

Cotswold District

Statement on Effective Cooperation

July 2026



COTSWOLD
District Council

Contents

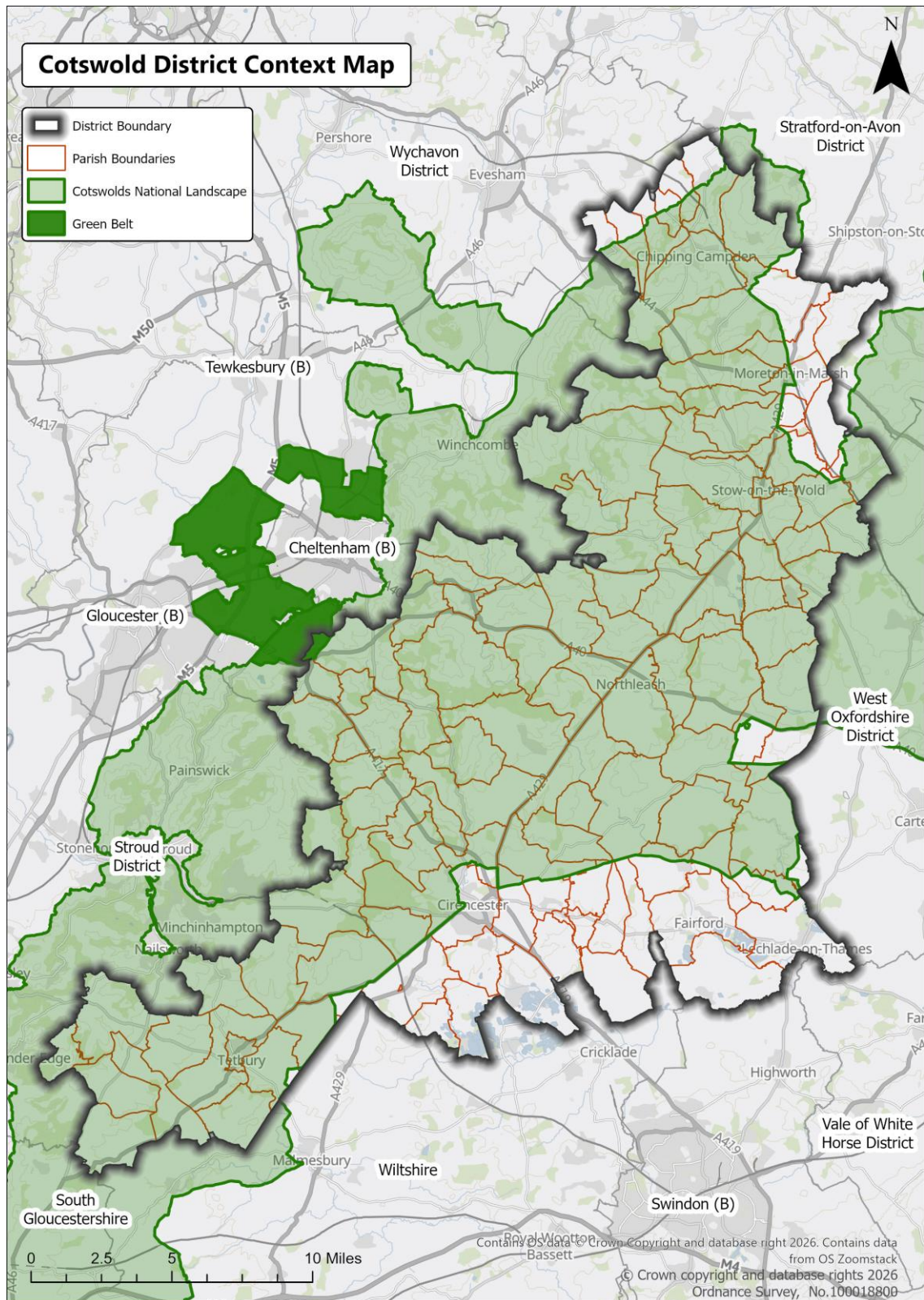
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1. Introduction

Cotswold Context

- 1.1 Cotswold District Council is producing a new Local Plan for the plan period 2026-2043, which will replace the existing Adopted Local Plan 2011-2031. This statement on effective cooperation is published alongside the Local Plan Regulation 19.
- 1.2 Three Regulation 18 stages of consultation were undertaken in 2022, 2024 and 2025. The outcomes of these consultations have fed into the preparation of the Regulation 19 Publication Version of the Local Plan in addition to the updated evidence base.
- 1.3 The statutory Duty to Cooperate was removed in March 2026. However, the requirement to demonstrate effective cooperation on strategic matters remains through national policy and the examination of plan soundness.
- 1.4 This statement provides a summary of how the Council has engaged constructively, actively and on an ongoing basis with relevant authorities and organisations in preparing the Local Plan.
- 1.5 It is supported by detailed evidence, including Statements of Common Ground (SoCGs) which demonstrate that cooperation has been effectively undertaken, that strategic cross-boundary matters have been appropriately considered and agreement, or any areas of disagreement, are adequately documented (see **Appendix 2**). The evidence also includes Memoranda of Understanding (MoUs) which demonstrate collaborative working with landowners and developers in particular on the delivery of strategic site allocations (see **Appendix 4**).
- 1.6 The Council has engaged with the relevant authorities and organisations in the preparation of the draft Local Plan through formal joint working, commissioning shared evidence, various types of meetings, and engaging in other partnership working.
- 1.7 Cotswold District Council forms the easternmost part of the County of Gloucestershire.

Figure 1: Context map showing Cotswold District and neighbouring authorities



- 1.8 Within Gloucestershire, we work closely with our neighbours in Tewkesbury, Stroud and Cheltenham. Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council are working together on a joint Strategic and Local Plan (SLP).
- 1.9 We also share physical boundaries with the authorities of Stratford-on-Avon, Wychavon, West Oxfordshire, Vale of White Horse, Swindon, Wiltshire, and South Gloucestershire.

Change to the Duty to Cooperate from legal requirement to policy compliance

- 1.10 The Duty to Cooperate was revoked in March 2026 following the coming force of new plan-making regulations under the Levelling-up and Regeneration Act 2023.
- 1.11 The Duty is therefore no longer a legal requirement and does not form part of the statutory tests at examination. This applies both to plans prepared under the new plan-making system and those continuing under the existing Local Plan Regulations.
- 1.12 However, the removal of the Duty does not remove the requirement for local planning authorities to engage constructively, actively and on an ongoing basis on strategic cross-boundary matters.
- 1.13 The NPPF sets out a continued requirement for authorities to maintain effective cooperation on strategic matters. These matters are examined through the tests of soundness, in particular whether the plan is:
- Positively prepared, including in relation to unmet need; and
 - Effective, including whether it is deliverable over the plan period and based on effective joint working.
- 1.14 In this context, this statement demonstrates how effective cooperation has been undertaken throughout the preparation of the Local Plan. It details the engagement activity to date with detailed evidence contained within the SoCGs and Memoranda of Understanding.
- 1.15 The approach set out in this statement reflects current national policy and guidance on plan-making following the removal of the statutory Duty.

Who do we cooperate with?

1.16 The neighbouring Councils include:

- Tewkesbury Borough Council
- Stroud District Council
- Cheltenham Borough Council
- Stratford-on-Avon District Council (Warwickshire County)
- Wychavon District Council (Worcestershire County)
- West Oxfordshire District Council (Oxfordshire County)
- Vale of White Horse District Council (Oxfordshire County)
- Swindon Borough Council (Swindon)
- Wiltshire Council (Wiltshire)
- South Gloucestershire Council
- Gloucestershire County Council
- Oxfordshire County Council
- Worcestershire County Council
- Warwickshire County Council

1.17 Other relevant organisations engaged on strategic matters include:

- The Environment Agency
- Historic England
- Natural England
- Sport England
- Water providers (Thames Water, Wessex Water, Severn Trent Water)
- Gloucestershire Integrated Care Board
- National Highways
- Network Rail
- Defence Infrastructure Organisation

What are strategic planning matters?

- 1.18 Strategic matters are things that relate to sustainable development, use of land or infrastructure that has, or would have a significant impact on at least two planning areas.
- 1.19 The strategic planning matters are not prescribed, and authorities will have specific strategic planning matters relative to their issues in their area.
- 1.20 The key strategic matters considered through this process include housing and employment provision, infrastructure (including transport, water and wastewater), and health and social infrastructure.
- 1.21 Further detail on how these matters have been addressed, including areas of agreement and any outstanding issues, is provided within the relevant SoCGs (see **Appendix 2**).
- 1.22 Cotswold District is a highly constrained region with around 80% of the area designated as National Landscape. Despite these constraints, the Council's evidence indicates that the Local Plan meets its identified housing need over the plan period and does not give rise to unmet need requiring accommodation from neighbouring areas. In the event that a modest level of unmet housing need were to be identified, it is assumed that the forthcoming Spatial Development Strategy that will include Gloucestershire, and/or new Local Plans to be prepared by the new unitary authority, or authorities in Gloucestershire, will provide a more effective mechanism to plan for this.
- 1.23 For that reason, even though the Council is seeking to avoid identifying any unmet housing need, the Council does not anticipate needing to ask any neighbouring authorities to assist with planning for unmet housing need, should any be identified through the remaining process.
- 1.24 The Council's evidence also indicates that the Local Plan meets its identified employment needs in full and will not require any unmet need to be accommodated in neighbouring authorities.
- 1.25 The Local Plan includes ten proposed strategic allocations that will support the delivery of sustainable development and infrastructure delivery, including strong sustainable transport connectivity, and provision for education, including two new secondary schools, along with extensive green infrastructure and the achievement of high environmental standards.
- 1.26 The specific strategic matters engaged on with each neighbour or relevant organisation are described in the relevant SoCG.

What are Statements of Common Ground

- 1.27 To demonstrate effective and ongoing joint working, we are preparing and maintaining SoCGs with relevant authorities and organisations in line with the requirements detailed in current plan-making guidance (see **Appendix 2**).
- 1.28 Each SoCG details the specific strategic matters that have been engaged on and any agreements relating to the issues discussed. They also detail any specific engagement that has taken place between ourselves and the relevant organisation or neighbour.
- 1.29 Our SoCGs are at an advanced stage of preparation. We are aiming to have as many SoCGs completed and signed by the time of this publication, even where in some cases this may indicate agreement that further discussions will take place after Regulation 19. This reflects the iterative nature of plan-making with committed ongoing engagement.
- 1.30 All SoCGs will be finalised and updated as necessary throughout the remaining process.
- 1.31 The table in Appendix 1 provides a summary table of the SoCGs, with full document SoCGs included in Appendix 2.
- 1.32 Alongside SoCGs, the Council are also preparing Memoranda of Understanding (MoUs) with landowners and developers, in particular in relation to the delivery of proposed strategic allocations. These will be used to assist in demonstrating that proposed sites can deliver the necessary infrastructure requirements, and that the Council have worked constructively and on an ongoing basis with developers and landowners throughout the process of allocating sites and masterplanning the design features.
- 1.33 The table in Appendix 3 provides a summary table of the MoUs, with full document MoUs included in Appendix 4.

2. Engagement

- 2.1 Engagement has been ongoing through the plan-making process including at Regulation 18 Issues and Options consultation (2022), Regulation 18 Draft Plan consultation (2024 and 2025), and engagement in preparation ahead of Regulation 19 consultation (2026).
- 2.2 This has included joint and coordinated evidence base work where appropriate, including studies prepared at the Gloucestershire-wide level and ongoing collaboration with Gloucestershire County Council and neighbouring authorities on infrastructure, transport and other strategic planning matters.
- 2.3 The SoCGs detail the specific engagement with neighbours and bodies throughout the plan-making process including detailed comments and discussion points (see **Appendix 2**)
- 2.4 Taken together, this demonstrates that the Local Plan has been prepared through effective, proportionate and ongoing joint working on strategic matters, in accordance with national policy.

Appendix 1 – Statements of Common Ground Summary Table

Organisation / Neighbouring Authority	Overview of strategic matters
Wiltshire Council	CDC housing need; Request for continued and ongoing engagement; Strategically important cross-boundary routes; Potential landscape and environmental impacts; Request for ongoing coordination on shared mitigation principles; Economic links across north Wiltshire/south-west Cotswolds
Swindon Borough Council	CDC housing need; Strength of strategic relationships; Density assumptions; Site-specific impacts; School capacity; Build-out rates and phasing; Cumulative impacts on strategic road network; Mitigation measures and HRA evidence; Ongoing joint working through Recreational Mitigation Strategy and Steering Group; Sharing data on Water Cycle studies; Potential impacts of growth on wastewater infrastructure and treatment capacity
West Oxfordshire District Council	CDC housing need; CDC economic needs
SLP authorities (Tewkesbury Borough Council, Cheltenham Borough Council)	CDC housing need
South Gloucestershire Council	Engagement with West England Combined Authority; Focus on non-National Landscape land
Stroud District Council	CDC housing need; HRA matters; No significant impacts relating to cross-boundary infrastructure
Oxfordshire County Council	CDC housing need; Impact of scale of growth at Moreton-in-Marsh on cross-boundary infrastructure provision and traffic impacts; Flood risk assessment
Worcestershire County Council	CDC housing need; School capacity in Worcestershire; Ongoing review of transport impacts with GCC
Warwickshire County Council	Strategic transport routes; Proposed transport hub delivery; Impact of development on from National Landscape in Warwickshire; Flood risk
Wychavon District Council	CDC housing need; Some engagement ongoing; Strategic transport routes; Impact on National Landscape; Employment land provision; Green infrastructure and potential increased visitor pressure
Vale of White Horse District Council	CDC housing and employment need; Protection of River Thames Corridor; Employment commuting patterns
Stratford-on-Avon District Council	Biodiversity near shared boundary; Protection of the River Thames corridor; Flood Resilience; Engagement on Housing and Employment capacity evidence; CDC housing need; Cross-boundary employment patterns
Network Rail	Development Impact on Level Crossings; Impacts to Moreton in Marsh and Kemble Station; New bridge across the railway at Moreton-in-Marsh
Gloucestershire ICB	Impacts on health infrastructure are determined through the Infrastructure Delivery Plan; requirements will be reflected in the new Local Plan policies

Organisation / Neighbouring Authority	Overview of strategic matters
Defence Infrastructure Organisation	Implications of emerging LP for operational defence establishments; Effect of proposed strategic and non-strategic allocations on military aviation safety, operational capability of defence sites, MOD estate interests
Sport England	Continue stage E of the Sport England Playing Pitch Strategy Guidance; masterplans will show areas to locate sports fields and pitches which will be of sufficient size to meet the need identified in the evidence
Severn Trent Water	Adequate water and wastewater infrastructure to serve all new developments is required; scale and location of upgrades needed is identified through the Water Cycle Study (WCS) and the Infrastructure Delivery Plan (IDP)
Thames Water	Adequate water and wastewater infrastructure to serve all new developments is required; scale and location of upgrades needed is identified through the Water Cycle Study (WCS) and the Infrastructure Delivery Plan (IDP)
Wessex Water	Based on this modest level of growth in the area served by Wessex Water, no issues have been identified other than standard matters which will be considered at the application stage.
Gloucestershire County Council	Several informal inputs have been provided to inform the Strategic Transport Assessment, including for mitigations following regular and ongoing engagement with GCC. A detailed issue log has been prepared by the Council's transport consultants which is being worked through, albeit some matters will be updated to inform the SOCG for Plan submission.
Environment Agency	Main strategic issues are planning for 'all' sources of flood risks and mitigation measures identified to address flood (through SFRA), strategic water planning (through WCS), green and blue infrastructure and contaminated land
Historic England	Setting and archaeological assessment are required to inform specific site selections; appropriate appraisals including the consideration of 'setting' issues so the character and appearance of significant historic settlements can be safeguarded; anonymous suburban estate type car-dependant sprawl that is at odds with the district's identity and special character should be avoided
Natural England	A full and comprehensive Habitat Regulations Assessment and Air Quality Assessment are required to support the Local Plan
National Highways	Informal inputs have been provided to inform the Strategic Transport Assessment, including for mitigations affecting the Strategic Road Network following regular engagement with NH. There are limited impacts on the Strategic Road Network and these are under review. The issues log prepared by the Council's transport consultants are being worked through, but some matters may be updated to inform the SOCG for Plan submission.

Appendix 2 – Statements of Common Ground

Defence Infrastructure Organisation

Environment Agency

Gloucestershire County Council

Gloucestershire ICB

Historic England

National Highways

Natural England

Network Rail

Oxfordshire County Council

Severn Trent Water

SLP authorities (Tewkesbury Borough Council, Cheltenham Borough Council)

South Gloucestershire Council

Sport England

Stratford-on-Avon District Council

Stroud District Council

Swindon Borough Council

Thames Water

Vale of White Horse District Council

Warwickshire County Council

Wessex Water

West Oxfordshire District Council

Wiltshire Council

Worcestershire County Council

Wychavon District Council

Appendix 3 – Memoranda of Understanding Overview Table

Developer / landowner	Overview of strategic matters
tbc	tbc
tbc	tbc
tbc	tbc

Appendix 4 – Memoranda of Understanding

[insert list and links to independent appendices]