



Council name	COTSWOLD DISTRICT COUNCIL
Name and date of Committee	CABINET (11 January 2024)
Subject	COTSWOLD DISTRICT LOCAL PLAN UPDATE & THE CIRENCESTER TOWN CENTRE FRAMEWORK MASTERPLAN
Wards affected	ALL
Accountable member	Councillor Juliet Layton, Cabinet Member for Planning and Regulatory Services Email: juliet.layton@cotswold.gov.uk
Accountable officer	Charlie Jackson, Assistant Director for Planning and Sustainability Email: charlie.jackson@cotswold.gov.uk
Report author	James Brain, Forward Planning Manager Email: james.brain@cotswold.gov.uk
Summary/Purpose	<p>To consider the recommendation to Council to start preparing a new local plan for the period 2026 to 2041 and to consult on a document that includes development strategy options.</p> <p>To consider the recommendation to consult the public on a set of draft policies that update the adopted Cotswold District Local Plan 2011-31 (the adopted Local Plan).</p> <p>To consider the recommendation to consult the public on an ‘initial ideas’ Cirencester Town Centre Framework Masterplan consultation document.</p> <p>To approve the updated Statement of Community Involvement and the updated Local Development Scheme documents.</p>
Annexes	<p>Annex A: Cotswold District Local Plan Consultation: Executive summary and consultation instructions.</p> <p>Annex B: Cotswold District Local Plan (2026-2041): Vision, Objectives and Development Strategy consultation document.</p> <p>Annex C: Cotswold District Local Plan (2011-2031): Draft Policies. <u>NOTE: DUE TO SIZE, ANNEX C IS NOT AVAILABLE IN THE PRINTED PACK. IT IS PUBLISHED FOR VIEWING ON THE WEBSITE.</u></p> <p>Annex D: Local Development Scheme 2024 to 2027.</p> <p>Annex E: Statement of Community Involvement (January 2024).</p> <p>Annex F: Cirencester Town Centre Framework Masterplan ‘initial ideas’ consultation document.</p> <p>Annex G: Updating the Adopted Local Plan – the scenarios.</p>



Recommendation/s	<p>That Cabinet resolves to:</p> <ul style="list-style-type: none"> a) Recommend to Council that Cotswold District Council begin the preparation of a new Local Plan that would extend the plan period from 31 March 2031 to 31 March 2041 and approves the Vision, Objectives and Development Strategy consultation document, as presented at Annex B, to be published for a six week public consultation; b) Approve the draft policies consultation document at Annex C for a six week public consultation; c) Approve the updated Local Development Scheme as presented at Annex D is approved; d) Approve changes to the Statement of Community Involvement as presented at Annex E; e) Approve the emerging Cirencester Town Centre Framework Masterplan 'initial ideas' consultation document for a six week public consultation as presented at Annex F; f) Note upcoming national policy changes and the impact this may have on the preparation of the Local Plan at Annex G; and g) Delegate authority to the Forward Planning Manager, in consultation with the Cabinet Member for Planning, to agree questionnaires and make minor and typographical corrections to the consultation documents prior to being published for public engagement.
Corporate priorities	To update the adopted Cotswold District Local Plan to make it green to the core. To publish a Cirencester Town Centre Masterplan.
Key Decision	YES
Exempt	NO
Consultees/ Consultation	<p>The following Publica / Council teams have been consulted: Development Management, Economic Development; Heritage, Design and Ecology; Strategic Housing; Housing; Parking; Climate Action; Estates; and Senior Management.</p> <p>The following external organisations and groups have been consulted on aspects of the consultation documents: Gloucestershire County Council, neighbouring local planning authorities, landowners and agents, Cirencester Town Council, Cirencester Neighbourhood Plan Steering Group, Cirencester Chamber of Commerce.</p>



1. EXECUTIVE SUMMARY

- 1.1. The substantive purpose of this report is to recommend that the Council continues to update its adopted Local Plan while, simultaneously, beginning preparation of a new Local Plan to replace the existing one. Against a complicated and uncertain legislative background officers consider that developing these two pieces of core work coterminously with a view to the likelihood of merging them at a later date is the wisest course for the Council to follow in ensuring that it maintains a robust Local Plan and a healthy five-year housing supply.
- 1.2. Planning reforms: The Levelling Up and Regeneration Act (2023) (the Act) sets a framework for the government to reform to the English planning system, including the way local authorities prepare local plans. These upcoming changes are significant and create uncertainty and added risks. This makes it difficult to navigate the plan-making process and alight on the most prudent course of action. This report and its recommendations allows the council to 'hedge its bets'.
- 1.3. Terminology: This report refers to several types of plan-making terms, so the following definitions provide a useful reference:
- **Adopted Cotswold District Local Plan 2011-2031 (the adopted Local Plan):** the extant plan used to determine planning applications.
 - **Partial update of the Cotswold District Local Plan 2011-2031 (Partial Update Plan):** The plan the Council has been preparing to date. It updates parts of the adopted Local Plan, mostly the development management policies, and it does not extend the plan period or alter the development strategy.
 - **Development strategy:** This is a core component a local plan. It specifies the quantum and location of development to meet identified needs. For example, the extant Local Plan's development strategy is defined by policies DSI to DS4 and the 'S' settlement policies.
 - **Development Strategy and Site Allocations Plan (2026-2041):** Specifies the quantum and location of development in Cotswold District during the period 2026 to 2041.
 - **Replacement Plan:** It combines the Partial Update Plan and the Development Strategy and Site Allocations Plan (2026-2041) into a single and comprehensive full local plan that meets development needs from 2026 to 2041. To achieve this the Replacement Plan would need to be submitted by 30 June 2025.
 - **New Style Plan:** The government is changing how future local plans are made. From 1 July 2025 authorities that haven't already submitted their draft local plan for independent examination in public will need to prepare and submit their local plan using new plan-making regulations. The new regulations are expected in late 2024. A New Style Plan would include a new/updated development strategy and a few development management policies of local importance that are not covered by the new National Development Management Policies (a new sister document to the National Planning Policy Framework, which the government proposes to introduce).



- 1.4. Diagram I shows how these terms interact with one another. Annex G provides a detailed explanation of the plan-making scenarios and the complexities of navigating the government's plan-making reforms.

Development Strategy and Site Allocations Plan (2026-2041)

- 1.5. The adopted Local Plan development strategy remains sound for the time being, although there are currently just over seven years remaining until the end of the plan period in 2031. It is recommended that the Council takes proactive action now by starting the preparation of a new local plan. This will enable a smooth transition to a new local plan. It will also help to ensure that a five year housing land supply can be maintained in the years to come and that plan-led development, which has the benefit of community participation, continues.
- 1.6. There are two recommended ways that the new local plan could be delivered. Members do not have to decide which way is best now and can keep their options open for the time being. The decision on the chosen approach can be made further down the line and will largely depend on progress before the June 2025 deadline for submitting local plans set by the Act.
- 1.7. The Development Strategy and Site Allocations Plan (2026-2041) would identify land to meet additional development requirements arising up to 2041. Indicatively, the council will need to allocate land to deliver up to 3,300 additional dwellings by 2041. This is the principal mechanism for increasing the supply of affordable housing, a core ambition of the council. Additional evidence would determine the housing and other development requirements.
- 1.8. The consultation document is based on an initial assessment that considers various high level development strategy options and proposes a preferred development strategy based on the current available evidence. This would deliver additional required development across several settlements, including strategic scale growth at Moreton-in-Marsh. Additional evidence and community consultation is needed to test and develop this initial work.

Partial Update Plan (2011-2031)

- 1.9. The council is already partially updating its adopted Local Plan to make it "Green to the Core". A set of draft policies are now ready to be consulted on, which builds on the consultation responses received in 2022 at the 'Issues and Options' stage of plan-making. The draft policies also respond to changes in national guidance and new evidence base studies undertaken to inform the Partial Update Plan. There are approximately 60 new or updated policies.

Local Plan consultation: February – March 2024

- 1.10. The Local Plan consultation invites local communities to help shape the new development strategy and the draft Local Plan policies. Diagram 2 provides a useful pictorial summary of the different components. This is a Regulation 18 consultation. The consultation would run from 1 February 2024 until 14 March 2024.
- 1.11. Included within the consultation is a 'call for sites' and an Integrated Impact Assessment (IIA). The former invites landowners to make land available for consideration to help meet future needs. The council will assess these sites in its Strategic Housing and Economic Land Availability Assessment (SHELAA) in 2024. This will provide a shortlist of potential



development sites for allocation in the new Local Plan. The IIA is an early stage environmental assessment that has helped to shape the local plan consultation. It helpfully includes a points of the compass assessment of development options in the district's larger settlements.

Cirencester Town Centre Framework Masterplan – initial ideas consultation

- 1.12. The proposed Cirencester Town Centre Framework Masterplan consultation is on an 'initial ideas' document that presents town centre analysis, a vision, principles and objectives and emerging ideas on the several opportunity sites within the town centre.
- 1.13. The consultation would also run from 1 February 2024 until 14 March 2024. This aligns perfectly with Cirencester Town Council's consultation on its draft Cirencester Neighbourhood Plan.

Statement of Community Involvement and Local Development Scheme

- 1.14. The council's Statement of Community Involvement and the Local Development Scheme have been updated. These now direct engagement to the Council's digital engagement platform, Citizen Lab, and update the timetable for delivering planning documents and plans; respectively.

2. BACKGROUND

English Planning Reforms

- 2.1. The Levelling Up and Regeneration Act (2023) (the Act) sets a framework for the government to reform to the English planning system, including the way local authorities prepare local plans. In early autumn 2023 the government consulted on its plans to implement parts of the Act which relate to local plans. The stated intentions of these reforms are to make plans simpler, faster to prepare and more accessible. The Royal Town Planning Institute¹ and Shropshire Council² have prepared useful summaries of the proposed changes. Key information to note is:
 - Plan-makers have until 30 June 2025 to submit plans under the existing legal framework and; Plan-makers have until 31 December 2026 for their plans to be adopted, with all independent examinations also having been completed by this point.
 - The new system is likely to go live in late 2024 and authorities that do not meet the 30 June 2025 submission deadline for old style plans will need to prepare plans under the new system.

¹ NPPF: Transitional arrangements for plan-making (Royal Town Planning Institute, Feb 2023)

<https://www.rtpi.org.uk/blog/2023/february/nppf-transitional-arrangements-for-plan-making/#:~:text=On%20plan%20making%20under%20the,been%20completed%20by%20this%20point.>

² Summary of the Levelling-up and Regeneration Bill: Consultation on implementation of plan-making reforms

(Shropshire Council, Sept 2023) <https://www.shropshire.gov.uk/committee-services/documents/s35850/Appendix%201%20-%20Summary%20of%20Governments%20Consultation%20on%20Implementing%20Plan-Making%20Reforms.pdf>



2.2. The council currently has 18 months to submit its local plan (partial or replacement) under the extant regulations.

The adopted Local Plan - Reviews

2.3. The adopted Local Plan was adopted in 2018. A ‘review’ of the adopted Local Plan was undertaken in 2020. This concluded that a partial update was appropriate, which commenced in 2021. This included preparing a framework masterplan for Cirencester Town Centre.

2.4. In September 2023, the council approved a further ‘review’ of the adopted Local Plan housing requirement. This concluded that the local housing need of the district had not changed significantly and that the minimum housing requirement provided by the adopted Local Plan did not require updating. Proactively updating the development strategy now does not alter the conclusions of that review.

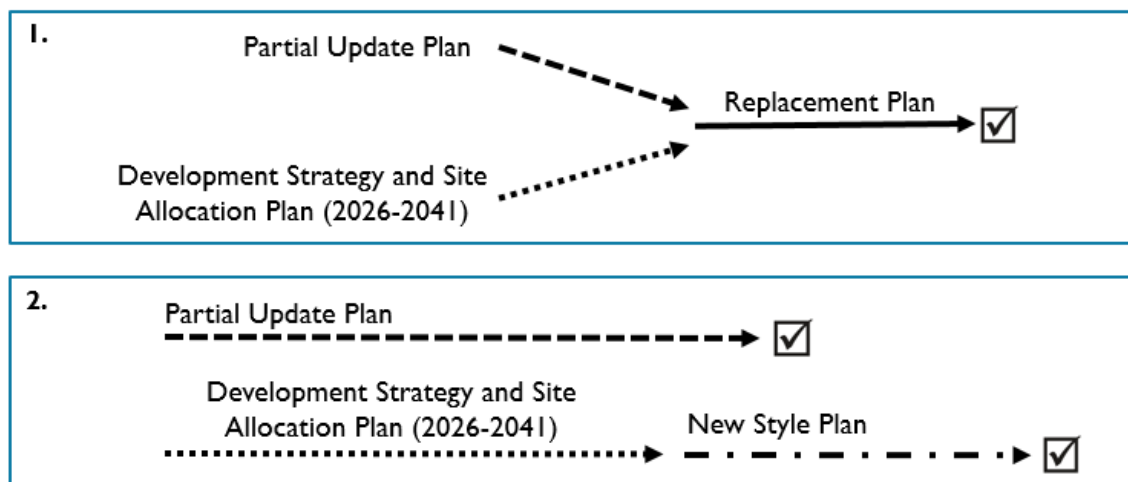
Navigating the complexities of the current and emerging plan-making system

2.5. This information is to note only. It helps to explain why councillors are being asked to consider consulting the public on a Partial Update Plan (2011-2031) and a Development Strategy and Site Allocations Plan (2026-2041) independently of one and other.

2.6. Annex G provides a detailed explanation of the plan-making scenarios and the complexities of navigating the government’s plan-making reforms, although a summary is offered below.

2.7. Diagram 1 shows how the council can progress updating the adopted Local Plan without coming unstuck by the emerging planning reforms. Both scenarios start off the same – i.e. the council continues with the ongoing Partial Update Plan and commences a new Development Strategy and Site Allocations Plan (2026-2041)³.

Diagram 1: Plan-making scenarios



2.8. Scenario 1. A Replacement Plan: would combine the Partial Update Plan and the Development Strategy and Site Allocations Plan (2026-2041) before the combined Replacement Plan is submitted for a single independent examination in public. This would largely depend on whether the Development Strategy and Site Allocations Plan (2026-2041)

³ Note that local planning authorities can produce two development plan documents at the same time.



is sufficiently advanced to be submitted before the Act's June 2025 deadline but it would also depend on the detail of upcoming changes to the regulations. This route is preferred as it would be more cost effective than Scenario 2 and the Replacement Plan would be adopted sooner than the equivalent in Scenario 2. It would also secure the policies of the Partial Update Plan up to 2041 instead of 2031. However, owing largely to the uncertainty surrounding the planning reforms and the consequent transitional arrangements, this paper does not offer a recommendation to combine the Partial Update Plan (the policies) and the Development Strategy and Site Allocations Plan (2026-2041) now. A review of this position should occur no later than December 2024, by which time planning reforms and local evidence gathering should provide a clearer steer.

- 2.9. Scenario 2. A Partial Update Plan and transition the Development Strategy and Site Allocations Plan (2026-2041) into a New Style Plan: Scenario 2 would submit the Partial Update Plan for independent examination in public before the Act's June 2025 deadline. However, the Development Strategy and Site Allocations Plan (2026-2041) would become a 'New Style Plan' and would be examined separately after June 2025. This would be the council's fall-back position if conditions outlined in Annex G are not met. This option is more costly (e.g. there would be two examinations in public). It would also take longer to adopt the Development Strategy and Site Allocations Plan (2026-2041) than Scenario 1. The Partial Update Plan policies would also be extant up to 2031 instead of 2041.
- 2.10. To reiterate, no decision needs to be taken now on which route to choose. The key decision now on this matter is whether or not to start preparing a Development Strategy and Site Allocations Plan (2026-2041).

3. DEVELOPMENT STRATEGY AND SITE ALLOCATIONS PLAN (2026-2041)

- 3.1. You may ask why the council should go to the trouble of updating its Local Plan vision, objectives and development strategy now, especially given it has a five year housing land supply and over seven years until the end of the adopted Local Plan period.
- 3.2. If long standing councillors cast their minds to the old Local Plan, which expired in 2011, it took seven years to update and was formerly replaced in 2018. There are various mitigating reasons why it took so long but the impact was hard felt across the district with it suffering several years of not being able to demonstrate a five year housing land supply and communities having to accept off plan development without their participation. It put the council and communities on the back foot for several years and resulted in at least 27 planning appeals and two Judicial Reviews where the lack of a housing land supply or an up to date housing requirement was a significant material consideration.
- 3.3. From April 2026 (just over two years' time) there will be less than five years remaining of the Local Plan period. Not having an adopted Local Plan housing requirement for the full five year period from April 2026 adds uncertainty to the way the five year housing land supply will be measured. For example, the council may become increasingly dependent on the government's 'standard method for calculating the housing needs' and its annual fluctuations as a basis for calculating the five year housing land supply. This would give the



council less control of delivering its housing target. Furthermore, as the council approaches the end of the plan period - 31 March 2031 - it will naturally have less housing supply to meet its housing target. Together, this will increase the risk of the council being unable to demonstrate a five year supply of housing, which would engage the government's presumption in favour of sustainable development in areas outside of the Cotswolds National Landscape, formerly known as the Cotswolds Area of Outstanding Natural Beauty.

- 3.4. The reason for updating the development strategy now is to ensure the council has long term control of its housing supply. Importantly, it also provides local communities with the opportunity to shape future growth and infrastructure in and around their neighbourhoods, rather than having to react to speculative development. Put simply, the council is advised to make hay whilst the sun shines.

How many additional houses are required to meet identified needs to 2041?

- 3.5. It is estimated that the Council would need to allocate land for either around 2,100 or 3,300 additional dwellings. You may wonder why two figures? This is because of government proposals to update the National Planning Policy Framework (NPPF), which may or may not confirm that past over-delivery of housing from the previous Local Plan can be factored into the number to be planned for in the new Local Plan. The government has indicated that it will update the NPPF this autumn and the Housing Minister, Michael Gove, indicated in a speech to MPs that the NPPF update could be published as soon as week commencing 11 December. The council will (hopefully) not have to wait long for the government to confirm the position. Furthermore, the government is due to publish updated housing need figures in March 2024 so again the council will need to consider any further resulting changes. During 2024 officers will be updating various needs assessments to finalise housing and economic requirements / targets.

What are the development strategy options?

- 3.6. A topic paper (Annex C) identifies eight options.
1. Additional non-strategic site allocations
 2. Main service centre focus
 3. Dispersed growth
 4. Village clusters
 5. New settlement(s)
 6. New strategic site(s)
 7. Focus growth around transport nodes
 8. Request neighbouring authority to deliver some of the housing need.

What is the proposed development strategy?

- 3.7. A combination of options 1, 2, 6 and 7 is proposed to accommodate the bulk of additional development needs up to 2041. The current development strategy of identifying 'Principal Settlements' would continue where the principle of development is supported. However, the strategy would have a greater focus on reducing carbon emissions and focussing growth



at locations with good transport connectivity and access to services, facilities and employment. Accordingly, some settlements may become a Principal Settlement and other settlements may have their Principal Settlement status rescinded.

- 3.8. Additional non-strategic site allocations would be made at the Principal Settlements whilst ensuring that the scale and extent of development within the Cotswolds National Landscape remains limited and that development is directed away from areas at higher risk of flooding. 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 at least 1,500 additional dwellings up to 2041.
- 3.9. The adopted development strategy of enabling small-scale residential development in Non-Principal Settlements (Policy DS3) would also continue, although it would have an increased emphasis on settlements that have better access to services, facilities and employment. Consideration may be given to whether some sites could be allocated in Village Clusters (Scenario 4). Together, development in Non-Principal Settlements, Village Clusters and windfall sites would provide additional flexibility within the housing land supply should any site allocations not come forward as planned.
- 3.10. 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.
- 3.11. It is important to note that this is an early stage regulation 18 consultation. The council is not being asked to commit to agree / approve the draft proposed strategy; this happens at the regulation 19 stage. However, the draft development strategy does provide councillors, public, key stakeholders, businesses, visitors, developers and landowners with an indication of where evidence and options are beginning to align.

Broad areas for growth

- 3.12. The Integrated Impact Assessment provides an objective assessment of the development strategy options. It also provides a 'points of the compass' assessment of the district's key settlements, identifying key constraints such as the Cotswolds National Landscape, flood zones and other areas or assets that national policy considers to be of particular importance⁴.

When will we see which sites will be allocated for development?

- 3.13. This will occur at the next stage in the plan-making process. At this stage the council will be inviting landowners to make their land available for development through a process called a 'call for sites'. The Council will use this information to update its Strategic Housing and Economic Land Availability Assessment (SHELAA), which will provide a high level assessment of their suitability. Suitable candidates will be considered in combination with other evidence through the site allocation process.

⁴ NPPF (2023) paragraph 11 and Footnote 7



4. PARTIAL UPDATE PLAN (2011-2031)

4.1. The council is partially updating its adopted Local Plan to make it “Green to the Core”. The council now has a set of draft policies that it wishes to consult on, which builds on the consultation responses we received in 2022 at the previous ‘Issues and Options’ stage of plan-making. The draft policies also respond to changes in national guidance and new evidence base studies undertaken to inform the update. There are approximately 60 new or updated policies; key changes include:

- *NEW* Sustainable Development Chapter that sets out local development principles including giving greater prominence to the updated design code (which will be consulted on separately in 2024) and health and wellbeing outcomes.
- *NEW* Climate Adaptation and Mitigation Chapter that includes new policies to deliver net zero development and communities and updated policies that seek to strengthen adaptation. This includes ten new climate mitigation policies, covering issues such as renewable energy, retrofit, embodied carbon, new build operational energy and district heating. The transport policy has undergone a significant update to emphasise the importance of delivering active travel and public transport.
- New accessibility standards have been incorporated in Policy DS3 (Policy DS3 Small-Scale Residential Development in Non-Principal Settlements) to ensure new housing developments have reasonable access to services, facilities and employment to reduce social isolation, vehicle dependence / cost of living issues and transport CO2 emissions.
- Several sites in the adopted Local Plan are proposed for de-allocation. The most prominent is Kemble Community Gardens, which would instead benefit from a Local Green Space designation covering the entire site.
- Updated Cirencester Central Area policy to support the emerging town centre masterplan Supplementary Planning Document.
- Various proposals to deliver more affordable housing. Includes: increasing the requirement from 30% to 40% on brownfield and from 40% to 50% on greenfield sites; changing the requirement for a financial contribution in the Cotswolds National Landscape and any future ‘designated rural areas’ from 6-10 dwellings to 3-9 dwellings with all developments of 10 or more homes requiring on-site affordable housing provision instead of the current 11 or more dwelling requirement; removing a loophole for avoiding affordable housing contributions by submitting several smaller schemes; a new policy for entry-level exception sites; and many more.
- New policy, ensuring that replacement dwellings are not inappropriately large. It also closes a loophole where applicants gain permission through permitted development rights or a Certificate of Lawful Existing Use of Development and build a new replacement dwelling in a location that would otherwise be unsuitable.



- New policy providing further support for community-led housing developments to deliver more genuinely affordable housing, whilst providing a further boost to the housing land supply.
- New policy requiring all major housing development (for example, 10 or more dwellings) to contribute towards homeless housing provision to meet the identified need in the district and to address the Council's strategic objectives on delivering more affordable housing.
- Providing greater protection to safeguarded employment sites, which are coming under pressure from changes of use to other uses, particularly C3 (dwellinghouses).
- Updates to Special Policy Areas policy (EC4) to reflect development proposals at the Royal Agricultural University, Cirencester and the Fire Service College, Moreton-in-Marsh.
- A new policy on equestrian related development incorporating and updating former Policy 31 from the Local Plan (2006), to support equestrian related development; to ensure new uses for traditional buildings and reduce the pressure for new, isolated buildings in the countryside.
- New guidelines on Tree, Hedges and Woodlands.
- The Local Plan incorporating the requirement for developments to deliver 10% biodiversity net gain.
- A new policy to safeguard dark skies in the Cotswold District.
- A new policy for the Sherborne Park Estate near Northleach. The policy enables the production of a masterplan for the estate, which will provide the framework for determining planning application(s) on the estate in future.
- An update to the infrastructure delivery policy (INF2) to remove an "exceptions" trapdoor and reduce debates of viability at the Development Management stage.

5. LOCAL PLAN CONSULTATION: FEBRUARY TO MARCH 2024

- 5.1. The Local Plan consultation invites local communities and interested parties to help shape the new development strategy and the draft Local Plan policies. This is a Regulation 18 consultation, which builds upon the 'Issues and Options' consultation that was undertaken in 2022. The consultation would run from 1 February 2024 until 14 March 2024.
- 5.2. The consultation will comprise four distinct elements and a set of instructions. Members of the public and other stakeholders are free to engage with all four elements or matters that only interest them (Diagram 2).

Digital Engagement

- 5.3. Over the last two years the council has been working with the government to trial software and practices to increase rates of digital engagement in the planning process, improve user experience of the planning system and to reduce back office administration. Together with its partner West Oxfordshire it has been awarded c.£250,000. The council will be using a

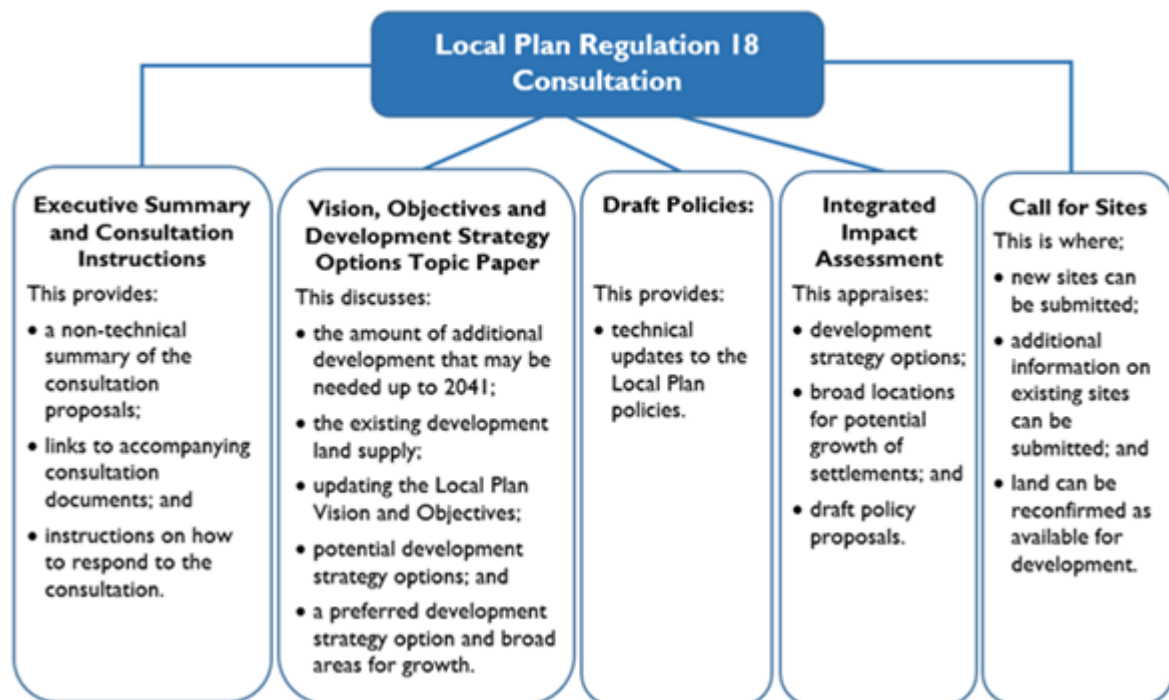


platform called Citizen Lab to run future Local Plan consultations. This system uses Artificial Intelligence software that can auto tag and summarise representations, which should speed up back office process and analysis.

Statement of Community Involvement

- 5.4. The 2012 Town and Country Planning Regulations (as amended) require the Council to prepare and keep up-to-date its Statement of Community Involvement (SCI). The SCI explains how and when different groups, organisations and communities can get involved with the local planning consultations and planning documents. They provide a framework for consultation and community engagement.
- 5.5. The council last updated its SCI in November 2020 and, for the most part, it remains relevant and up-to-date. However, officers seek to make several amendments (Annex F), which are primarily to promote the use of the digital engagement platform, especially from the development industry and private planning consultants. The SCI update also specifies that the council will be using auto-summarisation technology.

Diagram 2: The components of the Local Plan consultation.



6. CIRENCESTER TOWN CENTRE FRAMEWORK MASTERPLAN

- 6.1. The council's Corporate Plan and adopted Local Plan commits it to publish a masterplan for Cirencester town centre. This builds on a commitment contained in the adopted Local Plan (Policy S3: Cirencester Town Strategy).
- 6.2. The original basis for the masterplan was to coordinate major redevelopment opportunities within the town centre. Some of the key sites are currently surface level public car parks owned by the Council. They are allocated for redevelopment in the adopted Local Plan on the assumption that replacement capacity would be provided by the development of a multi-storey car park on one of the sites. Although work on that multi-storey car park project



has paused, master planning work for the town centre is still necessary to deliver the council's Corporate Plan.

- 6.3. Since the Local Plan was adopted, the council has identified several factors that necessitate a continued master planning approach.
- Changes in shopping habits are affecting the “traditional” high street, including how changing uses may impact footfall and car parking demand.
 - A significant part of the town centre is a Scheduled Monument, which adds to the complexity of formulating feasible and viable redevelopment proposals for individual allocated sites.
 - The council’s administration is deeply committed to promoting sustainable development, which includes facilitating a shift towards active and sustainable modes of travel, as well as opportunities to enhance the local green infrastructure and biodiversity networks.
- 6.4. The council has been working closely with Gloucestershire County Council (GCC) and Cirencester Town Council (CTC) who have vested interests in the town centre’s viability and vitality. GCC has recently prepared a Cirencester Local Walking and Cycling Infrastructure Plan⁵ and assisted in the preparation of multimodal interchange study⁶ and public transport assessment between Tetbury and Cirencester via Kemble train station⁷.
- 6.5. CTC’s Neighbourhood Plan Steering Group is working with local volunteers to prepare a Neighbourhood Development Plan for Cirencester and has carried out extensive community engagement that will assist with preparing a vision and set of objectives for the masterplan. CTC has indicated their intention to align their draft Neighbourhood Plan consultation with Cotswold District Council’s consultations, so draft Neighbourhood Plan consultation will also commence on 1 February 2024 and will end of 14 March 2024.
- 6.6. Bearing the above and other considerations in mind, a master planning approach is considered necessary to establish a clear vision and development objectives for the town centre, which will inform the council’s design briefing and design appraisal roles.
- 6.7. The masterplan is intended to be an urban design framework for the town centre. It will fulfil multiple functions, including those described in summary below.
- Describe and illustrate how planning and design policies and principles should be implemented across Cirencester town centre.
 - Include a vision and development objectives for the whole town centre, establishing a context for proposed and potential interventions.
 - Address the allocated sites and other potential areas of change within the town centre, which are likely to be developed at different times by different developers.

⁵ [Cirencester Local Cycling & Walking Infrastructure Plan \(GCC, June 2022\)](#)

⁶ <https://www.cotswold.gov.uk/media/nhebyw1i/cirencester-area-public-transport-study-potential-public-transport-hub-for-cirencester-itp-jan-2023.pdf>

⁷ <https://www.cotswold.gov.uk/media/lrrd1zej/cirencester-area-public-transport-study-cirencester-kemble-public-transport-options-study.pdf>



- Coordinate the phased delivery of more detailed design instructions and guidance (e.g. development briefs or masterplans) for specific sites within the town centre, as and when the need for them arises. This will include identifying front runner opportunities.
- 6.8. The vision and development objectives will respond to the factors described above, adopting a positive and innovative approach to the changing role of the high street.
- 6.9. The consultation document (Annex F) presents an emerging masterplan that offers a proposed vision and set of guiding principles for the town centre. It presents urban design analysis of the town centre and offers suggested land uses and reimagined corridors through the town centre. The document has been prepared by Mace, the Council's specialist master planning consultant, in partnership with CTC's Neighbourhood Plan Steering Group. The consultation is designed to spark a debate about the future of the town centre to help inform a full draft of the masterplan later in 2024.
- 6.10. The emerging masterplan is supported by a library of evidence⁸ that seeks to guide, influence and ultimately establish the masterplan's feasibility. Work includes:
- Cirencester Access and Movement study – this study seeks to quantify future parking needs and options for meeting these needs. It will also consider opportunities to increase active travel between the town centre and the suburbs;
 - Archaeological Survey – a desktop assessment to understand likely mitigation;
 - Cirencester Area Public Transport Options Study – this study examined opportunities to improve public transport links between Cirencester and Kemble train station.
 - Cirencester multimodal transport hub study – this study examined potential areas for a new public transport hub in the town centre;
 - Cirencester Local Cycling and Walking Infrastructure Plan;
 - Strategic Housing and Economic Land Availability Assessment (SHELAA);
 - Cirencester Town Centre Health Check; and
 - Forecast Change in Uses to 2051 – a study that seeks to understand future land use needs i.e. to establish if retail uses will decrease over time.

7. FINANCIAL IMPLICATIONS

- 7.1. There are financial implications associated with preparing and updating a local plan. The costs can be considered in several discrete parts:
- **Updating the evidence base** – includes costs associated with consultants and the commissioning of studies.

⁸ <https://www.cotswold.gov.uk/planning-and-building/planning-policy/cirencester-town-centre/>



- **Policy writing** – includes legal and specialist expertise / input to help shape the emerging plan and review all supporting documents.
- **Undertaking the Regulation 18 and 19 formal consultations** – includes costs associated with managing the Council’s Local Plan consultation database and interactive consultation system, procuring consultants (where required) to help run the consultation and other activities such as venue hire, printing of materials, etc.
- **Preparation of the publication/submission plan** – includes specialist expertise / input to ensure that the development strategy remains sound, having considered the comments received. If it is robust, then there would be costs associated with making any final amendments to the plan and associated documents, and printing of all documents for submission to the Secretary of State. If it is not sound, then a further targeted Regulation 19 consultation would be required.
- **Examination, adoption and legal challenge** – includes costs associated with hiring an independent Planning Inspector and a Programme Officer to support them. There would also be costs associated with having specialist consultants (where appropriate) to represent the Council, including a specialist barrister(s). Members of the public are free to legally challenge the adoption of a Local Plan within a set timeframe. Should the Local Plan be legally challenged this is likely to incur additional costs.

7.2. At 1 April 2023, the opening balance on the Local Plan reserve was £677,000.

7.3. It is estimated that an additional £550,000 will be required to prepare the Development Strategy and Site Allocations Plan (2026-2041). This would include commissioning additional evidence to test and justify new site allocations and aid the delivery of four supplementary planning documents (SPDs) listed at paragraph 7.6.

7.4. Additional funding will be required should the council need to use the fall back approach, shown in Diagram 1 (scenario 2). This may require up to an additional £500,000, although it is difficult to quantify at this stage as it requires far greater clarity on the new plan-making system. The new system is being advertised as being quicker and more efficient but this remains to be seen in the absence of secondary legislation. Furthermore, the planning system will continue to operate within a legal framework, where planning judgements need to be justified / evidenced. This is often where the costs and resources sit.

7.5. There will be a cost to the council if it chooses not to update or delay the preparation of the Development Strategy and Site Allocations Plan (2026-2041). History offers a useful reminder. Between 2011 and the adoption of the Local Plan in 2018, the council received 27 planning appeals where the housing land supply was challenged, 17 of which found the lack of a five year housing land supply to be a significant material consideration. Tewkesbury Borough Council provides a useful indication of cost. It recently lost three appeals, where the five year housing land supply was contested, at an estimated cost of £500,000.

Local Development Scheme – project timetable

7.6. The Council’s Local Development Scheme has been updated – see Annex E. This document sets out the key plan-making milestones and dates. The timetable is subject to periodic



review. Milestones may change if, for example, significant additional issues are identified through the consultation process and/or the review of the Council’s evidence base. This will be kept under review by the Local Plan Programme Board. The following table summarises the key milestones contained within the Local Development Scheme for the replacement plan.

DATE	STAGE
February 2024	Local Plan preparation (Regulation 18)
January 2025	Local Plan publication consultation (Regulation 19)
June 2025 to August 2026	Submission and Examination in Public
August 2026	Inspector’s Report
September 2026	Adoption

7.7. The Local Development Scheme also contains information on other additional plan-making projects, specifically supplementary planning documents (SPD). As the name suggests, these documents supplement local plans and guide the application of local plan policies. The Local Development Scheme identifies four SPDs that will be delivered alongside the replacement plan.

- Cirencester Town Centre Framework Masterplan SPD;
- Cotswold Design Code SPD;
- Affordable Housing SPD; and
- Developer Contributions SPD.

It is worth bearing in mind that adopting the eventual Cirencester Town Centre Framework Masterplan commits the council to additional long term costs. The council owns several regeneration sites in the town centre (typically car parks) and therefore it commits the council to act as lead and/or partner developer. During 2024 and as the masterplan begins to crystallise the council will undertake a market appraisal that will examine the gross development value of the masterplan proposals. This will support a wider review of the council’s Asset Management Strategy that is currently underway.

8. HUMAN RESOURCE IMPLICATIONS

- 8.1. The Forward Planning team is central to the delivery of several corporate projects and there is an expectation that these will be delivered in a timely and cost efficient manner.
- 8.2. The plan-making process employs a project management approach that actively monitors the time, cost and quality. This helps to anticipate risks and costs early in the process and aids transparency. It also helps to ensure an appropriate level of resource to keep the council’s local plan up-to-date.



- 8.3. The council has recently announced that the Forward Planning function is one of many services returning to the council from Publica. Restructuring is likely add some disruption to day to day services during 2024/25. However, it is not expected to fundamentally affect the delivery of projects listed in the Local Development Scheme. This will be kept under review.
- 8.4. Councillors may be interested to note the 'State of the [Planning] Profession' report published by the Royal Town Planning Institute in November 2023⁹, which offers some useful insights and trends on the planning profession.

9. LEGAL IMPLICATIONS

The Local Plan and extant plan-making process

- 9.1. Local planning authorities must review local plans at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community¹⁰. The council's Local Plan reviews discharge this duty.
- 9.2. Commencing the preparation of the Development Strategy and Site Allocations Plan (2026-2041) does not alter the conclusions of the recent review of the adopted Local Plan housing requirement. The adopted Local Plan policies continue to carry full weight with measuring the housing land supply. Rather, the decision to prepare a replacement plan is confirmation of the Council's commitment to take proactive action to plan for needs arising in the 2030s.

Local Development Scheme and Statement of Community Involvement

- 9.3. By keeping the Statement of Community Involvement and Local Development Scheme up-to-date the Council ensures compliance with The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This is an important consideration in the independent examination of the updated Local Plan.

10. RISK ASSESSMENT

- 10.1. Annex G examines the benefits and risks of navigating the plan-making process.
- 10.2. Planning reforms are complicating the plan-making process and are requiring convoluted approaches to ensure progress can be made without placing the council at risk of losing hundreds of thousands of pounds of investment and years of work. Although not advocated, it is completely understandable why some councils have paused their plan-making activities until the new system beds in.
- 10.3. The advocated approach is to continue with the Partial Update Plan and to begin a new plan with a plan period of 2026 to 2041 that focusses on updating the council's the development strategy and allocating sites to meet development requirements up to 2041.

⁹ <https://www.rtpi.org.uk/stateoftheprofession23>

¹⁰ Planning and Compulsory Purchase Act 2004 www.legislation.gov.uk/ukpga/2004/5/contents and The Town and Country Planning (Local Planning) (England) Regulations 2012 <http://www.legislation.gov.uk/uksi/2012/767/contents/made>



- 10.4. By December 2024, the council will need to make a judgement call based on whether sufficient work has been made on the Development Strategy and Site Allocations Plan (2026-2041) to merge it with Partial Update Plan to create a single Replacement Plan that can be submitted ahead of the 30 June 2025 deadline.
- 10.5. It is worth noting that there will be lots of councils wanting to submit their local plans by June 2025. This could create a bottle neck in the system and may affect the council's ability to adopt its Local Plan by December 2026, after which point time would be up and the Local Plan would need to switch to a New Style Plan. Officers are keeping the Planning Inspectorate informed of the council's plan-making timetable.
- 10.6. Even if all goes to plan and the combined Replacement Plan is submitted by June 2025, there is still a risk that the council will not have this plan adopted by April 2026 (i.e. the point when there will be less than five years remaining of the adopted Local Plan period). This has implications on the way the five year housing land supply is measured and the council may still need to take proactive measures to address this. However, waiting for a New Style Plan increases this risk and the potential length of time when there may be ambiguity in the way the five year housing land supply is measured.
- 10.7. Project management risks and the mitigation taken are also detailed in the Local Development Scheme (Annex E).

11. EQUALITIES IMPACT (IF REQUIRED)

- 11.1. The emerging Local Plan is supported by an Integrated Impact Assessment that considers these legal duties and requirements. An updated Integrated Impact Assessment will be available to review and comment on during the public consultation.

12. CLIMATE CHANGE IMPLICATIONS (IF REQUIRED)

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

13. ALTERNATIVE OPTIONS

- 13.1. Recommendations (a) and (b): Cabinet / Council could decide to only continue with the Partial Update Plan. Annex G examines the merits of. Another option would be to pause work on the Partial Update Plan until when the New Style Plan goes live. This option is not advised as it is contingent on various external factors that are not in place yet and are not in the council's control. For example, a general election in the next 12 months could result in new political party taking power who may have a different take on how the plan-making process should operate. This would also not provide enough time to adopt a Replacement Plan, thereby securing the council's housing land supply, before there is less than five years remaining of the adopted Local Plan period.



- 13.2. Recommendations (c) and (d): The Local Development Scheme and Statement of Community Involvement documents are regulatory requirements of the plan-making process and therefore there are no reasonable alternatives.
- 13.3. Recommendation (e): Cabinet could decide not to publish the Cirencester Town Centre Framework Masterplan for consultation. If such a decision was chosen it would not be able to progress its corporate objective to prepare a town centre masterplan for Cirencester.
- 13.4. Recommendation (g): Granting delegated authority to make minor changes to the consultation plan and agree the questionnaire will aid the timely publication of the consultation material in the New Year. Cabinet could decide not to grant authority to the Forward Planning Manager or grant authority to a more senior council officer.

14. BACKGROUND PAPERS

- 14.1. None

ENDS