

**YOUR  
COTSWOLD  
YOUR PLAN**

**CREATING A FUTURE  
THAT IS GREEN TO THE CORE**



## **Cotswold District Local Plan Update Consultation**

**Vision, Objectives and Development  
Strategy Options Topic Paper**

**Town and Country Planning (Local Planning)  
Regulations 2012**

**Regulation 18 consultation/participation**

**1 February 2024 to 14 March 2024**

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## 1. Executive summary

1.1 This report considers the amount of additional development that may be needed if the Local Plan period was extended to 2041, enabling the Local Plan to look ahead over a 15 year period from the base date of 1 April 2026. It discusses updating the Vision and Objectives of the adopted Local Plan to reflect this, as well as to make the Local Plan green to the core. Finally, the report considers potential development strategy options up to 2041 and proposes a preferred development strategy option.

1.2 Based on current estimations, the following provides a useful indication of the amount of additional development that may be needed:

- The housing need calculated by the Government's 'standard methodology' for the extended plan period is currently around 7,400 dwellings (although there may still be an exceptional circumstance to use an alternative housing need methodology). This would reduce to around 6,330 dwellings if past over-delivery is deducted from the number that needs to be planned for.
- The local housing need is the starting point for determining the housing requirement. The housing requirement may be higher or lower than the local housing need. For example, more homes may be required to increase affordable housing delivery or fewer homes may be required to protect assets or areas of particular importance (e.g. the Cotswolds National Landscape). The requirement would be determined further down the line and the local housing need is used as the basis of this analysis for indicative purposes.
- Around 5,150 dwellings' worth of housing land supply for the extended plan period has already been identified.
- Additional housing land supply would be needed for around 2,250 further dwellings to fully deliver the local housing need or around 1,180 dwellings if past over-delivery is deducted from the number to be planned for.
- The adopted Local Plan includes 14% more housing land supply than the housing requirement to provide flexibility in case any sites were not delivered as expected. If the same flexibility is provided on the local housing need for the Local Plan period up to 2041, around 3,290 additional dwellings would be needed or 2,070 additional dwellings if past over-delivery is deducted.
- The number of homes that would need to be planned for may increase or decrease before the Local Plan Update is submitted for independent examination in public. However, these figures provide a reliable and useful indicator of the scale of development that would be need if the plan period was extended to 2041.
- The needs / requirements and land supply for other types of development would be further assessed and these would be included within the updated development strategy.

1.3 Updates to the Local Plan Vision and Objectives are suggested. In summary, the adopted Vision has been updated to also include:

- Responding to the climate crisis;
- Providing more socially rented homes;
- Making the Local Plan Green to the Core;
- Supporting health and well-being; and

- Enabling a vibrant economy.
- I.4 The adopted Objectives have been updated to also include:
- Zero carbon developments;
  - Transitioning to a low carbon economy whilst maintaining a vibrant economy;
  - Providing more opportunities to access affordable housing, particularly social rented housing;
  - Delivering Biodiversity Net Gain;
  - Ensuring that development supports positive health outcomes; and
  - Reducing transport carbon emissions.
- I.5 Eight potential development strategy options have been identified to accommodate the additional growth:
- Scenario 1: Additional non-strategic site allocations
  - Scenario 2: Main service centre focus
  - Scenario 3: Dispersed growth
  - Scenario 4: Village clusters
  - Scenario 5: New settlement(s)
  - Scenario 6: New strategic site(s)
  - Scenario 7: Focus growth around transport nodes
  - Scenario 8: Request neighbouring authority to deliver some of the housing need
- I.6 A blend of Scenarios 1, 2, 6 and 7 are believed to be the most appropriate way to accommodate the bulk of additional development needs up to 2041.
- I.7 This would entail the continuation of the adopted development strategy of identifying Principal Settlements as locations where the principle of development would be supported. However, the updated development strategy would have a greater focus on reducing carbon emissions and focussing growth in locations with good transport connectivity and access to services, facilities and employment. Accordingly, having been reviewed as part of this process, some Non-Principal Settlements may become a Principal Settlement and some Principal Settlements may have their Principal Settlement rescinded.
- I.8 Additional non-strategic site allocations for different types of development would be made at the Principal Settlements whilst ensuring that the scale and extent of development within the Cotswolds National Landscape (formerly the Cotswolds Area of Outstanding Natural Beauty) remains limited and that development is directed away from areas with higher flood risk. In addition, given that Moreton-in-Marsh is a transport hub, which has a railway station; good provision of services, facilities and employment; and has various sites outside the Cotswold National Landscape, the town would become a focus for strategic-scale growth of over 1,500 additional dwellings and additional land for employment development.
- I.9 The adopted development strategy of enabling small-scale residential development in Non-Principal Settlements (Policy DS3) would continue, although it would also have an increased emphasis on settlements that have better access to services, facilities and employment. Consideration may be given to whether some development should be focussed within Village

Clusters, which could potentially involve some additional land being allocated for development (Scenario 4). Together, development in Non-Principal Settlements, Village Clusters and windfall sites<sup>(1)</sup> would provide additional flexibility within the housing land supply should any other allocated land not come forward for development as planned.

- 1.10 Open market housing would continue to be prohibited outside Principal and Non-Principal Settlements (i.e. in open countryside) unless it is in accordance with other policies that expressly deal with development in such locations.

## 2. Summary of adopted Cotswold District Local Plan (2011-2031)

- 2.1 Before discussing the development strategy for the extended plan period, a high level summary is provided of the adopted Local Plan development strategy. The adopted strategy has successfully delivered the identified development needs and requirements for the Local Plan period so far.

### *Development strategy*

- 2.2 The adopted Local Plan period is from 1 April 2011 to 31 March 2023.
- 2.3 The adopted Local Plan development strategy identifies 17 Principal Settlements, which are the focus of strategic housing growth. These are:
- Cirencester
  - Andoversford
  - Blockley
  - Bourton-on-the-Water
  - Chipping Campden
  - Down Ampney
  - Fairford
  - Kemble
  - Lechlade
  - Mickleton
  - Moreton-in-Marsh
  - Northleach
  - South Cerney
  - Stow-on-the-Wold
  - Tetbury
  - Upper Rissington
  - Willersey
- 2.4 The principle of development is supported inside the development boundary of the Principal Settlements (Policy DS2). Small-scale residential development is also supported in Non-Principal Settlements, which are not specifically identified in the Local Plan (Policy DS3). Open market housing is prohibited outside Principal and Non-Principal Settlements (i.e. in open countryside) unless it is in accordance with other policies that expressly deal with residential development in such locations.
- 2.5 The plan also provides for different types of housing needs, including a suitable mix of housing (Policy H1); Affordable Housing (Policies H2-H4); housing for older people (Policy H4); and Gypsy and Traveller sites (Policy H7).
- 2.6 The Plan also has an economic development strategy, which amongst other things includes: safeguarding established employment sites (Policy EC2); supporting three Special Policy Areas (Policy EC4); enabling diversification of businesses in sustainable rural locations (Policy EC5);

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<sup>1</sup> Windfall sites are sites not specifically identified in the development plan. The windfall allowance for the new Local Plan period is based on the assumption that the current windfall allowance of 138 dwellings per annum will be rolled forward.

and protecting town centres and the delivery of new main town centre uses (Policies S3 and EC7-9).

### Development requirements

- 2.7 Policy DS1 of the adopted Local Plan <sup>(2)</sup> identifies a minimum housing requirement of 8,400 dwellings (Use Class C3) for the period 1 April 2011 to 31 March 2031 (the current Local Plan period). There is a separate requirement of 580 nursing and residential care bedspaces (Use Class C2) over the 14-year period 2017-2031. Based on the Housing Delivery Test equivalence calculation <sup>(3)</sup>, this represents an additional, but separate, requirement of 322 further dwellings. The combined requirement is 8,722 dwellings for the plan period.
- 2.8 The Local Plan policies discussed in the previous section included need figures for different types of housing, which are delivered as part of the total housing requirement. For example, there is a need for an average of 157 dwellings of Affordable Housing a year between 2015 and 2031, as well as 665 sheltered and extracare housing units between 2017 and 2031.
- 2.9 Policy DS1 also includes a requirement for 24ha of Use Class B employment land over the Plan period. The requirement takes consideration of a forecast 16.6ha increase of Use Class B1 (now Use Class E(g)) land (including 64,626sqm of office floorspace), a 2.1ha reduction of Use Class B2 land, and a 9.9ha increase of Use Class B8 land.

### Land supply

- 2.10 When the Local Plan was examined, its housing land supply comprised dwellings completed since the beginning of the plan period; sites with extant planning permission; one strategic site allocation (part of which was expected to be completed after 2031); various non-strategic site allocations within or adjacent to the development boundaries of the Principal Settlements; and a windfall allowance.
- 2.11 At the point of adoption, the Local Plan was expected to deliver 9,614 dwellings (Use Class C3) over the plan period. This provided a 14% degree of flexibility over and above the 8,400 dwelling (Use Class C3) minimum requirement, which was needed in case any sites were not delivered as expected.
- 2.12 The Local Plan did not allocate sites to deliver its nursing and residential care accommodation requirement (Use Class C2). Policy H4 instead provided a supportive mechanism to enable this type of housing to be granted planning permission in suitable locations in order to deliver the requirement.
- 2.13 The housing land supply was expected to deliver an average of 100 dwellings of Affordable Housing a year, which was below the need of 157 Affordable Homes a year. Two locations were identified for accommodating Gypsy and Traveller needs and a permissive policy was provided to accommodate any further Gypsy and Traveller pitch needs.
- 2.14 The Local Plan included several employment allocations and planning permissions to deliver the requirement. Cirencester was the only location where main town centre use allocations were made.

<sup>2</sup> [Cotswold District Local Plan 2011-2031 \(adopted 3 August 2023\)](#)

<sup>3</sup> Para. 11 of the [Housing Delivery Test Measurement Rule Book](#) (MHCLG, July 2018) explains, “The ratio applied to other communal accommodation will be based on the national average number of adults in all households, with a ratio of 1.8”. Therefore, 580 bedspaces / 1.8 = 322 dwellings

### 3. Implications of extending the Local Plan period to 2041

- 3.1 Consideration is now given to the implications of extending the Local Plan period to 31 March 2041, enabling the Local Plan to look ahead over a 15 year period from the base date of 1 April 2026.
- 3.2 It is important to note that consideration of this matter does not affect the outcome of the Review of the Cotswold District Local Plan 2011-2031 Housing Requirement <sup>(4)</sup>, which the Council undertook in August 2023. In particular, consideration of extending the plan period is a proactive measure at a time when the Council's adopted Local Plan policies remain up-to-date and sound. The adopted Local Plan policies continue to be the starting point for determining planning applications and that the District continues to demonstrate a 5 year housing land supply.

#### *Extended Local Plan Period*

- 3.3 The extended plan period would align the Cotswold District Local Plan with the plan periods of other Gloucestershire Local Planning Authorities (with the exception of Stroud District Council who are planning up to 2040). This has strategic planning benefits, such as the joint commissioning of evidence studies.

#### *Vision and Objectives*

- 3.4 The updated Local Plan development strategy would need to reflect the updated Vision and Objectives of the Local Plan. The specific changes to the Vision and Objectives are provided as part of the Local Plan consultation. A summary is provided below.
- 3.5 The adopted Vision has been updated to also include:
- Responding to the climate crisis;
  - Providing more socially rented homes;
  - Making the Local Plan Green to the Core;
  - Supporting health and well-being; and
  - Enabling a vibrant economy.
- 3.6 The adopted Objectives have been updated to also include:
- Zero carbon developments;
  - Transitioning to a low carbon economy whilst maintaining a vibrant economy;
  - Providing more opportunities to access affordable housing, particularly social rented housing;
  - Delivering Biodiversity Net Gain;
  - Ensuring that development supports positive health outcomes; and
  - Reducing transport carbon emissions.

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<sup>4</sup> [Review of the Cotswold District Local Plan 2011- 2031 Housing Requirement \(CDC, August 2023\)](#)

## Development needs

- 3.7 As of October 2023, the standard methodology <sup>(5)</sup> calculates the housing need of Cotswold District to be 4,930 dwellings over the next 10-year period (an average of 493 homes a year). Applying the standard methodology housing need over the 15 period from April 2026 <sup>(6)</sup> identifies a total need of 7,396 dwellings <sup>(7)</sup>.
- 3.8 This figure may change ahead of the Local Plan being submitted for independent examination in public. For example, the housing need is partly based on housing affordability data, which is updated annually. The standard methodology is also expected to be updated following an update to the National Planning Policy Framework (NPPF) and wider planning reforms resulting from the Levelling Up and Regeneration Act. There may be a change in government with potential further updates to national policy. There may also be an exceptional circumstance(s) for using an alternative methodology to calculate the housing need, which would be determined later. All these factors may increase or decrease the housing need.
- 3.9 This analysis is also based on the local housing need alone (i.e. an unconstrained assessment of the number of homes needed in an area). It does not take consideration of the various other factors, which must be assessed to provide a housing requirement (explained further in the next section). This may result in a housing requirement that is higher or lower than the housing need.
- 3.10 The Government has also indicated in a recent consultation <sup>(8)</sup> that it intends to confirm that past over-delivery of housing from the previous Local Plan can be deducted from what needs to be provided in the new plan. This is a particular issue in Cotswold District.
- 3.11 In the first 15 years of the adopted Local Plan period between 1 April 2011 and 31 March 2026, there was a requirement for 6,507 dwellings. This is based on:
- A requirement for 6,300 (Use Class C3) dwellings (i.e. 420 dwellings x 15 years); and
  - A requirement for 207 further dwellings resulting from the adopted communal accommodation (Use Class C2) requirement between 2017 and 2026 <sup>(9)</sup>.
- 3.12 In the first 15 years of the adopted Local Plan period between 1 April 2011 and 31 March 2026, it is estimated that 7,573 dwellings will have been delivered / released to the market. This is based on:
- 7,340 (Use Class C3) dwellings being delivered <sup>(10)</sup>; and
  - 233 dwellings released to the market resulting from the net increase in bedrooms from completed communal accommodation developments (Use Class C2).
- 3.13 This provides a figure of 1,066 dwellings of over-delivery on the housing requirement(s) at 1 April 2026.

<sup>5</sup> [PPG: Housing and economic needs assessment \(last updated 16 December 2020\)](#)

<sup>6</sup> [PPG: Housing and economic needs assessment \(last updated 16 December 2020\)](#) Para: 012 Ref. ID: 2a-012-20190220

<sup>7</sup> Calculated using non-rounded figures

<sup>8</sup> [Levelling-up and Regeneration Bill: reforms to national planning policy \(DLUHC, updated 21 September 2023\)](#) – Chapter 4, paragraph 9

<sup>9</sup> Based on the annualised adopted C2 requirement between 2017 and 2026 (i.e. 23 dwellings x 9 years)

Policy H4 requires 580 nursing and residential bed spaces between 2017 and 2031. This is an annualised requirement for 41.4 bedspaces or 373 bed spaces for the 9 year period between 2017 and 2026. This equates to 207 dwellings, based on the Housing Delivery Test equivalence calculation of 1.8 dwellings per bedspace.

<sup>10</sup> Based on [Appendix 1](#) of the [Housing Land Supply Report \(CDC, August 2023\)](#)



- 3.14 Based on the current standard methodology housing need calculation, the extended Local Plan period would have an identified need of around 7,400 dwellings between from 1 April 2026 and 31 March 2031. If past over-delivery is deducted, this figure would reduce to around 6,330 dwellings.
- 3.15 The need for additional employment, retail and other types of development would be determined and incorporated into the updated development strategy up to 2041. It is anticipated the need / requirement for other types of development will align with housing growth.

### **Development requirements**

- 3.16 Local Planning Authorities must use their local housing need as the starting point for determining development requirements. The determination of requirement is based on an assessment of various relevant planning matters. For example, whether more development should be provided to deliver additional affordable housing, an economic growth strategy, strategic infrastructure improvements or so that an authority can take on unmet need from a neighbouring authority. Such circumstances could necessitate a requirement that is higher than the need. The converse also applies. For example, protected areas or assets of particular importance may provide a strong reason for restricting the overall scale, type or distribution of development in the plan area. There may also be insufficient deliverable / developable land to meet the identified need of the plan area, in which case the authority would, if possible, seek to deliver the unmet development need in a neighbouring authority. In simple terms, the development requirement(s) is the minimum target that the district is required to deliver over a period of time.
- 3.17 This analysis does not attempt to predict what the updated development requirement(s) will be. It instead uses the identified need figure(s), where available, as a reliable and useful indicator of the amount of development that may be required if the Local Plan period were to extended to 2041.

### **Land supply**

- 3.18 The Council's latest housing trajectory update <sup>(11)</sup> sets out the housing land supply that has already been identified for the period 1 April 2026 to 31 March 2041 (as of 1 April 2023). This comprises:
- 2,217 dwellings from the Chesterton strategic site in Cirencester <sup>(12)</sup>;
  - 528 dwellings on other sites that already have planning permission;
  - 203 dwellings are expected on adopted non-strategic site allocations; and
  - 2,070 dwellings are expected as windfalls <sup>(13)</sup>.
- 3.19 Since 1 April 2023, two further sites have been added to the housing land supply, which would likely provide 130 additional dwellings after 2026 <sup>(14)</sup>.

<sup>11</sup> Provided at [Appendix 1](#) of the [Housing Land Supply Report \(CDC, August 2023\)](#)

<sup>12</sup> Based on data supplied by Bathurst Development Limited in April 2023, contained at [Appendix 3](#) of the [Housing Land Supply Report \(CDC, August 2023\)](#)

<sup>13</sup> This figure is calculated by rolling forward the annual windfall allowance of 138 dwellings per annum over the 15 year period, as calculated by the [Housing Land Supply Report \(CDC, August 2023\)](#)

<sup>14</sup> The [Fairford Neighbourhood Development Plan](#) made a site allocation in June 2023, which gained planning permission for 87 dwellings in October 2023 (ref: 22/03770/OUT). The access issue of the 43 dwelling site allocation in Tetbury (ref: T31B) has been resolved, enabling this site to also be included in the housing land supply. (

- 3.20 In total, around 5,150 dwellings' worth of housing land supply has already been identified for the extended Local Plan period. This leaves a gap of around 2,250 further dwellings to meet the housing need for the plan period, or around 1,180 dwellings if past over-delivery is deducted from the number needed to be planned for.
- 3.21 As with the adopted Local Plan housing land supply, it would be necessary to identify additional homes to provide flexibility within the housing land supply to accommodate fluctuations in the wider economic and housing market over the plan period. If 14% flexibility was again provided, the housing land supply would need to be around 8,440 dwellings or 7,220 dwellings if past over-delivery is deducted.
- 3.22 This would increase the number of additional homes that would need to be identified for the extended plan period to around 3,290 dwellings or 2,070 dwellings if past over-delivery is deducted.
- 3.23 These figures are intended to provide an indication of the potential number of additional homes that may need to be identified in the Local Plan up to 2041. As previously discussed, the housing need may change, there may be an exceptional circumstance for using an alternative housing need calculation or the housing requirement may be higher or lower than the housing need. However, the above information provides useful context of the scale of the housing land supply that may need to be identified for the purpose of considering strategic housing options.
- 3.24 Annual monitoring of planning permissions is being undertaken for other types of development to establish the current development land supply for employment and retail uses.

## 4. Vision and Objectives

- 4.1 This section shows our proposed updates to the adopted Local Plan Vision and Objectives, which we would welcome your views on.
- 4.2 Having a Vision and a clear set of Objectives is helpful for a number of reasons:
- They help to guide the overall content of the Local Plan, providing context for emerging policies and proposals;
  - They form part of the Local Plan itself and therefore have an influence on how development proposals are put together and assessed; and
  - They allow us to measure progress once the plan is adopted, helping us understand if the plan is delivering as expected.
- 4.3 We have tried to make it clear for you to see where we propose deleting existing parts of the Vision or Objectives and adding new parts in. To achieve this, we have used the following formatting:
- Proposed deletions from the adopted Local Plan are shown in ~~red, strikethrough font with a yellow background~~.
  - Proposed additions to the Local Plan are shown in red, underlined font with a yellow background.

## Proposed updates to the adopted Local Plan Vision

The Local Plan's Vision supports the following priorities, which are set out in the District Council's Corporate Strategy:

- Deliver the highest standards of service
- Respond to the Climate Crisis
- Provide Socially Rented Homes
- Make our Local Plan Green to the Core
- Support Health and Well-being
- Enable a vibrant Economy
- Provide high quality services at the lowest possible cost to Council Taxpayers
- Protect and enhance the local environment whilst supporting economic growth
- Champion issues which are important to local people

### Vision

By delivering clear objectives, by ~~2031~~ 2041, the Local Plan will have:

- contributed to responding to the Climate Crisis;
  - contributed to enabling a strong, competitive and innovative local economy;
  - supported the delivery of a range of housing that helps to meet the requirements of all sections of the community;
  - further capitalised on the District's key strengths, notably its high quality historic and natural environment; and
  - helped to create more healthy, sustainable, mixed communities.

Cirencester and will continue to be the main focus for additional housing and employment growth, while its function as the dominant business location, service and cultural centre for much of the District will have been enhanced.

Beyond Cirencester, much of the planned, positive change will have occurred in the most sustainable towns and larger villages so that the provision of the majority of services and facilities is met from within those settlements, serving the surrounding rural areas.

The development needs of communities, businesses, and visitors will have been enabled taking particular account of:

- climate change, nature recovery and flood risk;
- the area's internationally recognised natural, built and historic environment; and
- the provision of adequate supporting infrastructure.

## Proposed updates to the adopted Local Plan Objectives

The following Strategic Objectives will help to deliver the Vision and guide development throughout the District over the period to **2031** **2041**.

### 1. Natural, **Built** and Historic Environment

Through the use of appropriate planning policies in the development management process:

- a. Conserve and enhance the high quality, local distinctiveness and diversity of the natural and historic environment.
- b. Deliver environmental and biodiversity net gain.**
- c. Ensure that new development is of high quality and sustainable design, which reflects local character and distinctiveness, is appropriately sited, and provides attractive and inclusive environments.
- d. Protect the open countryside against sporadic development, while also avoiding coalescence of settlements, particularly around Cirencester.
- e. Support the creation of new green infrastructure to enhance environmental quality and provide health benefits.

### 2. Population, **and Housing and Health**

Through establishing the District's OAN for the Plan period and allocation of land:

- a. Provide an adequate supply of quality housing, of appropriate types and tenures **(particularly social rented housing)**, to at least meet objectively assessed needs.
- b. Identify suitable land in appropriate locations to provide sufficient pitches for gypsy and traveller accommodation, to meet the needs established through the Gypsy & Traveller Accommodation Assessment.
- c. Ensure that development supports positive health outcomes and the delivery of local health and wellbeing strategies that seek to improve health, social and cultural wellbeing and address inequalities.**

### 3. Local Economy

Through implementation of the OAN, Economic Strategy and allocation of land:

- a. Supporting the local economy **to transition to a low carbon future** and enabling the creation of more high quality jobs in the District, which meet local employment needs.
- b. Enabling our residents to work more locally.**
- c. Encouraging the vitality and viability of town and village centres as places that support a diversity of activities and uses that includes:**
  - **for**-shopping, leisure, cultural and community activities;
  - **opportunities to access affordable homes;**
  - **opportunities to attain rewarding careers; and**
  - **becoming active transport hubs to aid health outcomes and reduce emissions and pollution.**
- d. **including m** **M**aintaining Cirencester's key employment and service role.

- e. Support sustainable tourism in ways that enable the District to act as a tourist destination which attracts higher numbers of longer-stay visitors.

#### 4. Infrastructure and Service Provision

Through implementation of the IDP, maximise the quality of life by maintaining and supporting the delivery of infrastructure, services and facilities needed to support local communities and businesses.

#### 5. Sustainable Travel

Through the implementation of the Local Transport Plan, Gloucestershire Transport Decarbonisation Plan and Cotswold Transport Decarbonisation Strategy:

- a. Reducing transport carbon emissions.
- b. Reducing car use by promoting a hierarchy of users.
- c. Locating most developments in sustainable locations where there is better access to jobs, services and facilities and public transport.
- d. Supporting improvements in public transport and walking / cycling networks.

Reduce car use by:

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

#### 6. Climate Adaptation and Mitigation Change and Flood Risk

Reduce the environmental impact of development and vulnerability to the impacts of climate change by:

- a. Requiring new development to be zero carbon and supporting the sympathetic retrofit of historic buildings.
- b. Making the best use of land by maximising the use of previously-developed land.
- c. Supporting the provision of renewable energy schemes.
- d. Maximising water and energy efficiency, promoting the use of renewable energy sources and sustainable construction methods, and reducing pollution and waste.
- e. Supporting the principle of waste minimisation and encouraging the reuse of buildings to avoid unnecessary demolition.
- f. Locating development away from areas identified as being at high risk from any form of flooding or from areas where development would increase flood risk to other.

## 5. Development Strategy Options

- 5.1 This section considers different development strategy options that may be able to accommodate the additional needs / requirements for different types of development, which we would also welcome your views on.

### **Scenario 1: Additional non-strategic site allocations**

- 5.2 Scenario 1 would roll forward the adopted Local Plan development strategy of focussing the majority of additional growth at Principal Settlements, including allocating some sites outside existing development boundaries. The supporting evidence for identifying Principal Settlements would be updated. This may result in some settlements no longer being a Principal Settlement and / or other settlements becoming a Principal Settlement.
- 5.3 Many of our other larger settlements offer a good range of services and employment opportunities. However, the ability of smaller settlements to absorb additional growth in a sustainable manner is more limited because people tend to need their cars more to access services and employment opportunities and other travel options are typically less available.
- 5.4 Some broad commentary on this potential approach is provided below (please note: this is not intended to be exhaustive).
- Well supported through consultation when the last Local Plan was prepared;
  - Accepted as a 'sound' approach by the previous Planning Inspector and the Government;
  - Likely to encourage less car use and thus reduce transport related carbon emissions by offering more alternatives (public transport, walking and cycling) and good access to services and facilities;
  - Allows for a proportion of future growth to take place in smaller settlements thus helping support their vitality and viability and enabling development sites to be locally identified (e.g. through Neighbourhood Plans), although getting the threshold right for an appropriate amount of development in each case is important;
  - Would help to provide a balanced mix of sites and opportunities;
  - Would continue to ensure the scale and extent of development within the Cotswolds National Landscape remains limited; and
  - Many larger settlements (e.g. Cirencester, Tetbury and Moreton-in-Marsh) have already absorbed a large amount of growth in recent years and/or have future growth already committed.
- 5.5 It is currently uncertain whether this option can deliver the indicative target number of additional homes.

### **Scenario 2: Main Service Centre focus**

- 5.6 Scenario 2 would involve focusing the vast majority of future development (beyond existing commitments) more specifically at the main service centres. These have not yet been determined.
- 5.7 The main services centres offer a broad range of services and facilities, good public transport accessibility and provide a mix of job opportunities. Some of the main services centres lie outside the Cotswolds National Landscape where the scale and extent of development is expected to be limited.
- 5.8 Under this scenario, proportionately less development (beyond existing commitments) would then take place in Principal Settlements that are not the Main Service Centres. The Principal Settlements that are not the Main Service Centres would retain a development boundary,

inside which the principle of development would continue to be supported. However, they would not receive any allocations for additional housing growth.

- 5.9 Development elsewhere would continue to be restricted to the extent it currently is in the adopted Local Plan.
- 5.10 Some broad commentary on this potential approach is provided below.
- The Main Service Centres offer the broadest range of services and facilities in the District and are thus potentially well-placed to accommodate further growth;
  - Several Main Service Centres have land available outside the Cotswold National Landscape;
  - Allows for a comprehensive strategy in some settlements (e.g. a new Transport Strategy for Moreton-in-Marsh);
  - Several Main Service Centres have already absorbed a significant amount of growth in recent years; and
  - Proportionately less development taking place in the smaller settlements would limit the opportunity to provide new homes in those locations, including affordable housing.

### **Scenario 3: Dispersed growth**

- 5.11 Scenario 3 would involve a more ‘dispersed’ approach to the future pattern of development so that instead of growth being steered mainly towards the District’s Principal Settlements or Main Service Centres, it would be more evenly distributed across the District.
- 5.12 Thus, whilst some additional growth would still take place in the Principal Settlements, there would be a much stronger emphasis on small to medium-scale development taking place in villages across the District.
- 5.13 Under this scenario, we would anticipate that the more restrictive approach that currently applies to very small villages, hamlets and the open countryside would continue to apply.
- 5.14 Adopting a more ‘dispersed’ approach to growth such as this would mean that more small and medium-size sites would need to be identified either through the Local Plan or through Neighbourhood Plans.
- 5.15 National policy emphasises the contribution that such small and medium sites can make to meeting overall housing requirements.
- 5.16 Some broad commentary on this potential approach is provided below.
- Small and medium-size sites are generally able to deliver new homes more swiftly than larger strategic sites;
  - Could offer a greater degree of local influence and control (e.g. new sites brought forward through Neighbourhood Plans);
  - A large number of the settlements fall within the Cotswolds National Landscape where the scale and extent of development is expected to be limited;

- A significant number of the villages are relatively poorly served by public transport, services, facilities and employment opportunities, leading to potentially higher car use and carbon emissions; and
- Such an approach could ‘cumulatively’ place strain on local infrastructure capacity.

#### **Scenario 4: Village clusters**

- 5.17 Like Scenario 3, Scenario 4 is based on a dispersed approach to the future pattern of growth but, instead of villages being treated separately, they would be considered collectively in small groups or ‘clusters’ based on the services, facilities, employment provision and transport accessibility they are able to cumulatively offer. Each village ‘cluster’ would then be the focus for an appropriate and proportionate amount of growth, potentially with site allocations made in the Local Plan.
- 5.18 The logic of this approach is rooted in the NPPF, which emphasises that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services and that where there are groups of smaller settlements, development in one village may support services in a village nearby.
- 5.19 This could apply to clusters of existing larger villages but it could also potentially apply to some smaller villages where the current Local Plan adopts a more restrictive approach to growth, particularly where these are close to other larger villages that offer a broader range of services and facilities.
- 5.20 To be clear, this does not mean identifying land between villages for development. It is about identifying land within or adjacent to existing settlements that form part of a village cluster.
- 5.21 Some broad commentary on this potential approach is provided below.
- It would consider the ‘collective’ opportunities and advantages presented by settlements rather than treating each in isolation;
  - Likely to bring forward some development opportunities in locations where historically this has not been possible, thus potentially helping them to thrive;
  - Potential to increase community cohesion and inclusivity;
  - However, could potentially lead to a perception of loss of identity between different settlements; and
  - Smaller settlements can be poorly served by public transport with limited opportunities for walking and cycling, albeit development may offer an opportunity for improvements.

#### **Scenario 5: New settlement(s)**

- 5.22 This option would initiate the development of one or more new settlements in the District. The new settlement(s) would grow to include all the services, facilities, employment provision and accessibility standards found within a Main Service Centre. The size criteria of the new settlement and the potential location are yet to be determined.
- 5.23 Delivering a new settlement has a long lead in time from conception of the idea to the first spade being put in the ground. A new settlement would therefore also be expected to deliver housing towards the mid to end of the new Local Plan period and would also likely continue



delivering into the next Local Plan period. A new settlement may therefore form only part of the housing land supply solution.

- 5.24 At this point we are seeking general ‘in principle’ views on such an approach rather than identifying any potential locations. However, because there is a presumption against major development taking place within the Cotswolds National Landscape other than in exceptional circumstances, the likelihood is that any such new settlement would need to be located outside of this area.
- 5.25 National policy recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).
- 5.26 National policy also makes it clear that any such approach should include careful consideration of a number of factors including infrastructure opportunities (existing or planned) size and location (ability to be self-supporting) the quality of places (e.g. garden city principles) and likely rates of delivery given the lead-in times for large scale sites.
- 5.27 Some broad commentary on this potential approach is provided below.
- The principle of establishing a new settlement is supported by national policy;
  - Provides the opportunity to create a well-designed, ‘green to the core’, sustainable and self-sustaining location for new homes, jobs and supporting services and facilities;
  - Provides the opportunity to create significant new infrastructure investment including education, public transport and green space;
  - In acting as a focus for growth under the new Local Plan, it could reduce development ‘pressures’ on other locations within the District;
  - Development of this scale would have a significant lead-in time to delivery so other sites are likely to be needed to meet shorter-term requirements (e.g. 5 year housing land supply);
  - Larger sites are generally more complex to assemble and deliver;
  - May deliver housing after 2041, so provides longer-term housing land supply; and
  - Development of this scale would likely have a significant environmental, social and economic impact, irrespective of location.

### **Scenario 6: New strategic site(s)**

- 5.28 This option would deliver one or more new strategic sites at a Principal Settlement(s) at a level that meets Main Service Centre expectations. As with a new settlement, strategic sites have a long lead in time from conception of the idea to the first spade being put in the ground. A new strategic site would therefore be expected to deliver housing towards the mid to end of the new Local Plan period and, similar to the Chesterton strategic site, would likely continue delivering into the Local Plan period. This may therefore form only part of the housing land supply solution.
- 5.29 At this point we are seeking general ‘in principle’ views on such an approach rather than identifying any potential locations. However, because there is a presumption against major

development taking place within the Cotswolds National Landscape other than in exceptional circumstances, the likelihood is that any such new settlement would need to be located outside of this area.

- 5.30 National policy recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).
- 5.31 National policy also makes it clear that any such approach should include careful consideration of a number of factors including infrastructure opportunities (existing or planned) size and location (ability to be self-supporting) the quality of places (e.g. garden city principles) and likely rates of delivery given the lead-in times for large scale sites.
- 5.32 Some broad commentary on this potential approach is provided below.
- The principle of delivering strategic scale sites is supported by national policy;
  - Provides the opportunity to create a well-designed, ‘green to the core’, sustainable and self-sustaining location for new homes, jobs and supporting services and facilities;
  - Able to make use of and improve existing services, facilities, employment opportunities and transport connectivity within a Principal Settlement or Main Service Centre;
  - Provides the opportunity to create significant new infrastructure investment including education, public transport and green space;
  - In acting as a focus for growth in the new Local Plan, it could reduce development ‘pressures’ on other locations within the District;
  - Development of this scale would have a significant lead-in time to delivery so other sites are likely to be needed to meet shorter-term requirements (e.g. 5 year housing land supply);
  - Larger sites are generally more complex to assemble and deliver;
  - May deliver housing after 2041, so provides longer-term housing land supply; and
  - Development of this scale would likely have a significant environmental, social and economic impact, irrespective of location.

### **Scenario 7: Focus growth around transport nodes**

- 5.33 Under this final scenario, we would look to focus future growth (beyond existing commitments) along key public transport corridors and around public transport hubs (e.g. rail stations).
- 5.34 In focusing development where the availability of public transport is good, people will be less likely to use their car, helping to reduce congestion and carbon emissions, particularly with increased electrification of our public transport services.
- 5.35 Public transport options in Cotswold District are, however, variable in terms of coverage and frequency.

- 5.36 In terms of bus services, some parts of the have a reasonably good level of service (e.g. the A429 Fosse Way corridor). However, coverage across much of the rest of the District, in particular more rural areas, is sporadic or even non-existent in some locations, particularly off-peak.
- 5.37 In terms of rail services, Cotswold District has two railway stations. Kemble railway station serve the Golden Valley Line (London - Swindon - Cheltenham). Moreton-in-Marsh railway station serves the North Cotswold Line (London - Oxford - Worcester).
- 5.38 Moreton-in-Marsh has various potential development opportunities located outside the Cotswolds National Landscape. Kemble is also located outside the Cotswolds National Landscape and has land available, although development opportunities are more constrained by the sensitive landscape that surrounds the village.
- 5.39 Kingham railway station is located in West Oxfordshire District but serves the east of Cotswold District. This area is located inside the Cotswolds National Landscape and will unlikely be suitable for strategic scale growth.
- 5.40 Taking account of the above, a public transport-focused scenario would see future additional growth focused in locations where there are good current and potential future opportunities to use public transport such as the A429 corridor and Moreton-in-Marsh in particular where there is also a railway station.
- 5.41 Some broad commentary on this potential approach is provided below.
- Would help to encourage ‘modal shift’ away from the use of the private car and towards increased use of public transport;
  - Potentially reduces carbon emissions – particularly with the electrification of bus services;
  - Development along transport corridors would increase public transport use and would make services more viable;
  - Allows for a comprehensive strategy in some settlements (e.g. a new Transport Strategy for Moreton-in-Marsh);
  - Coverage of public transport across the District is variable, unpredictable and outside of the Council’s control; and
  - This approach would mean further growth to some settlements, which may have already absorbed a significant amount of development in recent years.

### **Scenario 8: Request neighbouring authority to deliver some of the housing need**

- 5.42 If it is not possible to deliver the full local housing need within the District, it would be necessary to enquire with neighbouring Local Planning Authorities whether they could accommodate some of the District’s need. It has not yet been determined whether this option is necessary.

## **6. Preferred Development Strategy and Broad Locations for Growth**

- 6.1 A hybrid of several of the development strategy scenarios is proposed.

- 6.2 The preferred development strategy would continue the adopted strategy of identifying Principal Settlements and allocating land for different types of development in these locations (Local Plan Policy DSI and Scenario 1 of this report). This strategy has successfully delivered the development needs of the adopted Local Plan period. The adopted Local Plan established that the Principal Settlements are generally the most sustainable locations for development with the best services, facilities, employment opportunities and transport connectivity. This development strategy was tested at an independent examination in public and was found to be sound.
- 6.3 It is proposed that a review of the supporting evidence that underpins the Principal Settlements would be undertaken, particularly considering the updated Objectives and Vision. This would include a greater emphasis on responding to the climate crisis, transitioning to a low carbon economy and reducing transport carbon emissions. This may result in some settlements no longer being a Principal Settlement and / or other settlements becoming a Principal Settlement. The preferred development strategy would also focus more development at settlements that function as Main Service Centres (Scenario 2).
- 6.4 The preferred development strategy would have a greater focus on additional growth (beyond existing commitments) along key public transport corridors and around public transport hubs (Scenario 7). In so doing, the scale and extent of additional development within the Cotswolds National Landscape would remain limited and development would be directed away from areas with higher flood risk.
- 6.5 Where possible, the adopted development strategy sought to balance growth of settlements proportionately, albeit the Cotswolds National Landscape was a considerable constraint to achieving this. The aim was to grow each Principal Settlement by around the same percentage increase relative to the original size of the settlement in 2011. The same broad aim would be applied to distributing additional development in the updated development strategy.
- 6.6 Cirencester is already in the process of delivering a strategic site, which is expected to be completed around 2038. The town may receive further growth up to 2041.
- 6.7 Moreton-in-Marsh is a transport hub, which includes a railway station. There are various sites located to the south, east and north of the town that are available for development and that are located outside the Cotswolds National Landscape and areas at higher risk of flooding. These sites would likely have access to the level of services, facilities and employment opportunities of a Main Service Centre. It is estimated that a combination of these development plots could deliver over 1,500 additional homes by 2041. Moreton-in-Marsh would therefore be identified as a broad location for strategic scale growth (Scenario 6). This approach would enable further development in the town to be planned comprehensively (e.g. transport, water / wastewater, education, etc.). In addition, unlike single large strategic sites of 500+ dwellings<sup>15</sup>, which typically have long development lead-in times, the combination of the smaller development parcels on offer would enable shorter lead-in times.
- 6.8 It is anticipated that the remaining need for additional development up to 2041 (beyond existing commitments and windfalls) could be delivered by additional non-strategic site allocations in accordance with Scenarios 1, 2, 6 and 7.
- 6.9 Unlike the adopted development strategy, consideration may also be given to Village Clusters (Scenario 4) and potentially allocating some sites within or adjacent to settlements that form

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<sup>15</sup> As assessed in "[Start to Finish: What factors affect the build-out rates of large scale housing sites?](#)" (Lichfields, Second Edition, February 2020)

part of a village cluster. Additionally, the adopted strategy of enabling small-scale residential development in Non-Principal Settlements would continue (Local Plan Policy DS3), albeit with a greater emphasis on settlements with better access to services, facilities and employment. Unlike the adopted strategy, the Non-Principal Settlements may be identified in the Local Plan. Development within the Village Clusters and Non-Principal Settlements, together with additional windfalls, would provide additional flexibility within the housing land supply.

- 6.10 Open market housing would continue to be prohibited outside Principal and Non-Principal Settlements (i.e. in open countryside) unless it is in accordance with other policies that expressly deal with residential development in such locations.
- 6.11 Neighbouring authorities accommodating some unmet housing need of the District requires further assessment (Scenario 8). However, this option, as well as other options, would remain open if required.
- 6.12 Further details of broad locations for growth are provided in the accompanying document titled, 'Cotswold District Local Plan Update: Preferred Options Consultation Integrated Impact Assessment'.