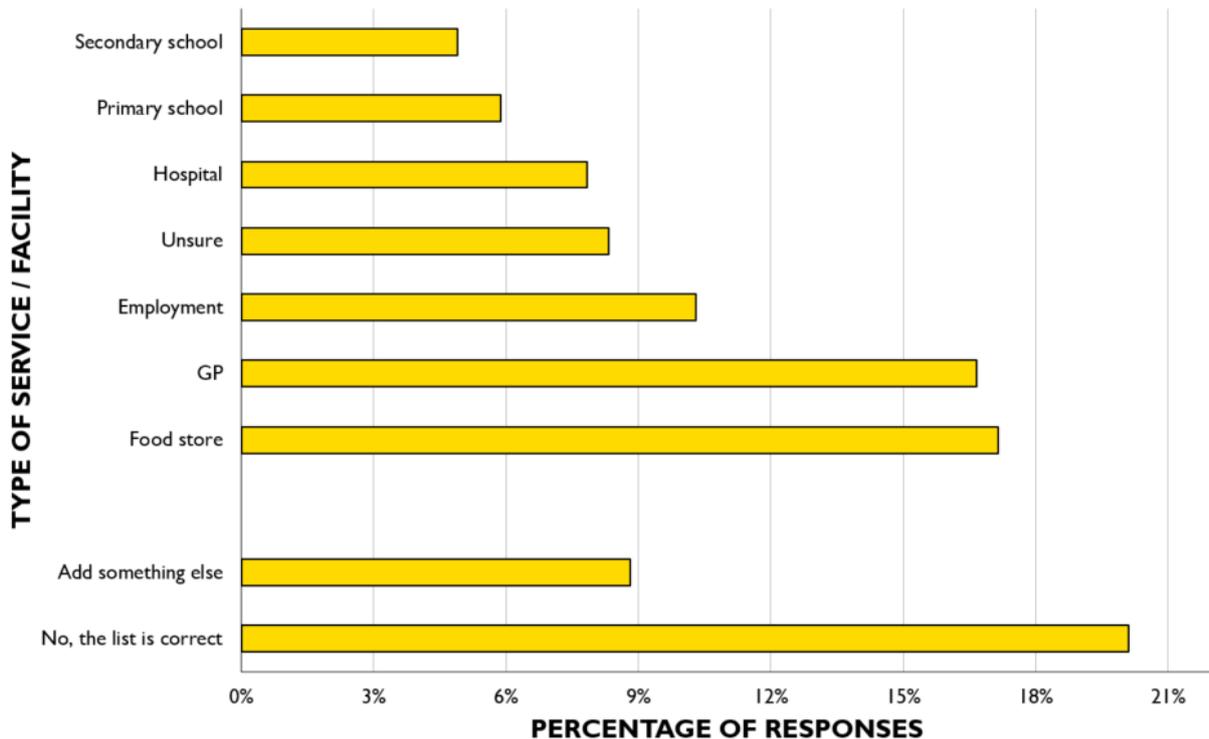


You said: Responses to this question were very mixed and there was little clear consensus or evidence arising from this section of the consultation.

We asked: Q5c. Is there anything you would remove from the list?

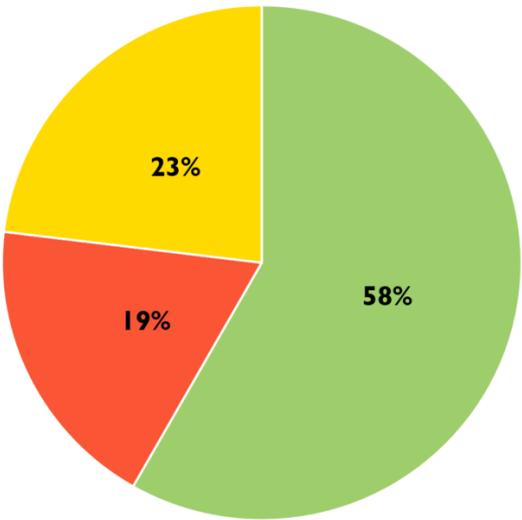


We asked: Q5c. Is there anything you would add to the list?



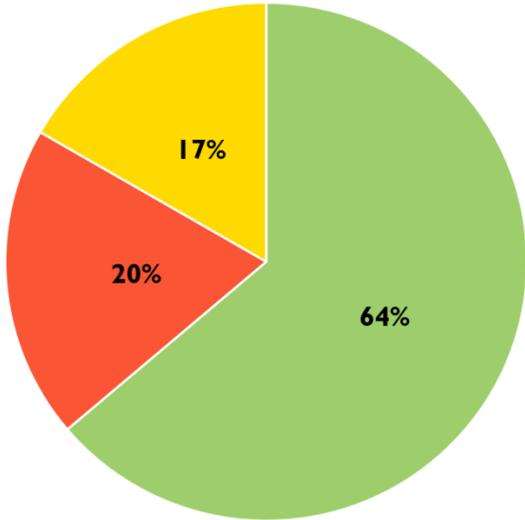
Officer comment: Responses to Questions 5a, b, and c were difficult to analyse with certainty. The question and selections were complicated by the inclusion of the Core Services in the list of options for Primary/Secondary services, which then dominated the responses. This is noted as a weakness in the formulation of the consultation question and a learning point for the future. We will seek to collate better data on this matter through other methods.

We asked: Q6a. Do you think the time bands for Core, Primary and Secondary Services are realistic? *and* Do the time bands reflect how long you would be willing to walk or use the bus to access these services?



■ Yes ■ No ■ Unsure

We asked: Q6a. Are these journey times realistic?



■ Yes ■ No ■ Unsure

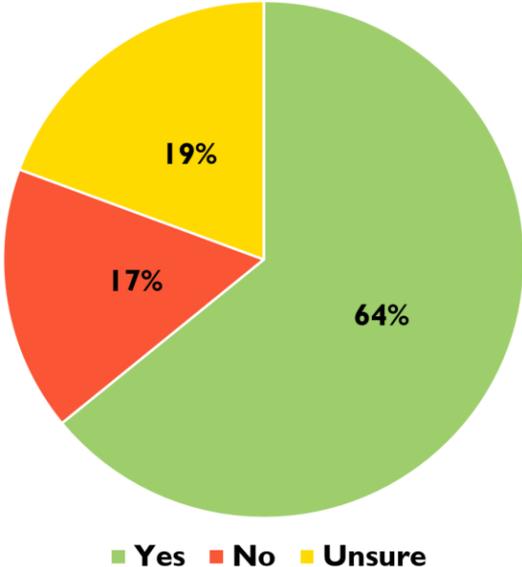
We asked: Q6b. Do they reflect how long you would walk/use bus?

You said: These twin questions show general agreement with the suggested assessment of acceptable journey times (by walking and/or bus) to the named services, which mirrors the results from Q3, but with more uncertainty expressed.

Of those who responded ‘no’, they thought the journey times may be too crude and required a degree of flexibility / pragmatism between the cut off points in different time-bands, further indicating that a revision to 10-min times bands may be desirable.

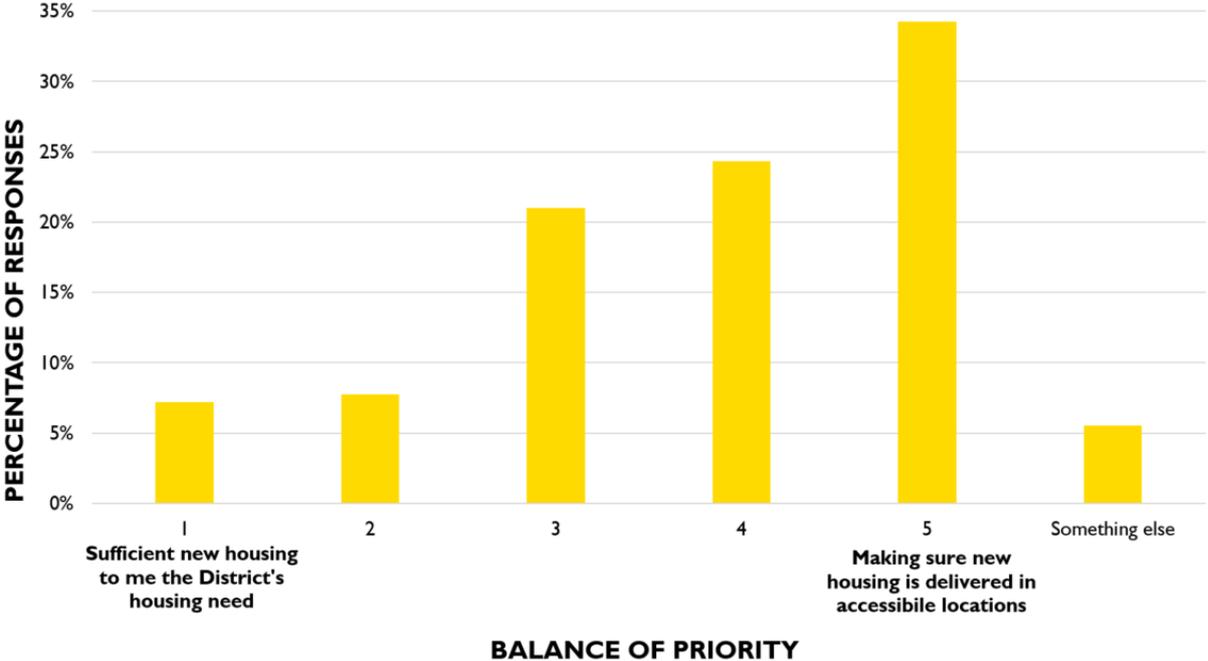
Officer comment: In each case, these options must be assessed alongside other sources of evidence about typical/acceptable journey times, and with a view to the level of “modal split” (proportional use of each mode of transport) we wish to achieve in Cotswold District and the relative importance of this target and others. Drawing the limits of acceptable accessibility for new developments more tightly may help to ensure private vehicle journeys are minimised, but it could also mean that both the number and the locations of new development are constrained.

We asked: Q7. 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?



You said: Again, the majority (nearly two-thirds) of respondents thought that the Council’s suggested approach was preferable. Some respondents thought that the standards should be used to help inform decisions rather than as a series of strict standards to be applied, which would otherwise restrict the delivery of housing.

We asked: Q8. 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?

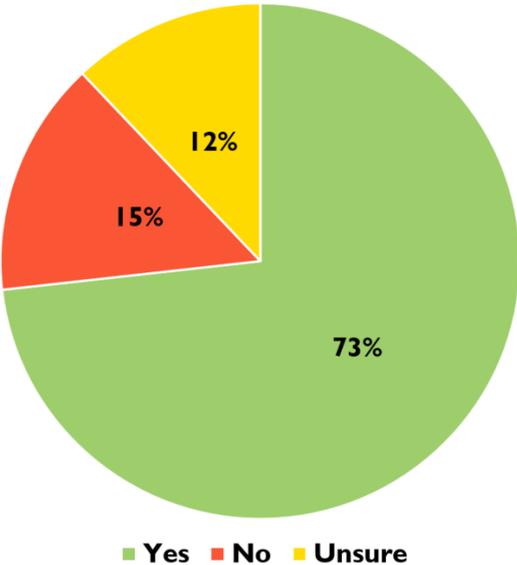


You said: People generally thought that it was more important to ensure that housing was delivered in accessible locations than to deliver the sufficient number of homes to meet the District’s housing need.

Officer comment: The less accessible locations will still have a degree of housing need which should be allowed for and that improvements to public transport links could help improve the accessibility of these locations and in turn ensure that sustainable housing can be delivered more widely across the District. Concern was raised that without a degree of development in non-principal settlements with

less accessibility, their vitality will decline and they may become unable to support existing facilities and services.

We asked: Q9. Do you agree that an accessibility test should form part of Local Plan Policy DS3?



You said: Nearly three-quarters of respondents thought that the accessibility test should form part of Policy DS3.

Of those who answered no or were unsure, comments received included that the accessibility standards should not be solely relied upon in a rigid manner in relation to the location of future development and that they should instead be used to inform decision making, alongside other considerations, rather than to dictate decisions.

In addition, it was commented that the Non-Principal Settlements, by their nature, are likely to be smaller settlements with more limited access to services and facilities. It was suggested that a form of assessment in terms of their accessibility

to key services and facilities should be undertaken but that this should be done using a more individual approach considering the geographical location of the settlement, whether the settlement functions in a cluster form with other settlements for service provision and importantly the access to public transport and specifically routes to other settlements to access services.

Officer comment: The comments and concerns raised in the latter two questions - mostly about the impacts of an Accessibility test on vitality/viability of smaller settlements and the potential impacts on the number and distribution of new developments across the district - are very important considerations that must be tested and discussed in detail during the next phase of policy development. Achieving an appropriate balance between these considerations and the need to ensure developments are sustainable is vital.

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

You said: It was commented that the Local Plan needs to strike a balance between delivering accessible developments and ensuring sufficient land can come forward for housing to meet needs.

Next steps:

- 1) Review the accessibility matrix proposed in the following ways:
 - Consider whether “hospital” should be removed from the list of Core Services and Pharmacy and/or Post Office added;
 - Whether definition of Employment as consisting of 1000+ job opportunities is appropriate for Cotswold;
 - Contact CCGs/NHS to review whether physical access to GP surgeries is likely to continue to be necessary for most patients in the coming years;
 - Split the journey time assessment down to 10-min bandings rather than 15 to allow for more variation/nuance; and
 - Consider whether a longer journey time to Employment should be deemed acceptable.
- 2) Research the potential impacts of introducing an Accessibility test on the number and distribution of housing, particularly with respect to the vitality and viability of Non-Principal Settlements and the windfall supply of housing.
- 3) Progress work to establish targets for modal shift (moving from car use to more sustainable modes) in Cotswold and establish how the Local Plan should contribute to those targets. From this (and other evidence), establish the weight that should be given to Accessibility considerations in the planning balance.

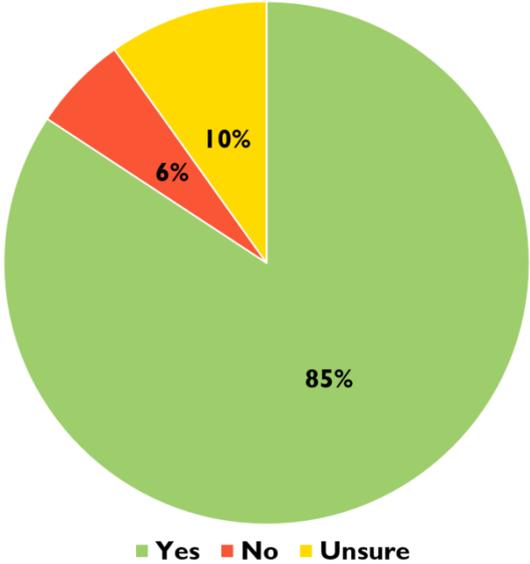
4. Biodiversity

The topic paper proposed several options that could be made to modify the adopted local plan to help make it green to the core. It asked ten questions that sought to find out people’s views on several key issues relating to biodiversity in the District.

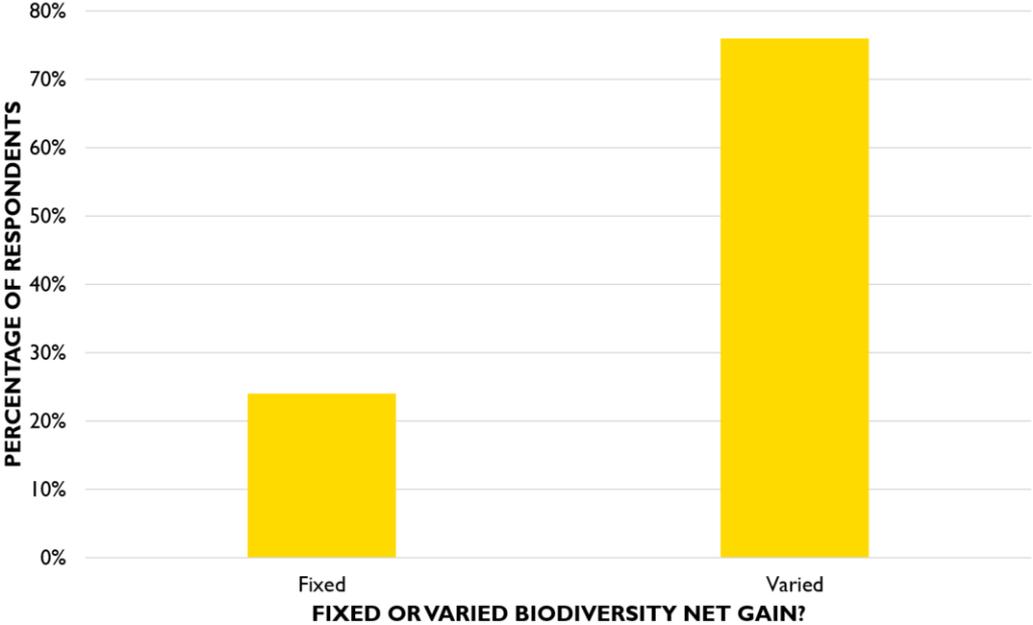
We asked: Q1a. Should developments in Cotswold District achieve more than 10% biodiversity net gain?

You said: The majority of respondents agreed that the Cotswold District should achieve more than 10% biodiversity net gain, one response suggested the Council should push for 25% BNG.

Officer Comment: There were some concerns raised by a few organisations about the Council setting a local target which would deviate from the 10% set by the Government as a minimum by the Environment Act 2021. Several comments were received requesting for more evidence to justify setting a higher threshold. The viability of setting a higher target was also questioned. However, there was support for an approach that seeks a higher level of BNG if it is achievable without compromising viability.



We asked: Q1b. Do you think there should be a fixed percentage or should it vary in relation to the size, location or type of development?



You said: There is significant support for biodiversity gain to take the varied approach.

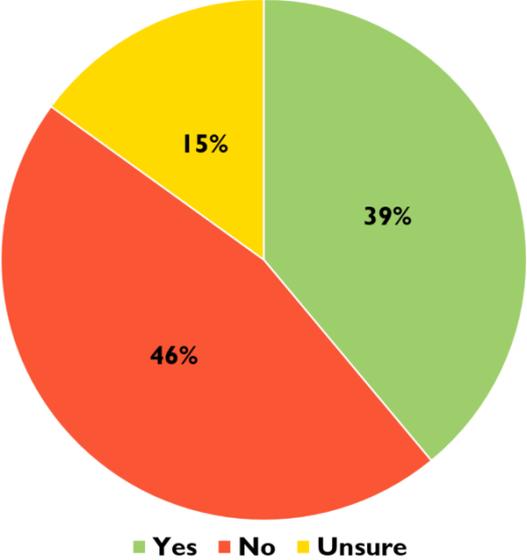
Your reasons included: Small scale biodiversity improvements can be made, which help to make a huge difference. Examples given included the creation of log piles, putting up bat and bird boxes as well as bee bricks. Orchards, and grass verges all have a part to play. Developers should be expected to provide funds to contribute to wildlife schemes etc regardless of whether they are building one house or one thousand

Officer comment: There is a clear preference for Biodiversity Net Gain to vary in relation to its size and location.

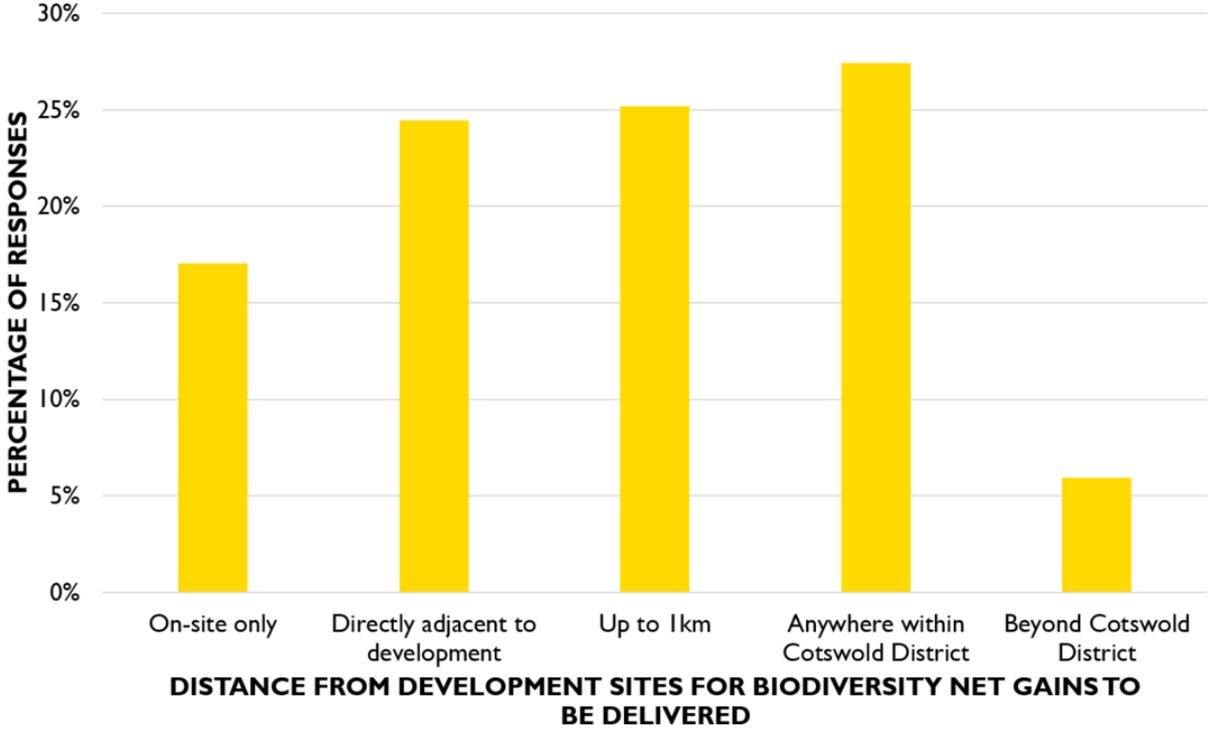
We asked: 2a. Should the Local Plan limit the percentage of biodiversity net gain that can be delivered off-site?

You said: The results of this question suggest a split between the ‘Yes’ and the ‘No’ answers.

Officer comment: The next question which required the respondent to go into greater detail provides a better understanding of what is deemed preferable.



We asked: 2b. How far away from development sites should the Local Plan require biodiversity net gains to be delivered?



You said: There was a mixture of responses to this question, but there was minimal support for BNG contributions to be made to sites outside the Cotswold District.

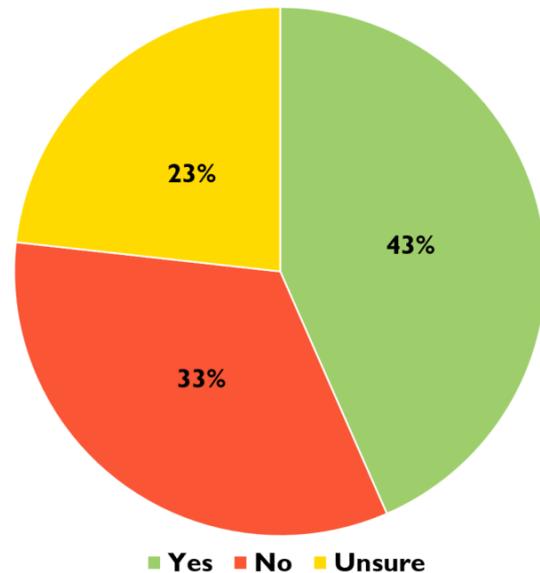
Your reasons included: The location of Biodiversity Net Gain should be considered as part of the overall picture to make sure Biodiversity Net Gain improvements link up with new and existing wildlife corridors to create the scale and connectivity required for it to be effective. A list of sites which are ready for improvement of any Biodiversity Net Gain offsite contributions would be a good idea. Consideration should be given to how far away the off site delivery should be as well as its management and that some rural areas would be more capable of delivering Biodiversity Net Gain where there are existing programmes in place. In some circumstances, it may be necessary to deliver a higher quantum of net gain off-site, depending on site specific factors and circumstances, to achieve a sustainable and balanced development. The local area should be looked at as whole rather than piecemeal for when improvements are put forward. Keeping net gain commitments on-site will require developers to be responsible in their design approach.

Officer comments: Overall, the responses indicate that offsite contributions for Biodiversity Net Gain are thought to be acceptable. If not on site, adjacent to or within 1KM of the development is favoured. Therefore, it is considered that the closer the offsite Biodiversity Net Gain can be delivered to the original development site the better.

We asked: Q3. Biodiversity Net Gain measures would have a minimum 30 year maintenance plan that is linked to the planning permission. Should the Local Plan require a longer maintenance plan?

You said: The majority of the respondents would like to see the maintenance plan for Biodiversity Net Gain to extend past 30 years.

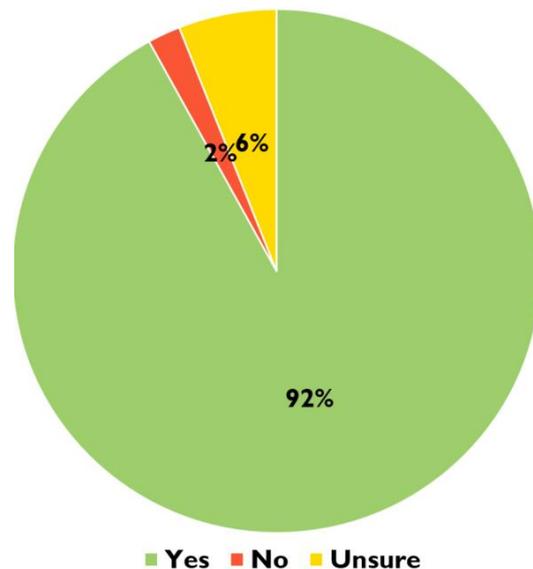
Officer comments: Although there is support for a maintenance plan to exceed 30 years. Opinion was split between the development industry and residents.



We asked: Q4. 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?

You said: There was overwhelming support for this proposal.

Your reasons included: The approach would help to provide a more direct link between the issues of development, biodiversity net gain and nature recovery.



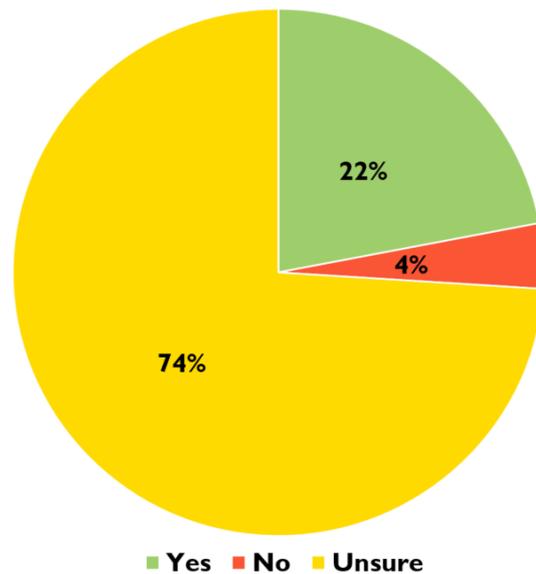
Officer comment: The support for this approach suggests that guidance to assist with this process is a useful tool.

We asked: Q5a. Have we correctly identified the European sites that should be scoped into the HRA for the Local Plan Partial Update (see Chapter 3 and Appendix A of the HRA)?

You said: A large percentage of respondents were unsure.

We asked: Q5b. If no please explain?

Officer comment: The questions regarding European Sites and the Habitat Regulation Assessment demonstrate that not all land based designations and assessments are generally known.



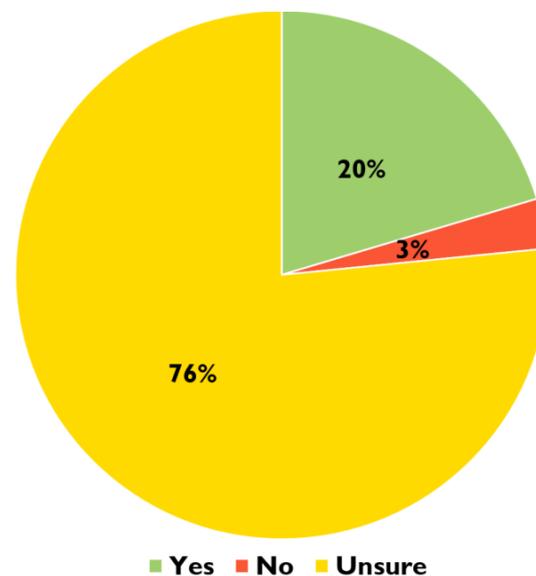
We asked: Q6a. Have we correctly identified the sensitivities of the scoped-in European sites to potential impacts from the Local Plan Partial Plan Update (see Chapter 4 and Appendix B of the HRA)?

You said: A large percentage of respondents were unsure.

We asked: Q6b. If no, please explain?

You said: There were only a handful of comments received about this question.

Officer comment: The questions regarding European Sites and the Habitat Regulation Assessment demonstrate that not all land based designations and assessments are generally known.



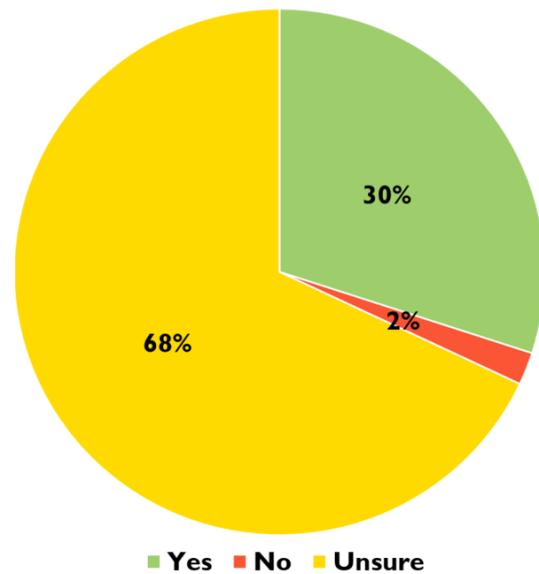
We asked: Q7a. Is the proposed approach to HRA of the Local Plan Partial Update reasonable (see Chapters 2 and 4)?

You said: A large percentage of respondents were unsure.

We asked: Q7b. If no, please explain?

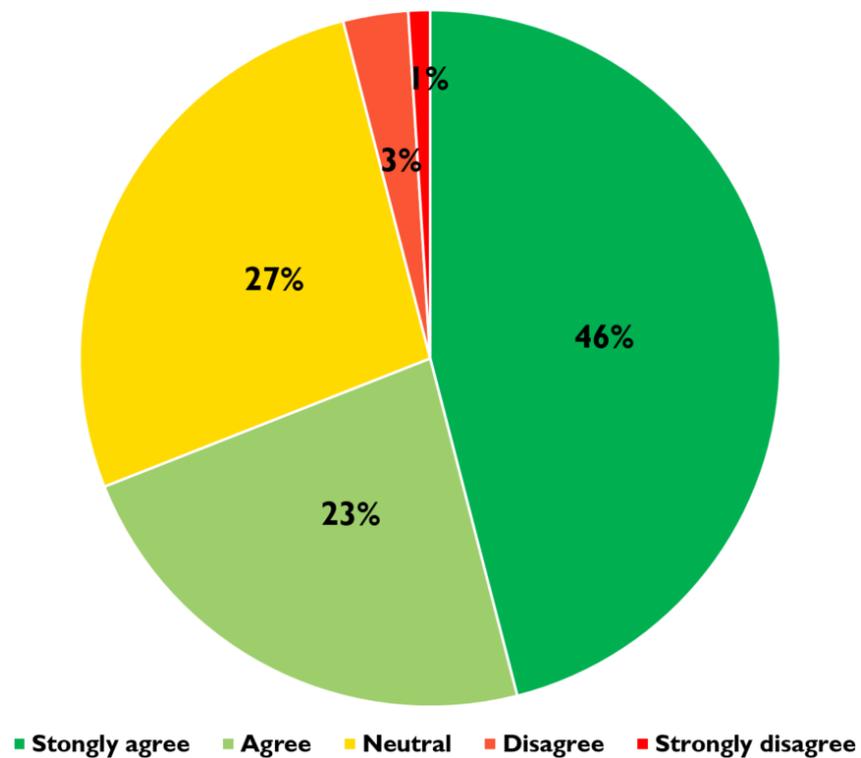
You said: There were only a handful of comments regarding this question.

Officer comment: The questions regarding European Sites and the Habitat Regulation Assessment demonstrate that not all land based designations and assessments are generally known.



We asked: Q8. Do you agree with the options?

You said: The majority of respondents strongly agreed or agreed by the options put forward in the topic paper for Biodiversity Net Gain.



We asked: Q9. Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

You said: The findings of the consultation demonstrate that there is support for Biodiversity Net Gain and the need for defining the scale and scope of improvements, but there were several points that divided opinion.

Officer observations: but also provides an insight into the need for defining the scope and scale of improvements. The figure of 10% is acceptable to all sectors of the community. There is however, a divide in opinion regarding whether CDC should request more than 10%. The Environment Act sets a 10% minimum with the option of developers contributing more. Therefore, careful consideration should be given to what would be required in terms of evidence to enable CDC to request a higher percentage. This conundrum is also relevant to the question of the number of years set for the maintenance of a site. The Environment Act sets it at 30 years with the option of extending it. Making a decision on both of these issues could be made on an individual site basis, but further analysis and research is needed before a decision can be made.

The findings also highlight that, overall, the names of some land allocations such as European Sites and assessments like the Habitat Regulations Assessment are and what they mean are not mainstream concepts. More work is required to explain what these areas are for and why they are needed in order to widen the net for consultation purposes.

From the outset, there will be a need for several policy areas to be considered collectively to ensure that conflicts in policy are avoided, particularly if land allocations are made.

Next steps

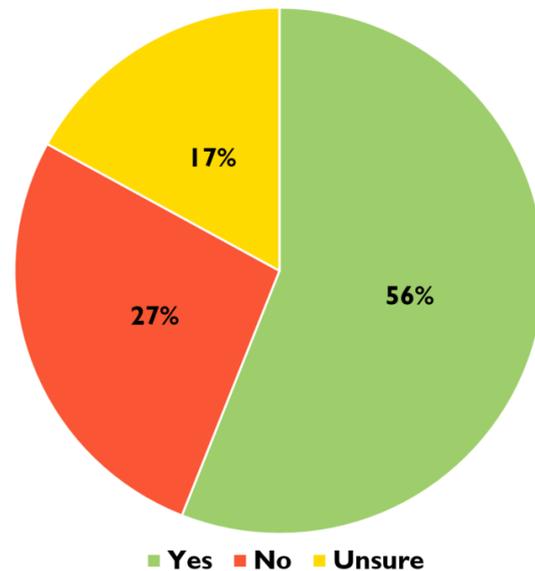
- We will consider the responses to the consultation
- Given the broad support for the policy options, we will seek to update the Local Plan to incorporate them.
- We will produce or commission evidence to fully justify the policy proposals.
- We will look into ways in which aspects of land use allocations and assessments can be explained in a clearer way.

5. Design

The Design topic paper asked three main questions that sought an appreciation of people's views on the extent to which tackling climate change should influence the design of new places and buildings and their overall support for the proposed modifications.

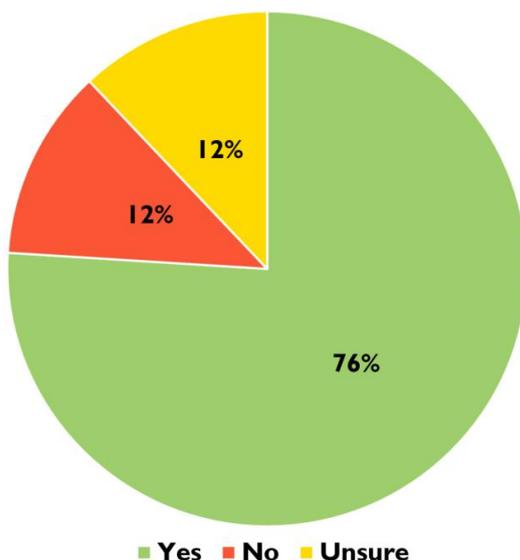
We asked: Q1a. Would you support a proposition in the Local Plan that required an energy performance improvement of the entire building when it is proposed to extend or refurbish the building?

Just over half of the respondents (56%) supported the proposition. 27% disagreed and 17% were unsure. Those that supported often cited the necessity for immediate change and that it was sensible to consider the wider building's energy performance when carrying out building work such as extensions. Those that disagreed and were unsure questioned the bureaucracy, affordability, enforceability and overall fairness of the proposed policy.



We asked: Q2. 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?

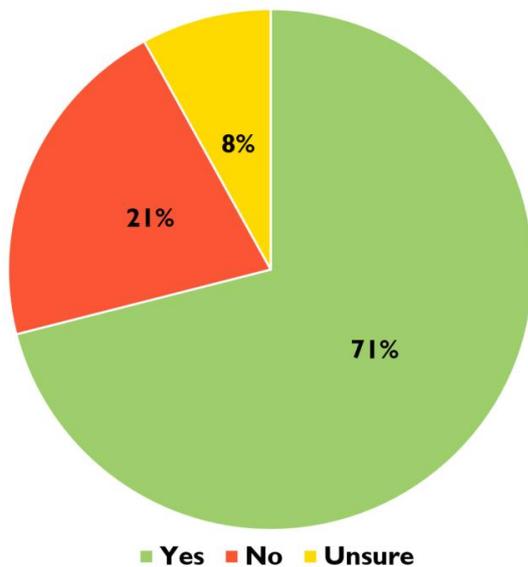
Three out of four respondents (76%) agreed that the policy changes suggested in the consultation were beneficial. 12% disagreed and 12% were unsure. Those offering their support explained the need for design to "evolve" and the desire to move away from playing it safe, pastiche and facsimile design. The need to respect character featured prominently in people's responses but also this was not mutually exclusive to achieving zero carbon buildings.



Those opposed also mentioned the need to respect the character and historic buildings and these important assets should not be placed to one side in the pursuit of a zero carbon future. Some believed it would lead to inappropriate design. There was some discussion on the ability of the local planning authority and architects to deliver and approve good design – there appeared to be an issue of trust and expertise.

Those unsure requested a definition of what the Council meant by *modern interpretation of the traditional Cotswold design*. A flexible approach to design was advocated as was the need to ensure design standards do not make development unviable and undeliverable.

We asked: Q3. Do you agree with the preferred option and the 5 suggested policy responses?



You said: 110 people responded to this question. 79 out of the 81 that agreed did not give a reason for their support, this was because the question only invited comments from those unsure or who objected. Approximately half of those opposing and unsure about the five policy suggestions recommended option 3, which would mirror the government’s pace of transition, which included the Home Builders Federation. Several recommended the need for a more flexible approach and to consider other mechanisms to reduce carbon emissions. There were concerns the policy suggestions would affect affordability and could be seen as excessive.

A summary of other issues, considerations and suggested solutions:

Matters relating to local plan policy and the Design Code:

- make provision for cavity nesting birds and bats;
- include density and space amenity standards. Including promoting more terraced houses which are more carbon efficient than detached / semi-detached;
- a transitional period to help ensure that developments remain viable and that housing continues to be delivered;
- mandate solar panels, rain water harvesting, solar panels and heat pumps on most new buildings. Adopt passive building design over bream and use of Active Design;
- encourage self-build to high environmental standards by having agreed templates for homes from timber, straw, etc.;
- durability and the use of local materials are key features in good sustainable design;
- green/wildlife considerations should be incorporated as well as human and functional considerations to promote wellbeing considerations;
- richer detail for new site allocations should include identifying at an early stage a strategy for surface water drainage to avoid proposals at a later stage which are based on surface water connections to combined or foul sewers;
- reducing car parking spaces in new developments needs to be done hand in hand with other schemes; and
- light pollution is an increasingly serious issue not helped by the proliferation of cheap LED lights which are designed to be used outdoors and are, of course, energy efficient which encourages residents to install more and keep them on longer.

Other

- private certification schemes for Building Regulations need to be stopped and Building Regulations certification taken back under Council control; and
- for the Council to demonstrate a rigorous approach to ensuring greater development planning compliance.

Next steps

Take forward proposed options, including:

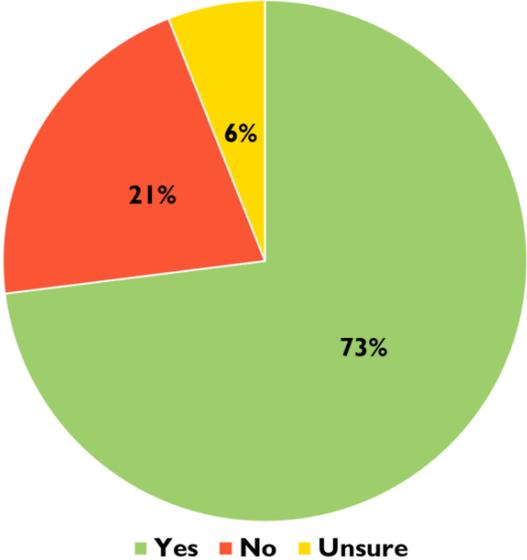
- prepare an updated District Wide Design Code;
- prepare a Framework Master Plan for Cirencester Town Centre; and

- preparing more detailed site allocation policies to clarify design and layout considerations at the planning application stage.

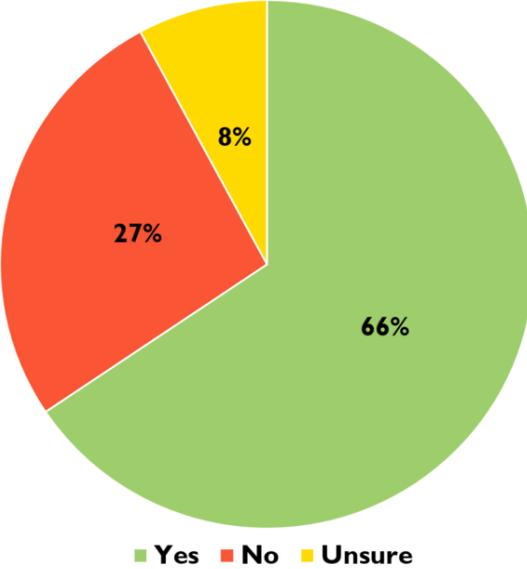
6. Economy and Employment

The Economy and Employment topic paper explored a range of economic issues and how they relate to making the Local Plan green to the core, whilst also supporting employment and the District's economy.

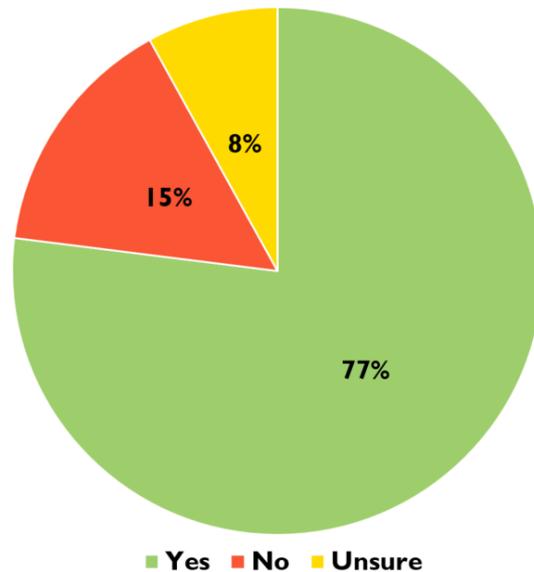
We asked: Q1a. Working patterns are changing. Is there a need to provide more workspaces closer to home?



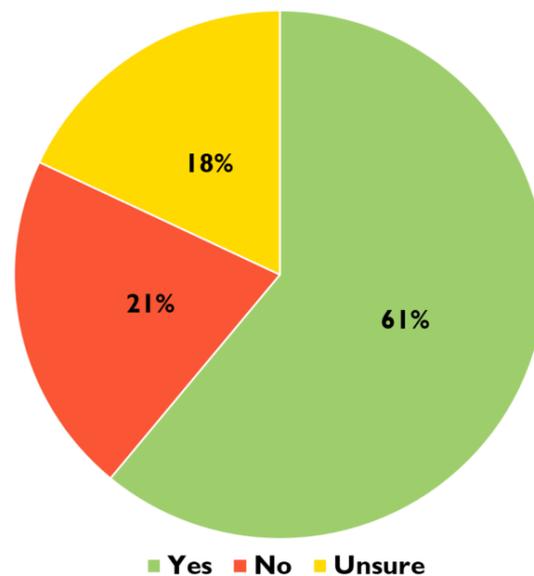
We asked: Q1b. Should new housing developments be required to provide or contribute towards providing flexible workspace in or close to those developments?



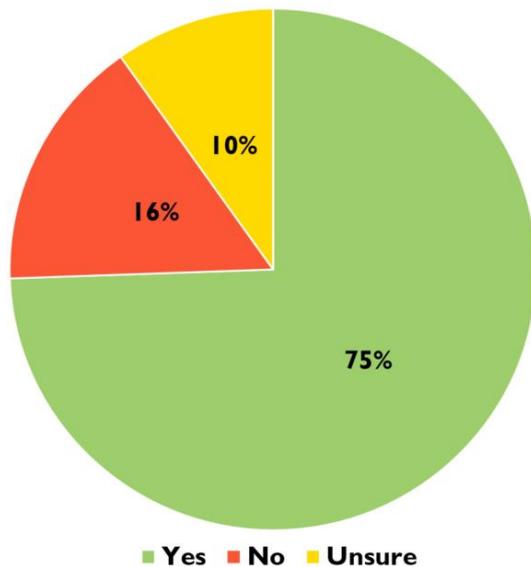
We asked: Q1c. Do you agree new housing developments should provide spaces and infrastructure for home working?



We asked: Q1d. Could existing community buildings, such as village halls, have a role to play in this?



Officer comment (Q1a-1d): the responses clearly are supportive about provision for home working and also the use of existing community buildings – the development of multi-purpose local “hubs” for instance - to enable working closer to home. An unintended effect of this is whether encouragement to provide space in or near new developments to enable home working and reduce commuting will be seen by some as a “green light” to develop larger properties, with consequent effects on affordability. To counterbalance this it will be preferable in the first instance to focus on the design of development rather than scale – flexible spaces within buildings would enable home working without necessarily requiring an intrinsically larger (and more expensive) house. The idea of using village halls as community workspaces (alongside other community uses of the building of course) potentially could provide a modest income stream for Parish Councils through the rental of work space perhaps on the basis of an hourly rate. CIL funding could be used to upgrade village halls – a legitimate use of CIL funding because this would be classed as infrastructure.



We asked: Q2. Do you support the use of legal agreements to ensure the delivery of employment development on mixed-use schemes at the same time as the housing element?

Officer comment: whilst there was significant support from respondents it is worth noting the view of some planning consultancies, such as “we object strongly to the suggestion made in the supporting Evidence Paper that employment floorspace must be delivered at a commensurate rate to residential dwelling delivery rates. Residential and employment developments are more often than not delivered by different parties and any policy framework which couples the delivery of housing with providing employment would significantly impact upon CDC’s ability to deliver their Local Plan objectives, including the delivery of affordable housing.”.

We asked: Q3a. How else can we use local planning policy to support green business activity and the local economy?

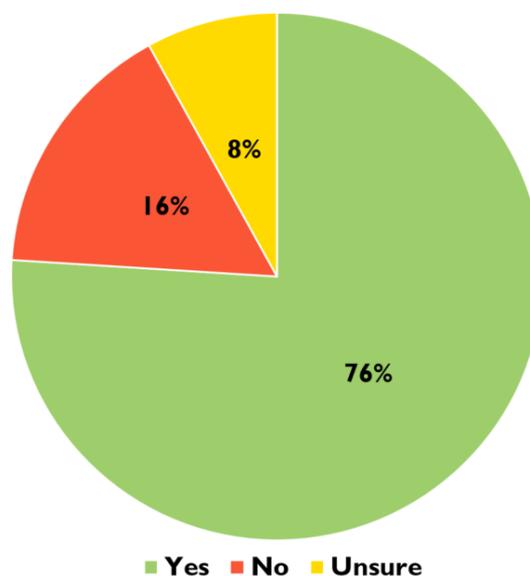
You suggested, as the wordcloud illustrates, a wide range of initiatives including:

- using locally-sourced materials;
- reducing on-site waste;
- enhanced broadband;
- integrated travel planning;
- community-based solar and wind power;
- incorporate Net Zero in new build;
- affordable business spaces with reduced rents for green businesses; and
- a “Green Scheme” where local businesses are rated for their greenness and sustainability

- Likewise, many detailed suggestions from GFirst LEP including:
 - the changes in working practices as a consequence of the Covid pandemic has seen a rise in the home working, virtual meetings and improved working environments. Cotswold District has the ability to provide and support businesses of this type and the Local Plan should make provision for this.
 - The Growth Hub within the Royal Agricultural University within Cirencester has proved to be successful and additional development of this nature should be supported by the Local Plan.
 - Consider policies to create a growth point, such as a future garden town or village within the district. The identification of a growth point will allow growth to develop more sustainably with the creation of a green infrastructure from the outset.
 - Live/work units should be encouraged by the inclusion of a specific policy. The Council could take a more practical and flexible approach to the development of new business parks, with ancillary uses such as hotels, cafes, pubs, restaurants, retail.

We asked: Q4. Do you agree that Option 3⁴ is the best option?

Officer comment: There is a broad level of support for Option 3. The proposal sets out five radical ideas and it will be interesting to see how these fare as the Update progresses to the next stage of plan preparation and on to Examination in Public.



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

You raised several issues including:

- home working is a blip – we should not base too much policy on it continuing;
- more support for farmers;
- growth in the economy should be focused around the strengths of the District but should also focus on addressing the climate change agenda and supporting technologies to secure a greener future.
- instead of providing or contributing to flexible workspaces on or close to developments, it is suggested that the design of dwellings could be such that they provide sufficient space to work from home.

⁴ Option 3 - revise extant policies from a technical viewpoint (Option 2) and amend existing or introduce new policy to:

- ensure that the employment element of mixed-use schemes is developed coterminously with the housing element;
- introduce a presumption in favour of viable employment development that demonstrably is part of the “green” economy;
- identify areas considered to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;
- 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
- 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.

- need to define what is meant by a “green business”
- the Local Plan should acknowledge the employment opportunities (direct and indirect) presented by military sites in the district and include policies that support/protect the existing and potential for additional opportunities
- much more effort should be placed into attracting high technology businesses into the Cotswolds
- reference should be made within the Local Plan of the specific needs and requirements of the RAU. The RAU’s continued growth aspirations should be recognised and facilitated.

Overall officer observations: some interesting responses to this Topic Paper. There is a good level of support for encouraging live/work units, home working and community-based hubs where local people can work close to home in an office-like environment. This will clearly help to reduce commuting and contribute to achieving the overall objective of the Local Plan Update to make it “green to the core”. At the more radical – but not any less interesting – end of the responses is the idea of “affordable business units”, perhaps being targeted at overtly “green” businesses (providing we define what that means of course). The LEP suggestion of a growth point, such as a future garden town or village within the district, is an exciting idea with huge potential to embed green, sustainable principles from the ground up but one that is definitely more appropriate to take forward in a full review of the Local Plan rather than in this partial update.

The level of support for the proposals in Option 3 is encouraging. These are radical proposals and they will undoubtedly face challenges as the plan preparation process progresses.

Next steps

- Preparation of the Local Plan Update follows a statutory process. The next formal step is to move from the Regulation 18 “Issues and Options” stage (where we are now) to the Regulation 19 stage where your responses are taken into account as part of the basis for amendments to the Local Plan, formulation of fresh policies and so on. A further round of public participation and consultation is part of that stage.
- A considerable number of responses you made require further consideration and evaluation, and this is an essential task as part of preparing the Regulation 19 stage.
- One of the key challenges is to turn ideas into useable planning policies. In terms of the Employment and Economy Topic Paper, we need to consider how we can implement the ideas about live-work units; flexible space in new builds to enable easier home working; and the exciting idea of “village hubs” located in existing community buildings. So there’s a lot of work to do!

7. Green Infrastructure

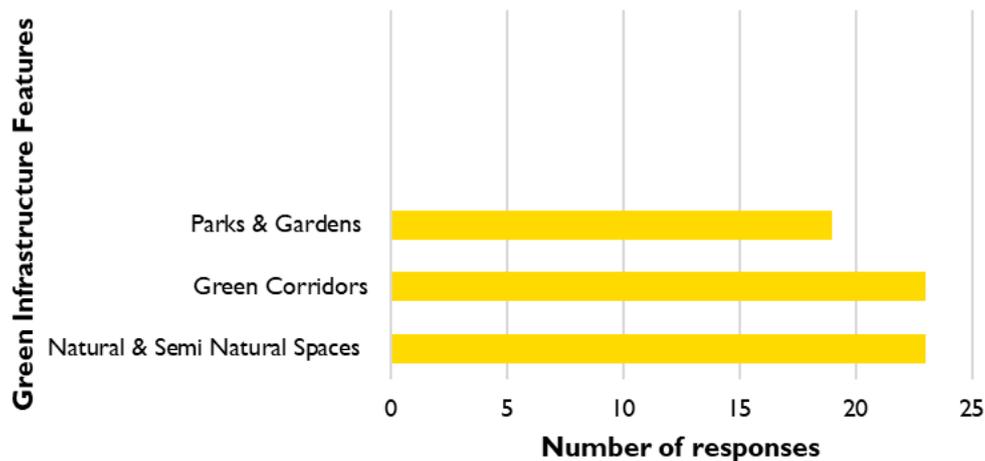
The topic paper proposed several options that could be made to modify the adopted local plan to help make it green to the core. The topic paper asked eight main questions that sought people's views on several key issues relating to green infrastructure in the District. The consultation also built on the previous consultation responses to the Draft Green Infrastructure Strategy in [The Green Infrastructure Strategy Consultation Response Report](#).

We asked: Q1a. What GI features are most important to you in new developments?

- Parks and gardens
- Natural and semi-natural
- Urban green spaces
- Green corridors
- Outdoor sports facilities
- Amenity green space
- Allotments, community gardens and city farms
- Cemeteries and churchyards
- Accessible countryside in urban fringe areas
- Civic spaces

You said: 85 people responded to this question. The three top choices can be found below:

What GI features are most important to you in new developments?



Officer observations: Although 85 people responded to this question, the clear winners were green corridors and natural and semi natural spaces, which both scored 23 votes each. Parks and gardens came in third at 19 votes.

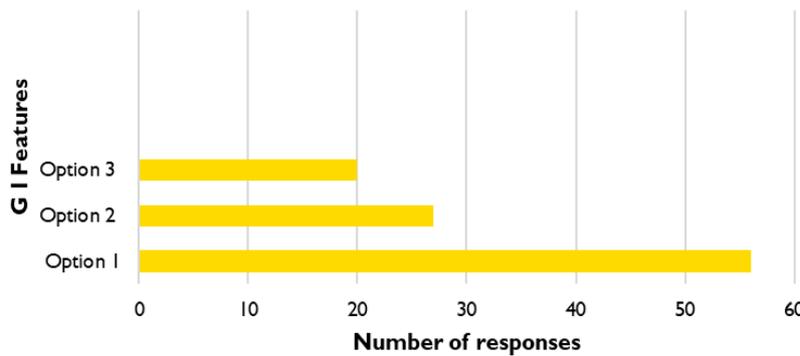
We asked: Q1b. Which of the following would deliver the most benefits for people and the environment?

1. New or enhanced pedestrian and cycle routes
2. Features within development sites to reduce flooding, prevent droughts and deliver biodiversity and amenity enhancements

3. Better management of streams and rivers to increase water quality, reduce flood risk and generate renewable energy
4. Creating fully accessible circular walks around towns and villages
5. Securing better long-term management and community involvement of new or enhanced GI within all new developments
6. More play opportunities with a particular emphasis on natural play Sufficient provision of allotments in all towns and villages.

You said: The three top choices can be found in order below:

Which of the following would deliver the most benefits for people and the environment?



Option 1 - New or enhanced pedestrian and cycle routes .
First choice = 56.

Option 2 - Features within development sites to reduce flooding, prevent droughts and deliver biodiversity and amenity enhancements. Second choice = 27.

Option 3 - Better management of streams and rivers to increase water quality, reduce flood risk and generate

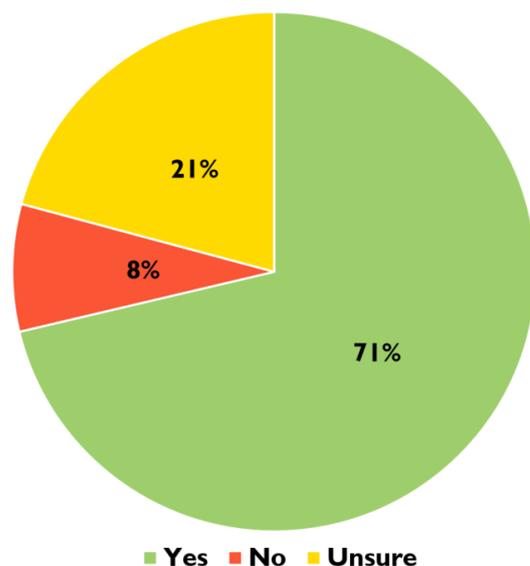
renewable energy. Third choice = 20.

The results of this question demonstrated that overall participants thought that new or enhanced pedestrian and cycle routes would deliver the most benefits for the people and environment of the District. Other comments included traffic calming, the creation of a new Local Green Space in Bibury and stopping municipal grass cutting.

We asked: Q2a. Do you think sites should be allocated within the local plan for the provision of country parks and further local community parks?

This question was asked as a result of the research conducted for the Draft Green Infrastructure Strategy, which demonstrated that at all levels, using the Accessible Natural Green Standards applied by Natural England the Cotswold District has a deficit of these spaces.⁵

You said: You are supportive of allocating sites in the Local Plan for country and community parks.



⁵ <https://cotswold.maps.arcgis.com/apps/MapSeries/index.html?appid=dac1a6973d4e4e2caa6cb1f47b013171>

Officer comment: The chart clearly illustrates a local desire for the Local Plan to allocate sites for the purposes of greater access to open spaces in the District. Amongst the organisations that responded, Natural England offered their support for this option. The MOD and Wychavon District Council requested to be kept informed regarding the pursuit of this option for infrastructure purposes. The MOD had concerns relating to the flight path for operations at RAF Fairford and Wychavon District Council regarding possible increases to traffic flows if a park was located near their border.

We asked: Qb. Can you suggest any locations for a country park or a local community park?

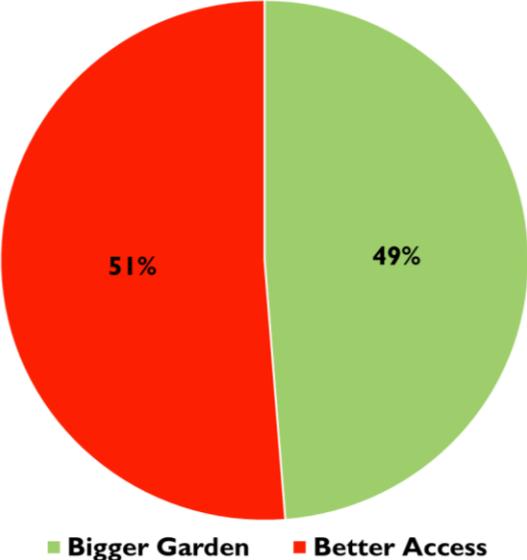
Your suggestions included:

- An extension to the Abbey Grounds, which would include the nearby meadows towards Stratton Mill and Bauton.
- Down Ampney.
- On the fringe of each of the Principal Settlements, with provision for community agriculture box schemes and allotments.
- The Craves Chipping Campden.
- Opportunities to allocate residential led mixed-use developments to include elements of a country park or local community park.

We asked: Q3. In new developments, would you prefer a bigger garden or better access to shared open spaces, such as parks, allotments, playgrounds, etc.?

You said: There is a clear signal that both suggestions were acceptable.

Officer comment: There was nearly an even split between the wish for bigger gardens or better access to shared open spaces, with a few responses requesting both. There was a call for guidelines for garden sizes, which also reflected the size of the unit/dwelling being built.



We asked: Q4. What mechanisms do you think can help to better provide for the long-term management of open spaces? Listed below are the options available, in no particular order.

You said: The majority of respondents would like a new policy put in the Local Plan, with a clear indication that Town and Parish Councils should manage open spaces from the outset.

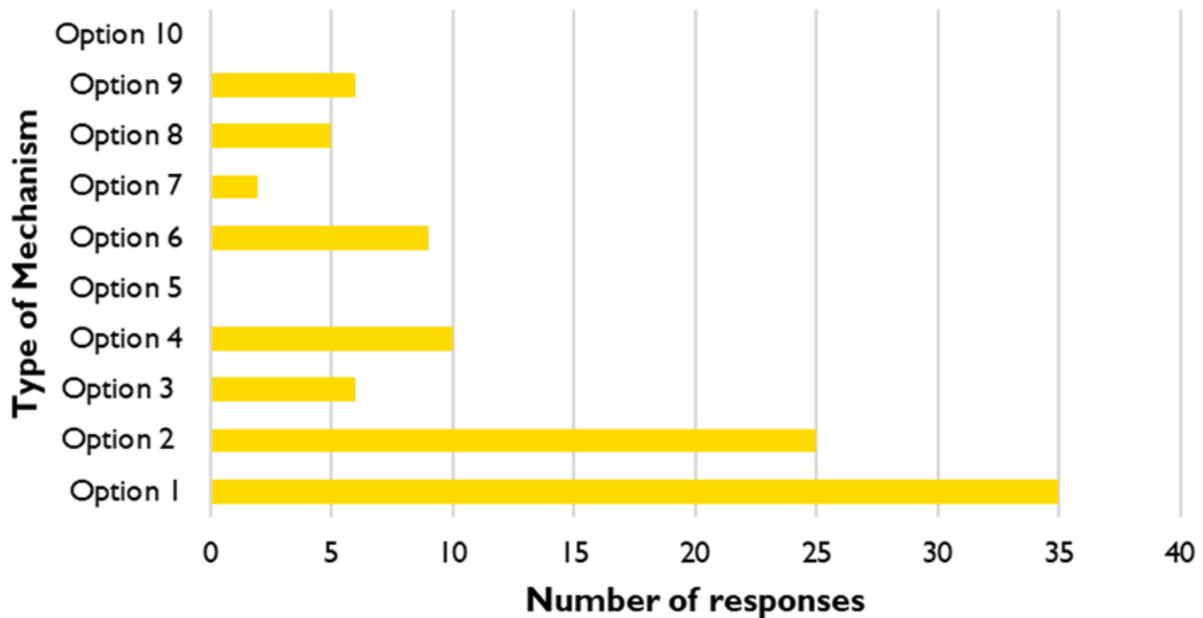
- Option 1 - A new local plan policy (e.g. a requirement for community participation in open space management, positive contribution towards the climate change and ecological emergencies, minimisation of maintenance requirements for public organisations, etc.)
- Option 2 - Town or parish councils managing new open spaces from the outset
- Option 3 - Cotswold District Council managing new open spaces from the outset
- Option 4 - Management undertaken by third parties, such as environmental charities
- Option 5 - Greater use of private management companies
- Option 6 - The design of open spaces minimising the maintenance burden
- Option 7 - Longer-term funding plans

Option 8 - Providing more stringent management requirements / standards

Option 9 - Better guidance for managing open spaces

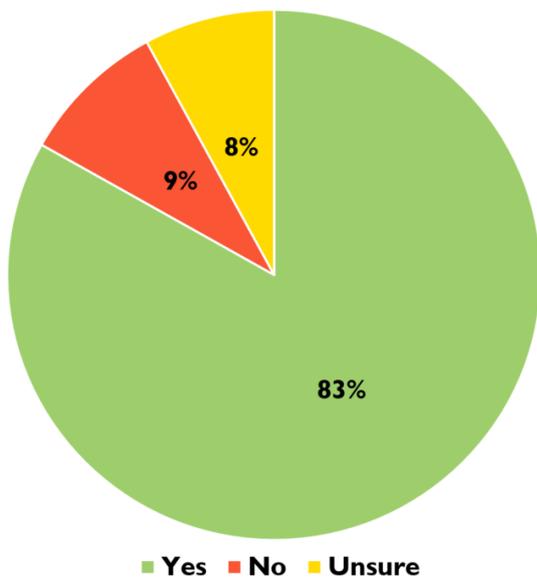
Option 10 - I think existing schemes of management are working effectively

Mechanism for long term management of Green Spaces



Officer comment: The majority of people (36%) who responded to this question opted for a new policy to be added to the partial update Local Plan, closely followed by the option of Town or Parish Councils managing new open spaces from the outset (26%). Other suggestions received included leaving green spaces to rewild and utilising several organisations to manage open spaces.

Additional comments included an example of a resident-led management company for new green spaces alongside the building of new developments, which would enable residents to have more say in the management of their spaces.



We asked: Q5. Do you agree with the proposed option? (i.e. Option 2)

You said: There is significant support for the changes suggested to the partial update of the Local Plan and the Green Infrastructure element of it.

Option 2 looks to update the Local Plan to reflect:

- Cotswold District Council's Climate Change Emergency and Ecological Emergency declarations and the Council's Corporate Plan;
- the Council's new 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.

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

You said:

- More recognition for the role Town and Parish Councils have and continue to play in delivering improvements for green infrastructure and biodiversity.
- The importance of traffic calming measures in rural areas.
- The widespread support for the creation of a new Country Park or similar.
- The need for high quality walking and cycling routes for the benefit of both people and the environment.
- The request for any policies that protect Green Spaces should allow flexibility so that they can also be used for flood alleviation.
- There was a suggestion that natural open spaces have some element of area restricted to human and pet access.
- The lighting of green spaces was raised, where needed, it was thought that low level sensitive lighting should be used and green corridors should not be lit to avoid reducing their value for habitat connectivity.
- For housing development it was suggested that it should be structured to allow large green amenity land / sports and play spaces en route to other infrastructure.
- Community allotment spaces next to park space.
- The creation of new open spaces to be developed in conjunction with new development, particular sites.

Overall officer observations: There is support for GI and the updates put forward to it, in the responses to the consultation. What do the Regulation 18 consultation responses tell us about GI in relation to the [Consultation responses to GI Strategy Consultation](#)?

There are several key points that can be drawn from the results of both consultations. These are listed below:

- There is support for Green Infrastructure at different levels, including; residents, Parish and Town Councils and numerous organisations representing both the public and private sectors.
- We asked, in both consultations, what GI features were most important to people in new developments and what people thought would deliver the most benefits for people and the environment. Both questions, put forward, in the two consultations produced very similar results. The most popular choice in both consultations was:

New or enhanced pedestrian and cycle routes (these could be off road or traffic-free routes e.g. linking settlements within and outside the district along disused railway lines and canals)

- The management of and long term funding of accessible open spaces was raised as a key issue in the consultation of the Draft GI Strategy. The questions raised as part of The Reg 18 consultation have been able to establish who, ideally, should manage new accessible open spaces from the outset and the need for a new policy in the partial update of the Local Plan.
- The findings of the Draft GI Strategy consultation revealed that there wasn't a huge desire for a new Country Park or similar. However, since that consultation, last year, the results of the Regulation 18 consultation clearly demonstrates that the creation of such a space is now a very popular option.

Next steps

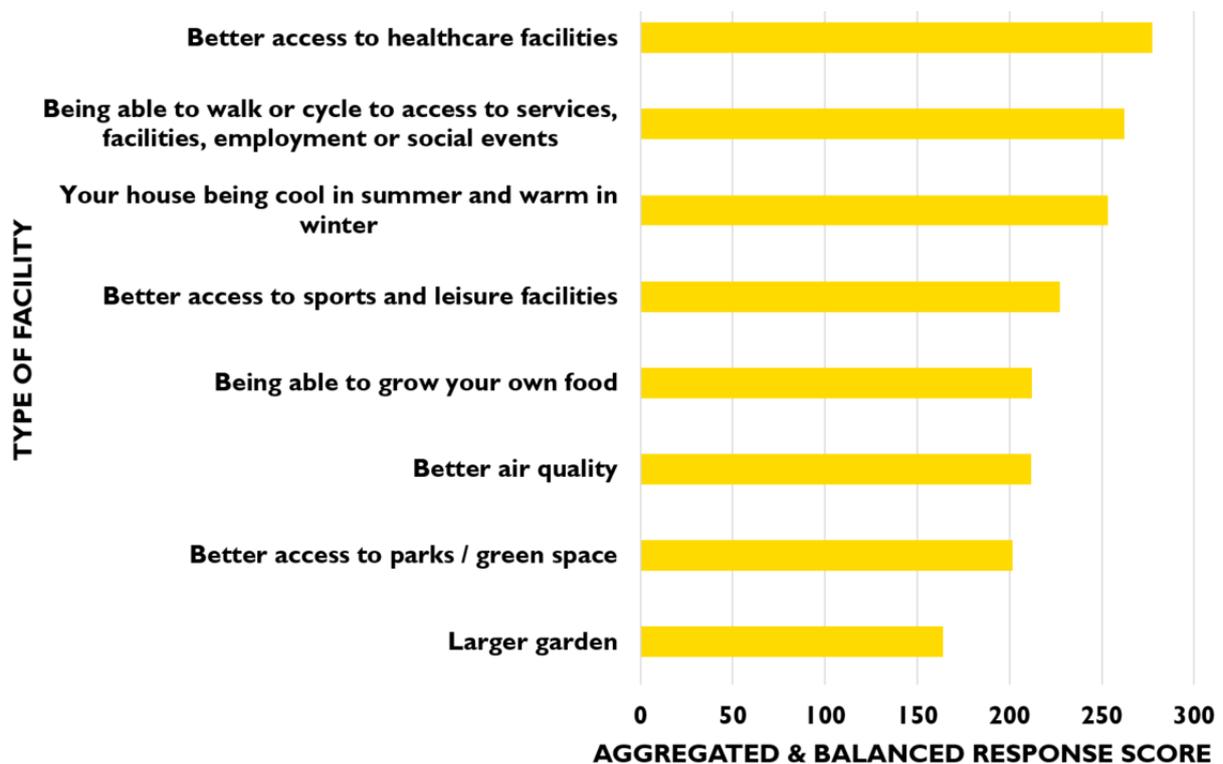
- We will update the Draft Green Infrastructure Strategy to reflect the consultation comments, where appropriate.
- The Draft Green Infrastructure Strategy will be put forward for formal adoption.
- Given the broad support for the policy options, we will seek to update the Local Plan to incorporate them.
- We will investigate further the opportunities available for the long term management of open spaces.
- We will produce or commission evidence to fully justify the policy proposals.

8. Health, Social and Cultural Wellbeing

The topic paper considered a wide range of complex issues surrounding health, social and cultural and wellbeing, such as loneliness, the ageing population, food and fuel poverty and the quality of housing. The topic paper set out several policy proposals, rather than a single policy option, which we sought views on whether they would be beneficial and justified and whether there were any additional ideas that could further benefit the District’s health, social and cultural and wellbeing.

We asked: Q1. Which new facilities in your local area could most help improve your health and wellbeing?

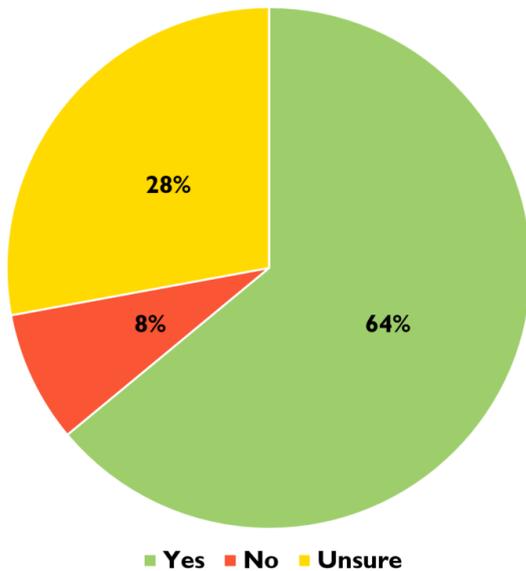
You said: Better access to healthcare facilities and being able to walk and cycle to access services, facilities, employment and social events are the two things that you feel can most improve your health and wellbeing.



You also provided some other ideas to help improve health, social and cultural wellbeing, which weren’t already covered within the eight options and which the Local Plan could potentially help to address, including:

<ul style="list-style-type: none"> • Community facilities (e.g. community halls, swimming pools open at convenient times) • Wild spaces • Guidelines for size of gardens for different sizes of houses / protection of gardens • Design to be healthy • Improved interaction with heritage & the historic environment 	<ul style="list-style-type: none"> • Facilities and cultural experiences for young people (e.g. leisure provision / cinema) • Community led schemes – e.g. cohousing • Increased space standards • Libraries • Places to gather in an informal manner, such as parks, recreation grounds, community orchards, etc.
--	---

We asked: Q2. Do you agree with the suggested policy options? If not, please explain why?



Officer comment: There was a broad level of support for the suggested policy options with nearly two-thirds (64%) of respondents agreeing with them.

Key reasons for the support included that the policies would help mental health across all ages and improve age-related design, increase physical exercise, tackle fuel poverty and improve accessibility to services, facilities and employment.

It was suggested that the Local Plan should identify sites for accommodating older person needs and provide a strategy to help older people to downsize. Concern was also raised that CO2 reduction measures would be expensive and hit

the poorest in society and that the sustainability of rural services could worsen at the expense of improvements in more urban areas.

We asked: Q3. Are there any additional changes to the Local Plan that could help to improve health, social and cultural wellbeing and inequalities in Cotswold District?

- In addition to prioritising provision of / access to healthcare generally – the need for new surgeries in Tetbury, Chipping Campden and Mickleton was highlighted.
- Improve long distance dedicated cycle paths and lanes so more journeys can be made in a safe way without cars.
- Delivering more facilities to meet community needs within new developments.
- Front-load infrastructure / service provision within new developments, so it's there when people move in.
- Provision to enable more local food networks (e.g. allotments, urban farms, etc.).
- Community halls which are for social and recreational purposes (and should not be confused with work hubs which are for economic purposes). New development should be required to make a proportionate provision to meeting its own needs for community meeting spaces and this should be provided as part of all strategic developments.
- Holiday homes / second homes are fracturing communities and causing social and cultural harm.

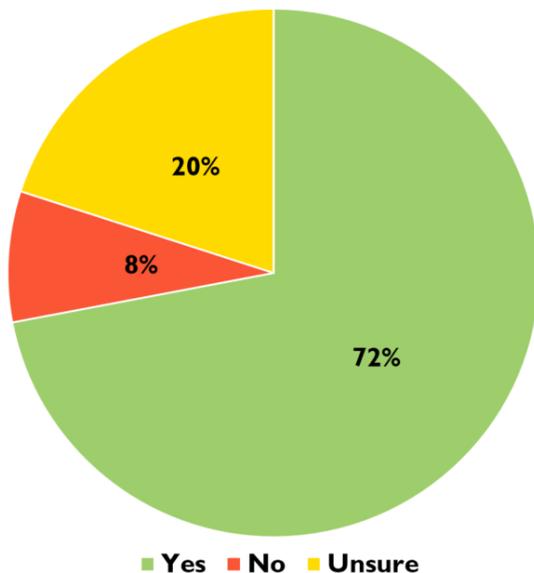
Next steps

Given the broad support for the policy options, we will seek to update the Local Plan to incorporate them.

- We will produce or commission evidence to fully justify the policy proposals.
- We will not allocate sites for older persons' accommodation as part of this partial update to the Local Plan.

9. Historic Environment

We asked: Q1a 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?



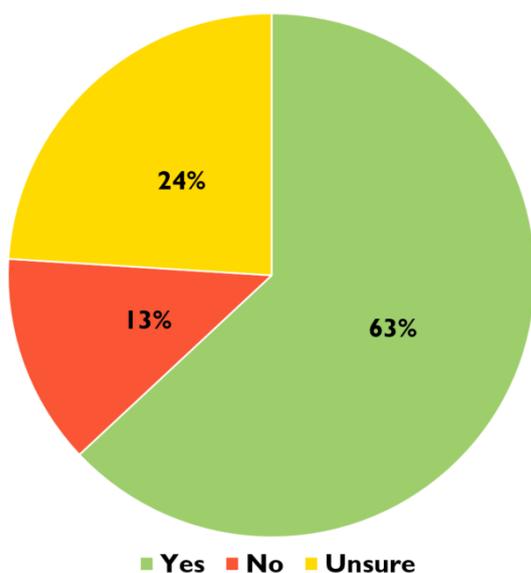
Officer comment: nearly three-quarters of respondents support the proposed measures. But that needs to be balanced against responses to later questions which reveal a degree of irritation amongst some respondents who are willing to adapt historic buildings to make them more climate change resilient, but feel frustrated with what they see as “red tape” obstructing that. The need to balance conflicting objectives is a classic planning dilemma: in this instance conservation of the historic environment on one hand and mitigating and adapting to the effects of climate change on the other. The two are not necessarily irreconcilable. It is the job of the Local Plan Update to tackle that.

We asked: Q1b Are there any other measures we should be considering?

You made a variety of suggestions, with the key themes being:

- the need to allow greater **flexibility** in making internal alterations to historic buildings to enable better insulation and other climate change mitigation and adaptation measures;
- the need to strike the right **balance** between conservation and climate change mitigation and adaptation;
- the **cost** of adaptation and mitigation measures.

We asked: Q2a if 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 and **Q2b** to explain why.



Officer comment: whilst officers had some doubt as to whether the question was fully understood by some respondents, of those that supported the delay until a full review of the Local Plan the reasons included:

- support but need to see a delivery programme sooner rather than later;
- strategy addressing the climate emergency should take precedence;
- Historic England’s position on certain issues may change, so wise to wait;
- support but approach needs to be more inclusive and involve the district’s towns.

Of those who objected to the delay, the reasons included:

- the danger of the strategy being “bumped” by other priorities;
- need to address energy efficiency issue of historic buildings now and not later;
- no need for a strategy, criteria-based approach sufficient
- there is no date for the Local Plan Review and hence no date for when the strategy will come forward.

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

You suggested a range of things including:

- the Council should consider preparing a Supplementary Planning Document (or another form of guidance) to inform retrofitting of climate change mitigation and adaptation measures in historic buildings;
- concerns about the enforcement of apparent breaches of planning control relating to historic buildings.

Overall officer observations

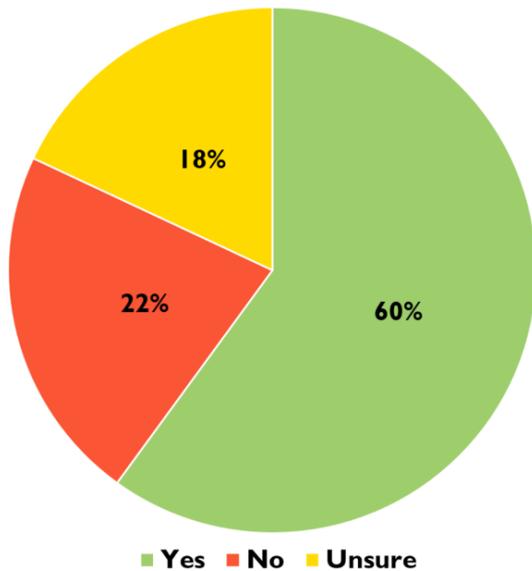
Of all the responses received, the most striking issue in the view of officers is the concern about adaptation of historic buildings to make them better able to contribute to the mitigation of climate change impacts without falling foul of what some consider to be overly-restrictive rules. Respondents appear willing to do this but require help and guidance, and a greater degree of flexibility in the application of policy, to enable that. This is an interesting dilemma and a matter that, for the next stage of the Local Plan Update, will need to be discussed with the Heritage Team and with Historic England.

Next steps

- preparation of the Local Plan Update follows a statutory process. The next formal step is to move from the Regulation 18 “Issues and Options” stage (where we are now) to the Regulation 19 stage where your responses are taken into account as part of the basis for amendments to the Local Plan, formulation of fresh policies and so on. A further round of public participation and consultation is part of that stage.
- a considerable number of responses you made require further consideration and evaluation, and this is an essential task as part of preparing the Regulation 19 stage
- one of the key challenges is to turn ideas into useable planning policies. In terms of the Historic Environment Topic Paper, these challenges include:
 - the need to discuss with Historic England (HE) the general level of public support there is for delaying preparation of a “Positive Strategy for the Historic Environment” until we prepare a replacement Local Plan; and
 - - again something to discuss with colleagues at HE - is the clear call from the public for greater assistance in adapting their historic buildings to make them more resilient to the effects of climate change. This is also an issue for the Design Topic Paper and could result in guidance from the Council in conjunction with HE or perhaps a Supplementary Planning Document. So there’s plenty to work to do!

10. Housing Affordability

The Housing Affordability topic paper explored the District’s acute housing affordability issues and the many causal factors. It noted the impact this is having on communities, particularly younger people. Rather than providing a single policy option, a range of policy proposals were provided and views were sought on whether these were justified and beneficial, as well as any further ideas that could be implemented in the Local Plan partial update.



We asked: Q1a. Are the suggested policy changes beneficial and deliverable? and **Q1b.** Please explain why and any alternative solutions that could be used?

Officer comment: There was a broad level of support for the suggested policy changes, with three-fifths of respondents saying that the policy changes were beneficial and deliverable. Just over a fifth disagreed and just under a fifth were unsure.

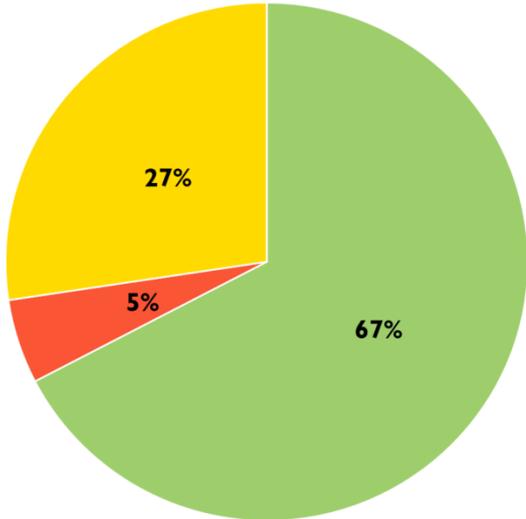
We asked: Q2. Are there any further policy changes that could maximise the delivery of affordable housing, whilst also achieving sustainable development with regard to issues such as the need to protect the high quality built and natural environment and reduce the need to drive?

In addition to the options already suggested in the topic paper, **you said** the following suggestions for helping to boost the delivery of affordable housing:

<p>New policies</p> <ul style="list-style-type: none"> ● Add a First Homes policy. ● Provide a housing requirement for each settlement and a policy that is generally supportive of housing in settlements (e.g. like Sedgemoor). 	<p>New strategies</p> <ul style="list-style-type: none"> ● Downsizing strategy to enable and encourage people to downsize, which could free up large homes for those who need them and reduce carbon footprints. ● A holistic view of housing affordability, which factors in house prices, utility bills, cost of travel, etc. Also consider the delivery of local jobs and increasing energy efficiency/creation as affordability policies.
<p>Policy adjustments</p> <ul style="list-style-type: none"> ● Reduce the affordable housing requirement threshold across the District from 11 to 10 or more dwellings and add a requirement for sites of 0.5 hectare or more. ● Reduce affordable housing requirement in the AONB from 5 to 3 dwellings. 	<p>Affordable housing delivery</p> <ul style="list-style-type: none"> ● Build homes specifically for young people. ● Deliver more bungalows as affordable homes. ● Build more smaller homes and limit how many 5+ bedroom homes are built. ● Restrict extensions of homes, as extensions make homes more expensive.

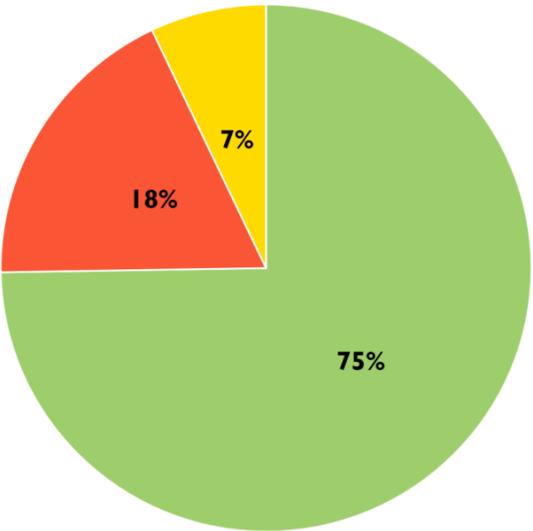
- Within Policy H2, refer to a net increase in dwellings to ensure that replacement dwellings are not included in the 30% or 40%.
- Lower the threshold for requiring a self-build plot from 20 dwelling to 10 dwelling sites.

We asked: Q3a. Do you think restricting second home ownership in new developments in Cotswold District would make the overall housing stock more affordable or less affordable?



You said: The majority of people supported the idea of the Local Plan restricting second home ownership in new developments and less than one-fifth were against the idea. This broadly aligns with the split of opinion on the effect of such a policy would have on affordability, in which 67% thought restricting second home ownership in new developments would make the overall housing stock more affordable with 5% thinking it would become less affordable.

■ More affordable ■ Less affordable ■ No change

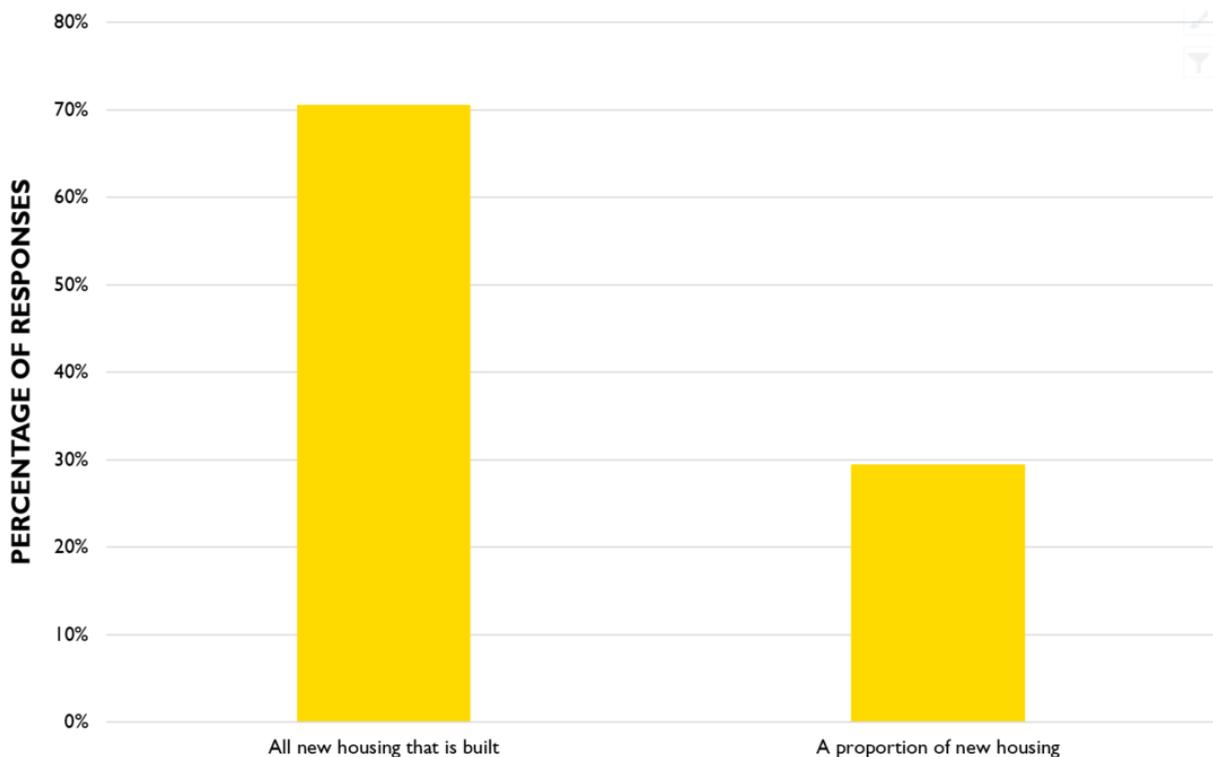


We asked: Q3c. Should the local plan restrict second home ownership in new developments?

Officer comment: There was a strong appetite to restrict second home ownership in new developments. Furthermore, the issue of second home ownership, holiday homes and AirBnBs negatively affecting communities was raised on numerous occasions in responses to this and other topic papers, as well as in the feedback received in discussions at the Local Plan drop in events.

■ Yes ■ No ■ Unsure

We asked: Q3d. Should this be all new housing that is built or a proportion of new housing?



A considerable majority of respondents (71%) thought that second home restrictions should apply within all new housing developments.

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

- Objection to over-delivering housing countered with support for allocating more sites and increasing the housing requirement to increase affordable housing delivery.
- Support for focussing the delivery of affordable housing in Principal Settlements but concern the housing delivery test will boost affordable housing delivery in inaccessible locations.
- Concern that the mix, size and type of homes should be evidence-led and fully justified.

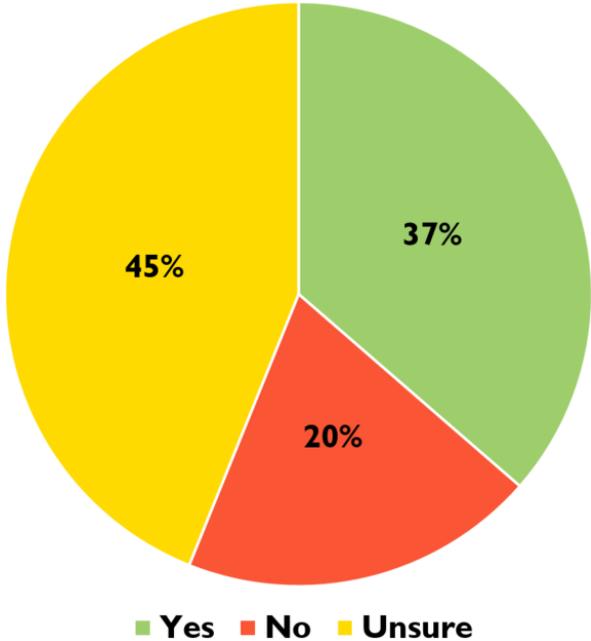
Next steps

- We will seek to implement some of the proposed policy options in the local plan partial update.
- We will investigate the additional policy suggestions that you provided.
- We will produce / commission further evidence to support and fully justify any policy update.
- We will look further into whether there is justification for introducing a policy that restricts second / holiday home ownership and AirBnBs in new developments.

11. Housing Need, Requirement, Supply and Delivery

The topic paper initially considered various issues in Cotswold District, such as the extreme high levels of historic over-delivery of housing and the increased housing need. It also considered specialist accommodation developments and the housing needs of Gypsies and Travellers.

We asked: Q1. Is there an exceptional circumstance to use an alternative approach to the standard method to calculate the minimum local housing need?



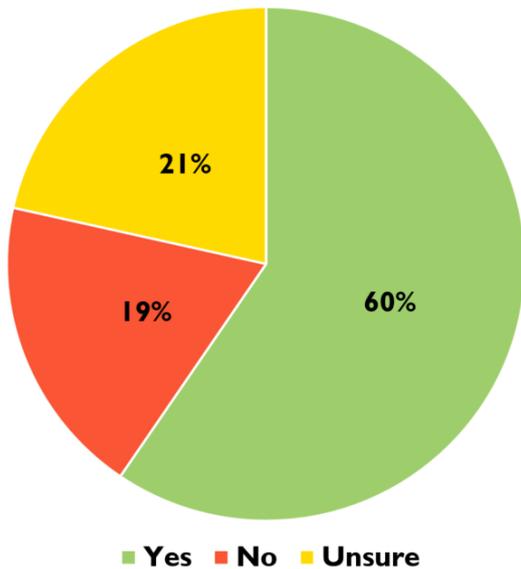
You said: Nearly twice as many people than not thought that there is an exceptional circumstance to use an alternative approach to the standard method to calculate the minimum housing need . 39% were unsure – such a large proportion is reflective of the technical nature of this question.

We asked: Q2. Please explain why?

The responses highlighted some confusion between the difference in calculating the District’s minimum housing need – and whether there are any exceptional circumstances for an alternative approach to the government’s standard method – and the various considerations that go towards determining the District’s housing requirement. Notwithstanding this, some good points were suggested for both, which are summarised in the table below.

There are two separate markets – one to meet local need and the other to meet a national/regional demand	Effects of the pandemic / increased home working have caused a 'race for space' – may affect the housing need calculation	Using an alternative method to the standard method would take more work and could delay the examination process.	The standard method has a harmful effect on, and is in conflict with, the statutory purpose of an AONB designation – 80% of the District is within the AONB and 5% within Special Landscape Areas, which protect the setting of the AONB	Spending CIL funds on climate change measures
Unsustainable level of growth for Cotswold towns and villages	High demand for homes	Standard method has an affordability adjustment but does not begin to tackle the actual affordability issue in Cotswold District, so is ineffective	The standard method has a harmful effect on climate change in Cotswold District – it would result in many homes in a rural district with limited public transport / reliance on cars / high out-commuting rates	
Need more homes for young people	Too little employment / insufficient infrastructure (schools, health care, etc.)	Extreme past over-delivery results in unrealistic household projections, so the standard method is unjustified as it does not provide proportionate evidence	Could add to the length of time to produce and examine the Local Plan	

We asked: Q2a. Do you agree 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? and **Q2b.** Please explain why?



You said: The majority of you agreed that reviewing and updating the Local Plan housing requirement for the remainder of the Local Plan period and, if required, allocating additional sites to maintain a five year housing land supply and pass the Housing Delivery Test was the most appropriate option.

Reasons you gave in support of Option 2 were that it would be better able to deliver plan-led development. There was also support for providing a flexible and balanced housing land supply and retaining the residual requirement methodology for calculating the requirement against which the five year housing land supply is measured.

It was commented that Option 1 could provide a stopgap for calculating the Local Plan / five year supply housing requirement if the Local Plan partial update is delayed.

We asked: Q3a. Are there any factual inaccuracies or missing information within the Strategic Housing and Economic Land Availability Assessment (SHELAA)? and **Q3c.** Are you aware of any additional land not already assessed in the SHELAA that is available for development?

You said: 127 people fed back potential factual inaccuracies or missing information within the SHELAA. There were also 13 new site submissions. These will all be taken into consideration in the next SHELAA Update later in 2022.

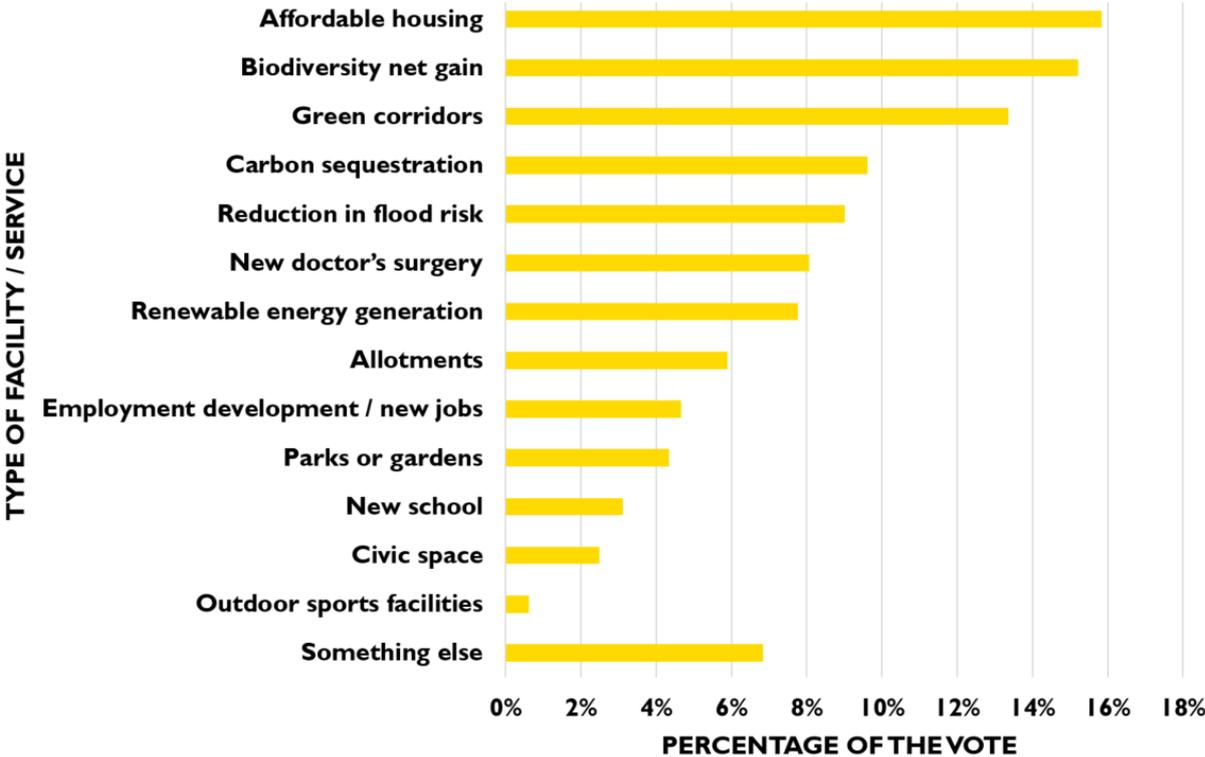
A large number of representations were received on a site in Lechlade (referenced as L33), which were responding to a poster / flyer that had been distributed around Lechlade by a member of the public. Unfortunately, the poster contained some incorrect information and omitted other important information, which caused some unnecessary local concern.

To clarify, no sites have been recommended for allocation by the Local Plan partial update as yet. An initial assessment of sites has been undertaken within the Strategic Housing and Economic Land Availability Assessment (October 2021) (the SHELAA), which identified the site referenced as L33 in Lechlade as a site for further consideration. There is much further assessment work to do though before any sites are recommended for allocation in the Local Plan, including a review of the SHELAA in light of feedback from this Local Plan consultation.

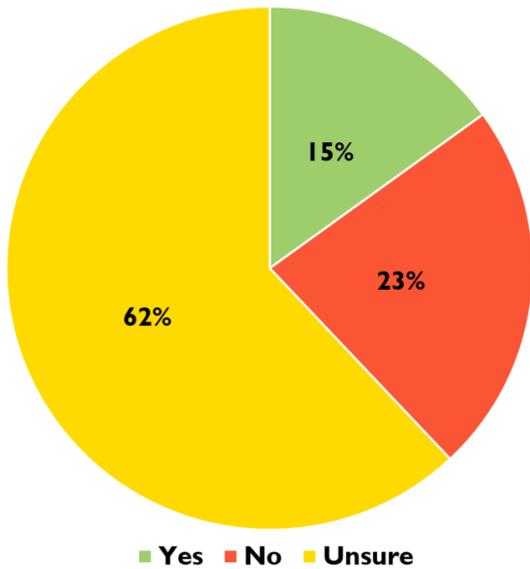
The next Local Plan consultation will include recommendations on site allocations, so we would encourage anyone interested in development in Lechlade – or anywhere else in the District – to sign up to our [Local Plan consultation database](#) to be kept informed of updates on the Local Plan. The team producing the Local Plan also hold consultation workshops, where we would be happy to answer your questions in person.

We asked: Q3b. What are the three most important opportunities that you would want to deliver on sites in your area?

The three most important things people wanted delivered in their area were affordable housing (1st); biodiversity net gain (2nd); and green corridors (3rd).



We asked: Q4a. Is the Local Plan currently working well with providing for the specialist accommodation needs of older people? and **Q4b.** How could the Local Plan further assist the specialist accommodation needs of older people?



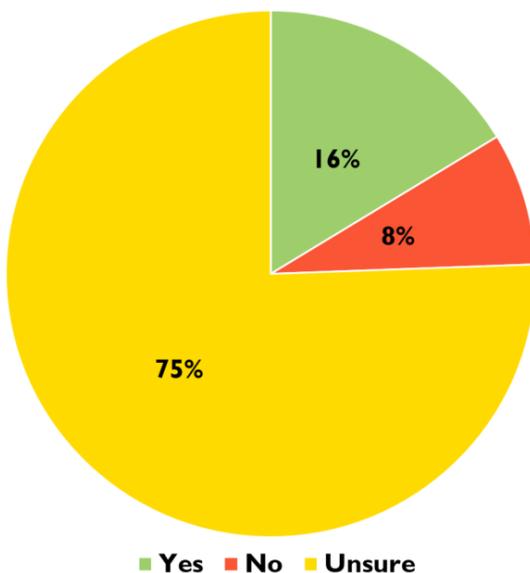
You said: 63% of respondents were unsure about whether the Local Plan is currently working well with providing for the specialist accommodation needs of older people; 22% thought it wasn't working well and 15% thought it was.

When asked why, people commented that there needs to be more affordable specialist accommodation for the elderly and homes need to be accessible. Some felt, however, that older people need to be able to remain in the heart of their community. Requests were made for more bungalows that are of a suitable size and that policies should require Lifetime

Homes. It was also commented that specialist accommodation site allocations should be made, so they can be located near healthcare, social care and local facilities.

The advantages of specialist accommodation for the elderly were set out – e.g. the value of the 'grey pound' within town centres; the health and wellbeing benefits to occupants; the reduced health burden on local services; the efficient use of land and materials; and enabling older homeowners to downsize and free up larger homes to those who need them.

We asked: Q5a. Is the Local Plan currently working well with providing for the accommodation needs of Gypsies, Travellers and Travelling Showpeople? and **Q5b.** How could the Local Plan further assist the accommodation needs of Gypsies, Travellers and Travelling Showpeople?



You said: The majority of respondents (75%) were unsure about whether the Local Plan is currently working well with providing for the accommodation needs of Gypsies, Travellers and Travelling Showpeople. 16% of respondents thought it is working well and 8% thought it wasn't.

Cotswold District Council is in the process of updating its Gypsy and Traveller Accommodation Assessment and Gypsy Sites Assessment, which will provide further insight on this issue and whether the Local Plan needs to be updated in this regard.

Next steps

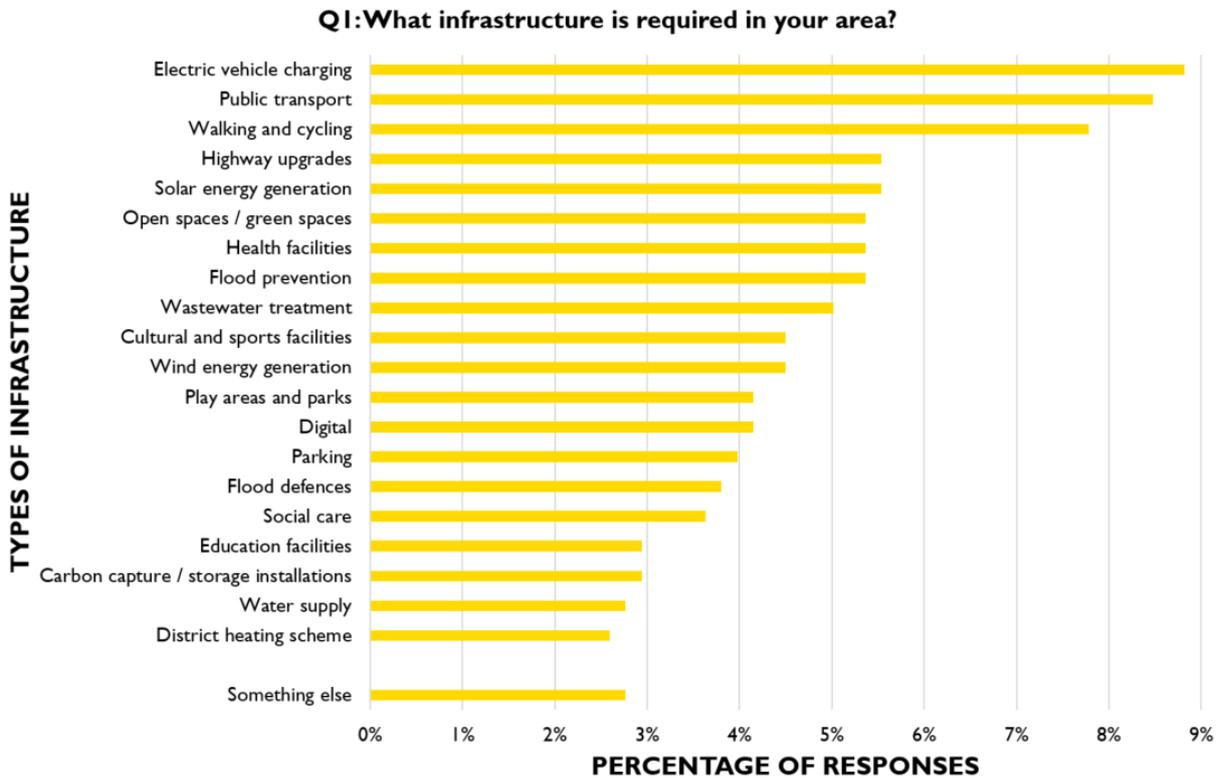
- Having reviewed all the responses, we maintain that Option 2 is the most suitable option.
- Evidence presented to date does not indicate that there are exceptional circumstances to use an alternative to the standard method to calculate the minimum housing need. Unless additional evidence emerges to the contrary, the Council will proceed to the next stage (a draft plan) on this basis.

- We will look into the issues that were raised on the Strategic Housing and Economic Land Availability Assessment and will reassess sites / assess new site submissions to reflect the consultation feedback.
- We will undertake an assessment to convert the housing need into a housing requirement, which will take consideration of the various issues such as increasing the delivery of affordable housing, protecting and enhancing the Cotswolds National Landscape (the Area of Outstanding Natural Beauty) and its setting, land availability and several other factors.
- We will undertake an evaluation of the available land to inform the recommendation of further sites to deliver the updated housing requirement.

12. Infrastructure

Responses to this topic paper should be read in combination with infrastructure issues raised in other topic papers, such as Economy and Employment; Green Infrastructure; Housing Affordability; Responding to the Climate Emergency; and Sustainable Transport and Air Quality.

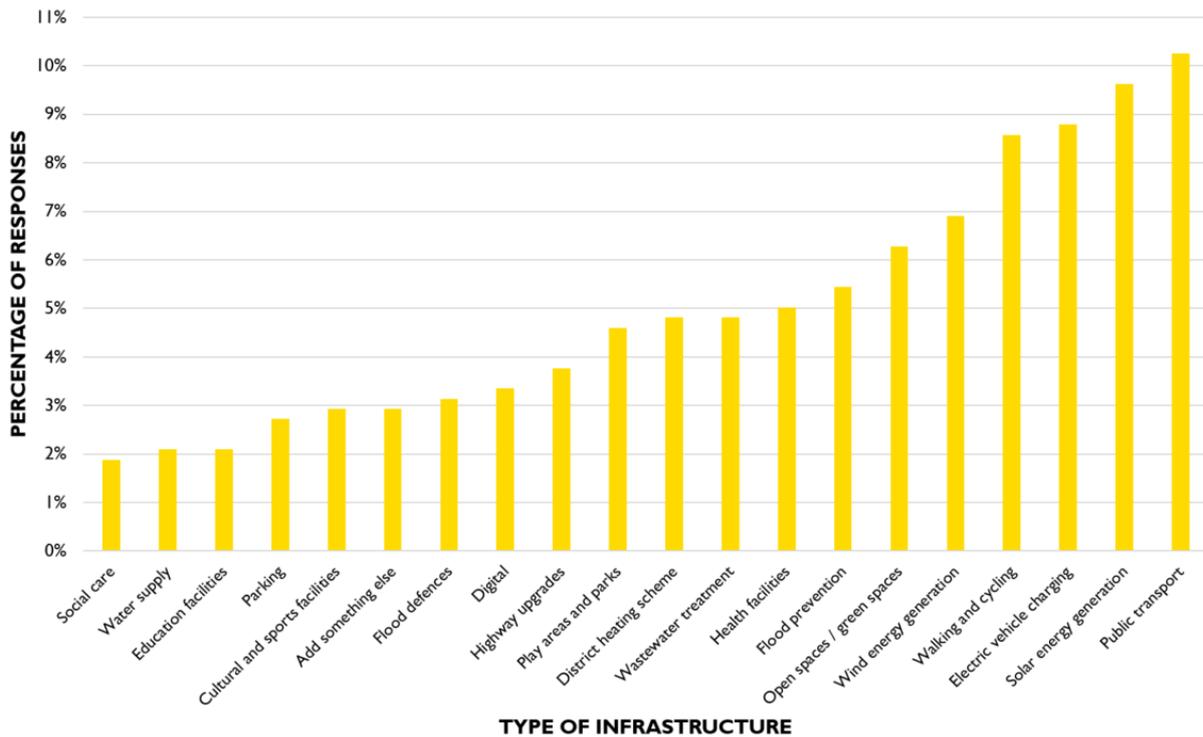
We asked: Q1 What infrastructure is required in your area⁶?



Officer comment: electric vehicle charging, public transport and walking & cycling infrastructure are clear front-runners.

⁶ We pointed out that 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.

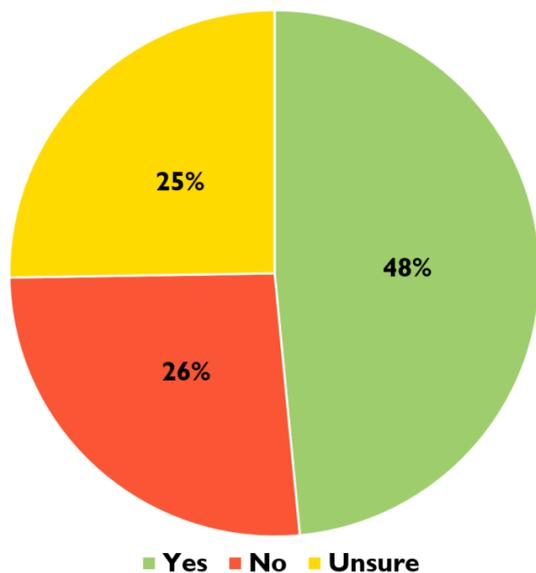
We asked: Q2 What infrastructure could most help make the Local Plan ‘Green to the Core’?



Officer comment:

The most favoured infrastructure type that the community thought would help to make the Local Plan ‘Green to the Core’ was public transport, followed by solar energy generation and electric vehicle charging.

We asked: Q3 if the Council should 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.



Officer comment: although, on the face of it, there is a majority in favour of the proposal, if the “no” and “unsure” responses are combined they outnumber it by a few percentage points. On the other hand, if the “unsure” responses - or at least some of them - could be persuaded positively, that would amount to an unassailable majority in favour. Clearly, more discussion is needed.

On the basis that major development is only permitted in the Cotswolds Area of Outstanding Natural Beauty where there is an exceptional circumstance **we asked Q4a** if 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.

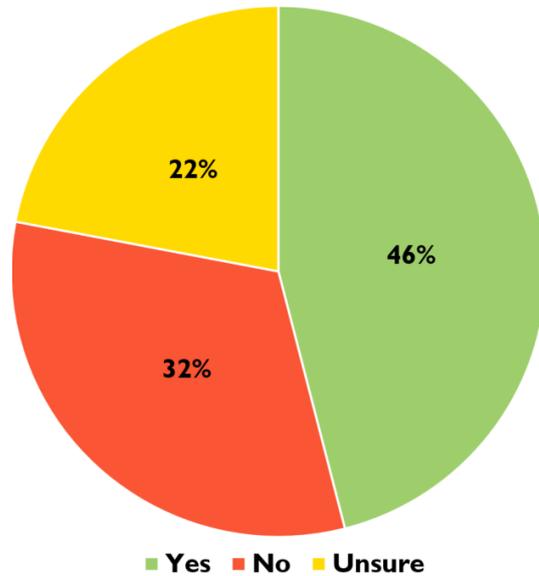
We asked: Q4b you to explain your response.

Your reasons included:

Impact – effect of wind and solar energy development on the natural environment (including landscape) would unacceptably detract from the AONB;

Imperative – climate change is an emergency. Mitigating and adapting to its effects must take priority over everything else;

Balance – difficult choice between conflicting policy objectives and priorities, careful and rigorous evaluation of costs and benefits is required. There may be technical reasons/constraints that potentially justify why the AONB is a favoured



location for renewable energy development. Infrastructural development to tackle climate change in the AONB should be on the least sensitive of land (brownfield first); and Caution – must be approached incrementally and in consultation with key stakeholders.

Officer comment: It is no surprise that there are strongly held pro- and anti- views about this proposal, generally all for legitimate planning reasons. It is a classic planning dilemma. Perhaps the more interesting responses are those that argue for a more balanced, incremental, cautious approach to the question.

We asked: Q5 if there were any other Local Plan-related issues or options on this topic paper that you would like to raise.

You suggested several things including:

- lifetime definitions for infrastructure should be introduced to ensure financial provision for upgrades is built into future plans;
- use existing assets in better and more imaginative way (dismantled railways for instance), turning them into an opportunity;
- GCC should work with CDC and other LPAs to create a single Local Developer Guide that clearly sets out what infrastructure expectations a developer should have when considering bringing a site forward or purchasing land to develop;
- review the balance between allowing the developer to make a profit and CIL contribution - is it right everywhere?
- the loophole needs to be closed that allows developers to bring sites to market in small stages so as to avoid infrastructure obligations.
- the quality of the districts roads needs urgent attention as do congestion bottlenecks;
- encourage transport modal shift away from car use;
- don't forget the infrastructure needed to support vulnerable people (especially communication), which needs to be as low cost and resilient as possible

Officer comment: several interesting ideas were put forward by the community, not all of which were matters for the Local Plan Update to consider. In those cases, officers can pass on suggestions – for example the issue about the quality of the district's road infrastructure – to the appropriate authority (in this case Gloucestershire County Council as Highway Authority). The idea of a “lifetime definition for infrastructure” for example, although not defined by the respondent, is intriguing. Trying to ensure that infrastructure is of sufficient quality to last for an optimum period, and that it or its components

are reusable/recyclable, has sustainability at its core and would certainly be worth exploring with other stakeholders.

Overall officer observations

The key issue here is obviously the question of whether renewable energy infrastructure should be located in the Cotswolds AONB. This is plainly controversial but it does need to be explored by stakeholders and the public in a calm and measured way, taking incremental evidence-based steps towards a conclusion. The Climate Change Emergency declared by the Council makes it imperative that all potential means of addressing the impact of climate change must be considered. Nothing should automatically be off the table.

Next steps

- We will update the Infrastructure Delivery Plan to reassess what infrastructure is needed to support planned growth.
- We will update the Whole Plan Viability Assessment to assess the cost of the proposed policy changes to ensure they are viable.
- We will consider whether the Community Infrastructure Levy should be increased to help bridge the infrastructure funding gap or lowered to ensure that policies remain viable.
- We will keep a close eye on national policy changes, which propose to alter the way infrastructure contributions are collected. The policy changes may supersede some of the Council's proposals.

13. Landscape

This topic paper sought views on how to balance and consider the impact of climate change and the emergency declarations by the Council upon the landscape. How to balance those planning policies which seek to protect and enhance the landscape with potentially conflicting planning considerations such as new development, including the provision of renewable energy facilities.

Option 1: Retain policies as they are, ‘do nothing’

Option 2: As Option 1, but amend and add to the supporting text to include more reference to the linkages between this topic and others such as biodiversity, green infrastructure and climate change

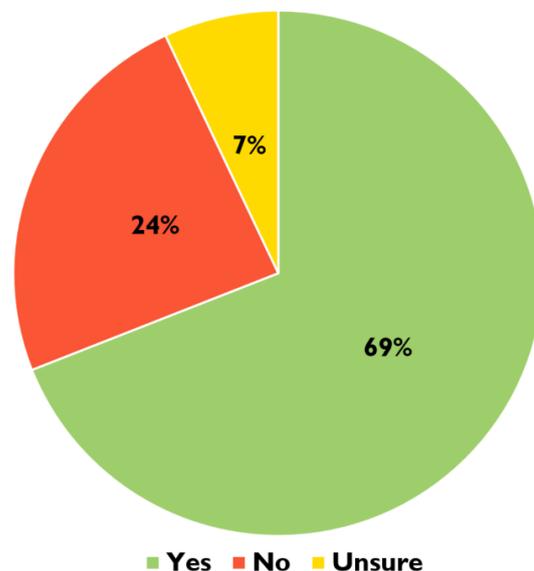
Option 3: A more climate-led landscape policy to investigate further policy options to be as ‘green to the core’ as possible, in light of the Corporate Strategy and declared emergencies.

We asked: Q1a. Do you agree with the preferred Option 3 to investigate options and amend the policy to be as ‘green to the core’ as possible in light of the Corporate Strategy and declared emergencies?

You said: Out of the 74 people who responded to this question, the majority of respondents agreed with the idea of the preferred option (Option 3) to investigate further policy options in order to be as ‘green to the core’ as possible.

We asked: Q1b. Why? **You said:** The majority of ‘yes’ reasons given in Q1b relate to the need to address climate change and ecological emergencies, to take action, to compel developers to act, and have a pragmatic approach.

‘Climate emergency trumps all other considerations in the end’



Conversely the ‘no’ or ‘unsure’ reasons to amend the policy to be as ‘green to the core’ as possible (Option 3) generally included; support for protection of the landscape, and/or views against the impact of wind turbines, the potential expense/cost of the proposals, that it should be personal choice, and potential to increase development for example, if developers only ‘planted a few trees’.

‘this is a matter of National Policy and CDC should not be aiming above this’

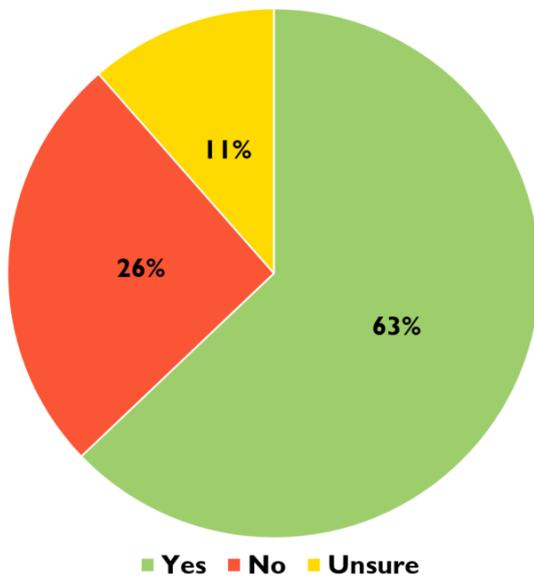
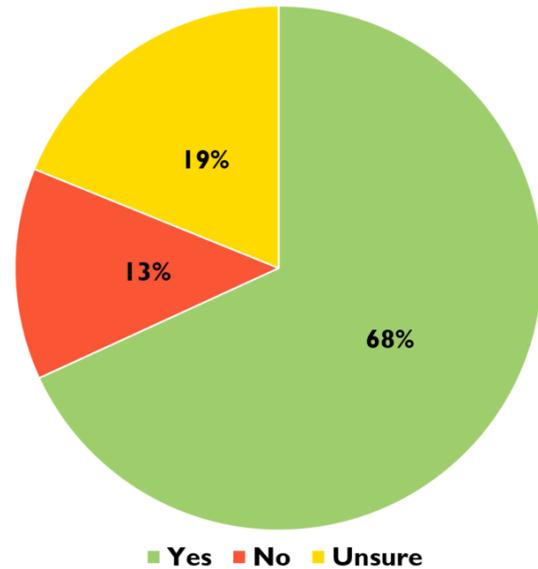
This included support for Option 2 (to only amend the supporting text - to include more reference to the linkages between this topic and others such as biodiversity, green infrastructure and climate change). In addition one response notably mirrored the Council’s comment in the Topic Paper that Option 3 would also need to be in line with national policy and ‘in the short term Option 2 may prove to be more realistic for this Update’ given Option 3 may take longer and need more evidence.

There was no clear support for Option 1 to ‘do nothing’.

We asked: Q2a. Does the Local Plan Objective 1a – Landscape – need to be updated?

For example, to reference a more holistic approach, ‘to support the maximum multiple benefits of the landscape such as recreation, water management and biodiversity’.

You said: 68% agreed with this approach



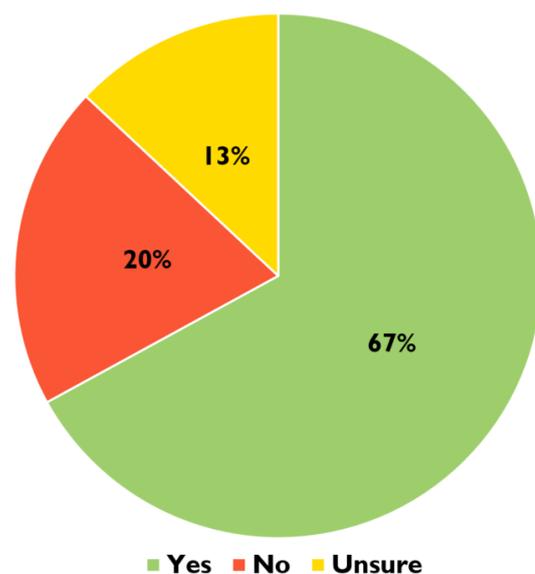
We asked: Q2b. Should Local Plan Objective 1a reference the need to balance the aesthetic aspects of the landscape with the need to mitigate and adapt to climate change?

You said: Over 60% agreed both with the need to reference and to balance the current Local Plan objective on landscape with climate change mitigation (Q2b), and to be more ‘holistic’ linking to other policies (Q2a).

We asked: Q3a. Should the Local Plan actively promote Renewable Energy developments in the District?

You said: Nearly a quarter of respondents said ‘no’ to the promotion of renewable energy in the District. This is related to the question being asked specifically in the context of, and thinking about, the ‘Landscape’.

If we look at this Q3a (67%), alongside Q1a (69%) above, it is noticeable that a similar majority of nearly 70% people agreed with both the preferred option and promotion of renewable energy developments in the District.



‘Climate change will have to prompt some difficult choices between aesthetics and measures to reduce climate change. However these tough choices should not be shied away from’.

Amongst the ‘no’ and ‘unsure’ responses there was consideration of the need to balance competing requirements in the landscape with climate change mitigation; and concerns for protection of the landscape, especially if designated, particularly in respect of wind turbines and solar farms.

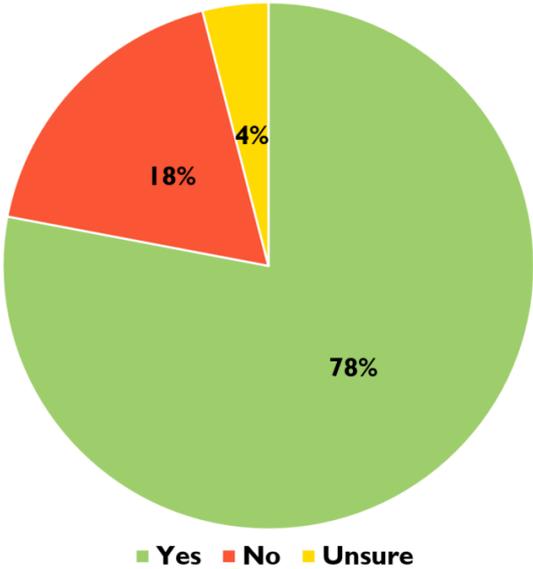
‘Protection and enhancement of the District’s sensitive landscape is the overriding priority in the AONB’

‘Very difficult to know how best to balance the unavoidable compromises’

We asked: Q3b. If you answered Yes to Q3a please answer the following questions:

i. Should the Local Plan identify broad locations where Renewable Energy developments would be suitable, such as wind turbines and large scale solar farms?

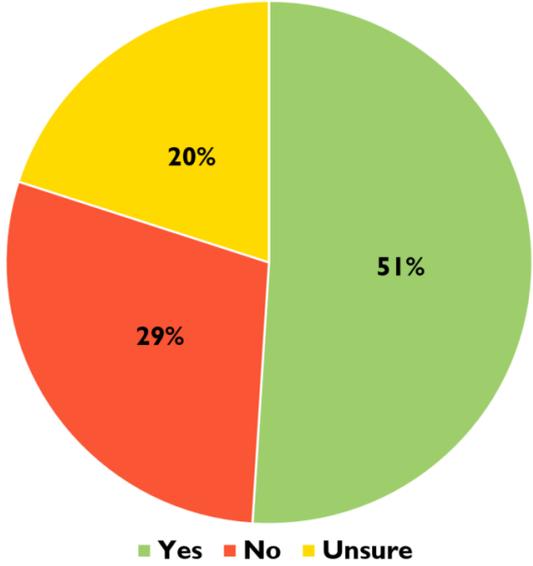
You said: A majority of people 78% that agreed the Local Plan should identify suitable broad locations for renewable energy development, but notably only 51% agreed that it should be considered in designated landscape areas (Q3bii) see below.



ii. Should locations in the Cotswolds AONB and the Special Landscape Areas be considered for Renewable Energy developments, particularly wind turbines?

You said: An almost equal number of people were either unsure or said no to Q3bii, as they said yes.

Over a quarter of respondents think the most sensitive ‘designated’ landscapes should continue to be conserved and enhanced rather than considered for renewable energy development; and those who are unsure would need convincing to agree with such areas being considered.

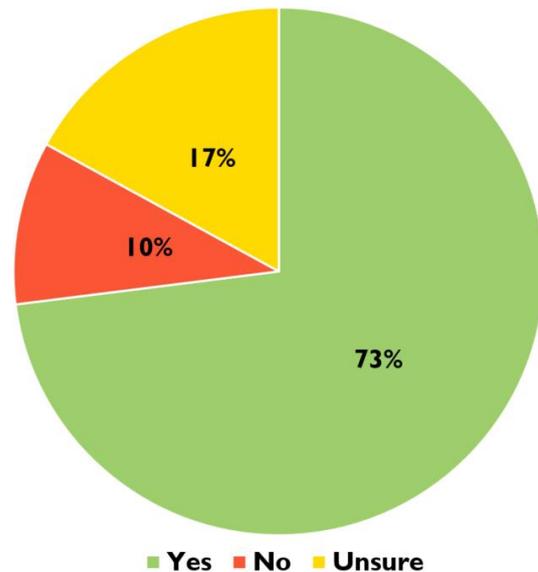


The suggestion that locations in the AONB and Special Landscape Areas be considered for renewable energy (especially wind turbines) is significant as it illustrates the difficult balance

between how to conserve and enhance, within the declared climate change and ecological emergencies, on the landscape - with nearly a 50/50 split of opinion: you said ‘yes’ (51%) vs ‘no and unsure’ (total 49%) please note however - this includes the 20% who remain unsure and assuming they would remain in the ‘no’ camp.

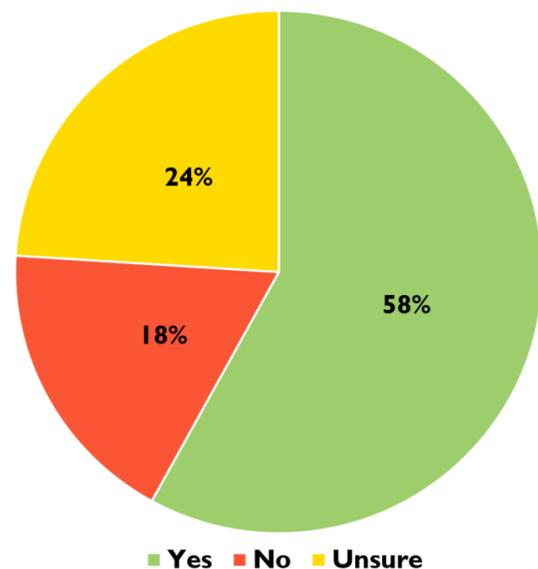
iii. If broad locations are not identified for Renewable Energy developments, should the Local Plan instead include a criteria based policy with a threshold on the size, type or location of proposals?

You said: If no broad locations were identified, a criteria based policy for renewable energy would be appropriate (as an alternative).



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?

You said: 58% of respondents agreed a sequential approach to the location (least suitable to most suitable development) could also be an alternative to identifying broad locations. This would likely also involve some assessment criteria (see Q3b iii).



Other issues/solutions that were raised:

- Appreciation of the difficulty of balancing often competing pressures upon the landscape
- Support for community-led renewable energy, local benefits and need for local discussion
- Suggestions for climate change mitigation; such as small-scale hydroelectric schemes/ water power, bio-digesters on farmland, use of redundant gravel pits as a water resource, air heat source and ground water pumps, use of new / existing infrastructure and buildings such as public buildings, supermarkets / car parks.
- Suggestion climate change mitigation and adaptation should be in separate, stand-alone policies.
- Compliance with national planning policy and relevant legislation. A Local Plan is required to be legally compliant and consistent with national planning policy.

Officer Observations:

- Identifying renewable energy development in designated areas of the landscape (the AONB and Special Landscape Areas) has most divided people’s opinion - for 51% and against 29%, (or when including those who are unsure (20%) this would total 49%, but this is assuming

however the ‘unsures’ would remain in the ‘no’ camp). It illustrates how difficult it is to balance these issues.

- Nearly 70% agreed (i.e. gave ‘yes’ response’s) to questions both supporting the preferred option, to look at the policies being as ‘green to the core’ as possible, and promotion of renewable energy developments in the District. (See Q3a (67%) and Q1a (69%)). A majority (78%) also agreed the Local Plan should identify suitable broad locations for renewable energy development
- There were positive suggestions to mitigate climate change that may have less impact on the local landscape (a more sequential approach), but would this also be less able to mitigate climate change?
- A key issue of uncertainty is how renewable energy proposals / climate change mitigation and adaptation can be achieved in the landscape whilst remaining in accord with national policy to conserve and enhance? This will need consideration and discussion with key stakeholders such as the Cotswold Conservation Board.

Next steps

How best to approach climate change mitigation, while also being consistent with national policy and designations to conserve and protect the landscape? In light of comments consider both Options 2 and 3;

- Take advice on the pursuit of the Preferred Option 3 in a partial update and in light of possible legal implications.
- Discuss all options (or combination of) with stakeholders such as Cotswold Conservation Board (Cotswold National Landscape), and our consultant AECOM who assessed alternative options for development, for example inside and outside the AONB, within the Integrated Impact Assessment (IIA) evidence, and the Council’s Climate Action Manager
- Consider the need for other evidence such as a landscape appraisal to support the Renewable Energy Strategy.
- Commission next stage of IIA
- Consider a sequential approach for Renewable Energy development and location i.e. least suitable to most suitable. Consider in conjunction with other related policy areas (topics) such as the Climate Change Topic Paper.
- Consider the alternative Option 2 - amend and draft only the Landscape supporting text in the Local Plan Update, including links with other related policy areas; and retain landscape policies as they are to ‘balance’ other more climate-led policies elsewhere in the plan.

14. Natural Capital and Ecosystem Services

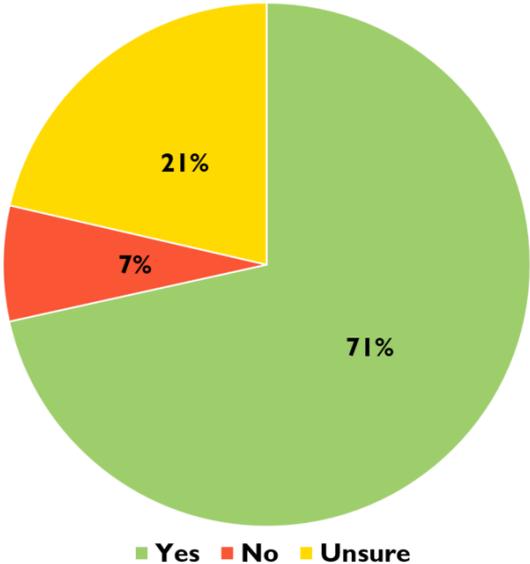
This topic paper proposed several options that could help make the local plan green to the core. The Natural Capital & Ecosystem Services topic paper asked eight main questions that sought people’s views on several key issues relating to green infrastructure in the District.

We asked: 1a. Our preferred approach to assessing natural capital and ecosystem services before and after development is the [Environment Agency’s Natural Capital Register](#)⁷ and Account Tool (see Section 5 within the website link). Do you agree with this approach?

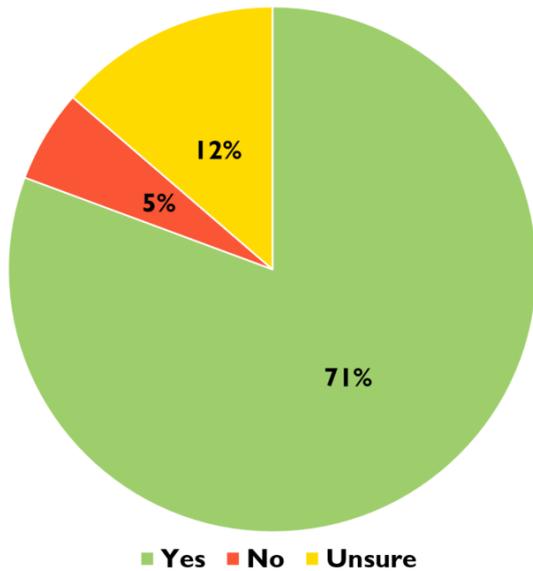
You said: There was strong support for this option, but there were a small number of comments questioning the use of the register.

We asked: 1b. Please explain why if you do not agree and, if possible, suggest an alternative method.

You said: The use of the metric, for its complexity. It is thought that a quantitative approach does not necessarily give better results than a qualitative one because it can’t give appropriate weight to particular local features or circumstances. There were doubts raised whether any improvements made could be sustained over the long term.



⁷ <https://www.gov.uk/government/publications/enca-featured-tools-for-assessing-natural-capital-and-environmental-valuation/enabling-a-natural-capital-approach-tool-summaries>



We asked: 2a. 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.

You said: The majority of people answered yes to this question (71%). Although there was general support for this option. There were a few people who didn't fully support it.

Reasons for questioning the approach included concerns raised about how losses to enhancements could be avoided in future years.

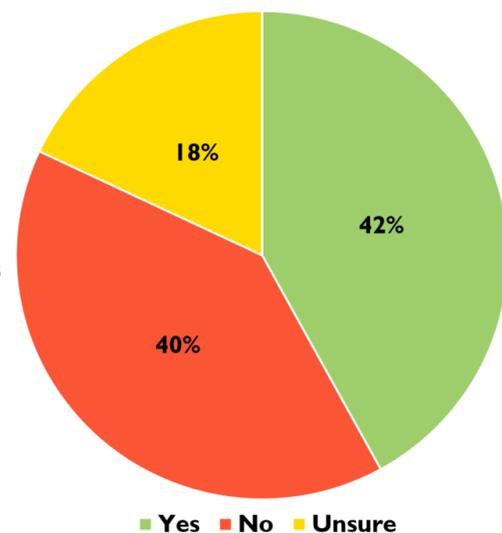
We asked: 2b. Please explain why?

You said: One answer in support said its use will enhance natural capital at a catchment or landscape scale across local authority boundaries; and it would help to achieve overall improvements in natural capital, ecosystem services and the benefits they deliver.

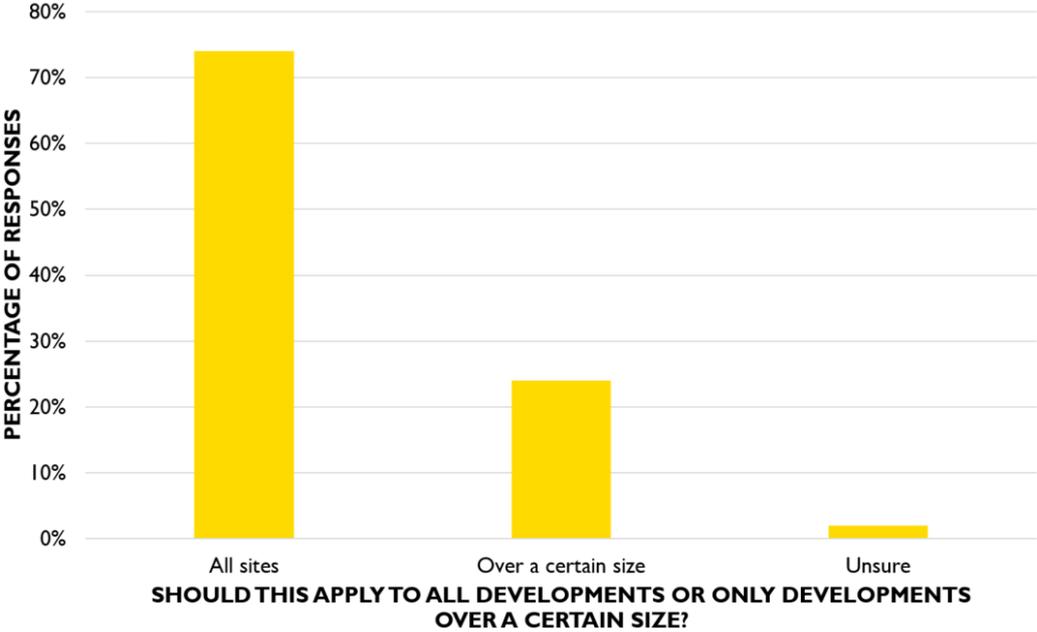
We asked: Q3a. Should the Local Plan allow on-site natural capital and ecosystem decreases to be compensated for by off-site improvements?

You said: There's a near 50/50 divide in opinion regarding this option and several concerns.

We asked: Q3b. Please explain why? Comments received highlighted that people wanted any off-site contributions, if there had to be any, to be made close to the original site / development. Losses from the local area should be avoided, that natural capital is as much about the place in which it exists and shouldn't be separated from it. Making sure any improvements were linked to the wider landscape was also suggested. One recipient questioned how offsite contributions would work. There were comments in favour of offsite contributions if no local solutions were available or the proposed off-site was more sustainable.



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



You said: This question revealed that the majority of people were in favour of all developments contributing to natural capital and ecoservice systems.

We asked: Q5. if there were any other Local Plan-related issues or options on the topic paper that people would like to raise?

You said: That the technical aspect of the topic paper was not easy to understand. That greater consideration should be given for the worth of brownfield as well as greenfield sites for their ecoservice systems. Longevity, maintenance as well as location is a concern and finding the right balance between carbon offsetting and natural capital is key.

Officer comments: Although Natural Capital and Ecoservice Systems are accepted to be one of the key ways to evaluate the environment and the services they provide, they are broadly confined to the academic and professional worlds. Some of the comments received highlighted the need for work to be done to open up these concepts to a wider audience. However, the proposals put forward within the topic paper have been met with general approval. At this stage there are several matters yet to be agreed upon at a national level including the metric used to measure Natural Capital. The partial update of the Local Plan will be aligned with any updates.

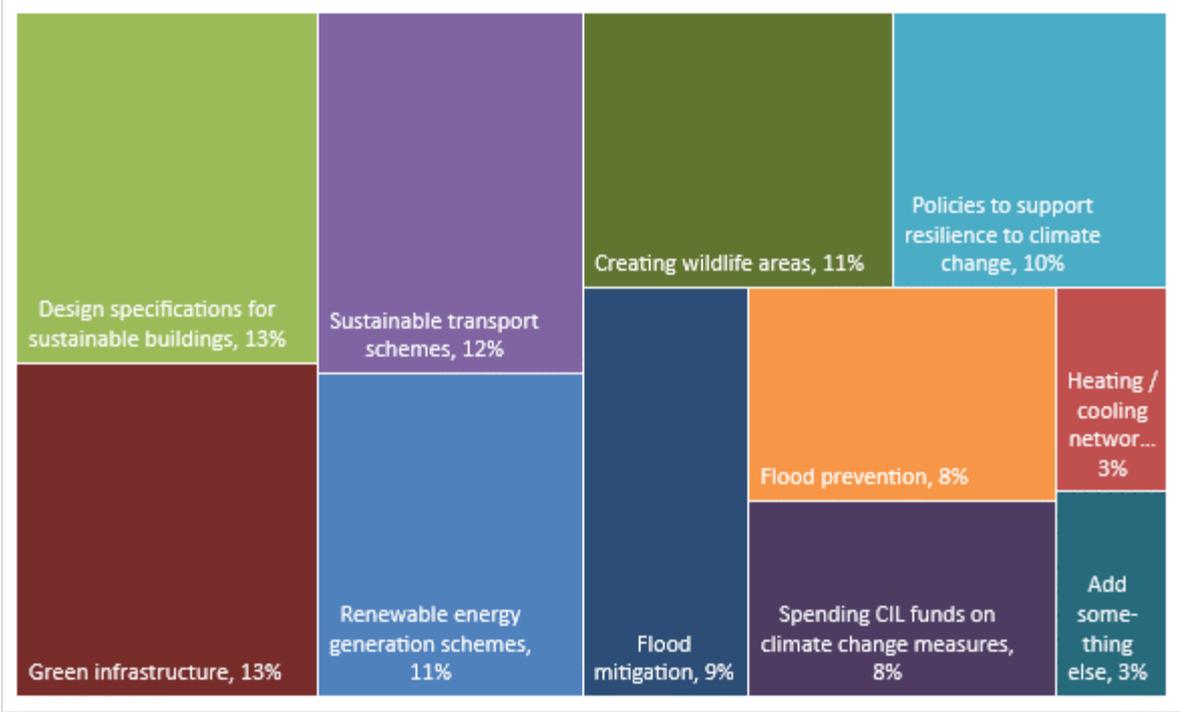
Next Steps

- We will update the Draft Green Infrastructure Strategy to reflect the consultation comments, where appropriate.
- Given the broad support for the policy options, we will seek to update the Local Plan to incorporate them.
- We will investigate further the opportunities for on and off-site contributions for Natural Capital and Ecoservice Systems.
- We will produce or commission evidence to fully justify the policy proposals.
- We will look into ways in which complicated concepts can be explained in a clearer way.

15. Neighbourhood Planning

The topic paper proposed several options split between non-local plan and local plan interventions. These included making clear which policies were strategic, creating a new Neighbourhood Plan policy, placing a duty on those preparing neighbourhood plans to respond to climate change, improved guidance and enhancing the local town and parish council support network. It sought to get an appreciation of people’s views on how the Council can better support town and parish councils preparing neighbourhood plans and how the local plan could be modified to ease the process of preparing plans as well as committing plans to deliver strategic climate change objectives.

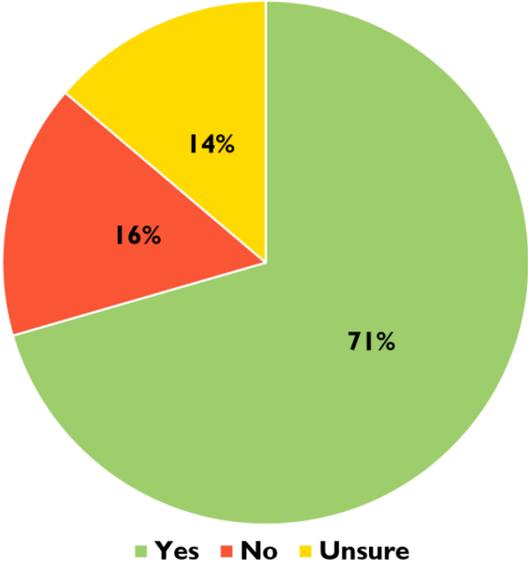
We asked: What kind of proposals do you think could be included in your local neighbourhood plan to help meet the challenges of the Climate Change and Ecological Emergencies?



You said: There were 62 individual responses to this question. Creating policies that specify design standards of new builds; create new and protect and enhance existing green infrastructure and wildlife areas; promote sustainable transport schemes; and support renewable energy schemes represented 60% of the selected policy preferences. Creating policies that deliver district heating and cooling networks was the least selected option. Setting local design standards was the most popular (42) - officers will reflect on this insight as it updates the Council’s district-wide design code.

There was another question relating to the Neighbourhood Plan contained within the Town Centres topic. It asked whether or not Neighbourhood Plans should "consider" preparing Town Centre Strategies - see page 87 onwards.

We asked: Do you agree with these options?



You said: 71% of respondents that were supportive of the proposed options (29 out of 42 respondents) did not provide reasons for their support. Those that did identified a range of matters including welcomed more guidance, greater support and improved communications. One respondent reminded the Council that it should *recognise that Neighbourhood Plans are produced by non-expert volunteers, who are unfamiliar with planning processes and vocabulary*; an important matter to bear in mind when supporting Town and Parish Councils. There was support to make clear which policies are strategic and non-strategic.

Those opposed and unsure (17 respondents) explained that this would be unnecessary bureaucracy, that policy options were potentially meaningless and that it would duplicate government policy. Fairford Town Council’s response was detailed and considered. It explained that:

- option 2 seemed to be attempting to inappropriately redefine/constrain the concept of ‘general conformity’;
- there is a danger of being over-prescriptive in such a policy which may result in preventing the effective addressing of specific local needs; and
- the second sentence* seems to be suggesting a form of blackmail which is contrary to the spirit of Localism Act (which brought in Neighbourhood Planning) and the aspiration of the new National Design Code that local communities should have more influence in plan making for their local area.

* *Place a duty within the local plan... that neighbourhood plans 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 ([Consultation document – Page 71, paragraph 3.1, third bullet point](#))*

A summary of other issues, considerations and suggested solutions:

- a common theme to emerge is that preparing neighbourhood plans is complicated, costly and time consuming. However, there appears to be overall support for the process and other processes that improve community engagement in shaping their towns, villages and rural areas.
- providing template toolkits and timelines could help groups understand how to get started quickly, how to run tasks in parallel where possible and in sequence where not, how to access funding from Locality.
- one respondent pointed out that Local Plan Update will likely impact policies contained with adopted (made) Neighbourhood plans, which will result in Town and Parish Councils needing to update their plans. The Council should consider how it can best support affected town and parish councils.
- one respondent made an astute procedural observation, specifically on the need for stylistic consistency to make it easier for Development Management officers (the Council’s planning

applications team) to navigate the Local Plan and Neighbourhood Plans and apply when determining applications. This could easily apply to the Council's Planning Committee also.

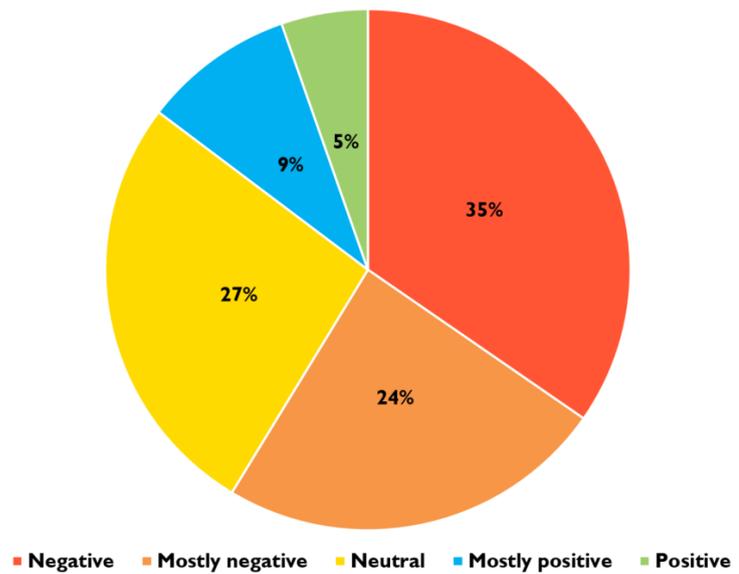
- there were several comments relating to Mickleton, which included the suggestion that Mickleton Parish Council should prepare a Neighbourhood Plan. One respondent explained that *we don't need anymore housing, there are no facilities in Mickleton*. The respondent explains the priority should be to build on brownfield sites and emphasised the importance of protecting the villages rural identity especially in the context of the large growth planned in Stratford on Avon District.
- Gloucestershire County Council explained that those preparing plans should be aware of its top priorities for transport in Gloucestershire. These are, 1) walking and cycling infrastructure improvements, 2) bus infrastructure improvements and 3) electric vehicle charging points.

Next Steps:

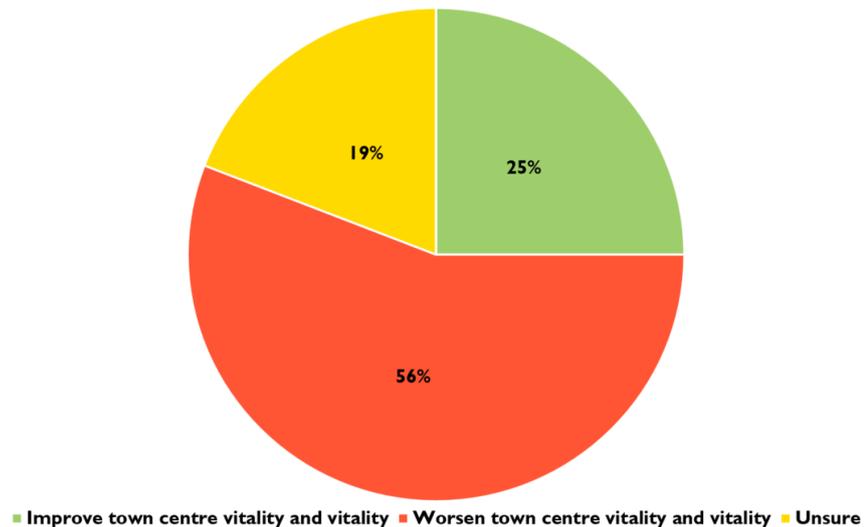
- Consider a proportional response that provides practical advice and useful policy in the local plan for those preparing neighbourhood plans.
- Establish if GCC has guidance that it can share with town and parish councils to help deliver these components within neighbourhood plans.

16. Retail and Town Centres

We asked: Q1 if you are concerned that changes of uses in town centres no longer require planning permission in your town and village centres (outside of AONB areas).



We asked: Q1b what impact you think not requiring planning permission for changes of use within Class E will have on town centre vitality and vitality.



Your reasons included:

Impact (worsen):

- lack of ‘holistic’ planning overview;
- lack of Council control leading to low-grade residential conversions with inadequate infrastructure;
- exacerbation of existing trend of loss of retail due to more commercially attractive uses;
- unregulated development affecting the appearance and attractiveness of town centres.

Vitality (improve):

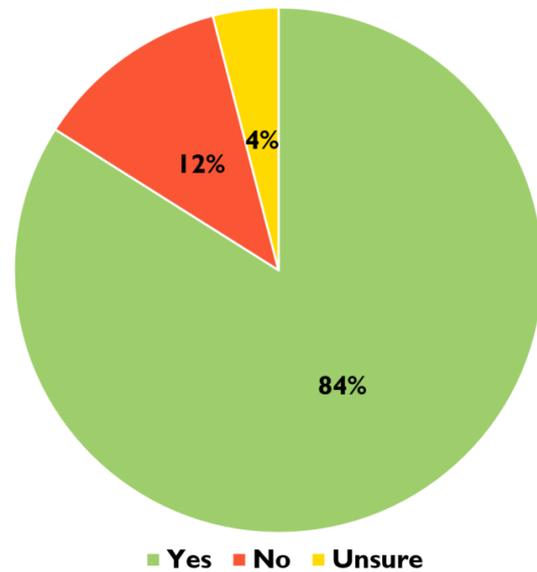
- broader scope for a variety of imaginative uses;
- more adaptability will allow greater flexibility and ability to keep pace with change;
- empty shop units would be better used for housing or other uses rather than being boarded up;
- more people living in town centres will increase vitality, particularly for the evening economy.

Balance:

- empty buildings should be brought back into use. Changes in shopping habits mean town centres will have to change. But core of shops and services must be retained and encouraged;
- may allow for more mixed use spaces like co-working cafes, community spaces that combine e.g. childcare during certain hours with other professional services at other hours. Mixed use spaces can make rents more affordable, allowing more services to be provided in town centres. But balanced with concern that certain non-residential institutions will be replaced by retail or restaurants, at the expense of the needs of local people;
- empty town centres are incredibly depressing, and any action that can fill them with shops/establishments/food is welcome. But lack of planning permissions could see more "low value" uses filling a town centre making it even less of a desirable place to live.

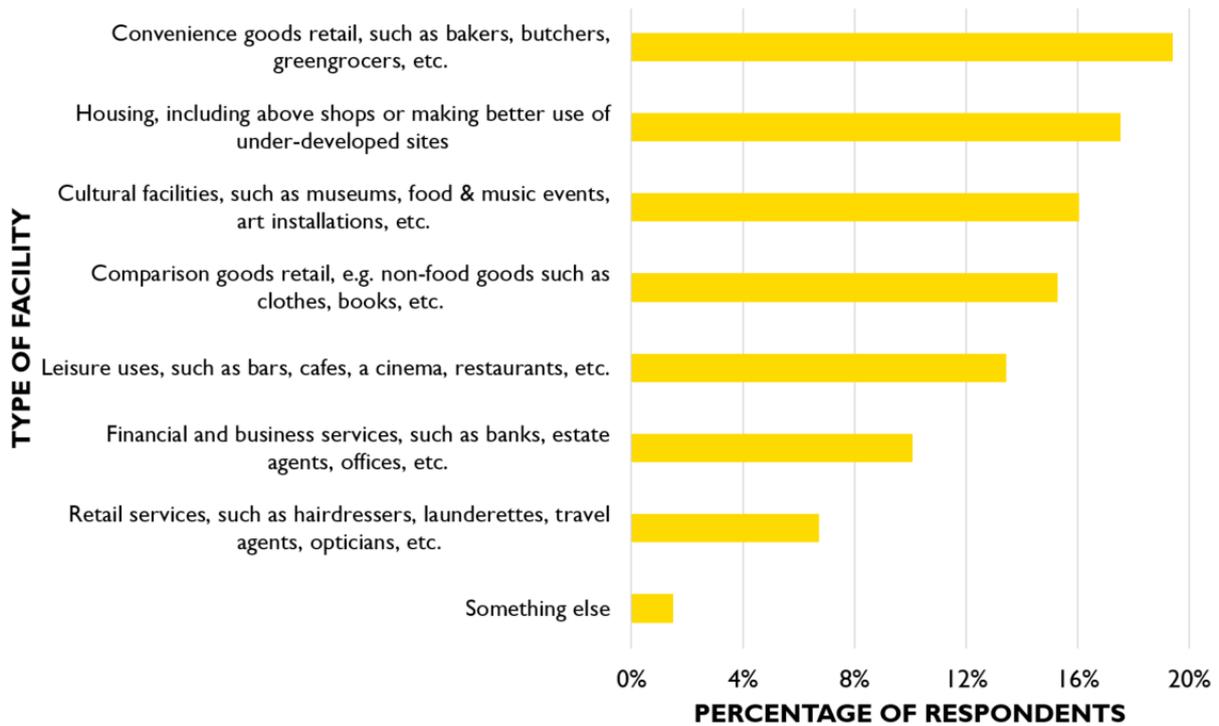
Officer comment: this is a rather technical question and, where it might take place, the impact that change of this type could have is unpredictable. As the responses clearly showed, the community is well aware that there are pros and cons. An informal desk-top survey of Cirencester town centre undertaken by Forward Planning officers concluded that up to 50% of the premises could be susceptible to this change. Clearly, if that came to pass it would have a significant impact on the nature of the town centre.

We asked Q2 if you thought there should be a more diverse mix of uses in your town centre.

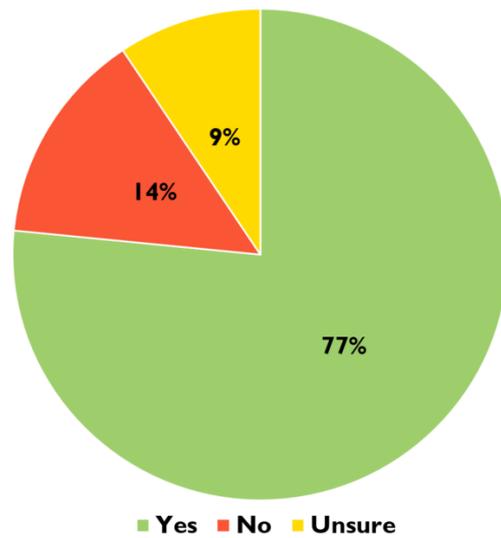


We also asked: Q2b what you would like to see more of.

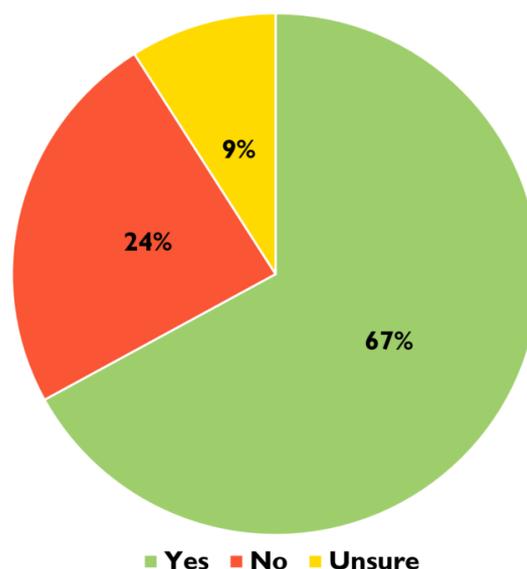
You said:



We asked: Q3 Where a Neighbourhood Development Plan is being prepared or revised, should the Neighbourhood Planning Group 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?



We asked: Q4a if you agree with the preferred option⁸



We asked: Q4b if we've missed any issues or options. We also asked if you suggest an alternative approach to explain why and show how it is sound in planning terms.

You said:

- the emphasis for producing town centre strategies should not be placed on the Neighbourhood Development Plan, it is not for the Local Plan to require a neighbourhood plan to make certain provisions;
- do not agree with increasing residential uses in town centres;
- better use can be made of former retail premises by converting them to residential use to absorb some of the housing need and to limit reliance on car travel.
- more efficient use of space above and behind existing retail premises may enable them to be more financially viable. Could the district look at ways to have 'affordable' business premises as well as 'affordable' housing?
- support the reduction of the primacy of retail in town centres, as long as the blend of uses is more diverse and of primarily an economic nature;
- Market forces should be allowed to determine uses;
- Important not to overlook the link with tourism – markets are a particular attraction for visitors;
- CDC should consider the use of Article 4 Directions to control change in town centres resulting from permitted development.

General officer observations

The proposal regarding Neighbourhood Development Plans and Town Centre Strategies has been misunderstood by several respondents. The proposal is not to require NDPs to incorporate Town Centre Strategies. The proposal is that NDPs are required to *consider* incorporation of a strategy into their new or revised plan. The reason why this proposal is being made is because all town centres are facing significant and rapid change as a result of various factors, primarily internet-based retailing. The Council does not wish to impose a “one-size-fits-all” policy approach but would rather tackle this

⁸ “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”. Increase provision of and density of residential uses within and surrounding town centres to support the viability of town centres. Retain an amended “primary shopping area” delineation to ensure no conflict with NPPF requirements. 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 settlement included within the retail hierarchy, as defined in the Local Plan. Alternatively include the “requirement to consider” in any NDP policy that is developed.”

problem collaboratively with the town and parish councils, using the current development plan (i.e. the Local Plan and the NDPs) to try to address the problem strategically *and* locally in an holistic and integrated way.

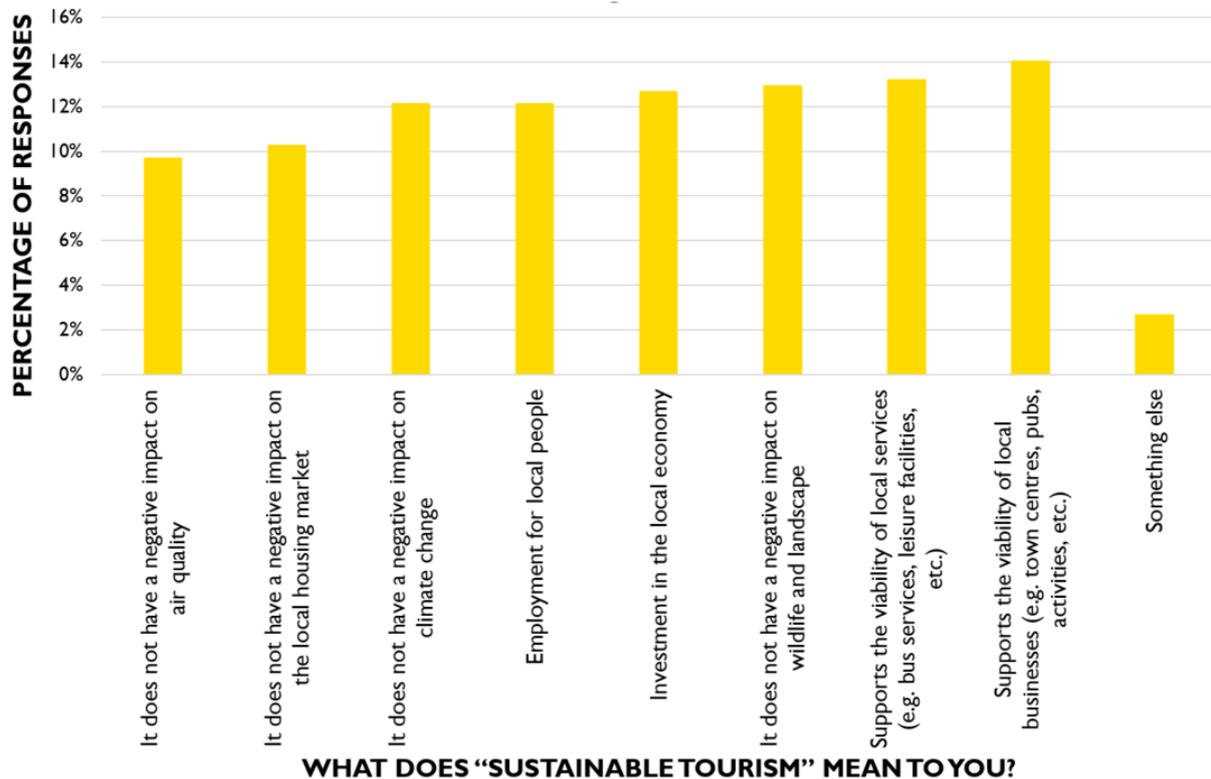
The threat to town centres posed by the recent changes affecting Class E of the Use Classes Order is well recognised by the community, although some see it as an opportunity. The problem is that although not all premises are affected (listed building are exempt, for instance) planning control has largely been wrested from the Local Planning Authority by central government. Whether or not Article 4 is available to remove the permitted development right to change from Class E to Class C3 (dwelling houses) requires further and very careful consideration. It should be noted that the imposition of a Direction under Article 4 can attract claims for compensation.

Next steps

- preparation of the Local Plan Update follows a statutory process. The next formal step is to move from the Regulation 18 “Issues and Options” stage (where we are now) to the Regulation 19 stage where your responses are taken into account as part of the basis for amendments to the Local Plan, formulation of fresh policies and so on. A further round of public participation and consultation is part of that stage;
- a considerable number of responses you made require further consideration and evaluation, and this is an essential task as part of preparing the Regulation 19 stage;
- one of the key challenges is to turn ideas into useable planning policies. In terms of the Retail and Town Centres Topic Paper, we need to consider how best we can implement the ideas about:
 - a strategic approach to protecting our town centres by ensuring that the Local Plan and Neighbourhood Development Plans work together to provide a coherent planning policy framework, including individual Town Centre Strategies where NDP groups consider that to be desirable;
 - exploring with legal advisors the feasibility of using Article 4 Directions to control the conversion of premises from Class E to Class C3 (dwelling houses) in our town centres; and
 - while staying within the boundaries set by the National Planning Policy Framework, looking strategically at the scope for a greater degree of flexibility in the use profile of our town centres so that there is less reliance on an “eggs in one basket” traditional retail-anchored identity and a broader mix of appropriate uses including leisure, hospitality and residential to safeguard and encourage vitality and assist in developing the evening economy.

17. Sustainable Tourism

We asked: Q1 what “sustainable tourism” means to you.

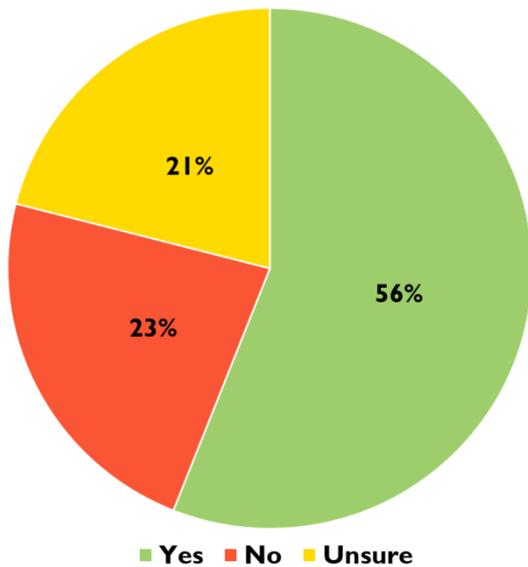


Officer comment: as might be anticipated, a broadly even split between various issues and concerns. Sustainable development comprises three interrelated strands: environmental, social, economic. In crude terms the central challenge for the Local Plan is balancing the environmental and social impact of tourism against the clear economic benefits it brings to the district.

We asked: Q2 whether there are new facilities you would like to see that would also appeal to visitors and which visitor spend would make more viable?

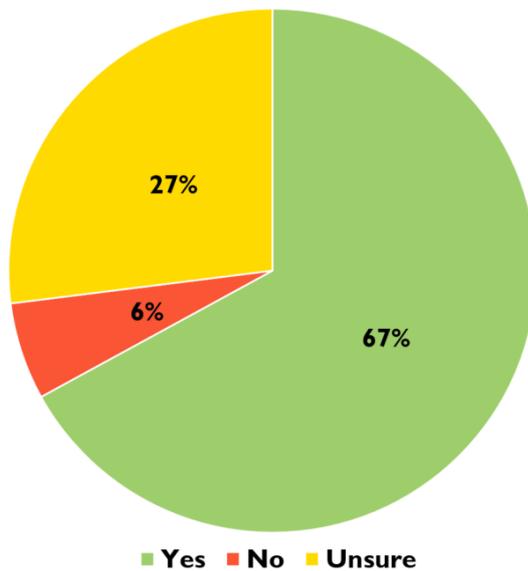
You suggested a wide variety of facilities including:

- Cycling and walking;
- Entertainment and leisure (particularly a cinema);
- Arts and culture;
- Retail; and
- Public transport.



Officer comment: on the face of it this proposal has good support, although if the “no” and “unsure” responses are taken together that is not quite so clear-cut. On the other hand “unsure” could equally lean towards “yes”. More work required.

We asked: Q7 if you agree with the preferred option⁹ and to give reasons for your response.



Your reasons included:

- Sustainability – reduce the environmental impact of tourism;
- Control – tourism needs to be actively managed to control its unwanted impacts including overdevelopment in certain areas;
- Balance – need to ensure we don’t throw the baby out with the bathwater – tourism is a significant part of the district’s economy. Also need to balance conflicting sustainability objectives;
- Change – needs and demands of tourism, and requirements to adhere to certain standards, are changing and CDC needs to keep step.

Officer comment: applying the same logic as the previous comment, whichever way the responses are cut there’s a clear two-thirds majority (or more) in favour of the preferred option.

We asked: Q8 if there were any other Local Plan-related issues or options on this topic paper that you wanted to raise?

You suggested several things in response, including:

- tourism needs to be integrated with a wider transport decarbonisation strategy;
- as part of a wider review, conditions for sustainable tourism need to be in balance with local needs so that facilities can benefit all;
- long distance public transport connectivity/links including rail;

⁹ (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.

- second/weekend homes and the impact these have on small villages;
- council tax should be substantially increased for all holiday homes in the area;
- tourism policies must be sufficiently flexible to allow businesses to adapt to changing economic trends and changes in the demands of tourists;
- tourism must also dovetail with the needs of residents and other businesses - high quality jobs, services and facilities that benefit 'us' as well as 'them'.
- Cotswold Water Park needs more provision for short-term holiday accommodation aimed at the more affordable end of the market.

Overall officer observations: No surprises or groundbreaking ideas here. The suggestion that the transport elements of tourism are integrated with the Sustainable Transport Strategy is sensible and should be considered, as is the point about ensuring that recreational facilities can be shared by local residents as well as visitors. The issue of holiday homes is a hardy planning perennial and is considered in other Topic Papers.

Next steps

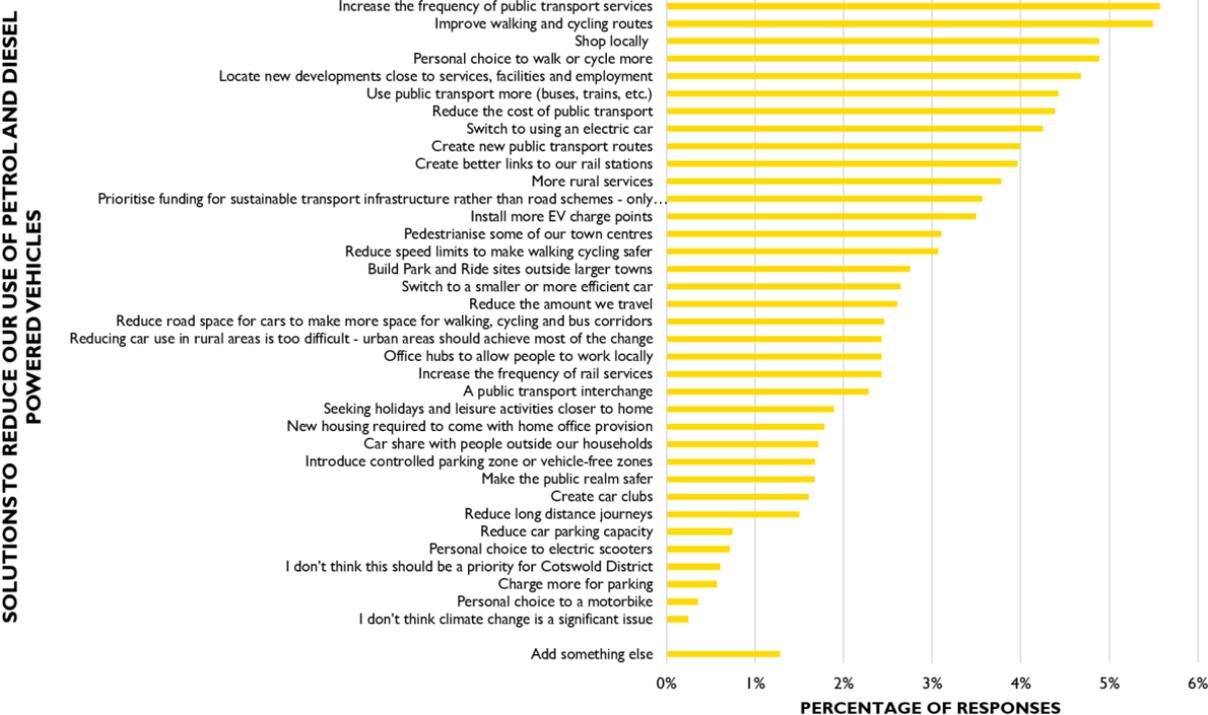
- preparation of the Local Plan Update follows a statutory process. The next formal step is to move from the Regulation 18 “Issues and Options” stage (where we are now) to the Regulation 19 stage where your responses are taken into account as part of the basis for amendments to the Local Plan, formulation of fresh policies and so on. A further round of public participation and consultation is part of that stage.
- a considerable number of responses you made require further consideration and evaluation, and this is an essential task as part of preparing the Regulation 19 stage.
- one of the key challenges is to turn ideas into useable planning policies. In terms of the Tourism Topic Paper, together with acting on your support for a future Sustainable Tourism Strategy we need also to consider how best we can implement ideas about:
 - ensuring that there is synergy between the Sustainable Transport Strategy and travel issues relating to tourism in the district; and
 - the sharing of recreational facilities between residents and visitors; and
 - the holiday homes/second homes issue that is plainly of concern to many respondents.

18. Sustainable Transport and Air Quality

The Sustainable Transport and Air Quality Topic Paper received 302 responses through our online consultation. 24 additional representations were received, mostly from organisations. These representations tended to be much longer and did not necessarily follow the set consultation structure. These representations are therefore not included in the graphical data, but a summary of the key issues raised and responses are included in the commentary.

Amongst other things, the topic paper asked a range of questions to help understand travel habits within the district, people’s willingness to switch to more sustainable modes of transport and the most likely successful solutions that would enable them to do so. The topic paper also sought to identify any issues that may arise from switching to sustainable modes of transport and further ideas that we can look into further.

We asked: Q1. Given transport’s high contribution to the UK’s total carbon emissions and other pollutants, how can we in Cotswold District seek to reduce our use of petrol and diesel powered vehicles?

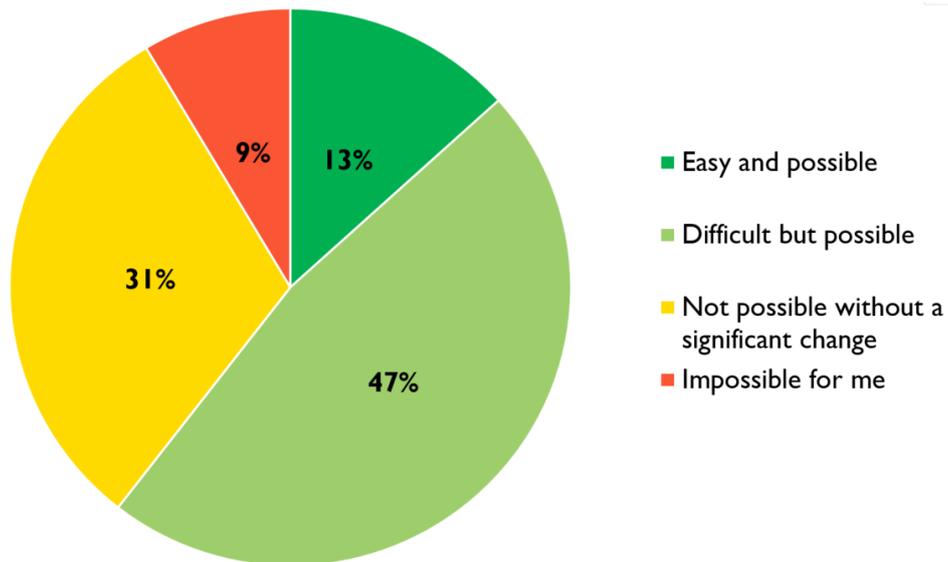


You said: Grouping the responses together by broad type, the most popular suggestions for actions to reduce our use of petrol and diesel powered vehicles can be summarised as:

- 1) Increase use of bus and rail by improving frequency, coverage and cost effectiveness;
- 2) Walk or cycle more frequently, aided by improving routes and reducing the distance between home and important services such as shops (“shop locally”) and other facilities (“Locate developments close to services, facilities and employment”);
- 3) Switching to electric vehicles, supported by the installation of charge points; and
- 4) Creating better conditions for active travel by increasing investment, reducing speed limits and creating more space for pedestrians, cyclists and bus corridors. (Note: there was less support for measures that constrain parking.)

Fewer than 1% of respondents thought that climate change was not a significant issue, and/or should not be a priority for Cotswold District.

We asked: Q1b. To what extent do you think [reducing use of petrol and diesel powered vehicles] is possible at the moment?

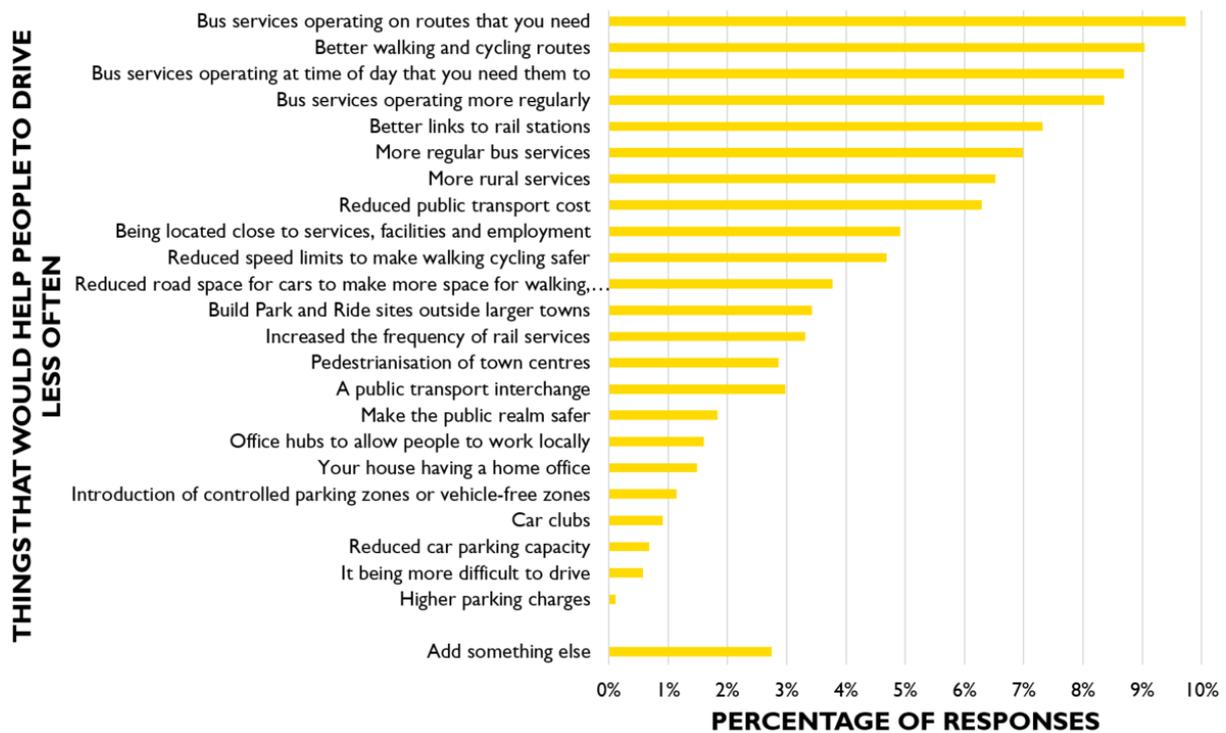


You said: Encouragingly, 6 out of 10 respondents thought reducing use of petrol/diesel powered vehicles would be possible for them right now.

4 in 10 thought they would need more significant change, with 1 in 10 considering it to be “impossible for me”.

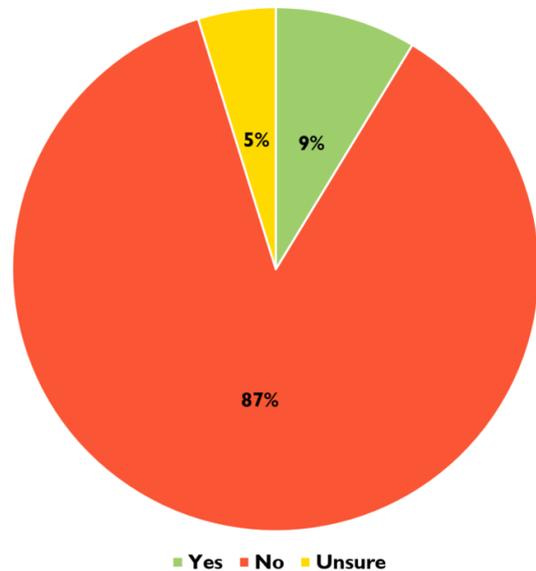
Feedback from the written/open text responses suggested that mobility or age-related limitations created difficulties for some respondents to reduce their car use. The proportion of respondents who considered it impossible for them to change is similar to the proportion of the UK population for whom disabilities or other impairments makes sustainable transport options less accessible (approx. 15%).

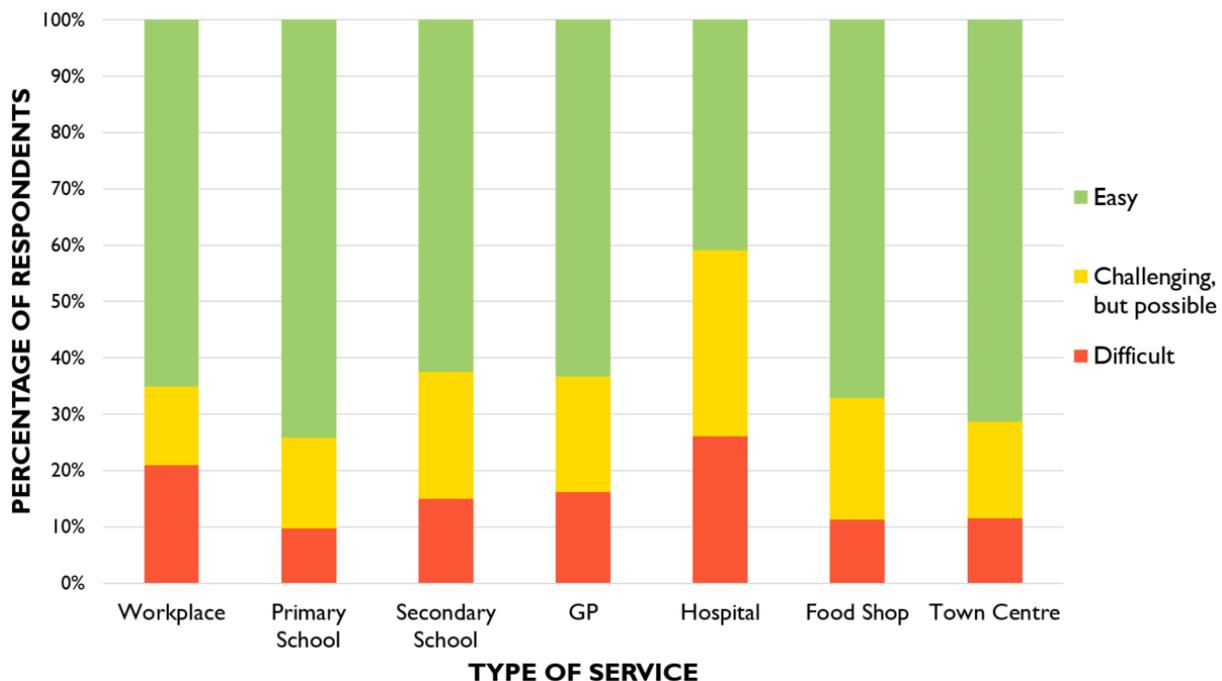
We asked: Q1c. Select your top three things that would help you to drive less often?



You said: The results from this question echo those from Q1a, with people seeing the greatest potential for reduction in driving arising from improvements to public transport services and facilities for walking and cycling.

We asked: 2a. When car use was restricted during the COVID lockdowns, did you struggle to be able to get the things you needed? and Please indicate how difficult it was for you to access the following services with restricted car use in the Covid lockdowns.



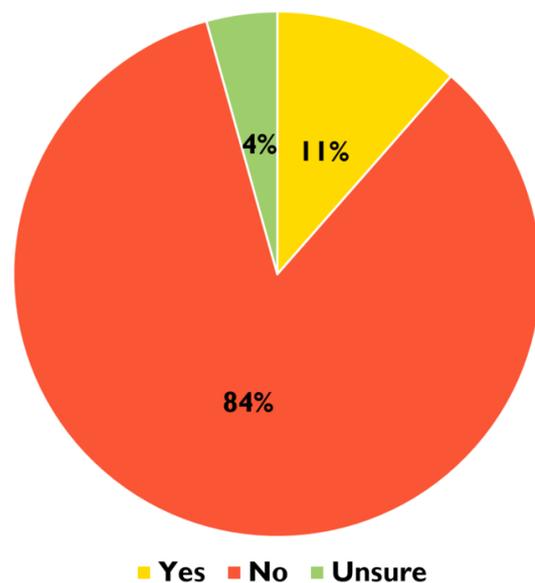


You said: Only 20% of respondents actively struggled to get the things they needed when car use was restricted during lockdown, which bodes well for the potential to shift to alternative modes of travel. Of the key services asked about, respondents found hospital and the workplace the most difficult destinations to reach, with secondary schools, GPs and food shops also proving challenging for around a third of respondents.

Officer comment: Where possible, the home location of respondents who struggled to access key services should be reviewed to identify potential areas where access to services could be improved.

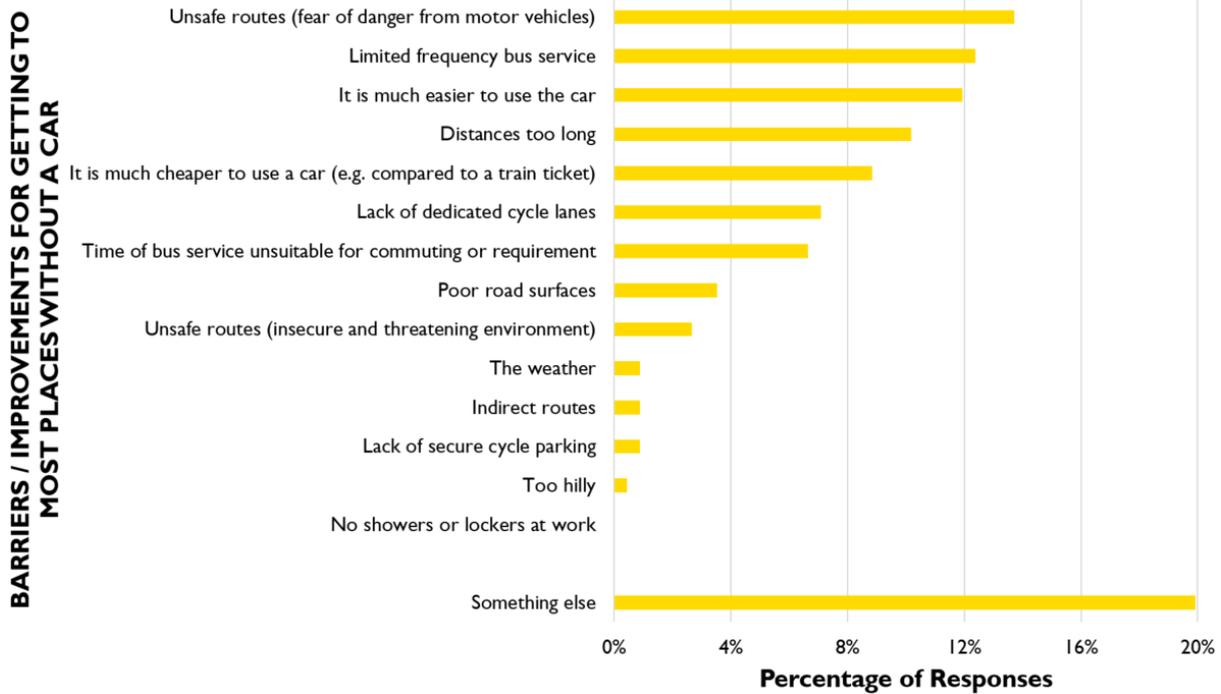
We asked: 3a Do you feel that the walking, cycling and public transport networks in your area are sufficient for you to get to most places you need to go without a car? and, **Q3b.** if not, are there any particular barriers or improvements that need to be made?

You said: Answers to this question provide a surprising contrast with the previous one, in which only 20% of people said they struggled to get to the places they needed to go without using a car in lockdown, yet 84% of respondents to this question thought the walking, cycling and public transport networks were insufficient to do so. The most-cited barriers were fears about walking or cycling on the road and the relative convenience



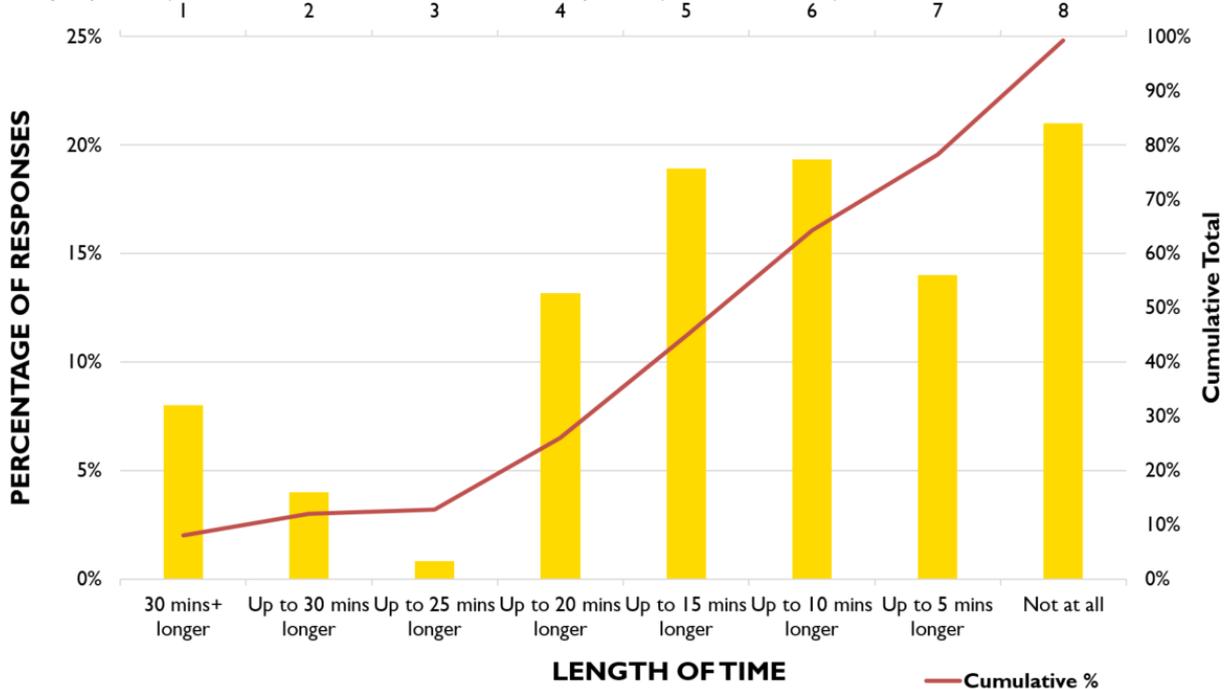
and cheapness of using a car compared to public transport.

Q3b: If you have answered no to Q3a, are there any particular barriers, or improvements that need to be made?



Officer comment: The answers to the previous three questions indicate that people were able to access many of the services they need without a car when they are obliged to do so during lockdown (e.g. when car use was prohibited) or when conditions were made safer by reductions in vehicles on the road, but are less inclined/able to do so during normal conditions.

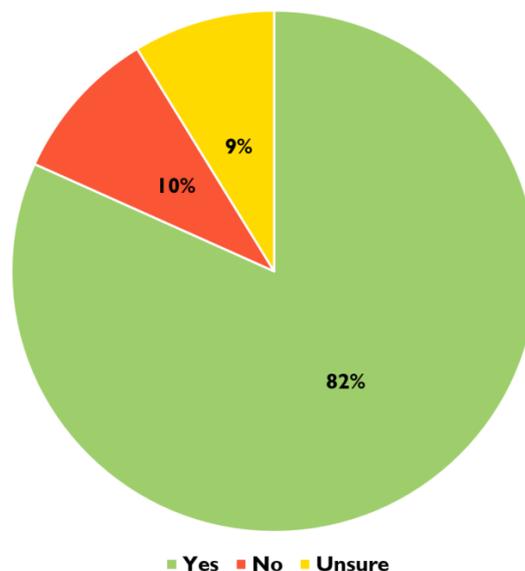
We asked: Q4. Do you think it is a good idea to try to build new places in such a way as to make it as easy as possible for people to get around without a car? To what extent would you be willing to accept longer journey times in a car to facilitate shorter journeys on foot or by bike?



You said: Results from this question show that 4 out of 5 people would be willing to accept a longer drive time to facilitate easier journeys on foot or by bike, with half of respondents willing to add at least 15 minutes to their journey.

We asked: Q5. 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?

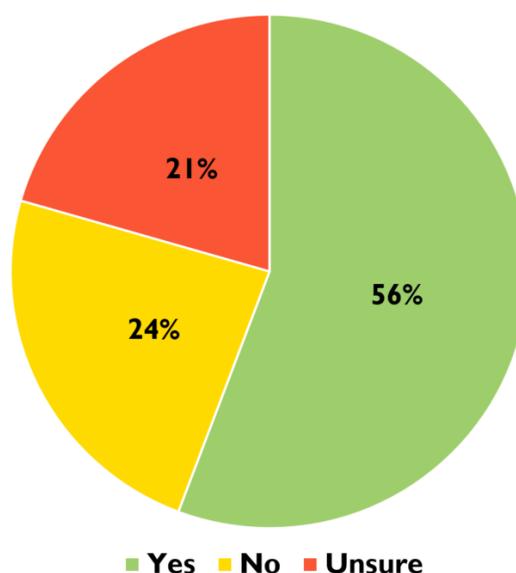
Officer comment: The strong support for the suggestion that developers should be required to commit to managing traffic generated from their sites supports our proposals to strengthen Local Plan policies that a) require new developments to be located in sustainable places (explored more in the Accessibility of New Housing topic paper) and b) that require sustainable transport infrastructure and other measures to be implemented that make sure people can get to as many places as possible



without needing to use a car. One way to achieve b) is through the use of Travel Plans, which identify and prioritise the most suitable transport measures for a specific site.

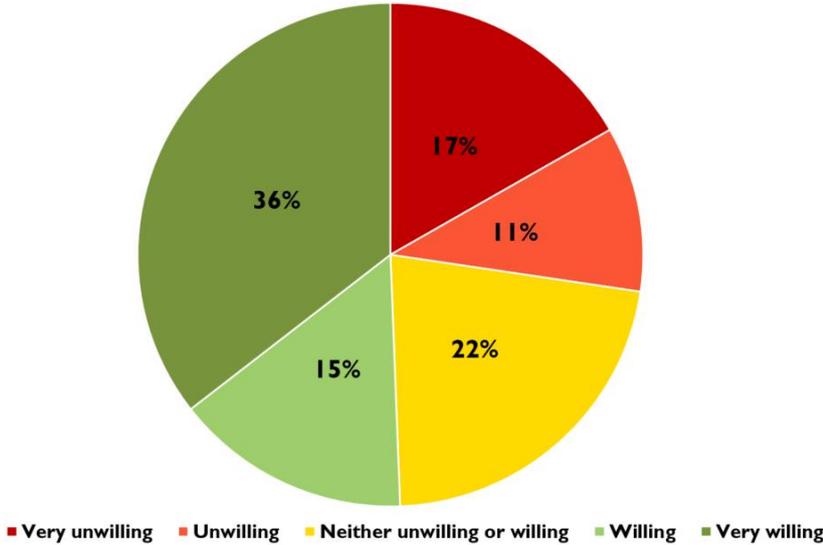
We asked: Q6a. Do you agree that we should prioritise safe and convenient space for more vulnerable road users (e.g. pedestrians, cyclists, horse riders) when we design new places and roads?

You said: Nearly three times as many respondents agreed that we should prioritise safe and convenient space for more vulnerable road users when we design new places and roads than disagreed.

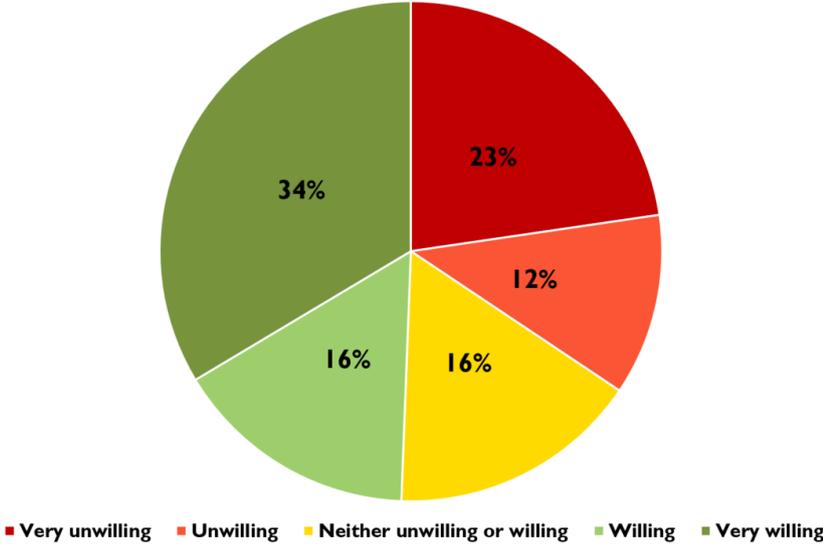


We asked: Q6b. To what extent would you be willing to accept a reduction in space for driving or parking to make sure there was enough space for people to walk, cycle and scoot comfortably?

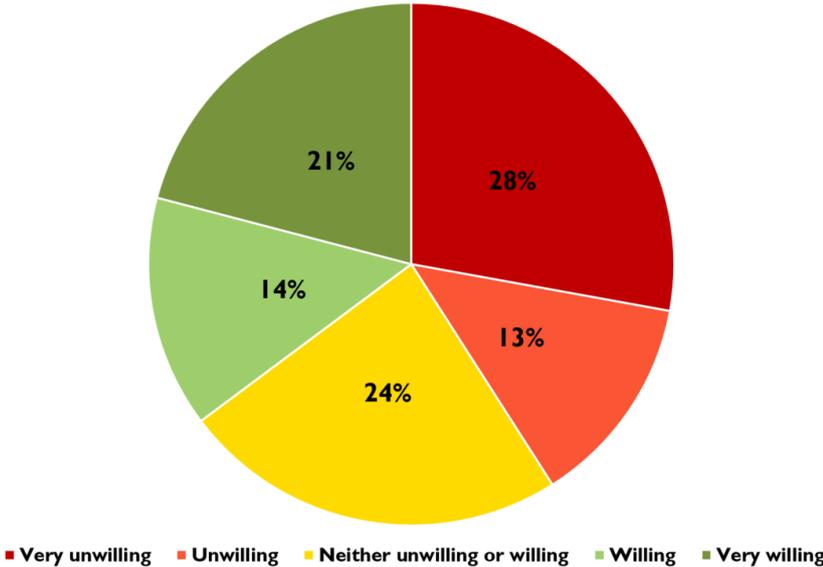
i) Reducing width of road lanes to create wider pavements or cycle paths



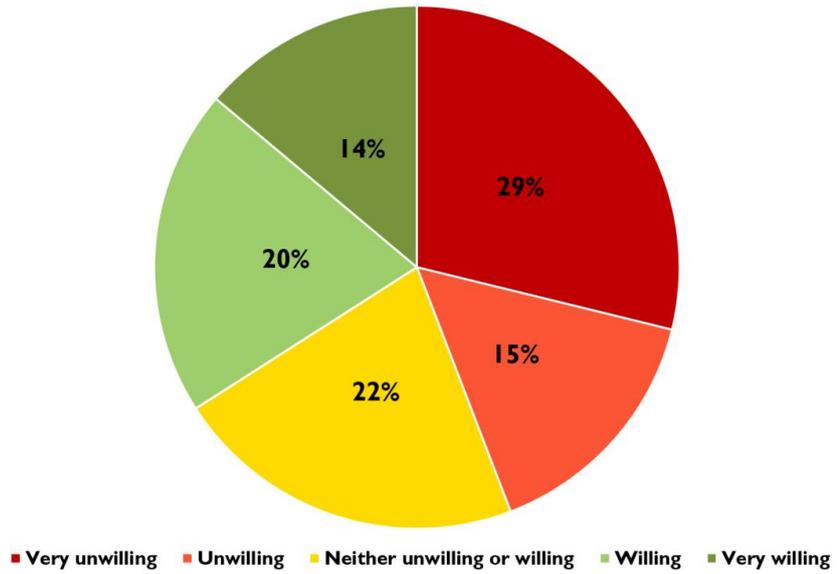
ii) Removing additional vehicle lanes (e.g. 2 lanes down to 1) to create more space for walking and cycling, or add bus lanes



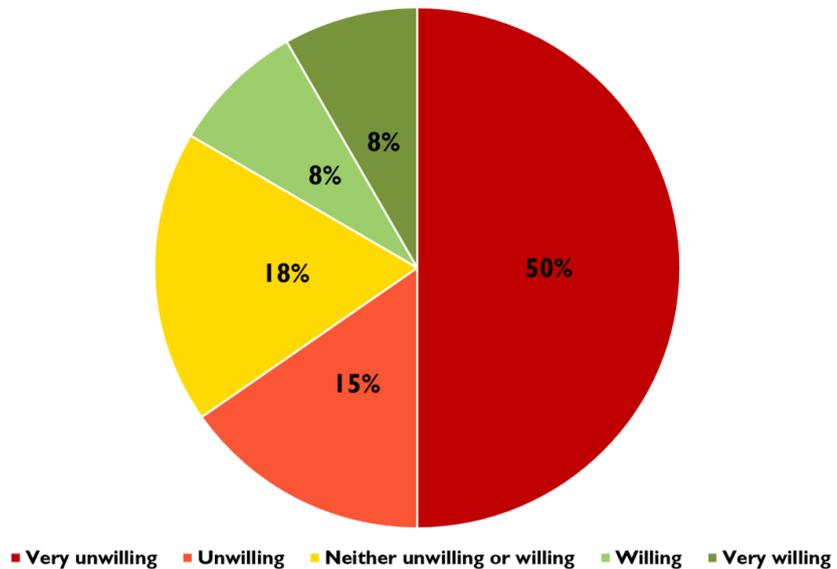
iii) Reducing on-street parking spaces in residential area



iv) Reducing parking spaces in town centres



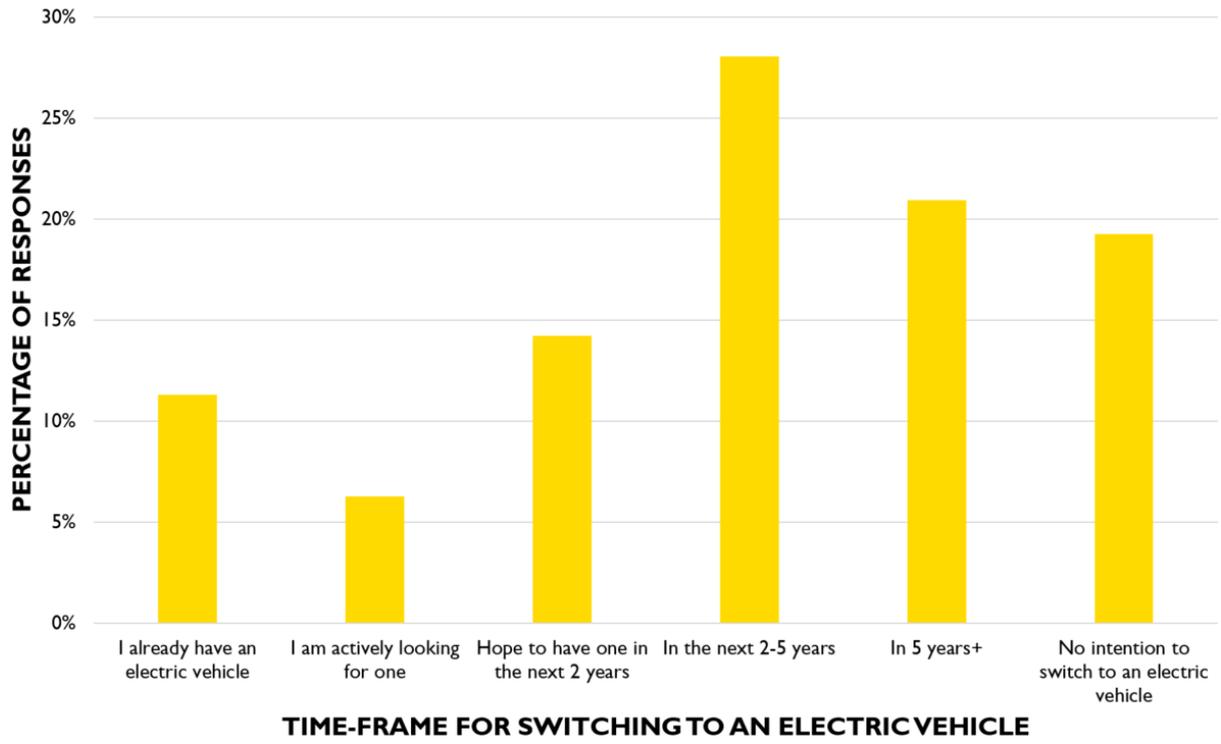
v) Reducing the size of the driveway and/or garage at your home



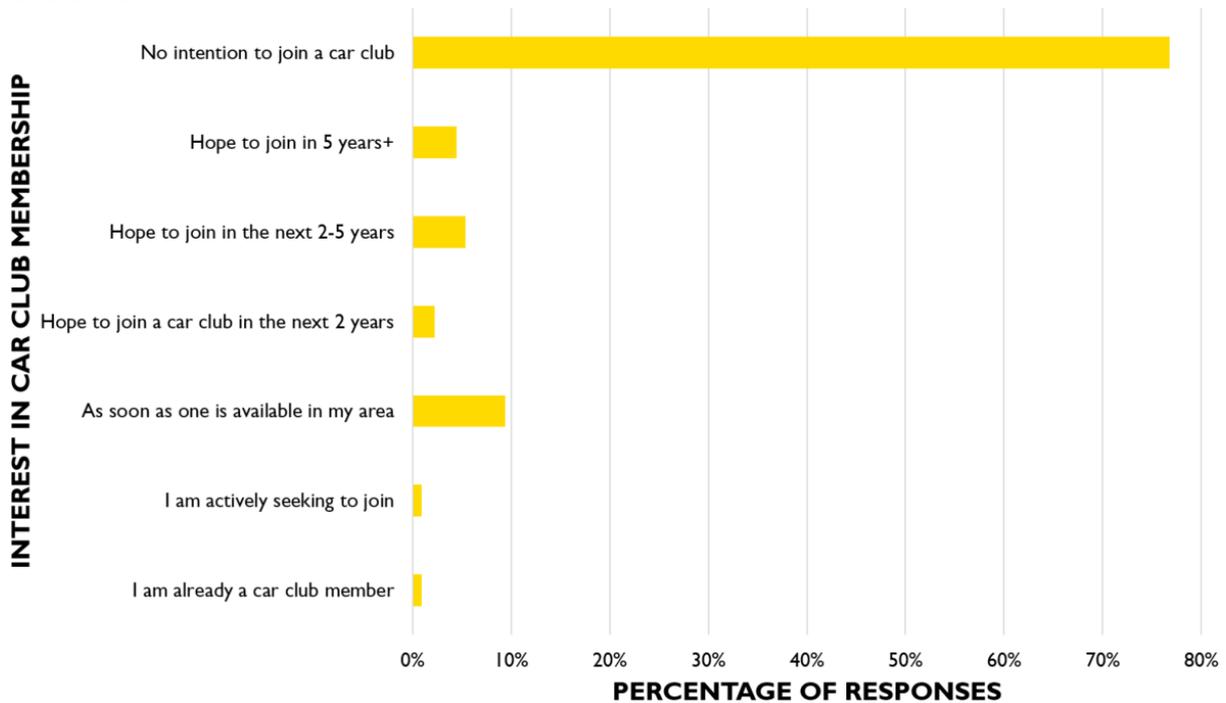
You said: The results from these questions indicate that a majority of people would be willing to accept a reduction in on-road space to create more safe space for walking and cycling, but support for reducing parking provision is more muted (approx 1 in 3 people willing/very willing).

Officer comment: Although there is a significant element of uncertainty, answers to questions 4-6 indicate that a majority of respondents are interested in creating safer space for walking, cycling and use of public transport and would be willing to accept some sacrifices in terms of driving convenience to achieve this. Only around a quarter of respondents thought that sustainable modes should not be prioritised and/or would not be willing to accept a reduction in space for vehicles or increase in vehicle journey time. This is something we need to consider in the design of future developments permitted under the Local Plan, though feedback in the written responses reminds us we must also make sure there is adequate provision for vehicle access for those whose ability to use other modes of transport is limited through age, disability or other factors.

We asked: Q7. If you own a vehicle, would you consider switching it to an electric one?



We also asked: Q8. Would you consider becoming part of a car club rather than owning your own individual car?



You said: The results from questions 7 and 8 revealed that 60% of respondents intend to switch to an electric vehicle (EV) within the next 5 years (with 11% of those having done so already). Over the same period, 18% of respondents intend to join a car club.

Cost, concerns about range and insufficient public charging points were all cited as reasons prohibiting conversion to EV. Many people also pointed out that the embodied carbon, energy and raw materials in the vehicles and batteries means that electric vehicles are much less sustainable than other options (e.g. walking, cycling and public transport), which should be maximised first.

Officer comment: With a majority of respondents announcing their intention to switch to EV and a smaller, but still significant, number interested in joining a car club, it will be important for us to make sure new developments provide the infrastructure - e.g. charging points, dedicated parking bays - and other support necessary to make these aspirations possible, while also acknowledging that EV is only part of the transport carbon reduction solution, rather than being a universal panacea.

Next steps

- Identify and prioritise options to improve public transport services in key areas of the district and improve routes for walking and cycling. We are currently working on a Sustainable Transport Strategy for the district, which will help to provide this information and inform the partial update of the Local Plan.
- We will look into the location specific transport issues that you raised and will consider whether the Local Plan can be updated to improve the situation, or whether we can feed this information to the relevant teams / organisations so they are aware of the issue(s).
- The consultation reveals strong awareness of the contribution of transport to carbon emissions and a general commitment to reducing these impacts. People expressed a general willingness to switch to more sustainable modes where possible, particularly if provided with appropriate support, opportunities and improvements. Many were willing to accept some reduction in driving convenience to achieve this. We must review the ways in which a partial update to the

Local Plan can enable this change to happen e.g. through the provision of EV charging, improving public transport services and creating more safe space for walking and cycling.

- In any measures we consider, we must also keep in mind the potential negative impacts on people who find it difficult to get around without a car - due to age, disability, financial constraints or external commitments - and seek to ensure these people are not unfairly disadvantaged.

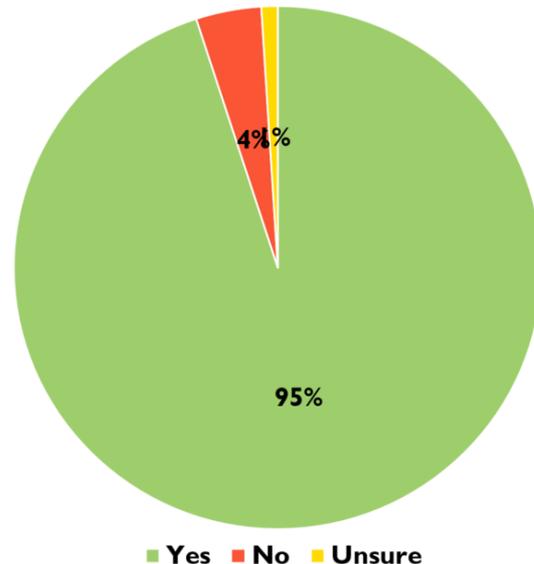
19. Water Quality, Water Resources and Flooding

This topic paper sought views on how the existing planning policies related to water resources, quality and flooding could be made more robust and positive in light of the impacts of climate change and the emergency declarations made by the Council; and how to balance planning considerations or any conflicts between climate change impacts and future development demands on our water environment.

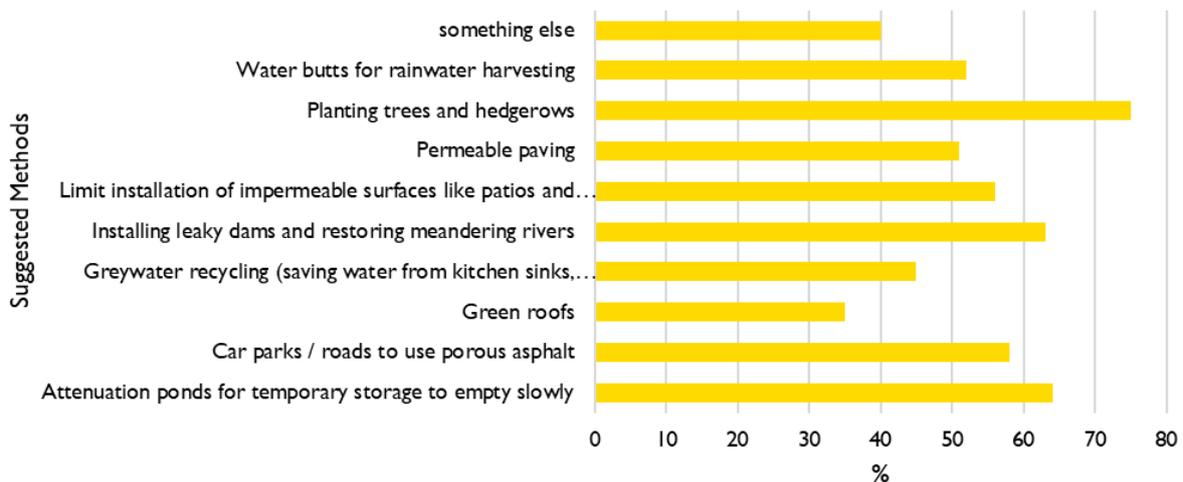
We asked: Q1. Are there areas close to where you live that flood more often?

You said; 28 said 'no', 2 were 'unsure' and 29 said just 'yes' and in addition, another 40+ 'yes's' also specified an area or place.

We asked: Q2. To mitigate and adapt to the Climate Change Emergency we may have to increase the planning restrictions on development in areas subject to flooding. Do you agree with this?



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



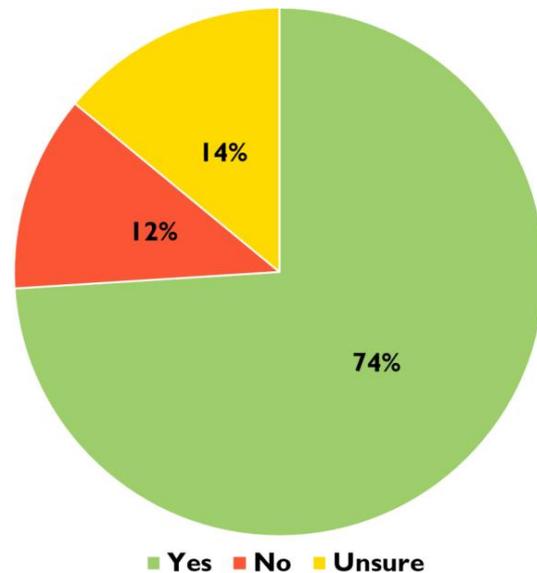
You said: Planting trees and hedgerows, followed by attenuation ponds for temporary storage to empty slowly, and installing leaky dams and restoring meandering rivers were the top ways respondents considered could improve the existing approach to water management.

Other ideas, which weren't already suggested in the consultation list include;

- adopt the greater focus on drainage management from highways,
- better maintenance of gullies, drains, culverts etc.

- increase runoff into ditches away from roads/properties,
- underground rainwater harvesting tanks (on a per-dwelling level),
- wilding manicured lawns in gardens, verges, country parks/estates and golf courses,
- removal of silt accumulations in streams and rivers, and
- limit installation of impermeable surfaces like patios and artificial grass.

We asked: Q4a. Do you agree with the preferred option? as part of the wider need for climate change adaptation and mitigation by amending the existing water management policies to be more explicit about climate change adaptation, and emphasise holistic linkages with other policies.



The options were:

Option 1 - the existing water management policies could be supplemented and amended, as an integral part of the wider need for climate change adaptation and mitigation

Option 2 - 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

You said: 74% of respondents agreed with the preferred Option 1. This could include, for example, looking at retrofitting of SUDs (sustainable urban drainage) when appropriate or surface water flood risk to be clearly considered as having equal importance with fluvial risk.

We asked: Q4b. Why? Following on to the above question (Q4a) responses as to why people said ‘yes’ (Q4b) and agreed with the preferred option included: support for a pragmatic need to drive change; clarity needed for development; for green infrastructure/wildlife/people; be comprehensive; to avoid more flooding robust action and approach needed. Alternatively Option 2 was considered that it would only be ‘advisory text not [a policy] commitment’ or just ‘wishy washy’. To quote two respondents;

‘...due to the emergency status of climate change, policy is required to make sure real change is made’.

‘Good flood schemes will enhance and create wildlife habitats and improve water quality so it will have a positive impact to the landscape aesthetic, wildlife and people. We should be bold’.

‘No’ or ‘unsure’ responses with regard to Option 1 (preferred option) included the fact it could be costly to pursue the best options, more underground storage or more maintenance (drains, gullies etc.)

are needed, policy should be national and consistent across the country, taking more land for flood storage could affect food production, it should be individual choice, building on greenfield should be reduced and/ or that policy is suitable as it is and no change is needed. For example one respondent stated,

'You present a very extreme view of what is needed in Option 1...'

Key issues/solutions that were raised;

- Include a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development
- Support water efficiency and a mains water consumption target of 110 litres per person per day for new developments, i.e. through installation of water efficient fittings, as we are in a 'water stressed' area.
- Ensure that new developments also follow the drainage hierarchy, avoiding discharging surface water to the combined sewer system. Recommended need to separate rainfall (intensifying due to climate change) from combined sewers (water and wastewater) which can cause overflow and flooding.
- Support for SUDs (sustainable urban drainage - as alternative drainage methods rather than the direct channelling of surface water through pipes and sewers) which can help ensure the sewerage network then has the capacity to cater for population growth and the effects of climate change.
- Consider growth and have early discussion with Thames Water, who have concerns in the northern part of the Cotswolds, for example an additional 1000 homes would require major clean water infrastructure upgrades.
- General public concern over surface water flooding and /or sewer overflow, and on specific developments
- Support for natural methods flood prevention / flooding seen as natural event
- Concern over lack of/poor maintenance of drains, culverts etc. and need enforce riparian responsibilities

Officer observations

- A key message is concern over rainwater in sewer / sewage pollution of rivers and flooding; and development being built before water infrastructure capacity can cope with the new development. This will need consideration and discussion with key stakeholders such as Water Companies. This could include more promotion of SUDs and conditions prior to occupation.
- Flooding is a big ‘local’ issue. 95% agreed with more restrictive planning measures on development in areas at risk of flooding. A significant majority (74%) also agreed that the existing water management policies should be amended and updated as part of the preferred option. The Water Companies agree on preventing surface water entering public sewers and a water requirement of 110 litres per head per day. This ties in with people's concerns over flooding generally and especially from sewer overflow.
- ‘Planting trees and hedgerows’ was the top method chosen for natural flood/pollution/storage measures and could be included within/linked to Green Infrastructure and Biodiversity Net Gain sites for example.
- More ways to prevent flooding improve water quality and resources could also include other measures suggested, such as promoting green roofs and to limit impermeable surfaces in development as well as tree planting, as part of site design/ allocation considerations.

Next steps

The water environment is an integral part of the wider need for climate change adaptation and mitigation. In light of supportive comments the existing water management policies could be supplemented and amended (as Option 1);

- Draft new policy requirements (and /or a new policy) and use consultant’s (JBA) expertise to advise, such as linkages to natural flood management, consideration of surface water map
- Discuss approach with stakeholders such as Thames Water and Environment Agency
- Commission Strategic Flood Risk Assessment (SFRA) Level 2 evidence to support Local Plan Update
- Commission Water Cycle Study update, including assessment for any settlements with additional growth especially wastewater
- Consider in conjunction with other related policy areas (topics) such as Green Infrastructure
- Pursue preferred option to be green to the core and amend/ draft policy – but note that water policies could be some of the Development Management policies to be ‘nationalised’ in potential future Planning Bill.

20. Other Issues

The ‘Other issues’ consultation tile received several responses. Some raised procedural and cross-boundary issues, which officers have responded to directly in via the **full consultation representations and officer responses** document, which is available to download from the Council’s website.

There were several representations that raised concerns that a full update to the Local Plan should be undertaken instead of a partial update. This document provides a summary of these representations and the officer’s responses.

Local Plan Partial Update vs Full Local Plan Update

Summary of Consultation Response	CDC Response
<p><u>15-year time-frame / strategic policies</u></p> <ul style="list-style-type: none"> ● The 2021 NPPF (para 22) requires that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. ● NPPF para 20 says ‘strategic policies’ include those making provision for housing and other development needs as well as infrastructure, community facilities and conservation and enhancement of the natural environment. ● The benefits of the Local Plan partial update will not be fully realised, as it would have only 8-years remaining of the plan period (even shorter if there is any delay) with the majority of sites already benefiting from planning permission. ● There is also a lack of a sufficient time horizon for statutory utility companies and service providers to plan for increases in population or employment opportunities in their asset management plans or similar forward looking investment documents. ● The adopted Local Plan is not in a format now expected of Local Plan with strategic policies clearly being identified. 	<ul style="list-style-type: none"> ● National policy and guidance enable partial updates to planning policies or the introduction of new policies without extending the plan period if the evidence points to this (see PPG para: 072 Reference ID: 61-072-20190315). ● NPPF para 33 invites the Council to review its adopted Local Plan every 5 years, which it has. The review did not find that the local housing need figure has[had] changed significantly or that a full review was required. ● The adopted Local Plan had 13 years left of the plan period when it was adopted, which was not considered to be a barrier at the time of examination. ● The partial Local Plan update is expected to take less time to adopt than a full update, so the proposed policy updates / new policies can take effect sooner. Once adopted, the policy updates will carry forward into subsequent Local Plans. In so doing, their benefits will have more time to be realised, not less. ● There is ample time for a full update to the Local Plan to be prepared and adopted before 2031. Recent government announcements suggest

	<p>plans will be prepared in as little as 30 months in future.</p> <ul style="list-style-type: none"> ● The partial update will seek to clarify which policies are strategic and which are not. The NPPF definition will be useful in this regard. ● The partial update will maintain the housing land supply over the plan period through plan-led development, whereas a full update would take longer to produce and may entail a period where the Council cannot demonstrate a five year housing land supply and where not-planned development may be required. ● The Local Plan partial update is proportionate to the issues being dealt with, which is consistent with national policy. ● There are significant national policy changes on the horizon - it makes sense to do a partial update, rather than expending more resources producing a full update, much of which could be superseded when national policies are changed. ● The local plan has been successfully delivering its development strategy. If it was not, this may be a key reason / catalyst to carry out a full update, but this is not the case.
<p><u>New policy</u></p> <ul style="list-style-type: none"> ● The Local Plan was adopted prior to the 2019 NPPF and the introduction of the Standard Method. Whilst the Government’s ambition to boost significantly the supply of housing was enshrined in the 2012 NPPF, the 2019 revisions to the NPPF intensified the focus on housing delivery through the introduction of the Standard Method. The subsequent revisions to the Standard Method in 2020 sought to assist in the delivery of the Government’s manifesto pledge to deliver 300,000 dwellings per year. 	<ul style="list-style-type: none"> ● The Local Plan partial update proposes to use the latest available evidence to calculate housing needs and requirements, including taking consideration of the Standard Method.

<p><u>Duty to cooperate</u></p> <ul style="list-style-type: none"> • The partial update is out of step with the emerging Gloucestershire Statement of Common Ground, which seeks to align plan making and plan periods across Gloucestershire to assist the coordination of strategic scale development and the provision of infrastructure. • The approach is also out of kilter with the Gloucestershire Local Transport Plan (2020– 41). • Engagement with neighbouring authorities and prescribed bodies needs to occur before a final decision on whether to update policies in a plan is made, as such engagement may influence that decision away from a partial update to a full review. 	<ul style="list-style-type: none"> • The Gloucestershire Statement of Common Ground (GSoCG) is a non-statutory statement that seeks to coordinate growth in Gloucestershire. The Council has an up-to-date Local Plan, which was only adopted in 2018, and therefore discharges its commitment to meet needs in full and to set a strategy to coordinate growth. A review of the Local Plan has confirmed that only a partial update is required at this stage. It is likely a full Local Plan update will be undertaken immediately after the partial update is adopted. In so doing, the Council fully accords with the Gloucestershire Statement of Common Ground and the Local Transport Plan. • There is ample time for a full update to the Local Plan to be prepared and adopted before 2031. Recent government announcements suggest plans will be prepared in as little as 30 months. • The Council engages with neighbouring authorities on a continual basis. There is no indication that a Local Plan partial update causes any cross-boundary issues.
<p><u>Housing need has significantly increased</u></p> <ul style="list-style-type: none"> • Local housing need is considered to have changed significantly where a Local Plan has been adopted prior to the standard method being implemented. • The adopted housing requirement is 8,400 dwellings (420 dwellings per annum on average). The uncapped housing requirement for Cotswold District Council is 505 dpa - a 20% increase over and above the adopted housing requirement. This is a significant increase. • The Local Plan currently benefits from being able to ‘bank’ over delivery in the early years of the plan period as part of the housing land supply calculations. As such, the actual annual requirement against 	<ul style="list-style-type: none"> • <i>“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. <u>Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.</u>” (NPPF para 33)</i> • The five year housing land supply is a tool that helps to ensure Local

which five year HLS calculations are assessed is currently only 292 dpa, with this likely reducing further to 238dpa in 2022/23. Based on a LHN of 505dpa, this would be an even more significant increase to the local housing need position of 73% and 112% respectively. This is clearly a very significant increase.

- Consideration about whether there has been a significant increase relates solely to whether the Local Housing Need, as derived from the Standard Method, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in the adopted local plan). Supply side factors should not be considered as part of the assessment.

Plan housing requirements are fully delivered. The requirement against which the five year housing land supply is measured should not be conflated with the Local Plan housing requirement or the local housing need. The two figures under comparison when considering whether there has been a significant increase in local housing need are the Local Plan housing requirement (i.e. 420 dwellings a year) and the local housing need (i.e. either the figure calculated by the standard method or another figure if there is an exceptional circumstance to use an alternative to the standard method).

- Unhelpfully, neither the NPPF or the PPG define a figure - or even a percentage figure - to clarify what a 'significant increase' actually means. If national policy makers had meant to do so, they would have. Instead, the meaning of 'significant increase' can vary locally depending on local circumstances. In the case of Cotswold, a 20% increase in the local housing need might otherwise represent a significant increase if the Council did not have a clear plan of action to deliver the (potential) increased housing need, but the partial update provides this. Furthermore, if the increase was 20% of 3,000 homes a year, it would require an extra 600 homes each year and it would be easy to see why that situation would require a full update. However, even if the increased local housing need is 20%, this equates to 85 dwellings a year. In this situation, the increase can be delivered most effectively and quickly by allocating additional sites within a development strategy that is proven to be working effectively. Consequently, for Cotswold District, this is not a significant increase that requires a full Local Plan update.
- CDC needs to determine whether there is an exceptional circumstance for using an alternative to the standard method to calculate minimum housing needs. If there is an exceptional circumstance, it may be that the housing is higher or lower.

<p><u>Housing requirement</u></p> <ul style="list-style-type: none"> ● Updating the housing requirement should be done as part of a full Local Plan review. The Planning Practice Guidance (PPG) is clear at paragraph 623 that Local Plan reviews should be “...proportionate to the issues in hand”. The future housing requirement is a significant consideration given housing affordability across Cotswold. Therefore, a substantial review of the housing requirement is not proportionate to this partial Local Plan update and should be done as part of a full Local Plan review. 	<ul style="list-style-type: none"> ● Updating the housing requirement is proportionate to the local circumstances and issues that have been identified. A partial update is the quickest and most effective way to deliver more housing and address the housing affordability issue.
<p><u>Benefits of a full Local Plan update</u></p> <ul style="list-style-type: none"> ● A full Local Plan review would allow sufficient time for CDC to produce the evidence base necessary to introduce such policy ambitions. ● The settlement hierarchy and spatial strategy could be reviewed, taking account of the proposed accessibility matrix and now more prominent policy priorities such as climate change adaptation. ● A longer Plan period would secure the planning policy framework necessary for CDC to properly respond to their climate and ecological emergencies, plan for the acute housing needs and align Plan periods across Gloucestershire to 2040/41. ● The evidence base for a full Local Plan update will be of a similar breadth to a partial update. 	<ul style="list-style-type: none"> ● The partial Local Plan update is expected to take less time to adopted than a full update, so the proposed policy updates / new policies can be adopted sooner. Once adopted, the policy updates will carry forward into subsequent Local Plans. In so doing, their benefits will have more time to be realised, not less. Unfortunately, the climate change emergency is such that a speedy response is required. ● It is proposed that the accessibility test will underpin all new Local Plan site allocations, as well as being applied to some existing Local Plan policies. So the benefit of updating the settlement hierarchy are negligible when compared to what will actually be delivered by the partial update. ● In terms of the level of evidence required for a full update, a full update would likely require the plan period to be extended to 2041. If the requirement was for an 490 homes a year, it would equate to an extra 4,900 homes on top of the 700-900 homes that are already estimated to be needed up to 2031. This would require a new development strategy, more sites, additional infrastructure, would encounter more cross-boundary issues, etc. This would require more evidence to assimilate and examine and is a higher risk option, which would less likely to

	secure plan-led development of the short to medium term.
--	--

Appendix 1: Your Cotswold, Your Plan communications plan evaluation

Summary

The Local Plan is one of the most important documents for the future of Cotswold District. It is a plan that sets out how and where new buildings are built and what type of infrastructure is needed to support communities and local businesses. It is used to determine planning applications and helps to steer how the district will look in the future.

We have to produce one by law and it provides residents and the Council with the opportunity to have our say on the house building the Government has told the Council we have to allow and what we want our area to look and feel like. We have aspired to be proactive with the plan and make sure it does everything it can to tackle key local issues and aim for a positive future.

Tackling the Climate Emergency is an issue the Council is deeply committed to addressing. We want to present a Local Plan that is 'Green to the Core', to make sure that climate change is considered in all aspects of future development.

The current Local Plan focuses on reducing the environmental impact of development rather than taking positive steps to tackle the emergency through, for instance, promoting the development of renewable energy generation. This means we have had to make a partial update of the plan.

Before the Council submits its draft local plan to the government for public examination, the Council consulted with the public and stakeholders about issues, options and proposed changes. An issues and options consultation ran for six weeks from Friday 4th February 2022.

In order to encourage greater engagement with the consultation, the Council purchased a new consultation system called CommonPlace, which is the result of the Council successfully accessing funding from the government's PropTech initiative.

Communications aims and objectives

The following aims and objectives were set through the communications planning process:

1. Help residents understand the reasons for the partial update and what the updates could include, how it may affect them and their community. Engagement data will be measured to ensure a representative cross section are engaging with the consultation, the latter is the main target and resources from comms, Forward Planning and CommonPlace will help to deliver this. This will be achieved by 18th March 2022
2. To alight on key issues affecting the local plan and preferred options/solutions on how to make the local plan 'Green to the Core'. Monitoring online the questionnaire, which asks direct questions about possible options, throughout the campaign will be key. The target is to try and ensure a representative cross section of society is engaging with the consultation. Resources from comms, Forward Planning and CommonPlace will help to deliver this by 18th March 2022
3. To deliver the following PropTech goals, a requirement of recent funding:
 - . prioritise early and effective engagement to ensure that a range of voices from within local communities are heard right from the beginning of the local plan process;
 - a. ensuring that documents and information are accessible in a range of different mediums and through various formats to ensure ease of access; and
 - b. making consultation documents and supporting information visually engaging, accessible, simple to understand and easier to 'apply' at the local neighbourhood level.

To achieve these aims we have set the following objectives:

- To plan communications activity to maximise responses to the forthcoming partial review consultation. The aim is to generate responses from most key stakeholders (including all T&P Councils with principal settlements).
- An indicative target of 500 individual responses from the public, businesses and organisations is proposed to benchmark the success of the campaign against previous regulation consultations. In truth success is more nuanced and meeting the numerical target will need to be in combination with securing feedback from key and statutory stakeholders.
- To create Local Plan communications assets which are easy to understand and simplify the complex nature of the Local Plan and make it understandable and accessible for the public.

Branding and look and feel

In order to meet the aims and objectives aligned to the PropTech goals, we were required to:

1. Make consultation documents and supporting information visually engaging, accessible, simple to understand and easier to ‘apply’ at the local neighbourhood level.
2. Create Local Plan communications assets which are easy to understand and simplify the complex nature of the Local Plan and make it understandable and accessible for the public.

In order to meet the above mentioned aims and objectives and to ensure that the consultation had its own distinctive identity the following activities were undertaken:

- Create a Council sub-brand to position the consultation as a stand-alone project, ensuring that it is recognisable through all stages of the consultation and that its collateral was easy to identify (Fig 1).
- Split the consultation elements into 18 easy to digest themes with a representative visual icon that aligned with the topic.
- Produce one-page topic papers covering each of the 18 themes to minimise the amount of technical information required to be digested by the reader.
- Ensure that key messaging and social media content was written in plain English and were relatable to residents and businesses.
- Create an area on Commonplace to appeal to younger residents between the ages of 13-18, incorporating condensed ‘poll’ type questions that can be completed in minutes.
- Create a suite of social media graphics aligning with the 18 themes, in plain English, for use across all Council channels and to direct traffic to the Commonplace platform (Fig 2).
- Commission an animated film that captures the imagination by visually representing how Cotswold District could develop if the Climate Emergency were tackled quickly by implementing some of the proposals in the consultation. The film was used to drive traffic to the consultation platform.

Fig 1:

YOUR COTSWOLD YOUR PLAN

CREATING A FUTURE
THAT IS GREEN TO THE CORE

Fig 2:



**YOUR COTSWOLD
YOUR PLAN**

CREATING A FUTURE
THAT IS GREEN TO THE CORE

**URGENT
UPDATE**

We need to shape places in ways that contribute to **radical reductions** in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure.

**Cotswold District Local Plan
(partial update) Issues and Options Consultation**
Friday 4th February until Sunday 20th March
Visit issuesandoptions.commonplace.is to take part.

**COTSWOLD
DISTRICT COUNCIL**

UNITED WE SERVE

Communication Strategy

As we progressed to the regulation 18 issues and options local plan consultation it was very important that we communicated the reason for the partial update to the Local Plan, the reasoning behind it, and the process we had taken to get there in a much more proactive and engaging way. This helped to mitigate negative feedback and help residents understand the role the Council plays in meeting the full needs of all communities.

As part of this work we reviewed the current Local Plan web pages and content to update them. This includes various content, FAQs and other accessible content so that people can understand and engage with the local plan as a whole. CDC Local Plan web pages direct the public to engage with the consultation via the CommonPlace platform.

To promote the consultation and engagement we used a wide range of communications channels to share our key messages and highlight the consultation to as many residents as possible, encouraging them to take part. This included a mail-out to all households via Royal Mail Door-to-Door service and paid promotion on social media which ensured the majority of residents had sight of the consultation. Messaging was produced in plain English, not focussing on the Local Plan itself, but what it could mean to residents in future and what they can get out of taking part.

Outputs included:

- Door-to-Door mail-out to all households across the district (promoting online response and back up methods);
- Paid for and organic social reaching upwards of 30k people - Facebook, Twitter, Nextdoor;

- Videos with cabinet members explaining the local plan and the review;
- Animation of a climate think piece
- Simple infographics summarising each of the 18 topics;
- Posts targeted at specific groups and geographical areas with tailored messaging to generate responses and feedback;
- Campaign on Instagram for the 13-18 age group
- Promotion via website homepage and banner seen by over 6k per week;
- Media engagement - release at start and end of consultation;
- Bespoke webpage covering key messages and linking to Commonplace;
- Info through stakeholders -
 - promote through parishes via briefing pack with posters, social content and key messaging; and
 - local social media groups;
- E-newsletter - included in February and March editions;
- Engagement with businesses through Business Matters;
- Promotion to staff and Cllrs through internal comms channels;
- Promotion to staff via Publica staff portal;
- Pull up banners in Trinity Road and Moreton Area Centre;
- 100 Correx board in key locations across district;
- Posters to T&P councils, Libraries and Council offices; and
- Place notice/advert in local newspapers (SCI requirement).

We also made use of local community groups to help spread the message, especially youth groups to try and engage a younger audience.

Performance

The consultation succeeded in obtaining 6,415 Commonplace visits and approximately 2,900 individual contributions from 755 respondents. This was achieved through a range of communication methods including those outlined above, but also direct email from the Strategic Planning team and 'news' items sent to those who signed up to Commonplace using their email address.

Mail- out

Door-to-Door mail-out to all 48,000 households across the district, promoting online response via URL or QR code and advertised two engagement sessions held in Cirencester and Moreton-in-Marsh. Also directing residents to places where hard copies of the consultation document and questionnaire could be obtained.

The QR code was not trackable but we know from Commonplace stats that 3,481 people arrived at the Commonplace platform via 'direct' and 'organic' traffic, meaning that they had inputted the URL into their web browser or used the QR code to access directly. This means that they were not referred from email or social media.

Social Media

The Council uses the following social media channels: Instagram, Facebook, YouTube, Nextdoor, Twitter and LinkedIn.

Fig. 3 below shows the high level result across the whole campaign and across all channels.

Number of organic posts: 76

Reach (the number of accounts reached) - 196.4k

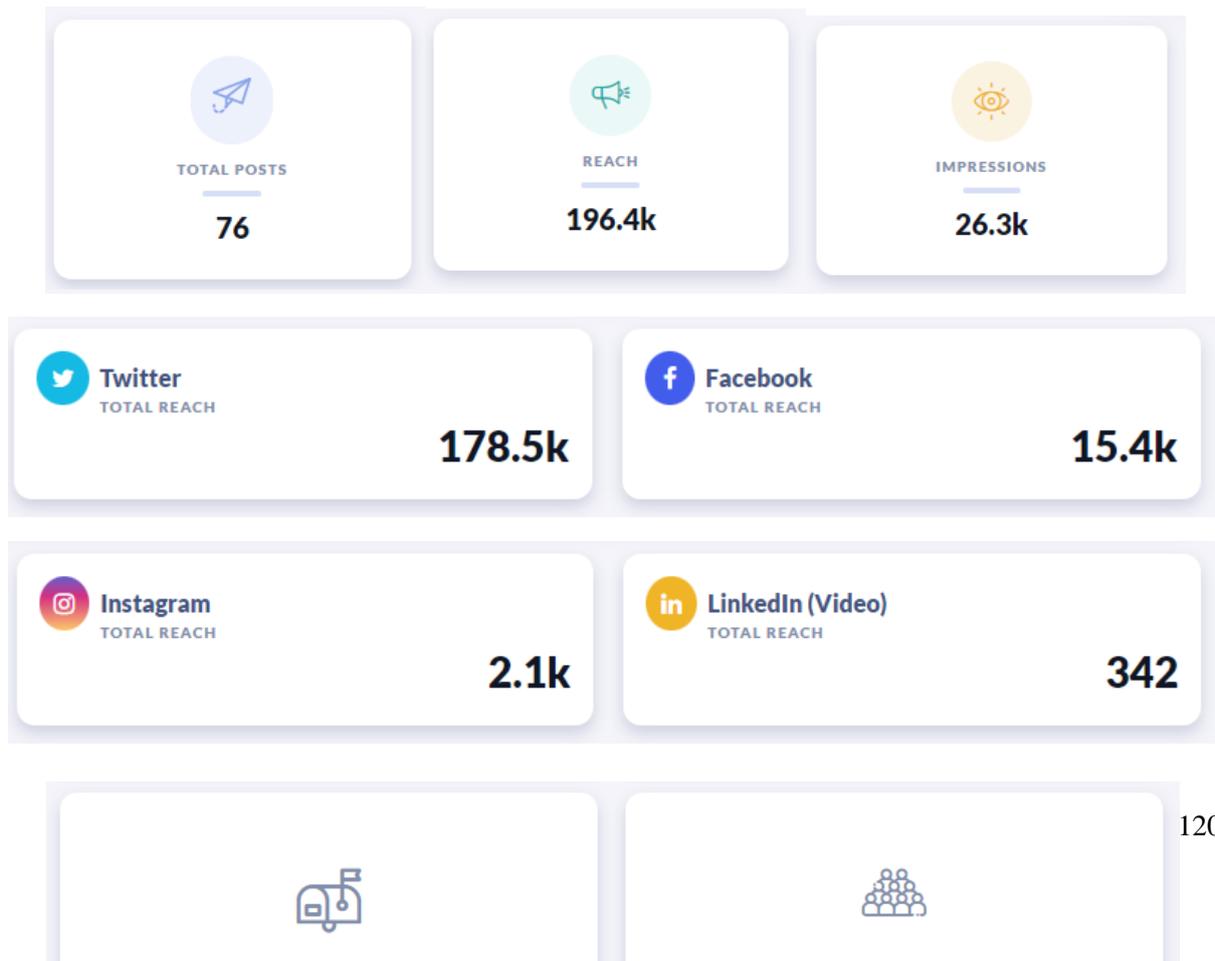
Impressions (the number of views) - 26.3k

Total likes - 122

Total comments - 27

Total shares - 67

Fig.3



Organic social content (posted directly to news feeds)			
Content	Channel	Reach	Impressions
Video with cabinet members explaining the local plan and the review	Facebook YouTube Next door LinkedIn Twitter	931 139 (views) 6,403 -	1041 321
Animation of a climate think piece	Facebook YouTube Next door Twitter	980 (13 shares) 340 1,725 -	1,050 462
Simple infographics summarising each of the 18 topics	Facebook Twitter Instagram LinkedIn NextDoor	12,947 -	13,535 7,267
Campaign on Instagram for the 13-18 age group	Twitter Instagram	- -	573 616
Polls requiring one click answers	Twitter Instagram	- -	1,282 616
Paid for ads - Facebook (in date order from top to bottom)			
Design graphic	Facebook (paid ad)	4,985	566
Economy graphic	Facebook (paid ad)	2,594	541
Green space graphic	Facebook (paid ad)	1,153	190
Biodiversity	Facebook (paid ad)	3,103	79
13-18 year olds	Facebook (paid ad)	5,183	332
Animated film	Facebook (paid ad)	7,912	361
Climate graphic	Facebook (paid ad)	2,266	432

Paid-for ads on Facebook returned the largest number of clicks through to the Commonplace site with the top performing ads at the beginning of the campaign. The highest performing organic ad was the animated film. The animated film also obtained the highest 'reach' of any of the paid-for ads.

Costs

The total cost of the Facebook paid-ads was £700 which translates to 27p per click through to Commonplace.

Conversions

Fig. 4

Referral website	Visitors	Responded	Subscribed
facebook	976	96	0
gov	549	548	0
google	187	93	0
nextdoor	68	22	0
twitter	33	9	0
instagram	30	6	0

Fig. 4 above shows that Facebook performed highest in terms of referring from its platform to Commonplace, with Instagram, Nextdoor and Twitter performing less well.

However, Nextdoor performed highest in terms of conversions with c.30% of link clicks resulting in a response to the consultation. Twitter was the second highest performer with c.10% of those linking to Commonplace responding to the consultation.

Gov relates to email sent directly from the Strategic Planning team to respondents, and by far outperformed any other channel.

Animated film

A study on visual communication by Hewlett Packard showed that people are 50% more likely to retain information when it is delivered in both a visual and audio format (such as animated video) than visual or audio alone.

The animation performed very strongly and was the highest performing social media post (in terms of reach) during the campaign. The Council created an advert directing people to the animation and this secured 13,483 views. On Facebook the council secured 1,642 views. On YouTube the council secured 385 views.

Newsletter

February's newsletter 27 total clicks and 23 unique clicks through to Commonplace, and in March 11 total clicks and 8 unique clicks.

Younger people

We regularly reviewed data from social channels and Commonplace and after a few weeks it became apparent that younger age groups (13-25) were responding to the posts and ads on Instagram and Facebook, clicking through to Commonplace, but were not staying long enough to engage with the consultation. This prompted the team to develop a series of one question polls and a Commonplace tile with an abridged version of the survey.

The polls resulted in 29 responses and the new Commonplace tile resulted in 6 responses. However, these were added in the final two weeks of the consultation.