# Local Plan Review

Preferred Options
Consultation

November 2025



Homes, landscape, livelihoods - a legacy we build together.





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#### 1. Introduction

#### What is a Local Plan?

- 1.1 A Local Plan is a statutory document created by a local planning authority that sets out policies and proposals for development in a specific area, such as a district council area, guiding decisions on planning applications, including for new housing, employment, shops, and infrastructure. The Local Plan provides a long-term vision for the future of the area, outlining where growth should occur and where development should be restricted, and serves as the starting point for determining planning applications.
- 1.2 The process of updating a Local Plan involves several stages. The initial stages involve looking at issues, options and policy proposals with stakeholders, including the public (formally known as a Regulation 18 stage). This is followed by a draft Local Plan (formally known as a Regulation 19 stage). The next step is then an Examination in Public where an independent Inspector appointed by the Planning Inspectorate assesses the soundness and legal compliance of the Plan and considers representations made in response to the Regulation 19 consultation. At each stage there is an opportunity for stakeholders to participate in the process and have their views heard. If the Plan is found sound and approved by the Planning Inspector, it is then adopted by the Local Authority and replaces the previous Local Plan to become the Development Plan for the area.
- 1.3 The Council encourages everyone to participate in the consultation to help inform the next stage of the Local Plan process, whether you are a resident, business, landowner, town or parish council, or anyone else. In taking part in the discussion, it is important to bear in mind the last step of the process the Examination in Public. The Inspector will be focusing on whether the Local Plan is sound, and one key consideration for the Inspector will be whether there is sufficient evidence to support the proposals. If you do make new alternative policy suggestions, please remember that for us to take them on board, we need to be confident we can robustly and justifiably support them when the Local Plan is examined.

#### What has been consulted on already and what has changed since then?

1.4 Cotswold District Council commenced a Development Strategy and Site Allocations Plan in January 2024. This included a new Local Plan period of 2026 to 2041. At the first stage of preparing this Local Plan, the Council undertook what is formally known as a Regulation 18 Issues and Options Consultation, and consulted on a Vision, Objectives and Development Strategy Options Topic Paper between February and March 2024. At the same time, the Council also consulted on a series of amended and new policies in order to make the Local Plan 'Green to the Core'.

- 1.5 At the time of these consultations, the government calculated that the district needed to deliver 493 additional homes a year. Accordingly, it was estimated that additional sites capable of delivering around 3,300 homes would be needed to deliver the new housing target over the new Local Plan period<sup>1</sup>. Various development strategy options were identified to deliver the housing target, and feedback was sought on those options.
- 1.6 In December 2024, the Government revised the National Planning Policy Framework. The changes included a new, mandatory 'standard method' for calculating the number of homes needed in each local planning authority area. As a result, and largely due to high house prices in Cotswold District, the district received a more than 100% increase to its annual housing target. The number of homes needed in the district is now calculated to be 1,036 homes a year, which means significantly more housing sites need to be identified.
- 1.7 National planning policy has a separate requirement for councils to demonstrate that they have enough land available to meet their housing needs for the next five years. This is known as the "five-year housing land supply." It ensures that Local Plans are delivering their housing target. If a council cannot show that it has this supply in place, national policy gives greater weight to approving planning applications for new housing, even if they do not fully align with local policies. The significant increase to the district's housing target meant the Council lost its five year housing land supply. This change has reduced the Council's ability to refuse speculative planning applications for new homes, even in areas that were previously seen as unsuitable for development.
- 1.8 Planning applications are consequently now also being decided one by one, without a joined-up approach. This means there is no overall plan guiding where new homes should go, and infrastructure like roads, schools, and health services may not be properly planned or provided alongside new development.
- 1.9 National planning policy also requires Local Plans to look ahead for a minimum of 15 years from the point of adoption and policies should be set within a vision that looks ahead at least 30 years, which may require the allocation of sites that continue to be

<sup>&</sup>lt;sup>1</sup> This was based on a need for 7,400 homes over the Local Plan period that was being considered at that time and already committed homes (e.g. sites with planning permission) that could contribute towards delivering that target.

delivered beyond the end of the Local Plan period. With an expected adoption of the Local Plan Update in 2027, the plan will need to run to 2043. This further increases the number of homes that need to be planned for (and supporting infrastructure) within this plan period and beyond.

- 1.10 In this current stage of consultation (formally known as a Regulation 18 consultation), the Council is consulting on its Preferred Options for development following on from the previous Regulation 18 Issues and Options Consultation, and is putting forward its proposed development strategy. This strategy will dictate how and where any land for additional development that is needed to meet identified requirements to 2043 should be allocated. This includes broad areas of the district where growth in, for example, housing and employment provision may take place. The identification of specific development sites will follow in the Regulation 19 consultation next year.
- 1.11 The responses from the previous Local Plan consultations are still valid and have been taken into consideration. However, the significant increase to the number of homes needed in the district requires a rethink of the proposed development strategy for delivering this scale of growth.

#### How can I comment on this consultation?

- 1.12 The consultation documents can be accessed via the Council's online consultation system <u>your.cotswold.gov.uk</u>. Hard copies are also available to view at all public libraries in Cotswold District, as well as the Council offices at Trinity Road, Cirencester, GL7 1PX and the Moreton Area Centre, High Street, Moreton-in-Marsh, GL56 0AZ. Hard copies can also be obtained on request by contacting the Council's customer services team on 01285 623000 or <u>customer.services@cotswold.gov.uk</u>. Please note that charges may apply.
- 1.13 Please respond using the <u>online consultation system</u>. The Council has also produced <u>guidance</u>, as well as a <u>video</u> explaining how to make your comments. You can respond to as many or as few questions as you wish. If you do not have access to a computer or smartphone, you can make your submission by email (<u>Local.Plan@cotswold.gov.uk</u>) or letter (Planning Policy, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX). Please ensure to clearly state for each of your comments which chapter/paragraph of the consultation they relate to; this ensures that your comments are processed swiftly and correctly.

- 1.14 Please note that consultation responses will be refined down to a list of <u>material planning considerations</u><sup>2</sup>, the Council cannot take into account other matters. Campaigns making multiple representations on the same point carry no extra planning weight than a single representation making the same point(s).
- 1.15 This consultation lasts for a period of seven weeks starting from Friday 14 November 2025. It will close on Friday 2 January 2026 at midnight. Please ensure your representations are submitted by this deadline. Unless there are mitigating circumstances, we will not accept late representations because this will affect the overall Local Plan timetable, as well as being unfair to those who have adhered to the deadline.
- 1.16 For further information about the Council's Local Plan consultation process and the next steps in the Local Plan process, please see <u>our Statement of Community Involvement and our Local Development Scheme</u>. The Local Plans team can be reached via <u>Local.Plan@cotswold.gov.uk</u> or Planning Policy, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

<sup>&</sup>lt;sup>2</sup> Material planning considerations are factors that must be taken into account when making planning decisions. Key considerations include (among others):

<sup>•</sup> Privacy: Overlooking or loss of privacy for neighbouring properties.

Daylight and sunlight: Potential loss of daylight or overshadowing.

<sup>•</sup> Scale and design: The scale, dominance, and appearance of proposed developments.

Access and safety: Considerations for disabled access, highway safety, and traffic issues.

<sup>•</sup> Planning policies: Compliance with relevant planning policies and legislation.

# 2. Spatial strategy options

#### **Context**

- 2.1 The development strategy of the Local Plan identifies the requirements for different types of development (housing, employment, retail, etc.) over the proposed new Local Plan period (2025 to 2043). It is also a 'spatial document' which sets out how and where the development requirements may be delivered. This chapter of the consultation sets out the different options that the Council has considered and the Council's preferred option. A more detailed analysis of the different options can be found <a href="Development Strategy Options Technical Report">Development Strategy Options Technical Report</a>.
- 2.2 Based on current estimations, the following housing targets will apply for the updated Local Plan:
  - a. 18,650 additional new homes are needed for the new Local Plan period (calculated using the government's 'standard method') <sup>3</sup>.
  - b. There are already 6,150 homes in the pipeline that can contribute towards delivering this 18,650 housing target. These are:
    - planning permissions that have not yet been built;
    - remaining site allocations from the current Local Plan; and
    - future windfalls (an estimation of sites that will not specifically be identified in the Local Plan, that is largely based on previous windfalls delivered in each parish since 2011). This will be recalculated and confirmed for the next stage of consultation on the Draft Local Plan (formally known as a Regulation 19 consultation)).
  - c. Additional sites capable of delivering 12,500 homes are needed to fully deliver the housing target (i.e. 18,650 6,150 = 12,500 homes).
- 2.3 Local planning authorities must use their housing target, as calculated by the standard method, as the starting point for determining the housing requirement included in their Local Plan. However, there may be matters that justify a lower housing requirement, such as protected areas or assets of particular importance providing a strong reason for restricting the overall scale, type or distribution of development in the plan area.

<sup>&</sup>lt;sup>3</sup> This figure is based on the government's 'standard method' calculation of the number of homes needed in the district (1,036 homes a year), provided by the MHCLG's recalculation of housing needs in December 2024. Note, this figure is periodically updated to reflect new housing affordability data and household estimates. It will be reassessed in the Gloucestershire Housing and Economic Needs Assessment, which is expected in spring 2026.

2.4 If there are insufficient deliverable / developable sites and the full development needs cannot be delivered inside the district, the Council would need to ask neighbouring authorities whether they can accommodate some of the unmet need. The Council would then set a housing requirement in its Local Plan that is lower than the number of homes that is needed, but that matches the deliverable / developable housing land supply. A similar situation exists for the need for other types of development (such as employment and retail) that cannot be fully delivered in the district.

#### The different scenarios

- 2.5 Seven development strategy options have been identified to accommodate the additional growth. A detailed analysis of the strengths and weaknesses of each of these scenarios can be found in the <u>Development Options Strategy Technical Report</u>. The potential impacts of each scenario have also been assessed in the <u>Integrated Impact Assessment</u> and the <u>Habitat Regulations Assessment</u>. You can put your comments against any of the scenarios and/or answer the two questions at the end of this chapter.
- 2.6 Please note, the figures provided in the scenarios are indicative and are subject to change (please see chapter 3 for further details).

# Scenario 1: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters and support Rural Exception Sites in Rural Settlements

- 2.6.1 This scenario would be a continuation of the current development strategy which focusses the majority of additional growth at Principal Settlements. In addition, this scenario would also identify the Non-Principal Settlements and Village Clusters as locations to proactively allocate sites for development.
- 2.6.2 A <u>Settlement Role and Function Study</u> was undertaken to determine a settlement hierarchy of Principal Settlements, Non-Principal Settlements (and Village Clusters) and Rural Settlements based on various factors, such as their existing size, level of services, facilities, employment provision, etc.
- 2.6.3 The final settlement hierarchy in the Local Plan may change, as it will factor in the amount of additional planned growth and any additional services, facilities, employment provision, etc. resulting from that growth.

16 Principal Settlements						
Andoversford	Cirencester	Mickleton	South Cerney			
Blockley	Fairford	Moreton-in-Marsh	Stow-on-the-Wold			
Bourton-on-the-Water	Kemble	Northleach	Tetbury			
Chipping Campden	Lechlade	Siddington	Upper Rissington			
13 Non-Principal Settlements or Village Clusters						
Avening	Broadwell	North Cerney	The Village Cluster			
Bibury	Down Ampney	Poulton	of Coln St Aldwyns,			
Bledington	Longborough	Preston	Hatherop and			
Bourton-on-the-Hill	Meysey Hampton	Willersey	Quenington			

- 2.6.4 Additional housing would be supported in Rural Settlements as Rural Exception Sites. These developments would normally not be permitted but would aim to provide 100% affordable housing and meet a local housing need. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding. These homes would be delivered as windfalls (i.e. sites not specifically identified in the Local Plan). Further housing would be supported as windfalls beyond the Principal and Non-Principal Settlements and Village Clusters where other national, local and neighbourhood planning policies allow it.
- 2.6.5 The total housing supply of the Local Plan period from Scenario 1 is estimated to be approximately **7,840 homes**. **This is 42% of the government target of 18,650 homes**.

# Scenario 2: Allocate sites in Principal Settlements, Non-Principal Settlements, Village Clusters and Rural Settlements

- 2.6.6 This scenario incorporates Scenario 1 but adds a more 'dispersed' approach to the future pattern of development so that instead of growth being steered mainly towards the district's Principal and Non-Principal Settlements, it would also be located within small villages and hamlets across the district. The Rural Settlements have very limited or no services, facilities or employment provision.
- 2.6.7 Many of the homes that would come forward in Rural Settlements from this scenario would either have been Rural Exception Sites or be included within

- the windfall allowance for Scenario 1. This means that the number of houses that are gained by this scenario is limited.
- 2.6.8 The total housing supply of the Local Plan period from Scenario 2 is estimated to be approximately **8,230 homes**. This is **44% of the government target of 18,650 homes**.

#### Scenario 3: Main Service Centre focus

- 2.6.9 Scenario 3 would focus the vast majority of future development (beyond existing commitments) at main service centres. These main service centres offer a broad range of services and facilities, good public transport accessibility and provide a mix of job opportunities. Some of the settlements with potential to be main services centres lie within the Cotswolds National Landscape where the scale and extent of development is expected to be limited.
- 2.6.10 Under this scenario, proportionately less development (beyond existing commitments) would take place in Principal Settlements that are not Main Service Centres. These Principal Settlements 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.
- 2.6.11 In simpler terms, compared to the previous scenarios, this scenario would put the majority of development near the largest settlements in the district. The total housing supply of the Local Plan period from Scenario 3 is estimated to be approximately **9,420 homes. This is 51% of the government target of 18,650 homes.**

#### Scenario 4: Focus growth around transport nodes

- 2.6.12 This scenario puts future growth (beyond existing commitments) along key public transport corridors and around public transport hubs (e.g. railway stations). It would see all future additional growth focused in locations where there are good current and potential future opportunities to use public transport.
- 2.6.13 In terms of bus services, some parts of the District have a reasonably good level of service. 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 during off-peak periods.

- 2.6.14 In terms of rail services, Cotswold District has two railway stations. Kemble railway station serves the Golden Valley Line (London Swindon Cheltenham). Moreton-in-Marsh railway station serves the North Cotswold Line (London Oxford Worcester). Kingham railway station is located in West Oxfordshire District but serves the east of Cotswold District. This area is constrained by its location inside the Cotswolds National Landscape.
- 2.6.15 The total housing supply of the Local Plan period from Scenario 4 is estimated to be approximately **9,190 homes. This is 49% of the government target of 18,650 homes.**

Scenario 5: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters. Support Rural Exception Sites in Rural Settlements. Create new settlement(s) and/or strategic extensions to existing settlement(s)

- 2.6.16 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). Local Plan policies on strategic sites<sup>4</sup> should be set within a vision that looks ahead at least 30 years to take into account the likely timescales for delivery. The practical reality of this is that the whole of strategic sites not just the part that is delivered in the Local Plan period need to be allocated in the Local Plan so that they can be planned comprehensively and so that all infrastructure requirements can be determined from the outset.
- 2.6.17 This option would include the development set out in Scenario 1 as well as new settlements and/or strategic extensions to existing settlements. As a minimum, settlements with strategic growth would (grow to) include all the services, facilities, employment provision and accessibility standards found within a Non-Principal Settlement.
- 2.6.18 Delivering a new settlement or strategic site has a long lead in time from conception of the idea to the first spade being put in the ground. These locations would therefore be expected to deliver housing and other types of development towards the mid to end of the new Local Plan period and would likely continue delivering into the next Local Plan period.

<sup>&</sup>lt;sup>4</sup> Please note, for the purpose of this consultation, strategic sites are considered to be a single site, or collection of smaller sites in the same location, which provide 500 or more homes.

- 2.6.19 As there is a presumption against major development taking place within the Cotswolds National Landscape other than in exceptional circumstances and development being in the public interest, any new settlement or strategic site would need to be located outside of this area.
- 2.6.20 The total housing land supply of the Local Plan period from Scenario 5 is estimated to be approximately **14,660 homes. This is 79% government target of 18,650 homes.**

Scenario 6: Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters. Support Rural Exception Sites in Rural Settlements. Create new settlement(s) and/or strategic extensions to existing settlement(s). Support major development within the Cotswolds National Landscape

- 2.6.21 Scenario 6 retains all strategic sites and settlement growth identified in Scenario 5. But unlike Scenario 5, it includes sites within the Cotswolds National Landscape, irrespective of whether they constitute major development or have high landscape sensitivity.
- 2.6.22 This scenario is intended to test the upper limits of potential growth across the district, including areas that are subject to greater planning constraints due to their landscape designation. National landscapes have the highest status of national policy protection. Major development within them should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Given this option is contrary to national planning policy, Scenario 6 is not considered to be a viable option.
- 2.6.23 The total housing land supply of the Local Plan period from Scenario 6 is estimated to be approximately **19,320 homes. This is 104% of the government target of 18,650 homes.**

Scenario 7: Maximise growth across the district with sites assessed to be unsuitable for development (for example, via additional new settlement(s) / strategic extensions)

2.6.24 Scenario 7 tests a further theoretical housing capacity across Cotswold District by combining all elements of previous growth scenarios (excluding Scenario 6). In other words, it includes all of the development proposed in the scenarios 1 to 5, with the addition of new settlements and/or strategic extensions (outside of the National Landscape) in locations that have been assessed to be unsuitable for development.

- 2.6.25 As with Scenario 6, the Council does not consider this to be a sustainable level of development and therefore Scenario 7 is not a viable option.
- 2.6.26 The total housing land supply of the Local Plan period from Scenario 7 is estimated to be approximately **16,200 homes. This is 87% of the government target of 18,650 homes.**
- 2.7 As Scenarios 6 and 7 are excluded for not delivering sustainable growth, only five scenarios remain. None of these remaining scenarios provide a housing land supply that meets the target of 18,650 new homes set by the government. Therefore, the Council will need to ask if neighbouring authorities could contribute to the delivery of the residual housing need whichever of the first five scenarios is chosen. The Council could only set a housing target in its Local Plan that is lower than the one set by the government if neighbouring authorities are unable to contribute to delivering the shortfall in full.

# **Increasing density**

- 2.8 National policy recognises that where land for housing is limited, it is important to make the best use of available space. This means building homes at higher densities especially in town centres and areas with good public transport links so more people can be housed. National policy therefore requires Local Plans to include clear policies to support this, and developers are expected to use land efficiently.
- 2.9 National policy also emphasises the importance of creating sustainable places of high quality design, conserving and enhancing our national landscape and building houses to meet the needs of our communities. A balance therefore must be struck between maximising density, whilst also ensuring the character and scenic beauty of the Cotswolds and the wider district is retained, as well as providing the right types and sizes of homes that are needed.
- 2.10 In Cotswold District, the average density of potential development sites for the Local Plan is currently 21 dwellings per hectare <sup>5</sup>. One way to help meet our housing target may be to increase the density of homes provided on each site. This would supply more homes but would mean building up, building more compactly, and/or reducing the level of private and shared open space.

<sup>&</sup>lt;sup>5</sup> Calculated to be 30 dwellings per hectare for sites under 0.4 hectares; 25 dwellings per hectare for sites of 0.4 to 2 hectares (to provide for other things, such as public green space); and 19 dwellings per hectare for sites of 2 hectares or more (to provide for further things, such as infrastructure). The density of strategic sites is assumed to be 19 dwellings per hectare unless evidence confirms an alternative density is achievable.

- 2.11 In a rural district like Cotswold, where the character of towns and villages is shaped by historic buildings, open spaces, and protected landscapes, achieving higher density development is challenging. For example, taller buildings or more intensive layouts can conflict with conservation areas, heritage settings, or the natural beauty of the Cotswolds National Landscape. Additionally, delivering the right mix of homes, such as family houses, accessible homes and affordable housing with the right space standards, can be harder at higher densities, where space is more limited and design flexibility is reduced. Whilst increasing density in some locations may be possible, there are likely to be many areas where this is not possible e.g. rural edge of settlement locations with small to medium sized sites due to the impact on the character of the surrounding area.
- 2.12 In addition, there are some sites where the density cannot be increased or where increasing the density would not deliver more homes in the Local Plan. For example:
  - a. The Council cannot require density to be increased on sites that already have planning permission (existing planning permissions contribute 3,260 homes to each scenario).
  - b. Similarly, there are likely to be only limited opportunities to increase density on windfall sites. These are normally smaller sites, such as barn conversions, residential subdivisions, or infill developments. In most cases, the density of these sites cannot reasonably be increased, and it is estimated that only 25% windfalls would be eligible for a potential increased density<sup>6</sup>.
  - c. Increasing housing density on strategic sites may provide further housing land supply in the longer-term. However, due to the long length of time it takes to plan and build new homes on these sites, and because they are already counted as delivering the maximum number of homes when compared with similar sites, this approach is unlikely to significantly increase the number of homes that are delivered from these sites in the Local Plan period<sup>7</sup>.

<sup>&</sup>lt;sup>6</sup> This approximate figure considers types of windfall delivered between 2011 and 2024 with particular regard to larger sites, which is evidenced in <u>Appendix 4 of the Housing Land Supply Report (CDC, June 2025)</u>.

<sup>&</sup>lt;sup>7</sup> The need for other types of development and infrastructure within strategic sites can also constrain the delivery of higher density development. For example, the Steadings in Cirencester was permitted with a density of 10 dwellings per hectare owing to the need to provide employment land, a neighbourhood centre, public open space, allotments, playing fields, pedestrian and cycle links and other infrastructure, and there would be similar requirements of other strategic sites.

Table 1 – Percentage density increase required to deliver 18,650 homes.

Indicative total housing land supply	Sites where density can potentially be increased (no. of homes) (i)	Average increase in density of eligible housing sites to supply 18,650 homes	Average density of potential housing sites to supply 18,650 homes (dwellings per hectare)
Scenario 1 = 7,840	2,685	502%	106
Scenario 2 = 8,230	3,148	429%	91
Scenario 3 = 9,420	1,290	1,046%	221
Scenario 4 = 9,190	1,071	1,260%	267
Scenario 5 = 14,660	2,685	502%	106
Scenario 6 = 19,330	8,702	N/A	N/A
Scenario 7 = 16,200	3,148	429%	91

<sup>&</sup>lt;sup>(i)</sup> Does not include sites that already have planning permission; or the 75% of windfalls estimated to be delivered in the Local Plan period (see paragraph 2.12b above); or strategic sites.

- 2.13 Table 1 illustrates how the number of homes from sites where density can potentially be increased is lower than the total housing number of homes from each scenario<sup>8</sup>. Densities of between 91 and 267 dwellings per hectare would be required on eligible sites to meet the government's full 18,650 home target.
- 2.14 While maximising housing density where opportunities exist may help reduce the shortfall on this target, very high densities are not seen as realistic or suitable for Cotswold District. They would likely conflict with the area's character and the practical limits of infrastructure and services.

# The Council's preferred option

- 2.15 The Council's preferred development strategy is Scenario 5, as it builds on the current adopted strategy which has successfully delivered the development needs of the adopted Local Plan period until the introduction of the new housing target in December 2024. It ensures that the creation of new homes, employment and infrastructure is targeted in the most sustainable locations for development with the best services, facilities, employment opportunities and transport connectivity.
- 2.16 On top of the existing strategy, Scenario 5 also includes the creation of new settlement(s) and/or new strategic site(s). This ensures that the Council can evidence it has looked at all options to reach the housing target of 18,650 new dwellings. However, it is important to note that at this stage the figures are indicative.

<sup>&</sup>lt;sup>8</sup> This excludes sites with planning permission; 75% of homes that would be delivered as windfalls; and all potential strategic sites.

- Chapter 3 of this consultation document includes indicative figures and maps that show what this scenario might look like in practice.
- 2.17 The Council will maximise higher housing density development where possible, which may help to bridge the gap between the indictive capacity of Scenario 5 and the delivery of the full housing target. However, this approach will be difficult to achieve in much of the district, where the landscape, conservation areas, and historic character of settlements place constraints on building height and layout. The housing density of 106 dwellings per hectare, which is needed from Scenario 5 to deliver the government's full housing target, reflects a highly urbanised form of development, typically characterised by apartment blocks and flatted schemes with limited private outdoor space. This level of intensity is comparable to parts of inner London, such as Woodberry Down in Hackney and Stratford Halo in Newham, where high-rise living is common. Similar densities are also seen in the Temple Quay development in inner-city Bristol, which has been master-planned to accommodate densities exceeding 100 dwellings per hectare. While such densities may be appropriate in city centre contexts, they are generally out of character with the district. Such a density of development can also make it harder to deliver the required mix of housing types, which are important for meeting the needs of all residents.
- 2.18 Scenario 5 is preferable over the other scenarios as it provides a housing land supply with the highest percentage of the government's housing target (79%). It is unlikely that the other scenarios would be accepted as the Council's strategy by an independent Inspector at the Examination in Public when Scenario 5 can deliver the most housing in a sustainable way (subject to further assessment).

#### Questions

Question 1 – Which of the above scenarios has your preference? Why do you prefer this option?

Question 2 – Should the Council consider locating development in locations it considers unsustainable to meet the government housing target? Please explain.

Question 3 – To what extent would you support increasing housing density in developments (such as smaller houses and gardens, more flats or higher buildings) to help meet the full housing target? Please also explain why.

# 3. Indicative figures

#### Context

- 3.1 To deliver the housing target, the Council will need to evidence that it has a sufficient supply of available sites that can be delivered both within five years and for the rest of the plan period. To find suitable sites, amongst other things, the Council has undertaken several 'Calls for Sites' allowing landowners, developers and members of the public to put forward potential sites for development.
- 3.2 The Council has also undertaken an <u>Assessment of Broad Strategic Development Locations</u> (and <u>Appendices</u>) which assesses the suitability of broad locations for strategic development (developments of five hundred or more homes). The study found no 'obvious' sites that could be readily developed. However, it has identified areas that require further detailed assessment (in terms of mitigating constraints etc.) to determine their suitability and the level of development that could occur (if any).
- 3.3 Alongside this consultation, the Council is running another Call for Sites with a specific focus on the areas that have been identified as having potential for further investigation in the Assessment of Broad Strategic Development Locations and within and surrounding settlements identified by the proposed Local Plan Development Strategy. More information on this Call for Sites can be found in Chapter 6.

#### How did the Council select locations?

- 3.4 Many sites are submitted to the Council as potential land for development, whereas further assessment is required to confirm the deliverability of other sites. There can be various reasons why a site is undeliverable, such as it not being available for development. Sites may also be unsuitable for development, for example, because of flood zones, impacts on landscape, protected habitats, historic buildings etc., as well as the sustainability and accessibility of sites.
- 3.5 All submitted sites go through a site selection process which applies a series of filters to progressively identify which sites should be rejected and which should be recommended for allocation. A comprehensive explanation of each of these filters can be found in the <a href="Site Allocation Selection Methodology">Site Allocation Selection Methodology</a> and <a href="Stage 1 Landscape Screening Methodology">Screening Methodology</a>.

#### **Indicative figures**

- 3.6 Based on the sites currently being assessed, the Council has provided a high level indication of the location and level of new development that could be expected in each settlement or location identified in the preferred Local Plan Development Strategy. These high level figures are based on current planning permissions / allocations, windfalls and further sites that have been put forward and identified as potentially deliverable.
- 3.7 It is important to note that some settlements have many homes that already have planning permission or are allocated for development in the already adopted Local Plan. For example, Cirencester has 2,306 homes already with planning permission, which are largely attributed to The Steadings (the Chesterton strategic site). The total number of homes therefore does not necessarily mean that additional sites would be allocated in the Local Plan.
- 3.8 It is also important to note that **these numbers are indicative** of the number of new homes proposed for each settlement or location over the whole Local Plan period; they are in different stages of assessment and **further work is needed to determine the sustainability and viability of the sites. This may result in sites being discounted which would then result in a reduction of homes proposed for a settlement or location.**
- 3.9 Furthermore, additional land is expected to be submitted through the Call for Sites, which may increase the number of homes or the type of development to be proposed in a settlement or location.
- 3.10 It is also important to emphasise that **the selection of the development strategy options and sites at this Regulation 18 consultation stage is an iterative process**. The final development strategy and recommended sites for allocation in the Local Plan will form part of the pre-submission Local Plan, which will undergo a further public consultation in summer 2026 (formally known as a Regulation 19 consultation).
- 3.11 Given the scale of the housing target, it is likely that **all deliverable and developable sites in sustainable locations for growth will likely need to be allocated for development in the Local Plan**. Settlements may therefore receive disproportionately more development than others e.g. settlements outside the Cotswolds National Landscape will normally be expected to receive more development than those inside the Cotswolds National Landscape. Where new strategic growth is planned (i.e. sites of 500 or more homes), the location will be expected (to grow) to include the level of services and facilities of a Non-Principal Settlement as a minimum.

- 3.12 The total estimate of 14,660 homes from Scenario 5 would provide a housing land supply that is 79% of the 18,650 housing target calculated using the government's 'standard method'. However, because the district will likely fall short of delivering its housing target, national rules will consequently require the Council to plan for more homes than are actually needed, just to make sure enough get built. For example, the adopted Local Plan had a minimum requirement for 8,400 homes but included a housing land supply of around 9,600 homes in case any sites were delayed or were not built. This proved to be needed, as the delivery of The Steadings in Cirencester a large site including 2,350 homes and other development was delayed. Scenario 5 relies on the delivery of eight similar large sites of 500 or more homes. Large sites can be difficult to deliver and are often delayed, so Scenario 5 has a higher risk of not delivering housing on time.
- 3.13 There are also challenges in providing some infrastructure for example the water supply and wastewater treatment infrastructure needed to support new housing. Much of the area is already under pressure for water supply, and some sewage treatment facilities need upgrading. Thames Water, the company responsible for most of the district, is facing financial difficulties, which may delay these improvements. As a result, some housing developments may be held back until the necessary infrastructure is in place. Although Scenario 5 plans around 14,660 homes, not all are likely to be built on time. Realistically, around 20% fewer homes may be delivered during the Local Plan period, meaning only about 11,730 homes are expected.
- 3.14 The Council will need to ask neighbouring authorities whether they could accommodate some of the unmet need. The Council would then set a housing requirement in its Local Plan that shows the amount of housing that could be delivered in the Cotswold District and what, if any, that could be delivered in neighbouring authority areas. This may be lower than the number of homes that is needed, but that matches the deliverable / developable housing land supply.
- 3.15 Without the allocation of these sites, the Council will be unable to set its housing requirement in the Local Plan and evidence it has a sufficient supply of deliverable / developable sites. However, this does not mean that development will not happen in these locations. On the contrary, the Council will have less power to require developers to deliver all the necessary infrastructure needed to support these developments. The Council will also be unable to stop development occurring in less suitable locations if developers can evidence that their development is in line with national planning policies as the Council would not have an up to date Local Plan with allocated sites.

3.16 Moreton-in-Marsh was identified in the previous Local Plan consultation stage (also formally known as a Regulation 18 consultation) as a potential location for strategic development. The Council has commissioned specialist consultants to assess the feasibility of strategic development in the town and is currently awaiting this evidence.

Table 2 – Illustrative numbers of houses (non-rounded) delivered by the Council's proposed Development Strategy by 2043 (see Tables 3 and 4 for projected

total figures for new settlements and strategic sites).

		Already committed dwellings			Additional dwellings		
Settlement	Current dwellings <sup>(i)</sup>	Extant planning permissions or sites with a resolution to permit (ii)	Remaining adopted Local Plan site allocations <sup>(ii)</sup>	Windfalls <sup>(iii)</sup>	Indicative additional non- strategic site allocations to 2043	Indicative additional strategic site allocations to 2043	Total estimated homes (2025-43)
<b>Proposed Principal Settlemen</b>	nts						
Andoversford	307	2	52	31	49	1	134
Blockley	616	17	27	37	47	ı	128
Bourton-on-the-Water	1,936	108	ı	81	38	ı	227
Chipping Campden	1,154	18	36	64	110	1	228
Cirencester	9,900	2,306	ı	475	36	396	3,213
Fairford	1,800	143	-	64	265	780	1,252
Kemble	388	6	1	26	_	587	619
Lechlade-on-Thames	1,241	10	9	51	150	ı	220
Mickleton	954	7	1	143	439	1	589
Moreton-in-Marsh	2,663	227	1	196	_	1,712	2,135
Northleach	815	4	49	30	_	_	83
Siddington	339	5	-	21	_	881	907
South Cerney	1,318	6	-	105	_	_	111
Stow-on-the-Wold	1,240	43	-	85	25	_	153
Tetbury	3,257	122	43	106	50	_	321
Upper Rissington	757	6	_	26	_	_	32
Total	28,685	3,030	216	1,541	1,209	4,356	10,352

(please see page 23 for table footnotes)

		Already committed dwellings			Additional dwellings		
Settlement	Current dwellings <sup>(i)</sup>	Extant planning permissions or sites with a resolution to permit (ii)	Remaining adopted Local Plan site allocations <sup>(ii)</sup>	Windfalls <sup>(iii)</sup>	Indicative additional non- strategic site allocations to 2043	Indicative additional strategic site allocations to 2043	Total estimated homes (2025-43)
Proposed Non-Principal Settl	ements						
Avening	412	27	_	46	_	_	73
Bibury	190	3	_	35	_	_	38
Bledington	208	6	_	5	_	_	11
Bourton-on-the-Hill	134	2	_	5	_	_	7
Broadwell	150	6	_	11	_	_	17
Down Ampney	231	28	13	6	369	_	416
Longborough	224	7	_	33	_	_	40
Meysey Hampton	179	1	_	4	_	_	5
North Cerney	72	1	_	26	_	_	27
Poulton	173	0	_	15	18	_	33
Preston	89	8	_	163 <sup>(iv)</sup>	_	960	1,131
Willersey	458	9	57	16	102	_	184
The cluster of Coln St Aldwyns, Hatherop and Quenington	352	2	-	14	67	_	83
Total	2,872	100	70	379	556	960	2,065

(please see page 23 for table footnotes)

		Alrea	Already committed dwellings		Additional dwellings		
Settlement	Current dwellings <sup>(i)</sup>	Extant planning permissions or sites with a resolution to permit (ii)	Remaining adopted Local Plan site allocations <sup>(ii)</sup>	Windfalls <sup>(iii)</sup>	Indicative additional non- strategic site allocations to 2043	Indicative additional strategic site allocations to 2043	Total estimated homes (2025-43)
Other Potential New Settleme	ents and Strategic S	ites					
Strategic extension north of Ampney Crucis	246	-	-	-	-	660	660
New settlement west of Driffield	-	-	-	-	-	840	840
Total	_	0	0	0	0	1,500	1,500
Other Housing Land Supply							
Other Rural Settlements and Open Countryside	_	156	-	619	_	-	775
District-wide planning permissions expected to lapse	-	-27	-	-	-	-	-27
Total		129	0	619	0	0	748
District Total	_	3,259	286	2,539	1,765	6,816	14,665

<sup>&</sup>lt;sup>(1)</sup> Total number of dwellings currently in the settlement. Please note that this figure refers to the settlement only, not the whole parish.

<sup>(</sup>ii) Planning permissions have been assessed to exclude sites that are no longer deliverable / developable.

<sup>(</sup>iii) Rolls forward the annual average number of windfalls delivered between 2011 to 2024, which is assumed to continue up to 2043.

<sup>(</sup>iv) The figure of windfalls in Preston is high due to the large amount of retirement houses that have been built at Siddington Park. The figure of windfalls is largely based on an average of past delivery of sites that come forward that are not allocated in the Plan. This will be recalculated and confirmed for the Regulation 19 Draft Plan.

#### **Development beyond 2043**

3.17 Whilst this consultation primarily focusses on options to deliver development needs up to 2043, some of the strategic sites would likely grow well beyond this. Importantly, if the indicative strategic sites are allocated in the Local Plan, the total number of homes expected to be delivered by these sites would be allocated, even though much of the development would be expected after 2043<sup>9</sup>. This is because the government requires us to plan at least 30 years ahead for these sites to make sure they are well-designed and have the right infrastructure from the start. The indicative total sizes of the potential strategic sites are provided in Table 3, and the total growth of settlements including development beyond 2043 are provided in Table 4.

Table 3 – Indicative number of homes on strategic sites (rounded)

Strategic Site	Estimated homes up to 2043	Estimated homes up to 2043 and beyond
Strategic extension north of Ampney Crucis	660	660
Strategic extension south of The Steadings, Cirencester	400	1,290
New settlement west of Driffield	840	2,100
Strategic extension north-east of Fairford	780	1,400
Strategic extension south-west of Kemble	590	1,070
Strategic extension north, south and east of Moreton-in-Marsh	1,710	3,970
Strategic extension south of Preston	960	2,510
Strategic extension north, south and west of Siddington	880	1,100

Table 4 – Total growth of relevant settlements (rounded) up to and beyond 2043

Settlement	Current dwellings (i)	Total estimated homes up to 2043 and beyond (ii)
Ampney Crucis	246	660
Cirencester	9,900	4,110
Fairford	1,800	1,870
Kemble	388	1,100
Moreton-in-Marsh	2,663	4,390
Preston	89	2,680
Siddington	339	1,130

<sup>(</sup>i) Total number of dwellings currently in the settlement. Please note that this figure refers to the settlement only, not the whole parish.

<sup>(</sup>ii) Figure includes current planning permissions / allocations, windfalls and further sites that have been put forward and identified as potentially deliverable on both strategic and non-strategic sites.

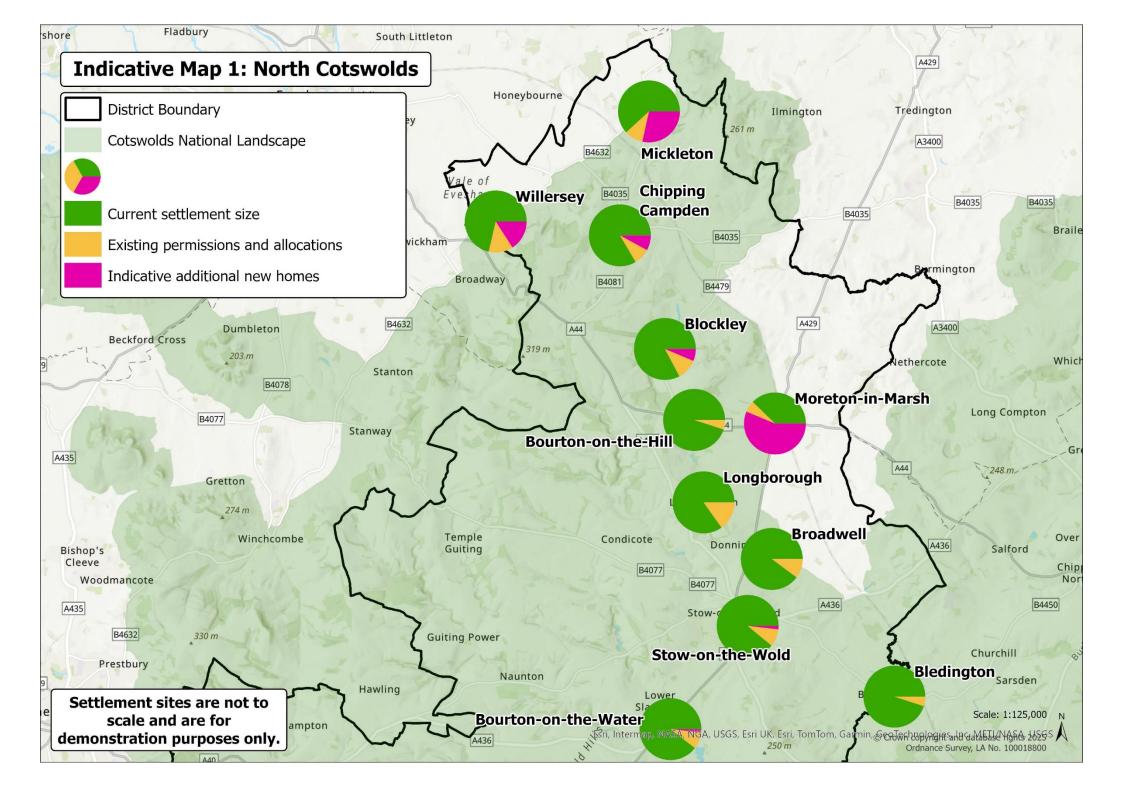
<sup>&</sup>lt;sup>9</sup> Please note that the Local Plan cannot restrict homes from being delivered sooner if the necessary infrastructure is provided. Similarly, sites may be delayed – e.g. if there are delays to infrastructure being delivered (e.g. the Thames Water issue) or if homes sell slower than anticipated.

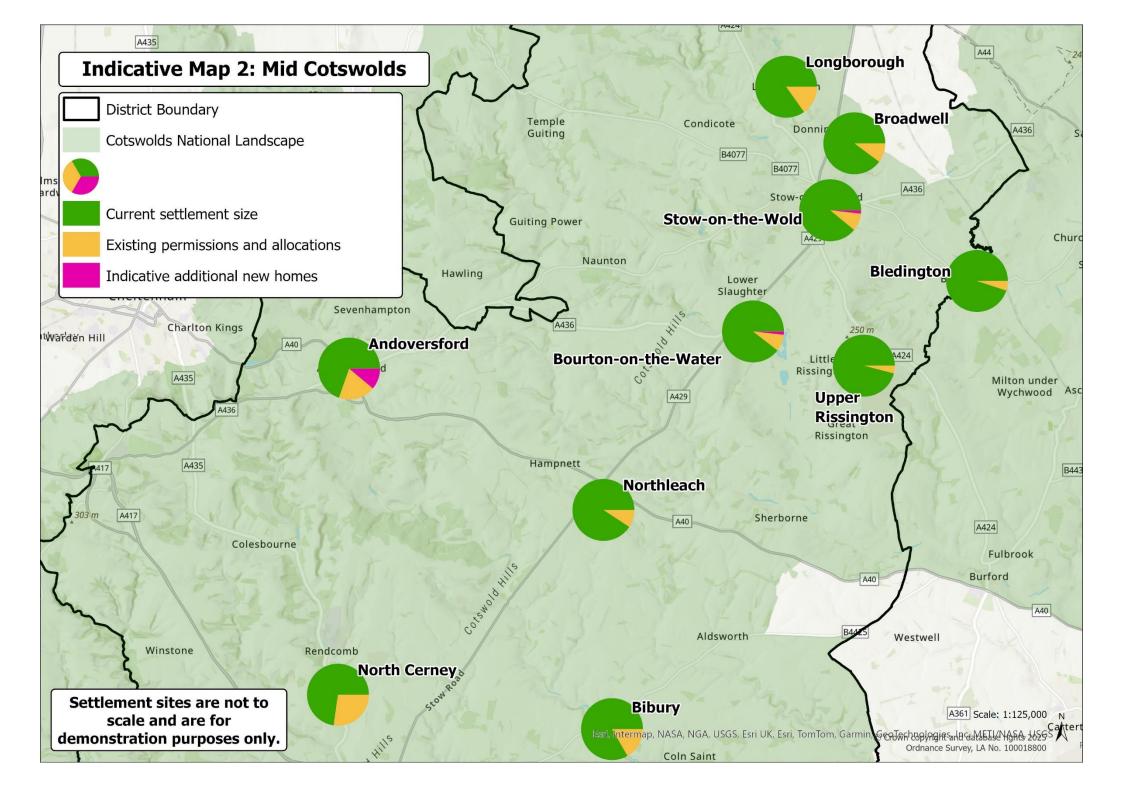
### **Indicative maps**

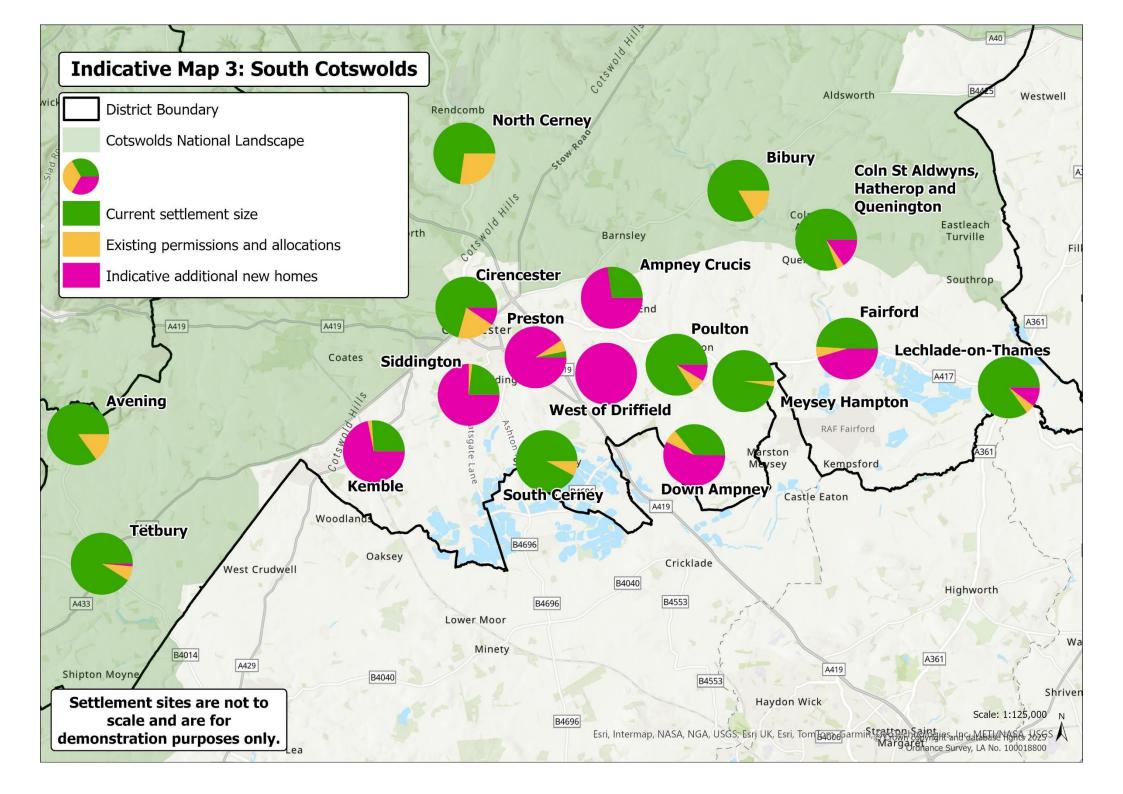
- 3.18 To assist with visualising the location and level of growth, the Council has also produced the maps below. The pie charts in maps 1 to 3 mark the likely location and level of new development. Each pie chart shows the current size of the settlement in green, the existing planning permissions and site allocations in yellow, and the indicative number of additional new homes in pink. The latter includes the 'Estimated homes up to 2043 and beyond' figure from Table 3.
- 3.19 Map 4 gives a high level indication of the location of the potential new strategic sites. The arrows show which direction the settlements could potentially grow, based on areas that may be available for development. They are general indicators, and the start and end points of the arrows do not denote specific locations nor the extent of the potential strategic site. Further investigation on maintaining green buffers between towns and surrounding villages will need to be undertaken.

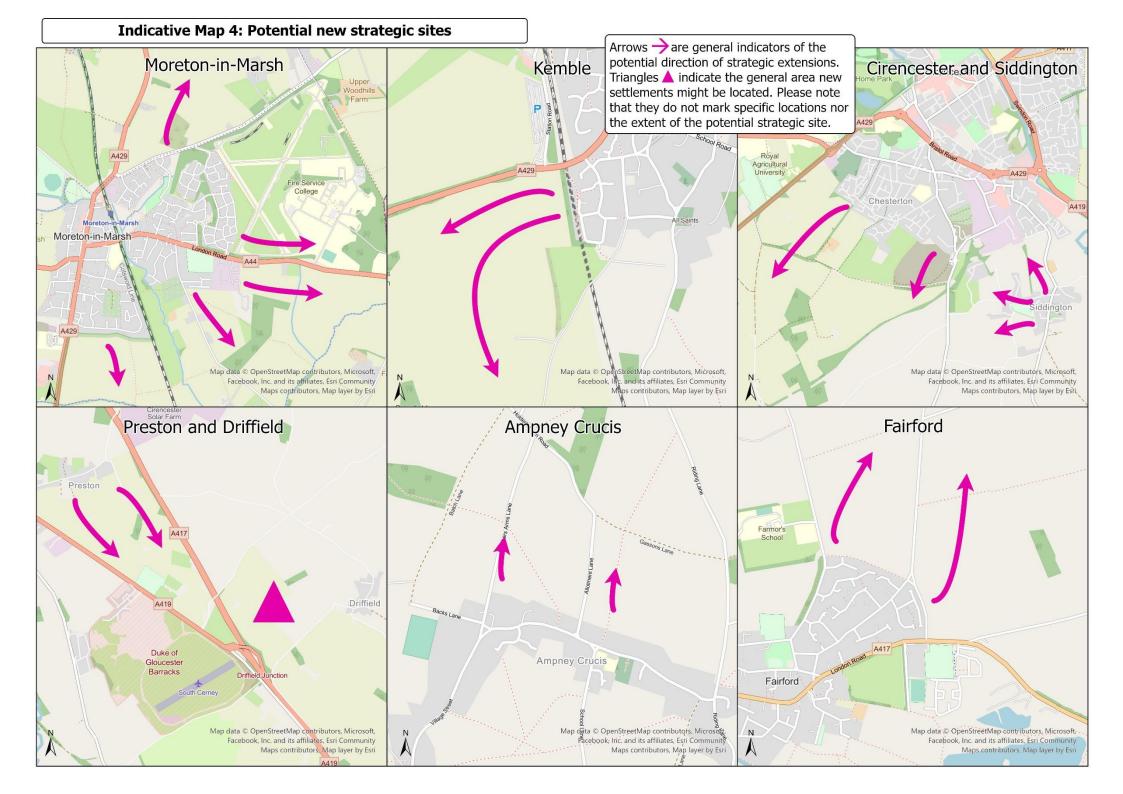
#### Question

Question 4 – Do you think the proposed level of development up to 2043 – the end of the Local Plan period – and beyond 2043 is sustainable? If not, what provisions would need to be added to the settlement(s) to make them a sustainable location for the proposed level of development? These could be new services, facilities or the provision of infrastructure. Please clearly state which settlement(s) your comment relates to.









# 4. Beyond conventional housing

- 4.1 The government has put housing development at the forefront as shown by the introduction of the new, mandatory 'standard method' for calculating the number of homes needed in each local planning authority area. Accordingly, there is a focus on delivering on this target in this consultation. However, the updated development strategy will also look at the needs/requirements and land supply for other types of development such as employment needs. Moreover, the Council also needs to take into account infrastructure needs and requirements that arise from development in the updated Local Plan. Evidence in regard to employment and infrastructure needs and sites has been commissioned and will form part of the next consultation on the Regulation 19 draft Local Plan.
- 4.2 The updated Local Plan itself will also be more than an update to the development strategy. It also aims to be 'Green to the Core' and protect the historic and natural environment, etc. These items have already been covered by the previous Local Plan consultation stage (also formally known as a Regulation 18 consultation) in February 2024 and comments received during that consultation remain valid. The updated version of these policies will be consulted upon during the Regulation 19 consultation in 2026.

#### **Employment and commercial development needs**

- 4.3 Cotswold District Council is currently participating with all other local planning authorities in Gloucestershire in a county-wide Housing and Employment Needs Assessment. This study, which will be undertaken by an external consultant, will set out the employment needs as well as the types of housing required in the district and will inform policies accordingly. The study is expected to be completed by the end of 2025, and the results will feed into the policies which will be consulted upon in 2026.
- 4.4 The Council is also procuring a Town Centres Study which will identify retail and other commercial development needs for the main town centres.
- 4.5 Despite the results of the Housing and Employment Needs Assessment and Town Centres Study not being available until later this year, the Council still welcomes any comments regarding employment and commercial development needs in the district, especially in relation to the areas with potential for strategic development as set out in Chapter 3.

# **Gypsy and traveller needs**

- 4.6 The Council is also participating with all other local planning authorities in Gloucestershire in a county-wide Gypsy and Traveller Accommodation Assessment. This study, which will be undertaken by an external specialist consultant, will set out the needs for different types of gypsy and traveller accommodation over the Local Plan period. The study is expected to be completed by the end of 2025, and the results will feed into the policies which will be consulted upon in 2026.
- 4.7 Despite the results of the Gypsy and Traveller Accommodation Assessment not being available until later this year, the Council still welcomes any comments regarding gypsy and traveller needs in the district and how these can be delivered if there is a shortfall in the supply of sites.

#### Infrastructure needs

- 4.8 New housing needs to be accompanied by the necessary infrastructure. Cotswold District Council has instructed an external specialist consultant to undertake an update to its Infrastructure Delivery Plan which will set out infrastructure needs and requirements of all development proposed in the Local Plan update.
- 4.9 The Infrastructure Delivery Plan will look at a large range of infrastructure items and will determine the infrastructure requirements and needs for each allocation in the updated Local Plan:
  - Community and Culture
  - Education
  - Healthcare
  - Transport (Highways)
  - Public Transport
  - Walking and Cycling
  - Open Space
  - Sport and Recreation
  - Flood Management
  - Water Supply and Waste Water (sewage)
  - Emergency Services
  - Utilities
  - Digital Infrastructure (telecoms)
  - Renewable Energy

4.10 The infrastructure requirements/needs are dependent on the recommended site allocations, which have not yet been determined at the time of this consultation. The Infrastructure Delivery Plan is therefore still in its early stages. Although the Call for Sites might result in new potential development sites being identified, the Council still welcomes comments on infrastructure needs and requirements either in general or for any of the high level locations identified in the previous chapter.

### Question

Question 5 – Are there any other matters beyond conventional housing that have not been listed here that you think should be considered in the Development Strategy for the updated Local Plan?

# 5. Revised vision and objectives

5.1 The Cotswold District Council Local Plan 2011 to 2031 includes a vision statement setting out the aspirations of the plan for the future. This is supported by a set of objectives. These vision and objectives are being revised in the updated Local Plan to reflect the Council's Corporate Priorities as well as any changes in national legislation. The draft revised Vision and Objectives are as follows:

#### 5.2 Vision

By 2043, Cotswold District will be a resilient, inclusive, and forward-looking rural district that has successfully responded to the climate crisis, conserved and enhanced the Cotswolds National Landscape, delivered sustainable communities, and supported a vibrant, low-carbon economy. Development will have been guided by a spatial strategy that prioritises environmental stewardship, social equity, and economic vitality, while respecting the district's unique landscape, heritage, and character.

The district will have delivered a diverse range of housing, including a significant increase in socially rented and affordable homes, enabling residents of all ages and backgrounds to live securely and sustainably. New settlements and strategic sites will have matured into thriving communities, offering high-quality homes, employment opportunities, and essential services, all supported by integrated infrastructure and sustainable transport networks. Existing Principal and Non-Principal settlements will have grown proportionately, enhancing their role as local service centres while maintaining their distinct identities.

The district will have transitioned to zero-carbon development, with new buildings and infrastructure designed to minimise energy use and maximise renewable energy generation. Biodiversity Net Gain will be embedded across all development, contributing to a richer natural environment and improved ecological resilience.

Transport emissions will have been significantly reduced through investment in active travel infrastructure, public transport, and strategic growth focused around transport nodes. Communities will be healthier, more connected, and better supported by local services, green spaces, and digital infrastructure.

Cotswold District will continue to be "Green to the Core," with planning decisions consistently reflecting the long-term interests of people, place, and planet.

## 5.3 **Objectives**

# a. Respond to the climate crisis through adaptation and mitigation

- Require all new development to be zero-carbon and climate-resilient.
- Support the provision of renewable energy schemes and promoting community owned renewables initiatives.
- Locate development away from flood-prone areas and promote water and energy efficiency.

#### b. Conserve and enhance the natural, built, and historic environment

- Preserve the high quality, local distinctiveness, and diversity of the natural and historic environment.
- Support the sympathetic retrofit of historic buildings.
- Conserve and enhance the distinct character of the Cotswolds National Landscape and open countryside.
- Promote high-quality, sustainable design and green infrastructure that supports health and wellbeing.

# c. Deliver inclusive, healthy, and affordable housing

- Provide a diverse mix of housing types and tenures, with a focus on socially rented homes.
- Ensure development supports positive health outcomes and embeds local health and wellbeing strategies.

#### d. Enable a vibrant, low-carbon local economy

- Support the transition to a low-carbon economy and promote local employment.
- Encourage the vitality and viability of town and village centres as places that support a range of activities and uses such as shopping, leisure, cultural and community activities; as well as providing access to affordable homes.
- Promote sustainable tourism.
- Maintain Cirencester's role as a key employment and service centre.

#### e. Promote sustainable transport use and connectivity

- Reduce transport emissions by encouraging walking, cycling, and public transport.
- Focus development on accessible locations with strong transport links.

 Create active transport hubs to aid health outcomes and reduce emissions and pollution.

# f. Ensure infrastructure and services support sustainable communities

- Deliver infrastructure, services, and facilities that meet the needs of residents and businesses.
- Ensure the required infrastructure, as set out in the Infrastructure Delivery Plan, is delivered in a timely manner.

# Question

Question 6 – Do you agree with the vision and objectives? Or is there anything else that should be covered in the vision and objectives? Please explain.

#### 6. Call for sites

- 6.1 As part of the preparation of the Local Plan, the Council is inviting submissions of potential development sites for consideration. This is an opportunity for landowners, developers, agents, and other interested parties to suggest sites that may be suitable for future development.
- 6.2 We are calling for sites for all types of development needs identified in the Local Plan, including:
  - · market and Affordable Housing;
  - employment / commercial development;
  - rural exception sites for Affordable Housing;
  - gypsy and traveller pitches;
  - renewable energy;
  - new country park(s); and
  - other types of development that may be needed.
- 6.3 Submissions should include:
  - 1. A completed New Site Submission Form
  - 2. A clear site location plan
  - 3. Supporting information that demonstrates the site's suitability for development and the delivery timescales of the proposed development.
- 6.4 The <u>Assessment of Broad Strategic Development Locations</u> has narrowed down the potential locations for strategic development. These have been marked as 'Broad Zones' on the map below. Although the Council is keen to confirm all land that is available for development, the Council is especially interested in any available land for strategic growth in these Broad Zones. For more detailed information, please see the maps in Appendix A of the Assessment of Broad Strategic Development Locations. Similarly, we are particularly keen to hear about potential sites within and surrounding the Principal and Non-Principal Settlements identified in the Preferred Development Strategy.
- 6.5 In addition, the Council would find it helpful if landowners and agents who have previously submitted sites could:
  - Reconfirm the availability of their sites.
  - Provide any further relevant updates regarding the delivery or progress of those sites.

- 6.6 Site submissions can be made on any land that is available for development. At this stage, the Council is seeking sites that can deliver five or more dwellings or economic development on sites of 0.25 hectares or more (or 500 square metres or more of floor space). The Council is unlikely to allocate land in areas with high flood risk (i.e. Flood Zones 3 identified on the <u>Flood Risk Map</u>), although such land may be suitable for green or blue infrastructure associated with the development.
- 6.7 To submit a new site, please complete a New Site Form which can be found on the consultation document page.
- 6.8 Please ensure that all submissions and updates are made by midnight, **Friday 2<sup>nd</sup> January 2026**. Late submissions may not be considered.

