

EVIDENCE PAPER: DEVELOPMENT STRATEGY DECEMBER 2014



COTSWOLD
DISTRICT COUNCIL

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1. Introduction

- 1.1 The Development Strategy has evolved through various stages over several years. The purpose of this Topic Paper is to:
- Explain these stages, leading up to the publication of the Preferred Development Strategy (PDS) in June 2013 (Part One).
 - Refine the PDS, taking account of updated evidence; consultation responses; and work that has been undertaken on allocating sites for housing development in the District's most sustainable settlements (Part Two).
- 1.2 The PDS was a pivotal point in the evolution of the Development Strategy because it was the Council's first attempt to distribute the District-wide housing requirement to 2031 to specific settlements. The resulting indicative levels of housing proposed in (then) 17 settlements¹ were a starting point for informing subsequent community engagement events, which explored potential site-specific allocations, primarily for housing development. The PDS was accompanied by the Development Strategy Evidence Paper (April 2013), which set out the rationale for, and evidence used to inform, the proposed distribution of housing.
- 1.3 The PDS was published shortly after the Council had made its decision to switch from producing an LDF-style Core Strategy to a comprehensive Local Plan², incorporating a development strategy; site allocations; and a full suite of policies.
- 1.4 In December 2013, the Council's Cabinet took the opportunity to endorse the thrust of the PDS and make some minor amendments. These were made in the light of representations received in response to the Consultation Paper and the emerging latest review of the Strategic Housing Land Availability Assessment (SHLAA), which was eventually published in March 2014.
- 1.5 Sustainability appraisal (SA) had been undertaken at the Second Issues and Options (2nd I&OP) and PDS stages and this helped to inform the preparation of the Development Strategy. Various spatial options were assessed as part of the 2nd I&OP and a number that performed poorly were rejected³. The SA at the PDS stage assessed strategic sites and spatial distribution options.
- 1.6 To inform the preparation of the Local Plan Reg. 18 Consultation: Development Strategy and Site Allocations (December 2014), SA was undertaken by consultants (URS) in September 2014, of all potentially deliverable housing and employment sites in the 18 settlements identified in the Development Strategy⁴. At about the same time, URS undertook a 'points of the compass' analysis, which considered broad segments defined around each of the 18 settlements. The purpose of this exercise was to rank each of the 'segments' in terms of sustainability, together with an explanation of the rankings. The 'points of the compass' analysis was incorporated into the Interim Sustainability Appraisal Report (November 2014).

¹ Down Ampney was subsequently added – CDC Cabinet report 5th December 2013

² CDC Portfolio Holder report 21st March 2013

³ See paragraph 4.2 of this Paper for further details.

⁴ Interim Sustainability Appraisal Report to accompany the Local Plan Reg. 18 Consultation: Development Strategy and Site Allocations (URS, November 2014)

PART ONE: EVOLUTION OF THE DEVELOPMENT STRATEGY

2. Core Strategy Issues and Options Paper (2007)

- 2.1 This consultation paper touched on the issue of where development should go. It referred to the extant Local Plan strategy, based on Cirencester and nine other 'principal settlements', and gave examples of other potential approaches, including:
- Focusing development in and around Cirencester
 - Placing most development in the District's market towns and larger villages
 - Spreading development across larger and smaller villages as well as market towns
 - Using public transport routes and transport corridors to guide new development
 - New settlements
- 2.2 Questions 27 and 28 (page 41) asked: (i) which option, or mix of options, was preferred and whether there were any other suggestions: and (ii) what sustainability factors were considered important when assessing settlements' suitability for locating development.
- 2.3 The main points raised by representations addressing these questions were summarised as follows:
- (i) Strong support for locating development in Cirencester and the market towns. A few comments suggested spreading development across the District.
 - (ii) A general acknowledgement of the issues that make settlements sustainable, including: access to services, avoiding the use of private cars, etc. However, a few respondents felt that villages needed further development to "*make them sustainable*" and thereby increase service provision.

3. Core Strategy Settlement Hierarchy Topic Paper (November 2008)

- 3.1 The Settlement Hierarchy Topic Paper (SHTP) aimed to establish a hierarchy for the District's settlements based on their current role and service provision. It had been informed by national guidance available at the time, in particular PPS1 (Delivering Sustainable Development); PPS3 (Housing); PPS7 (Sustainable Development in Rural Areas); and PPS13 (Transport). It was also largely developed using settlement criteria that had evolved through preparation of the Regional Spatial Strategy for the South West (RSS). At that time, district-wide plans were required to conform with regional strategies. The RSS included two settlements categories: Policy B – Market Towns; and Policy C – Small Towns and Villages).
- 3.2 A matrix was appended to the SHTP, which compared various services and facilities available in 21 settlements. The methodology used in the matrix built upon the one used in the extant Local Plan⁵. This was seen as a valid starting point in devising the hierarchy for reasons set out in paragraph 3.5 of the SHTP. The settlements included the following 10 towns and villages, which had been identified in the Cotswold District Local Plan 2001-2011 Development Strategy:

⁵ SHTP paragraph 4.5 acknowledges that the methodology is fairly crude but that its purpose was to highlight differences between the roles of the respective settlements.

Cirencester	Moreton-in-Marsh
Bourton-on-the-Water	Northleach
Chipping Campden	South Cerney
Fairford	Stow-on-the-Wold
Lechlade	Tetbury

3.3 The other 11 settlements assessed in the matrix were:

Andoversford	Kempsford
Avening	Mickleton
Birdlip	Siddington
Blockley	Upper Rissington
Down Ampney	Willersey
Kemble	

[N.B. Birdlip and Upper Rissington scored significantly less than any of the other settlements].

3.4 Using these findings, the SHTP proposed three options for a settlement hierarchy based upon various settlement categories.

3.5 The main points raised by representations on the SHTP are set out below in Table 1.

MAIN POINTS RAISED BY REPRESENTATIONS	RESPONSE/ ACTIONS
Cotswold Settlement Hierarchy will need to be aligned with RSS Policies B and C	This was done and new settlement categories (B1, B2, C1 and C2) were included in the 2 nd I&OP.
To make the weighting system in the matrix in the Appendix more meaningful and assist in differentiating between the respective service centre functions, new categories and different 'weightings' were suggested.	There are potentially infinite variations of permutations and weightings. It was considered doubtful that minor changes to the scoring would make much difference overall. The basis on which different settlements were categorised was explained in the document, and this was felt to be adequate for distinguishing between different types of settlements in the District.
Option 1 (Cirencester; Market Towns; Key Local Service Centres; Small Local Service Centres as a basis for a settlement hierarchy) received most support.	Taken forward as an option in the 2 nd I&OP.
Service provision to be re-examined in the following settlements and updated as required: <ul style="list-style-type: none"> ○ Down Ampney ○ Chipping Campden ○ Mickleton ○ Siddington ○ Stow-on-the-Wold (include a score for employment in the settlement) 	The service provision of all these settlements were re-examined, and an updated table was produced in Settlements' Sustainability Matrix in section 4 of the 2 nd I&OP Supporting Information (including post offices, which were erroneously omitted from the SHTP Appendix).

○ Willersey	
Poulton and Temple Guiting should be included as potential settlements in the hierarchy.	Poulton and Temple Guiting were assessed in the Settlements' Sustainability Matrix in section 4 of the 2 nd I&OP Supporting Information, but scored poorly and did not feature in any of the three options ⁶ .

TABLE 1: main points raised by representations made in response to the Settlement Hierarchy Topic Paper

4. Core Strategy Second Issues and Options Paper & Supporting Information (December 2010)

- 4.1 Although the Government had announced its intention to revoke regional strategies in May 2010, it had also been made clear that evidence underpinning emerging RSS could be used to help inform emerging district-level plans. Accordingly, the Council continued with its planned consultation on the Second Issues and Options Paper 2010 (2nd I&OP), parts of which had been substantively informed by the emerging RSS for the South West.
- 4.2 The three 'spatial strategy options' put forward for consultation in the 2nd I&OP (SS2, SS3 and SS9) were essentially based on the outcomes of consultation on the SHTP. The 2nd I&OP Supporting Information Paper explained that, besides these three spatial strategy options, five others had been tested through sustainability appraisal and ruled out for further consideration. Essentially, those options would have located the District's housing requirement to 2031 in the following places:
- SS1 – In and around Cirencester
 - SS4 – Any settlement in the District
 - SS5 – Along public transport routes and transport corridors
 - SS6 – At new or expanded settlements
 - SS7 – In areas outside the AONB
 - SS8 - Focus on settlements that welcomed further development
- 4.3 Paragraph 5.5 of the 2nd I&OP explained that most SHTP consultation responses indicated the option considered most suitable for accommodating growth was the one which identified four 'levels' of settlements. The relevant RSS settlement categories B (Market Towns) and C (Small Towns and Villages) were split into two sub-categories each to create the four levels. The settlements assessed as meeting the criteria set out under those levels were as follows:
- Cirencester (Category B1);
 - Bourton-on-the-Water, Moreton-in-Marsh, Tetbury ; (Market Towns - Category B2);

⁶ Paragraph 5.7 of the 2nd I&OP stated: *"Settlements with fewer facilities were considered to be unsuitable for accommodating further development that would be unsustainable in a rural area."* Although Kempford scored lower than Poulton and Temple Guiting, the village featured in Option SS3 while the other two did not. That anomaly was rectified later in the process when the sustainability credentials of all three villages (along with numerous others) were reassessed through the R&FSS. Following that reassessment, the DSEP concluded that Kempford, Poulton and Temple Guiting should be excluded from the PDS. Upper Rissington, conversely, was 'promoted' to the PDS following receipt of an earlier appeal decision, which had allowed substantial housing and employment development along with significant improvements to services and facilities.

- Chipping Campden, Fairford, Lechlade, Northleach, South Cerney, Stow (Small towns - Category C1);
- Andoversford, Avening, Blockley, Down Ampney, Kemble, Kempsford, Mickleton, Siddington, Willersey (Local Service Centres - Category C2);

4.4 At the time of producing the Core Strategy, PPS12 (Local Spatial Planning) allowed for the identification of areas of strategic significance⁷. In line with that guidance, the 2nd I&OP proposed two ‘strategic’ sites at Cirencester and Tetbury, the District’s largest towns. No other potential development sites were put forward because these would have been the subject of a subsequent site allocations DPD.

- Cirencester had been identified in successive Gloucestershire Structure Plans as one of the County’s five main towns, after Gloucester and Cheltenham, and alongside Stroud and Tewkesbury. Importantly, it was also identified as the main centre in Cotswold District where ‘most’ of the District’s development requirements should be met. Nothing had changed in recent years to alter Cirencester’s pre-eminent position. Although Cirencester is constrained by various factors, areas to the south and east of the town have comparatively few constraints and land to the south of Chesterton was put forward as a potential area for development of strategic significance.
- The extant Local Plan had identified Tetbury (after Cirencester) as one of three Principal Settlements that were more sustainable than any of the District’s other main service centres. A ‘strategic’ proposal was put forward on the northern side of Tetbury for a number of reasons (set out on pages 46 and 47 of the 2nd I&OP Supporting Information), including a recommendation in the 2007 Employment Land Study⁸.

4.5 The main issues raised by representations on the three proposed strategic options are summarised in Table 2 below.

STRATEGY OPTION	COMMENTS OF SUPPORT	COMMENTS AGAINST
SS2: LOCATE DEVELOPMENT AT CIRENCESTER, MARKET TOWNS, SMALL TOWNS AND LARGER LOCAL SERVICE CENTRES	<ul style="list-style-type: none"> • Appropriate to locate development at the most sustainable locations. • A community relies on access to services; this strategy ensures higher degree of sustainability. • Should concentrate development on larger settlements where good facilities exist. • Would enable towns to increase their self-containment. • Support for development in towns that have sufficient transport links, local employment and medical facilities. • Majority of housing should be 	<ul style="list-style-type: none"> • Should not include Kemble, Blockley, Andoversford. • Unnecessarily restrictive. Too focused on Cirencester and market towns, less consideration of rural settlements.

⁷ Paragraph 4.6 – “Core Strategies may allocate strategic sites for development. These should be those sites considered central to the achievement of the strategy. Progress on the Core Strategy should not be held up by the inclusion of non-strategic sites.”

⁸ Employment Land Study (Donaldsons/ White Young Green, March 2007)

http://consult.cotswold.gov.uk/portal/fp/empstudy/employment_land_study_2007?tab=files

STRATEGY OPTION	COMMENTS OF SUPPORT	COMMENTS AGAINST
	<p>accommodated in Cirencester and market towns, with limited development in smaller towns and service centres.</p> <ul style="list-style-type: none"> • Support concentration at larger settlements. • Most beneficial option for sustainable transport and most sustainable pattern of development. 	
<p>SS3: LOCATE DEVELOPMENT ACROSS CIRENCESTER, MARKET TOWNS, SMALL TOWNS AND THOSE LOCAL SERVICE CENTRES WITH A REASONABLE LEVEL OF FACILITIES</p>	<ul style="list-style-type: none"> • Support for this option as concerned that focusing development at limited settlements will lead to decline in villages. • Support as this option still supports areas with services. • Prefer this option as small communities may want some development. • Support for this less prescriptive, more flexible approach, helping communities meet identified local demand. • It will help smaller settlements retain their services. 	<ul style="list-style-type: none"> • This option has carbon emissions implications. • Less favourable as employment is important
<p>SS9: LOCATE DEVELOPMENT ACROSS CIRENCESTER, MARKET TOWNS, SMALL TOWNS AND THOSE LOCAL SERVICE CENTRES WITH A REASONABLE LEVEL OF FACILITIES INCLUDING EMPLOYMENT</p>	<ul style="list-style-type: none"> • This is more flexible in terms of type of services • This option may help address long distance commuting. • May provide the opportunity for some desirable facilities to be developed in smaller settlements. • Support the option to spread demand and promote sustainable growth. • This is the most sustainable option due to the importance of employment. 	<ul style="list-style-type: none"> • It is limited by only allowing new development in those settlements

TABLE 2: Main issues raised by representations responding to the three proposed strategic options SS2, SS3 and SS9

4.6 In summary, Spatial Strategy Option SS3 best met the requirements of communities and the consultation responses. This strategy would allow for most development to be focused at the market towns, while also supporting the other sustainable locations. This could further support the sustainability of villages with communities identifying areas for growth through adopted Neighbourhood Plans.

- 4.7 There was a recurring contradiction in representations received on the 2nd I&OP between those supporting a concentrated strategy and those calling for development to be spread across the District. However, it was clear that there is concern about developing greenfield land, while there was also a desire to support rural villages with appropriate development that would help to retain services and facilities. A number of additional, smaller settlements were suggested, including: Ampney Crucis; Bibury; Chedworth; Coates; North Cerney; Sapperton; Temple Guiting; and Upper Rissington. Others objected to the inclusion of certain settlements in the various options.
- 4.8 Representations were received, mostly objections to the likely amount of development to the south of Chesterton, Cirencester, for various reasons. These were repeated in far greater numbers at the PDS stage (see Table 4 below). There were also various representations to the proposed land identified to the north of Tetbury, with various reasons being put forward objecting to development in that area.

5. Role and Function of Settlements Study (July 2012)⁹

- 5.1 The purpose of the Study (R&FSS) was: (i) to develop a methodology which identified the current role and function of the more sustainable settlements in the District; (ii) their inter-relationships; and (iii) their potential future roles. The Study built upon the earlier settlement hierarchy work and was prepared in light of the NPPF, which was published in March 2012.
- 5.2 The scope of the R&FSS and settlement classification was defined in Chapter 2 (Methodology).
- The list of 21 settlements from the Settlement Hierarchy Topic Paper 2008 was the starting point.
 - The list was supplemented by a further 10 settlements, which had arisen from consultation responses on the SHTP and 2nd I&OP
 - A cluster of 3 further settlements was added in response to issues raised in the SHTP.
- 5.3 Paragraphs 2.9 – 2.15 explained that the findings of the R&FSS would test the settlement hierarchy previously developed through the Core Strategy work and presented in the 2nd I&OP. The conclusions of the R&FSS would then be used, along with the findings of other on-going work (including the housing evidence review, economy study, capacity of settlements, etc.), to inform the Local Plan Development Strategy.
- 5.4 The following 34 settlements were considered in the Role and Function Study:

Cirencester ¹⁰	Willersey
Bourton-on-the-Water	Avening
Moreton-in-Marsh	Birdlip
Tetbury	Down Ampney
Chipping Campden	Kempsford,
Fairford	Ampney Crucis
Lechlade	Bibury
Northleach	Chedworth
South Cerney	Coates

⁹ Published alongside Preferred Development Strategy

¹⁰ Stratton included as part of Cirencester

Stow-on-the-Wold	North Cerney
Andoversford	Poulton
Blockley	Sapperton
Kemble	Temple Guiting
Mickleton	Didmarton / Leighterton
Siddington	Coln St Aldwyns /
Upper Rissington	Hatherop / Quenington

6. Local Plan Development Strategy Evidence Paper (April 2013)

- 6.1 This Paper (DSEP) was produced after the review of housing requirements 2011-2031 for the District had been produced. The DSEP provided the evidence and reasoning for proposing 17 settlements in the PDS and the provisional distribution of indicative levels of housing to each of them.
- 6.2 The main evidence used to help inform the DSEP (and PDS) included:
- (a) Role and Function of Settlements Study (CDC, July 2012);
 - (b) Cotswold Economy Study (Peter Brett Associates, October 2012);
 - (c) Economy Evidence Paper (CDC, January 2013);
 - (d) LDF Core Strategy (all CDC):
 - Issues and Options Paper (October 2007);
 - Settlement Hierarchy Topic Paper (November 2008);
 - Second Issues and Options Paper and Supporting Information (December 2010); and
 - resulting representations;
 - (e) Report on Visioning Workshop – Land South West of Chesterton (ATLAS, October 2012);
 - (f) A Review of Future Housing Requirements for Cotswold District (Dr. Keith Woodhead, February 2013);
 - (g) Physical capacity of the settlements to accommodate further growth, based largely upon:
 - Strategic Housing Land Availability Assessment - SHLAA (CDC, October 2010);
 - SHLAA Review (CDC, October 2012);
 - Review of existing and potential employment sites, undertaken in the Employment Land Study (White Young Green, 2007) and refreshed as part of the November 2012 Cotswold Economy Study;
 - Study of Land Surrounding Key Settlements in Cotswold District (White Consultants, June 2000);
 - Local Countryside Designation Review: Protected Open Space Policy Areas (White Consultants, February 2002);
 - Strategic Flood Risk Assessment Level One (Halcrow, September 2008);
 - Interim Infrastructure Delivery Plan (Arup, May 2013).
 - (h) Sustainability Appraisal (CDC):
 - Core Strategy SA Scoping Report (October 2007)
 - Core Strategy SA Scoping Report, version 2 (May 2008)
 - Core Strategy Second Issues and Options Paper – Supporting Information (December 2010)
 - Assessment of Spatial Options
 - Strategy Assessment of Core Strategy Objectives

- SA Interim Report Local Plan (May 2013):
 - Update to Scoping Report
 - Strategic Sites
 - Spatial Distribution Options
 - Employment Distribution Options
- (i) Parish-level plans and appraisals.
- 6.3 Following the revocation of regional strategies, the Council decided to no longer apply a rigid settlement hierarchy across the District. A more flexible approach was considered desirable, recognising that all of the settlements are unique; have varying roles and functions; differing environmental sensitivities; and quite differing needs, demands and issues. Therefore, each settlement was taken on its merits, based on the most up-to-date evidence available, with the proviso that Cirencester clearly remained the District's predominant centre by a very considerable margin.
- 6.4 In order to evaluate how the 34 settlements¹¹ compared in terms of social and economic sustainability, a simple scoring system was applied to the findings of the RFSS (explained on p.4 of the DSEP). Along with other evidence, this helped to determine which settlements should be included in the emerging Development Strategy.
- 6.5 Some of the smaller settlements scored poorly in terms of sustainability and were excluded from the PDS due to their lack of services, facilities, poor access to public transport, etc. A number of them also had few or no sites identified in the SHLAA¹²; therefore, it was unlikely that the Strategy would benefit from the inclusion of any of these settlements. Instead, a separate, criteria-based policy was considered to be the most appropriate mechanism for facilitating appropriate development in smaller settlements that could help to sustain those rural communities, and rural areas around them¹³.
- 6.6 The SHLAA had assessed that at least 40 units could be delivered in the most 'sustainable' settlements between 2011 and 2031 (see Appendix C for explanation). The rationale for the threshold was set out in the DSEP at para. 22: *"In order for the Strategy to deliver new housing, there must be reasonable certainty that sites of a sufficiently 'strategic' scale will be developed up to 2031. When considering which settlements to specifically identify in the Strategy, the Council has used a capacity of 40 dwellings as the lowest qualifying limit. The capacities of settlements have derived from the SHLAA's assessment of sites deliverable within 5 years or potentially developable between 6 and 20 years..."*
- 6.7 15 settlements were excluded from the PDS due to a combination of sustainability considerations and a lack of deliverable land for housing. Kempsford and Didmarton/Leighterton had sites that would deliver more than 40 dwellings, but were ruled out because of their comparative lack of facilities and services¹⁴.

¹¹ Stratton included as part of Cirencester.

¹² Strategic Housing Land Availability Assessment Review (CDC, October 2012)
http://consult.cotswold.gov.uk/portal/fp/shlaa_2/shlaa_2012_review/cotswold_district_strategic_housing_land_availability_assessment_review_-_october_2012?tab=files

¹³ Rural Housing Topic Paper (CDC, November 2014)

¹⁴ In May 2013, prior to publication of the PDS, an application for 11 affordable and 18 open market family homes was permitted at Kempsford. That application, which included the provision of sports

- 6.8 A proposed new settlement at the former Aston Down airfield was proposed in a consultation version of the Stroud Local Plan¹⁵. The site straddles the district boundary and some 80 units of the resulting development were expected to spill over into Cotswold District. Although CDC, at the time, cooperated with SDC on this matter¹⁶, the proposal has subsequently been dropped from the Stroud Local Plan. The Cotswold part of the Aston Down proposal would make little sense without the Stroud proposal – the majority of the site - going forward.
- 6.9 The Duke of Gloucester Barracks, south of Cirencester was considered as a potential development site due to speculation about possible disposal by the MoD. However, the MoD subsequently confirmed that the site was being retained for the foreseeable future¹⁷.
- 6.10 Settlements **included** in the Development Strategy at this stage were:

Cirencester	Stow-on-the-Wold
Bourton-on-the-Water	Andoversford
Moreton-in-Marsh	Blockley
Tetbury	Kemble
Chipping Campden	Mickleton
Fairford	Siddington
Lechlade	Upper Rissington
Northleach	Willersey
South Cerney	

- 6.11 Settlements **excluded** from Development Strategy at this stage were:

Ampney Crucis	Didmarton / Leighterton
Avening	Down Ampney
Bibury	Kempsford
Birdlip	North Cerney
Chedworth	Poulton
Coates	Sapperton
Coln St Aldwyns / Hatherop/ Quenington	Stratton (Cirencester) Temple Guiting

- 6.12 Other locations considered for development and **excluded** were:

Aston Down former airfield (west of Sapperton)	Duke of Gloucester Barracks (south of Cirencester)
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facilities and associated parking, was supported by the community and was determined at a time when the Council was unable to demonstrate a five year housing land supply.

¹⁵ PFH report March 2012 considered the outcomes of meetings between officers of Stroud and Cotswold district councils.

¹⁶ This was reflected in the Preferred Development Strategy (Proposed Strategy 19)

¹⁷ This was reflected in the Preferred Development Strategy (Proposed Strategy 20)

7. Local Plan Preferred Development Strategy Consultation Paper (May 2013)

7.1 The PDS was published for Consultation during June/July 2013. The document attracted over 2,000 representations¹⁸.

7.2 A District-wide housing requirement of 6,900¹⁹ over the period 2011-2031 was distributed to the 17 most sustainable settlements as indicated in Table 3 below.

SETTLEMENT	HOUSING BUILT 1 ST APRIL 2011 TO 31 ST MARCH 2013	PLANNING COMMITMENTS AT 31 ST MARCH 2013	FURTHER HOUSING REQUIRED 2013-2031	TOTAL HOUSING REQUIREMENT 2011-2031 (ROUNDED)
Cirencester (excl. Stratton)	508	196	2656	3360
Tetbury	18	534	96	650
Moreton-in-Marsh	114	238	168	520
Upper Rissington	0	368	22	390
Bourton-on-the-Water	57	2	241	300
Fairford-Horcott	3	172	85	260
South Cerney	7	142	71	220
Stow-on-the-Wold	26	20	134	180
Chipping Campden	22	12	126	160
Lechlade-on-Thames	5	67	68	140
Northleach	2	17	111	130
Andoversford	51	1	78	130
Kemble	3	50	27	80
Mickleton	0	1	79	80
Siddington	2	1	67	70
Blockley	1	1	58	60
Willersey	0	1	49	50
Other locations ²⁰	115	220	N/A	335
TOTALS	934	2044	4136	7115

TABLE 3: Proposed distribution of housing to the 17 most sustainable settlements identified in the Preferred Development Strategy

7.3 The indicative requirement of 3,360 dwellings for Cirencester included the strategic area previously identified in the 2nd I&OP to the south of Chesterton. Capacity work suggested that 2,500 dwellings could be accommodated in this area.

7.4 The other 'strategic' area previously identified to the north of Tetbury was not, however, carried forward. Much of that area, including Highfield Farm and former employment land, had been granted planning permission since the 2nd I&OP was published; therefore, the original rationale for identifying this area had been overtaken by events.

¹⁸ Full Response Report on 2nd I&OP can be viewed here:

http://consult.cotswold.gov.uk/portal/fp/local_plan_2011-2031/development_strategy?tab=files

¹⁹ Derived from 'A Review of Future Housing Requirements for Cotswold District 2011-2031' (Keith Woodhead, February 2013)

²⁰ These were housing completions in places beyond the 17 listed settlements [N.B. the 'total housing requirement' column in the published document erroneously included a figure of 120 instead of 335.

- 7.5 The PDS therefore essentially identified sustainable settlements where specific sites could be allocated to deliver the housing requirement for 2011-2031.
- 7.6 Numerous representations were made in response to consultation on the PDS, notably on the Development Strategy and the strategic site proposed at Chesterton. A full response report was published, which included verbatim extracts of representations with comprehensive officer comments and recommended actions.
- 7.7 None of the main statutory consultees raised overriding issues with the thrust of the PDS. The Highways Agency and Thames Water gave general support for focussing development on the 17 most sustainable settlements, subject to some specific comments. The latter noted that there were no overriding constraints to preclude the levels of growth proposed by the Strategy, including on land to the south of Chesterton. Many representations cancelled each other out, particularly in relation to distribution of development.
- 7.8 The main points of direct relevance to the Development Strategy arising from the PDS consultation are summarised in Table 4 below.

MAIN POINTS RAISED IN REPRESENTATIONS ON DISTRICT DEVELOPMENT STRATEGY	RESPONSE/ ACTION
<p>By locating half of the housing requirement and bulk of affordable dwellings to the south of the District, the housing needs in other parts will not be met. This is at odds with one of the Strategy's key objectives, which is to allow young people and families to remain in their local settlements.</p>	<p>The distribution of housing will continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence.</p>
<p>Over-reliance on a single, large strategic allocation could risk the delivery of the Plan's objectives, as well as the Strategy both for the District and for Cirencester.</p> <p>Disproportionate growth to smaller settlements (e.g. Andoversford) would result in unsustainable growth.</p> <p>Commitments and previous local plan allocations are not clearly documented. Sites which are earmarked in the current Local Plan without planning permission should not be regarded as a commitment as there is no certainty to their delivery without planning permission. These sites should also be subject to full review for their inclusion in the 2011-2026 plan period as there may be fundamental issues preventing delivery.</p>	<p>The distribution of housing will continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence.</p>
<p>'Strategic' scale development at Cirencester/ Chesterton:</p> <ul style="list-style-type: none"> • Why so much housing in Cirencester/ Chesterton? • This development should be redistributed to other parts of Cirencester or District. • Is there a need for this housing? Much of it will be bought by in-migrants. • Strategic-scale site will ruin historic market town character of Cirencester. 	<p>The distribution of housing will continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence.</p>

MAIN POINTS RAISED IN REPRESENTATIONS ON DISTRICT DEVELOPMENT STRATEGY	RESPONSE/ ACTION
<ul style="list-style-type: none"> • Chesterton is poorly located in relation to strategic routes. • Increased commuting is inevitable, which will exacerbate congestion. Many prospective commuters will be attracted to Chesterton by the relatively close proximity of Kemble station • All forms of infrastructure (schools, health, drainage, water supply, town centre parking, etc.) were cited as being under-provided and/ or will become inadequate/ problematic. • Where will all the jobs be provided? Will employers be attracted? • High quality agricultural land/ open countryside should not be sacrificed. Brownfield land should be prioritised. 	
<p>The Sustainability Appraisal (May 2013) assessed strategic areas for Cirencester as individual options; however, it did not assess a combination of them as an alternative option. The Sustainability Appraisal should have looked at other permutations involving smaller combinations of development on all of the strategic areas.</p>	<p>The Sustainability Appraisal should be revisited to ensure that it considers permutations involving smaller combinations of development on all 'strategic' options around Cirencester.</p>
<p>Smaller-scale developments should be supported in villages, which are struggling to keep their village school, shop, pub and community heart. Limited development, with a mix of open market and affordable housing should be encouraged in the District's larger rural villages.</p>	<p>A rural housing policy²¹ has been developed, building upon generic policies 21, 22 and 23 in the PDS.</p> <p>The distribution of housing will continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence.</p>
<p>The Council has appeared not to have given sufficient consideration to the restriction on development imposed by the statutory purpose of AONB designation and paragraphs 115 and 116 of the NPPF.</p>	<p>The Council believes it has given appropriate weight to this issue, particularly when weighed against the fact that 80% of the District, including many of its most sustainable settlements are within the AONB.</p> <p>The distribution of housing will, however, continue to be re-evaluated, as appropriate, in the light of representations received and any material, updated, evidence.</p>
<p>Discounting settlements that have been defined as Local Service Centres due to a lack of current development potential (i.e. Down Ampney) is not appropriate as this assumption may change and</p>	<p>Incorporate Down Ampney into the Development Strategy.</p>

²¹ Rural Housing Topic Paper (CDC, November 2014)

MAIN POINTS RAISED IN REPRESENTATIONS ON DISTRICT DEVELOPMENT STRATEGY	RESPONSE/ ACTION
would necessitate further revision to the local plan.	
Include a strategy for phased release of land.	Explore this further.
Planning authorities can make an allowance for windfall sites when calculating a five year land supply and that would also apply for this local plan (NPPF paragraph 48). Cotswold District has an established record of windfall sites coming forward and a fair proportion of these have come forward consistently in minor settlements.	Explore this further. There is evidence of inspectors now accepting a windfall allowance, subject to demonstrating robust evidence that it would be delivered (e.g. south Worcestershire).
Table 1 contained an error. The total rounded number of allocations 2011-2031 in 'other locations' (120) was lower than the number already built/committed (335).	Error to be rectified. [N.B. see Table 3 above and associated footnote]

TABLE 4: Main points raised by representations responding to the Preferred Development Strategy

PART TWO: REFINING THE PREFERRED DEVELOPMENT STRATEGY

8. Local Plan Preferred Development Strategy – Cabinet Report December 2013

- 8.1 The Cabinet report made clear (paragraph 1.5) that the distribution of development is not a precise science. The amounts of housing ‘assigned’ to each of the settlements were, therefore, potentially subject to further change depending on various factors, including:
- representations made in response to the Preferred Development Strategy;
 - recent completions and planning permissions granted;
 - further reviews of the SHLAA;
 - infrastructure considerations;
 - revisions to the District housing requirement; and
 - any other material evidence.
- 8.2 The Cabinet report also clarified (paragraphs 1.7 and 1.8) that the main purpose of assigning a number of dwellings to each of the settlements in the PDS was to provide an ‘order of scale’. It was not intended to lay down precise requirements; rather, it was a ‘stepping stone’ towards distributing appropriate levels of development to the most sustainable settlements in the District. Importantly, along with other evidence, including sustainability appraisal, it would help to inform the complex site allocations process. Once sites have been allocated, housing numbers will no longer need to be assigned to settlements because site-specific proposals will be in place to deliver the approximate levels of development envisaged.
- 8.3 After the consultation period for the PDS had finished, the second SHLAA review revealed that sufficient sites had been identified at Down Ampney for that village to be reconsidered for inclusion in the Development Strategy. The reinstatement of Down Ampney was confirmed in the Cabinet Paper December 2013, as was the retention of the strategic site at Chesterton, Cirencester.
- 8.4 In addition, the Cabinet approved the following recommendations:
- That the general thrust of the Local Plan Development Strategy be maintained²².
 - The scope for, and robustness of, including a windfalls element as part of the overall housing requirement should be considered.
 - That the indicative levels of housing proposed for settlements in the Preferred Development Strategy be used to help inform the forthcoming Community

²² Cabinet considered the following Motion in November 2013: *“Through its new local plan process, this Council will ensure that sufficient housing sites are allocated to all communities who desire them, thereby giving everyone in the Cotswolds the opportunity to accommodate new local housing developments that meet their present and future needs”*. Cabinet resolved that, subject to any amendments to the PDS prompted by representations received in response to the consultation, and/ or new evidence arising from the second review of the SHLAA, the general approach set out in the PDS should be maintained. The detailed response to the Motion, which informed the November 2013 Cabinet decision, is included at Appendix B.

[N.B. a policy for rural housing in smaller settlements is included in the Draft Local Plan: Revised Development Strategy and Site Allocations consultation paper (December 2014). For an explanation of how that policy evolved, see Rural Housing Topic Paper (CDC, November 2014)]

Engagement events, subject to any amendments made necessary by further updated evidence.

9. Revised District Housing Requirement

- 9.1 When the Government announced on 27th May 2010 that regional strategies (RSS) were to be revoked, CDC followed national advice to establish its own housing requirement. Up to that point, high level plans - such as regional strategies and structure plans - provided 'top-down' housing requirement figures for district authority areas.
- 9.2 As an interim measure, CDC initially adopted an annualised requirement figure of 300 dwellings for the purposes of calculating its five year housing supply, which it subsequently increased to 345 dwellings (or 6,900 over 20 years). These figures were based on requirements laid down for Cotswold District in the Regional Spatial Strategy for the South West (Draft and Proposed Changes versions respectively). In the absence of any other compelling evidence, the RSS provided a logical figure because it had been based on extensive research and evidence gathering. The figure, though, was subject to policy restraint – a reflection of the regional desire for the RSS to focus development at strategically significant locations such as Swindon, Gloucester and Cheltenham.
- 9.3 The District-wide housing requirement figure proposed in the PDS derived from work undertaken by consultant, Dr Keith Woodhead, to establish an objectively assessed housing need (OAN) for the District 2011-2031. Dr Woodhead's February 2013 report (and March 2014 update)²³ both produced the following conclusion:
- “To support the Local Plan objectives, and the requirements of the NPPF to support economic growth through sustainable development, it is recommended that the upper part of the above ranges (5,000 - 6,800 and 6,000 - 7,100 dwellings) be used, but not exceeded bearing in mind the risks and costs that come with an excess of unimplemented allocations. This would suggest that the objectively assessed need-based requirement is in the range 6,800 - 7,100 dwellings. Any existing supply shortfall will be addressed through the Council's five year supply calculation.”*
- 9.4 The PDS Consultation Paper proposed a housing requirement of 6,900 dwellings, a figure which fell in the middle of the upper end of the ranges recommended by Dr Woodhead. Due to a minor accounting error in the column for 'other locations', the PDS actually proposed 7,115 dwellings, which was slightly more than Dr Woodhead's recommended maximum figure.
- 9.5 In June 2014, the Inspector's interim conclusions of Stroud District Council's Local Plan examination (stage one – duty to cooperate and housing requirements) were made known. These indicated that the OAN should have been based on a common methodology across the Housing Market Area (Gloucestershire) rather than calculated at individual district level. Consequently, CDC jointly commissioned further work with Forest of Dean and Stroud district councils. The purpose was to meet the Inspector's recommendation for a soundly-based objective assessment of housing and employment requirements, having regard to assessments that had already been undertaken for the Joint

²³ A Review of Future Housing Requirements for Cotswold District (Dr. Keith Woodhead, February 2013 and Update March 2014) <http://www.cotswold.gov.uk/media/755869/KW-Cotswold-Housing-Requirements-FINAL-190313.pdf>

Core Strategy area²⁴. The outcomes of this work²⁵ and other related matters are evaluated in the Housing Topic Paper (CDC, November 2014).

- 9.6 Taking account of the revised OAN and other updated evidence, it has been concluded that the **revised Cotswold District objectively assessed housing requirement for the period 2011-2031 should be 7,600 dwellings²⁶**. This amounts to an increase of some 600 dwellings over the housing requirement proposed in the PDS.

10. Outstanding Planning Permissions and Completions

- 10.1 Numerous planning permissions have been granted in recent years, particularly since the introduction of the NPPF in March 2012 and increasing pressures to maintain a five year housing land supply. To ensure that these have been taken fully into account, the Council's latest monitoring data have been used to provide the most up-to-date position. The Residential Land Monitoring Statistics report (April 2014)²⁷ provides data on all completions up to 31st March 2014. Unfortunately, data on housing completions since that date are not available as they are only monitored annually. However, the live database for Residential Land Monitoring 2014-15 does provide more recent data on planning permissions.
- 10.2 Table 5 (below) sets out all commitments over the Plan period to date [i.e. all housing built from 1st April 2011 to 31st March 2014; and all outstanding planning permissions up to 30th September 2014].

SETTLEMENTS	PDS Requirement figure	Built 1/4/11 to 31/3/14	Permissions at 31/3/14	Permissions granted 1/4/14 to 30/9/14	TOTAL built to 31/3/14 + permissions to 30/9/14	Total commitments to date +/- Compared with PDS
Andoversford	130	50	17	1	68	-62
Blockley	60	5	3	0	8	-52
Bourton-on-the-Water	300	58	260	9	327	27
Chipping Campden	160	33	46	2	81	-79
Cirencester [excl. Chesterton]	860	573	387	46	1006	146
Land south of Chesterton	2500	0	0	0	0	-2500
Down Ampney	0	1	22	0	23	23
Fairford	260	38	258	146	442	182
Kemble	80	7	51	0	58	-22
Lechlade	140	14	81	1	96	-44
Mickleton	80	0	149	0	149	69

²⁴ Gloucester, Cheltenham and Tewkesbury districts

²⁵ The Objectively Assessed Housing Needs of Stroud, Forest of Dean and Cotswold (Neil McDonald with Christine Whitehead) October 2014)

²⁶ See paragraphs 17.2 and 17.3 below.

²⁷ <http://www.cotswold.gov.uk/media/865412/Residential-Land-Availability-Report-2013-14.pdf>

Moreton-in-Marsh	520	286	141	392	819	299
Northleach	130	11	7	25	43	-87
Siddington	70	4	2	-4	2	-68
South Cerney	220	48	106	1	155	-65
Stow-on-the-Wold	180	32	11	48	91	-89
Tetbury	650	18	581	140	739	89
Upper Rissington	390	36	332	26	394	4
Willersey	50	2	2	01	5	-45
Windfalls in other locations	335	101	171	67	339	4
TOTALS	7115	1317	2627	901	4845	-2270

TABLE 5: Commitments from 31st March 2011 to 30th September 2014 and comparisons with settlement requirements in Preferred Development Strategy.

10.3 Table 5 shows the following settlements have already significantly exceeded the 'requirement' proposed by the PDS for the entire Plan period:

- Mickleton 186% (80 proposed/ 149 committed)
- Fairford 171% (260/ 445)
- Tetbury 118% (650/ 769)
- Moreton-in-Marsh 114% (520/ 595)
- Bourton-on-the-Water 110% (300/ 330)

11. Potential Site Allocations

11.1 The site allocations evidence paper²⁸ explains in detail how SHLAA sites were evaluated for potential allocation in the 18 settlements. The paper covered all potential sites except the Chesterton strategic site²⁹ (see following section). The site allocations process involved taking account of numerous planning criteria; strategic objectives; sustainability appraisal; and, importantly, engagement with local communities. The latter provided local communities with an opportunity to advise the Council of their preferred and reserve SHLAA sites, having evaluated their respective planning merits. Some potential sites were deleted from consideration where deemed appropriate.

11.2 The site allocations process revealed that there are no realistic opportunities to deliver significant development in Siddington village³⁰ over the remainder of the plan period. Moreover, no more than a handful of dwellings have been built or committed since 2011. This has led to the conclusion that Siddington should be

²⁸ Site Allocations – Housing and Employment (Non-Strategic) Paper (November 2014) and Site Allocations – Housing and Employment (Non-Strategic) Paper - Appendices (November 2014)

²⁹ In the case of land south of Chesterton, no reasonable or available 'strategic' alternatives have emerged through the process (either at Cirencester or elsewhere) to help meet the District's objectively assessed housing requirement. The absence of any other strategic options rendered the need for community engagement to consider alternative sites unnecessary. Instead, efforts have focussed on seeking to get the best possible outcomes for the site through the consultation process and engagement with stakeholders.

³⁰ For the purpose of the Development Strategy, Siddington village comprises the two parts of the village proper, based around the Church and Park Way/ Ashton Road except the area around Siddington Primary School and The Old Rectory. It does not include areas within Siddington parish that have effectively been absorbed into Cirencester's built-up area (e.g. parts of Love Lane industrial estate and housing at Siddington Road, including North Hill Road), or Siddington Park Farm.

deleted from the Development Strategy, thus reducing the number of named settlements from 18 to 17.

- 11.3 **'Preferred' sites** are those that, in most cases, have been supported by local communities through the site allocations community engagement process. These sites have also been assessed as not having material planning constraints or, where there are constraints, they can either be mitigated or are outweighed by other considerations. Preferred sites have a realistic chance of being delivered within the Plan period.
- 11.4 **'Reserve' sites** are those that have material planning constraints which could be overcome, though there may be less certainty that they can – particularly in the earlier years of the plan period. For example, these may include sites that are already developed or are in multiple ownerships. Reserve sites may be areas of land located within settlements that have already experienced substantial development early in the Plan period and there is consequently less need to bring sites forward. Reserve sites may have community support, but usually less so than the preferred sites.
- 11.5 **Sites not allocated** are those with material planning constraints that are unlikely to be adequately mitigated, and/or are not considered suitable for development in this plan period. For example, the scale of development proposed may be too large or the site may be poorly related to the settlement, in comparison to other, more suitable, sites of an appropriate scale and/or better located. In most cases there has been little community support for such sites, but in instances where there was support, this has been overridden by evidence of material planning considerations that have carried greater weight.
- 11.6 Table 6 (below) provides a summary of the number of dwellings expected to accrue from all of the preferred and reserve SHLAA sites.

Settlements	All potential 'Preferred' Site Allocations	All potential 'Reserve' Sites
Cirencester [excl. Chesterton]	31	31
Andoversford	40	0
Blockley	51	36
Bourton-on-the-Water	10	32
Chipping Campden	127	51
Down Ampney	31	44
Fairford	0	77
Kemble	12	24
Lechlade	18	0
Mickleton	0	8
Moreton-in-Marsh	21	218
Northleach	53	0
Siddington	0	0
South Cerney	0	64
Stow-on-the-Wold	30	87
Tetbury	27	43
Upper Rissington	0	0
Willersey	80	17

Settlements	All potential 'Preferred' Site Allocations	All potential 'Reserve' Sites
TOTALS	531	732

TABLE 6: Number of dwellings expected to accrue from 'preferred' and 'reserve' SHLAA sites

12. Strategic Development site south of Chesterton, Cirencester

- 12.1 The planning arguments for allocating land south of Chesterton were set out in both the 2nd I&OP/ Supporting Information and the PDS. The Sustainability Appraisal Interim Report (May 2013), appraised four strategic option areas around Cirencester, and concluded that Option 1 (land south of Chesterton) was the most sustainable option. That appraisal was undertaken even though no reasonable and available 'strategic' alternatives to the Chesterton site had emerged throughout the process (either at Cirencester or elsewhere). Further work was subsequently commissioned to address salient points raised by objectors to the PDS proposals for the Chesterton strategic site, including 'Points of the Compass Analysis' and 'Appraisal of Site Combinations around Cirencester'³¹.
- 12.2 Tables 5 and 6 demonstrate that, even if all of the preferred and reserve SHLAA sites were to be allocated, the District housing requirement could not be met unless a site of 'strategic' scale is also proposed. To date³², outstanding planning permissions and completions since April 2011 amount to 4,845 dwellings. Adding these commitments to the estimated housing on all of the preferred SHLAA sites (531) produces a total of 5,386 dwellings. That figure is over 2,200 dwellings short of the revised objectively assessed housing requirement (7,600).
- 12.3 As explained at paragraph 11.4, there is too much uncertainty surrounding the prospects of reserve sites coming forward at this stage to rely on them delivering the housing requirement. The same applies to potential 'windfalls', which could occur at any time in unplanned locations.
- 12.4 The main outstanding issues to resolve are: (i) the amount of development that should be proposed south of Chesterton; and (ii) the requisite on and off-site infrastructure requirements to ensure that this is a sustainable extension to the town rather than a large 'housing estate'.
- 12.5 Regarding (ii), the proposals set out in PDS Proposed Strategy 2 required the Chesterton development to be *"...implemented on a comprehensive basis in accordance with the Council's vision and development objectives (set out in PDS Appendix 2) and a site-wide Master Plan Framework which will be agreed by the local planning authority...The development will include the following...*
- *A neighbourhood centre to meet the day-to-day needs of people living and working within the site, including convenience shopping, health care and community facilities;*
 - *Appropriate education facilities to cater for the proposed development;*

³¹ Interim Sustainability Appraisal Report to accompany the draft Local Plan: Revised Development Strategy & Site Allocations (URS, November 2014)

³² Dwelling completions 1st April 2011 to 31st March 2014 and outstanding planning permissions for housing at 30th September 2014 (see Table 5 above)

- *A network of green infrastructure (including public open space, informal open space and structure landscaping) providing convenient access to a range of recreation and play facilities and enhancing bio-diversity;*
 - *The provision of supporting infrastructure and facilities, including the early provision of drainage and transport infrastructure. A comprehensive package of transport measures will be required to mitigate the impact of the proposed development on the existing road network and to ensure the site is well connected to the rest of the town, with an emphasis on sustainable modes of transport...*
- 12.6 No representations have objected to these aspirations in principle, though many criticised the amount of housing proposed or, in some cases, opposed any development in this location. In particular, concern has been expressed that the proposal could become another large housing estate (rather than a sustainable and high quality mixed use development sought by the draft vision and development objectives). Clearly, there is a balance to be struck between the amount of housing proposed and the achievement of a high quality, sustainable extension to the town. Reducing the amount of housing below a certain level will inevitably impact on what else could be achieved to meet the vision and objectives for this site.
- 12.7 A number of complex and interrelated factors have to be considered before a final capacity figure can be agreed, including: the final outcomes of the transport assessment; the latest update to the infrastructure delivery plan; and the results of the playing pitch strategy. All of these – and other factors – will influence the final number of dwellings to that will ultimately be delivered on the site.
- 12.8 The aspirational 'target' of up to 2,500 dwellings, proposed in the PDS, has already been reduced by a modest 150 in the draft concept master plan. The master plan was made available at a Community Planning Weekend in May 2014, led by JTP on behalf of the Chesterton landowners. There is an acceptance from the landowner's agent that this figure may well be modified to something lower in due course as the further evidence is collated; for example, analysis of site surveys and highway capacity testing. However, for the time being, figure of 2,350 is the only one supported by evidence. Therefore, for the purposes of the December 2014 consultation, the land to the south of Chesterton will be proposed for a capacity of up to 2,350 dwellings; 9 hectares of employment land; and other land set aside for community uses.
- 12.9 Over many months, the landowner's planning agent has been liaising closely with the Council (who have sought specialist advice from ATLAS³³) about the potential future development of this land. It is known that the landowner wishes to submit an outline planning application in accordance with an agreed master plan framework once the Local Plan process has reached an advanced stage. There has been no suggestion of a desire to pre-empt the Local Plan in any way.
- 12.10 In terms of build rates, the agent has expressed confidence that 2,500 dwellings could be completed by year 2027/28, assuming that: (a) there is a 50% affordable housing requirement; and (b) construction commences during 2018/19. This assumes a maximum build rate of 300 p.a. (50% open market/ 50% affordable) from years 2020/21 to 2026/27³⁴. The Council currently has no

³³ The Homes & Communities Agency's Advisory Team for Large Applications.

³⁴ Letter from Savills dated 17th March 2014.

evidence to counter the landowner's claim that the site could deliver the housing requirement by the end of the Plan period.

13. Windfalls

- 13.1 On 28th October 2013, the Inspector's interim conclusions on the Stage 1 examination of the South Worcestershire Development Plan were issued. Contrary to previous understanding, the Inspector in this instance took the view that windfalls could be included in the housing requirement provided that there is robust evidence to support this position:

"62. NPPF paragraph 48 enables LPAs to make an allowance for windfall sites in the five-year housing land supply if there is compelling evidence to support this. The five-year supply is not a static measurement but rolls forward each year. In principle, therefore, I see no objection to the Plan accounting for windfalls as part of the supply of housing over the Plan period ...

63. The Councils have provided evidence of recent windfall supply rates on small sites of less than 10 dwellings, or less than five dwellings in the case of Malvern Hills. In order to avoid double-counting with existing commitments, the windfall rates are applied from 2016/17 only, and they are reduced by one-third to allow for uncertainty at the end of the Plan period. An adjustment is also made to account for small-site allocations in the first 10 years. With these adjustments in place, it is reasonable to suppose that windfall developments will come forward on the basis that the Councils assume.

64. NPPF paragraph 48 also makes it clear that windfall allowances should not include residential gardens. In this respect ... I need to seek further clarification from the Councils. ... Depending on the outcome of this clarification process, the actual level of the windfall allowance, as set out in the submitted Plan, may be confirmed or may need to be adjusted."

- 13.2 In his further interim conclusions, the Inspector concluded:

"62. The Councils have recalculated the windfall allowance figures ...in accordance with the advice given in my letter of 16 December 2013 responding to their draft proposed modifications... I endorse these figures as they are based on the latest available evidence of windfall completions in each district over the period 2006 to 2013 and are calculated using a methodology which I found to be sound in my IC."

- 13.3 While this is a position taken by just one Inspector, it does suggest that the inclusion of a windfalls element is reasonable, especially given the similarities between Cotswold District and the more rural parts of South Worcestershire, notably the Malvern Hills and parts of Wychavon. This could provide useful flexibility in aiming to meet the District's objectively-assessed housing requirement.

- 13.4 The Council has robust evidence of the contribution that windfalls have made to the District's housing supply in recent years. Based on the same methodology as South Worcestershire, it has been concluded that 69 dwellings p.a. can reasonably be expected to accrue from this source over the 13 year period 2018-2031 (897 dwellings). The rationale behind the calculation is explained in more detail in the Housing Topic Paper (CDC, November 2014).

- 13.5 While the Council should not rely on windfalls contributing to the total housing requirement in the distribution strategy, they provide significant flexibility in the supply of housing should any of the commitments or preferred allocations fail to materialise within a reasonable timescale.

14. Reviewed Housing Distribution

- 14.1 The proposed Development Strategy should be revised to broadly distribute at least 7,600 dwellings³⁵ over the period 2011 – 2031 in accordance with the distribution indicated in Table 7 below.

SETTLEMENTS	Built since 2011 + extant planning permissions	Sites proposed for allocation	TOTAL
Cirencester – strategic site	0	2,350	2350
Cirencester (excl. strategic site)	1006	31	1037
Andoversford	68	40	108
Blockley	8	51	59
Bourton-on-the-Water	327	10	337
Chipping Campden	81	127	208
Down Ampney	23	31	54
Fairford	442	0	442
Kemble	58	12	70
Lechlade	96	18	114
Mickleton	149	0	149
Moreton-in-Marsh	819	21	840
Northleach	43	53	96
South Cerney	155	0	155
Stow-on-the-Wold	91	30	121
Tetbury	739	27	766
Upper Rissington	394	0	394
Willesley	5	80	85
Other locations	341	-	341
DISTRICT TOTALS	4845	2,881	7726

TABLE 7: Recommended Housing Distribution Strategy for inclusion in Local Plan Reg. 18 Consultation: Development Strategy and Site Allocations

- 14.2 Clearly, a significant proportion of the objectively assessed housing requirement is already committed, while most of the balance can be accommodated through allocating all of the 'preferred' SHLAA sites together with the strategic site south of Chesterton. There is evidence to demonstrate that all of these sites have

³⁵ See paragraphs 17.2 and 17.3 below

good prospects of delivering virtually the entire District housing requirement to 2031. However, should any of them fail to come forward, windfalls offer ample flexibility to deliver housing. This source of supply is expected to accrue up to 900 dwellings over the period 2018-2031. Although future windfalls have not been included as part of the strategic distribution, they represent a significant additional supply of housing which can be counted retrospectively towards the supply when the Council's annual monitoring is undertaken.

- 14.3 While 'reserve' SHLAA sites could produce up to a further 783 dwellings, there is uncertainty, at this stage, that many of these sites would deliver the amount of housing indicated (paragraph 11.4 above). As the requirement can be met from other sources, there is no reason to allocate any of them in this Local Plan.

15. Employment Land Requirement

- 15.1 In order to achieve sustainable, balanced communities, the delivery of housing for the District should be balanced with appropriate employment growth. To that end, the objectively assessed housing needs³⁶ took various demographic factors into account, including the District's ageing population. The resulting employment land requirement and distribution strategy needed to reflect, and be able to deliver, the economic assumptions used in the housing requirement.
- 15.2 The Cotswold Economy Study 2012³⁷ (CES) had identified a requirement for 15.28 hectares of employment land - covering all employment generating uses - over the plan period. In the months leading up to the publication of the December 2014 consultation on the Development Strategy and Site Allocations (see section 16 below), the CES was rigorously reviewed³⁸. The latest evidence indicated that an employment land requirement in the range of 20 to 28 hectares, solely for B Class uses, would be appropriate over the plan period.
- 15.3 Evidence indicates that planning for a gross employment land requirement figure would help to maintain a flexible and adaptable land supply to meet the needs of business. In addition, the Council should propose to plan for the higher end of the range of land required to provide a choice of land. Therefore, the employment land requirement proposed for B class employment land over the plan period is 28 hectares (over and above existing commitments).
- 15.4 Although the employment land requirement figure relates to B-class uses only, there are other employment-generating uses too. Where opportunities have arisen, mainly in Cirencester, these have been identified for various mixed use allocations.
- 15.5 The proposed Development Strategy should broadly distribute at least 28 hectares of Class-B employment land over the period 2011 – 2031 in accordance with the distribution indicated in Table 8 below.

SETTLEMENTS	B class employment (gross hectares)
Cirencester – strategic site south of Chesterton	9.10
Bourton-on-the-Water	3.38
Chipping Campden	0.67

³⁶ The Objectively Assessed Housing Needs of Stroud, Forest of Dean and Cotswold (Neil McDonald with Christine Whitehead, October 2014)

³⁷ Cotswold Economy Study (Peter Brett Associates, October 2012)

³⁸ Supplement to CES and Economy Evidence Paper 2013 (CDC, November 2014)

Lechlade	1.25
Moreton-in-Marsh	7.13
Tetbury	6.74
DISTRICT TOTALS	28.27

TABLE 8: Recommended class B employment Distribution Strategy for inclusion in Local Plan Reg. 18 Consultation: Development Strategy and Site Allocations

16. Gypsies and Travellers

- 16.1 An assessment of need for gypsies, travellers and travelling showpeople identified a need for 26 pitches in Cotswold District to 2031³⁹.
- 16.2 A study was subsequently commissioned to identify potential sites to accommodate the need identified in the District⁴⁰.
- 16.3 Based on the draft recommendations of that study, an advisory panel meeting was convened in November 2014 to consider 10 sites that were considered to have the greatest potential for meeting the future needs of the gypsy and travelling community. The resulting evidence paper⁴¹ informed the content of the December 2014 Local Plan consultation document.

17. Local Plan Reg. 18 Consultation: Development Strategy and Site Allocations December 2014

- 17.1 The Consultation document was formally approved by Cabinet on 4th December 2014. The main evidence that helped to inform the consultation document included:
- (i) Evidence Paper: Development Strategy (CDC, November 2014/ updated December 2014⁴²)
 - (ii) Evidence Paper: Housing (CDC, November 2014/ updated December 2014⁴³)
 - (iii) The Objectively Assessed Housing Needs of Stroud, Forest of Dean and Cotswold (Neil McDonald with Christine Whitehead, October 2014)
 - (iv) Evidence Paper to inform non-Strategic Housing and Employment Site Allocations (CDC, November 2014)

³⁹ The Gloucestershire County Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (October 2013)

⁴⁰ Gypsy and Traveller – Identification of Potential Sites for Cotswold District (WS Planning & Architecture, November 2014)

⁴¹ Evidence Paper to inform Cotswold District Local Plan: Advisory Panel on Gypsy and Travellers Site Allocations Assessment (CDC, November 2014)

⁴² Updated to take account of the delegated decision, after the December 2014 Cabinet meeting, to increase the housing requirement from 7,500 to 7,600 dwellings.

⁴³ See footnote above

- (v) Evidence Paper to inform non-Strategic Housing and Employment Site Allocations: Appendices (CDC, November 2014)
- (vi) Addendum to the Strategic Housing Land Availability Assessment and Strategic Economic Land Availability Assessment May 2014 (November 2014)
- (vii) Cirencester Sports and Recreation Needs Analysis (Ploszajski Lynch Consulting Ltd, November 2014)
- (viii) Evidence Paper: Rural Housing Policy (CDC, November 2014/ updated December 2014⁴⁴)
- (ix) Supplement to Cotswold Economy Study 2012 and Economy Evidence Paper 2013 (CDC, November 2014)
- (x) Gypsy and Traveller – Identification of Potential Sites for Cotswold District (WS Planning & Architecture, November 2014)
- (xi) Evidence Paper: Advisory Panel on Gypsy and Travellers Site Allocations Assessment (CDC, November 2014)
- (xii) Interim Sustainability Appraisal Report to accompany the Local Plan Reg. 18 Consultation: Development Strategy and Site Allocations (URS, November 2014)
- (xiii) Topic Paper: Local Plan Contextual Chapters (CDC, October 2014)
- (xiv) Study of Land Surrounding Key Settlements in Cotswold District Update (White Consultants, October 2014)
- (xv) Historic Environment Topic Paper - (CDC, July 2014)
- (xvi) Sequential Test - Draft Report (JBA Consulting, July 2014);
- (xvii) Strategic Flood Risk Assessment Level Two (JBA Consulting, June 2014)
- (xviii) Minerals Local Plan Site Options and Draft Policy Consultation Document (June 2014)
- (xix) Strategic Employment Land Availability Assessment Viability Considerations (Hewdon Consulting, May 2014)
- (xx) Strategic Housing Land Availability Assessment and Strategic Economic Land Availability Assessment (CDC, May 2014)
- (xxi) Strategic Housing Market Assessment review (HDH Planning & Development, March 2014)
- (xxii) Strategic Housing Land Availability Assessment Viability Assessment (POS Enterprises, March 2014)
- (xxiii) Feedback from the Site Allocations Community Engagement (conducted in March 2014)
- (xxiv) Local Plan Consultation Paper: Preferred Development Strategy Response Report (CDC)
- (xxv) Archaeology Review of Sites (GCC, January 2014)
- (xxvi) Biodiversity Assessment of Sites (GCER, November 2013)

⁴⁴ Updated to take account of decision to delete Siddington from the Strategy, thus deleting the number of settlements from 18 to 17.

- (xxvii) Gloucestershire County Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (Peter Brett Associates, October 2013)
- (xxviii) Local Plan Consultation Paper: Preferred Development Strategy (May 2013)
- (xxix) Local Plan: Sustainability Appraisal Interim Report (May 2013)
- (xxx) Infrastructure Delivery Plan: Interim Version (ARUP, May 2013)
- (xxxi) Habitat Regulations Assessment Screening Report (LUC, May 2013)
- (xxxii) Development Strategy Evidence Paper (CDC, April 2013)
- (xxxiii) Cotswold Economy Study (Peter Brett Associates, November 2012)
- (xxxiv) Report on Visioning Workshop – Land South West of Chesterton (ATLAS, October 2012)
- (xxxv) Role and Function of Settlements Study (CDC, July 2012)
- (xxxvi) LDF Core Strategy: Second Issues and Options Paper (CDC, December 2010)
- (xxxvii) LDF Core Strategy: Second Issues and Options Supporting Information (CDC, December 2010)

17.2 When the December 2014 Cabinet papers were being prepared, the following, minor, issue was highlighted by the authors of the report 'Objectively Assessed Housing Needs of Stroud, Forest of Dean and Cotswold' (OAN):

"...in preparing the JCS version of my report for you I have discovered that the JCS figure for the number homes needed to support the CE view of economic growth over the period 2011-2031 should be -600, not -1400 as appears in Figures 41 and E4 of the Stroud, Cotswold and Forest of Dean report. The Gloucestershire total then becomes 6100 rather than 5400.

This is only relevant to Stroud, Cotswold and Forest of Dean in that paragraph 135 uses the Gloucestershire total of 5400 to arrive at a figure for the number of additional homes to be allowed for to support economic growth. Replacing that figure with 6100 has no effect (after rounding) on the number of additional homes needed in Stroud but increases the Cotswold figure from 1200 to 1300 and the Forest of Dean figure from 800 to 900. Given the large uncertainties in these estimates of the additional homes to support economic growth I do not consider these changes to be material."

17.3 Although the OAN report's authors stated that "... these changes are not thought to be material enough to justify changing the overall estimates of the OANs for the three authorities" (i.e. including Cotswold), the Council felt it was appropriate to add the extra 100 dwellings to the District housing requirement. The decision to increase the overall figure from 7,500 to 7,600 was made on 23rd December 2014 under delegated powers (which had been approved by Cabinet on 4th December 2014). The 'Evidence Paper: Housing' (CDC November 2014) has been updated to take this change into account.

APPENDIX A – SETTLEMENTS CONSIDERED AT VARIOUS STAGES OF THE EMERGING DEVELOPMENT STRATEGY

SETTLEMENT	Local Plan 2001-2011	Sett. Hierarchy Topic Paper	2 nd Issues & Options Paper	Role and Function Study	Preferred Development Strategy	Draft LP Development Strategy	NOTES
Ampney Crucis				x			Minimal land identified in SHLAA at April 2013
Andoversford		x	x	x	x	x	
Aston Down							Considered as part of the DSEP but not included in PDS.
Avening		x	x	x			Minimal land identified in SHLAA at April 2013.
Bibury				x			Minimal land identified in SHLAA at April 2013
Birdlip		x		x			No land identified in SHLAA at April 2013.
Blockley		x	x	x	x	x	This refers to Blockley village rather than the parish, which contains several other, smaller, settlements.
Bourton-on-the-Water	x	x	x	x	x	x	Identified as 2 nd tier Principal Settlement in Local Plan
Chedworth				x			Minimal land identified in SHLAA at April 2013
Chipping Campden	x	x	x	x	x	x	Identified as 3 rd tier Principal Settlement in Local Plan
Cirencester ⁴⁵	x	x	x	x	x	x	Recognised as one of the County's five main towns, and Cotswold District's main service centre in Glos. Structure Plan Second Review ⁴⁶ . Also identified as 1 st tier settlement in Local Plan.
Coates				x			Minimal land identified in SHLAA at April 2013
Coln St Aldwyns / Hatherop/ Quenington				x			Minimal land identified in SHLAA at April 2013
Didmarton / Leighterton				x			Discounted on sustainability grounds. ⁴⁷
Down Ampney		x	x	x		x	No land identified in SHLAA at April 2013, but reinstated by Cabinet December 2013 after submission of significant sites to SHLAA review process
Duke of Gloucester Barracks							Considered as part of the DSEP but not included in PDS.
Fairford-Horcott ⁴⁸	x	x	x	x	x	x	Identified as 3 rd tier Principal Settlement in

⁴⁵ Up until publication of the Preferred Development Strategy, Stratton was treated as part of Cirencester in planning terms.

⁴⁶ Policy H4 – *'In Cotswold District, development serving the needs of the District will mostly be provided within and adjacent to Cirencester.'*

⁴⁷ Development Strategy Evidence Paper, paras. 29-32

SETTLEMENT	Local Plan 2001-2011	Sett. Hierarchy Topic Paper	2 nd Issues & Options Paper	Role and Function Study	Preferred Development Strategy	Draft LP Development Strategy	NOTES
							Local Plan
Kemble		x	x	x	x	x	.
Kempsford		x	x	x			Discounted on sustainability grounds ⁴⁹ .
Lechlade-on-Thames	x	x	x	x	x	x	Identified as 3 rd tier Principal Settlement in Local Plan
Mickleton		x	x	x	x	x	
Moreton-in-Marsh	x	x	x	x	x	x	Identified as 2 nd tier Principal Settlement in Local Plan
North Cerney				x			No land identified in SHLAA at April 2013
Northleach	x	x	x	x	x	x	Identified as 3 rd tier Principal Settlement in Local Plan
Poulton				x			Minimal land identified in SHLAA at April 2013
Rural 'windfalls'					x ⁵⁰	x ⁵¹	It is appropriate to include total dwellings built + outstanding planning permissions to date in 'other locations' (as in Preferred Development Strategy).
Sapperton				x			No land identified in SHLAA at April 2013
Siddington ⁵²		x	x	x	x		Discounted due to a combination of lack of commitments and no preferred sites for allocation
South Cerney	x	x	x	x	x	x	Identified as 3 rd tier Principal Settlement in Local Plan, largely due to good employment base
Stow-on-the-Wold	x	x	x	x	x	x	Identified as 3 rd tier Principal Settlement in Local Plan
Stratton (Cirencester)	x	x	x				Minimal land identified in SHLAA at April 2013
Temple Guiting				x			No land identified in SHLAA at April 2013
Tetbury	x	x	x	x	x	x	Identified as 2 nd tier Principal Settlement in Local Plan
Upper Rissington		x		x	x	x	Originally discounted on sustainability grounds but included following appeal decision to allow 368 houses + employment, facilities, services, etc.
Willersey		x	x	x	x	x	

⁴⁸ Up until publication of the Preferred Development Strategy, Horcott was not treated as part of Fairford in planning terms.

⁴⁹ Development Strategy Evidence Paper, paras. 25-28.

⁵⁰ Latest commitments only, no projected 'allocations'.

⁵¹ Latest commitments only, no projected 'allocations'.

⁵² Some development within Siddington parish abuts Cirencester's built-up area and has thus been treated as part of Cirencester in planning terms. Siddington refers only to the self-contained village.

APPENDIX B – RESPONSE TO MOTION SEEKING THE ALLOCATION OF HOUSING SITES TO COMMUNITIES WHO DESIRE THEM

The Motion

'Through its new local plan process, this council will ensure that sufficient housing sites are allocated to all communities who desire them, thereby giving everyone in the Cotswolds the opportunity to accommodate new local housing developments that meet their present and future needs.'

Consideration by Programme Board on 10th September 2013

A response to Cllr Searles' Motion was prepared by officers, which helped to inform the Board's consideration of the Motion. Key points that arose from the Board meeting included:

- Agreement that the proposed 20 year District requirement for 6,900 dwellings was realistic.
- Agreement, in principle, that there should be opportunities for development to take place in smaller settlements.
- Cllr Searles supplemented his Motion by referring to recently submitted local plans (e.g. Stroud, Vale of White Horse and West Oxfordshire), which had incorporated a rural element as part of the housing requirement and had included a range of higher and lower figures. *[N.B. Stroud DC has since confirmed that the plan proposes a fixed housing figure, not a range].*
- Cllr Searles mooted that, unlike other plans (e.g. Stroud, Vale of White Horse and West Oxfordshire), CDC's preferred development strategy lacked a mechanism for bringing sites forward in locations beyond the 17 currently identified sustainable settlements. *[N.B. Stroud DC has since confirmed that no proactive policy is proposed to bring forward such sites].*
- Agreement that there is a need to consider the implications of amending the Preferred Development Strategy in a way that pays regard to the themes set out in the motion.

Based on the Board's deliberations, officers have weighed up the pros and cons of the following alternative approaches. *[N.B. the Board acknowledged that any significant change of strategy direction would inevitably delay the delivery of the Local Plan].*

Alternative Option 1: Assign a fixed number of dwellings to cover potential sites that could come forward in rural areas over and above the currently proposed District-wide figure of 6,900

Pros

- This option would allow for additional flexibility in seeking to meet the District's housing target and potentially offer an opportunity to 'absorb' any shortfall that may emerge through the examination process.

Cons

- Potential unidentified sites – rural or elsewhere - are generally referred to, in the planning world, as '*windfalls*'. Such development, by definition, cannot be accurately identified with confidence and this would inevitably cast doubts on the prospects of the housing being delivered. This is the main reason why national

policy is silent on the inclusion of windfalls⁵³, and has called on local authorities to only allocate sites in plans that are based on robust evidence in their SHLAA that the allocated housing sites can be delivered within the plan period.

- There is no robust evidence to support a fixed number of dwellings coming forward on unidentified sites in rural areas. The best that could be done would be to rely on historic windfalls data. However, this only provides a global number; not a list of identified sites supported by robust evidence to demonstrate that they can be delivered.
- Although this option would provide flexibility, the additional dwellings (over and above 6,900) would undoubtedly be seen by the development industry as a new lower-end housing requirement for the District. Therefore, if a notional figure of, say, 500 were to be added on, the lower-end requirement is likely to be seen as 7,400 dwellings rather than 6,900.
- If the notional rural settlements 'requirement' were to be met, it raises the question whether any further development of that type should be allowed. It would clearly be unreasonable not to continue doing so and there would be no rational basis to suddenly stop allowing rural development just because a notional 'target' had been reached. Putting a 'stop' on rural housing developments would contradict the aim of allowing more housing in such locations as well as conflict with the principles of 'Localism' if communities had wanted some development to come forward.

Summary Option 1

Unidentified small-scale development would be accounted for through annual monitoring and added retrospectively towards the District's housing supply. This obviates the need to, effectively, increase the overall housing requirement by adding a rural element to the development levels already proposed for the most sustainable settlements

Alternative Option 2: Assign a fixed number of dwellings to cover potential sites that could come forward in rural areas ⁵⁴ as part of the currently proposed District-wide figure of 6,900

Pros

- None, although it may, initially, be seen by some as a potential way of 'keeping the District housing requirement down'.

Cons

- Potential unidentified sites – rural or elsewhere - are generally referred to, in the planning world, as '*windfalls*'. Such development, by definition, cannot be accurately identified with confidence and this would inevitably cast doubts on the prospects of the housing being delivered. This is the main reason why national policy is silent on the inclusion of windfalls, and has called on local authorities to only allocate sites in plans that are based on robust evidence in their SHLAA that the allocated housing can be delivered within the plan period. [N.B. Stroud DC has confirmed that a figure of 750 was included as part of its draft housing requirement to cover settlements that were not specifically named in the plan's development strategy. However, that figure has been based on historic windfall rates with a

⁵³ Other than NPPF paragraph 48, which specifically refers to windfalls, but only in the context of calculating the five year housing land supply

⁵⁴ Over and above dwellings that have been built since April 2011 or which have been granted planning permission beyond the 17 strategic settlements.

notional non-implementation rate applied. They do not relate to specific, deliverable, sites].

- There is no robust evidence to support a fixed number of dwellings coming forward on unidentified sites in rural areas. The best that could be done would be to rely on historic windfalls data. However, this only provides a global number; not a list of identified sites supported by robust evidence to demonstrate that they can be delivered.
- Given the Government's continuing aim of addressing the national housing shortage, any approach that seeks to reduce the requirement (other than redistribution to another authority through the duty to cooperate) is likely to fail the tests of soundness.

Summary Option 2

The inclusion of a notional figure would be tantamount to 'allocating' a proportion of the District's housing requirement without the necessary evidence to justify its inclusion. Such an approach would be highly unlikely to meet the tests of soundness because there is no evidence to indicate that unidentified sites would have a realistic prospect of being delivered over the plan period.

Alternative Option 3: Allocate small sites in rural villages where communities desire housing development

Pros

- Housing development sites would be identified in more rural settlements, subject to evidence being available which indicates that deliverable sites of an appropriate scale exist and that communities want these to be brought forward.

Cons

- Very few communities have indicated willingness for their villages to be incorporated into the development strategy. Of those that have, none have indicated exactly where they would want development to take place.
- Given the rural nature of such settlements, only small-scale development would be appropriate. Such development is permissible through other policies, both in the emerging plan (Proposed Strategy 21, 22 and 23) and the NPPF. The latest national SHLAA guidance, moreover, states that only sites of 5 or more dwellings should be considered. Therefore, evidence on the deliverability of many small-scale development sites would not be available in any event.
- The Preferred Development Strategy has come about as a result of considerable evidence gathering; several stages of scoping and consultation (including Issues & Options; Settlement Hierarchy; Second Issues & Options; and the Preferred Strategy itself); and sustainability appraisal. A dispersal strategy option, along with others, was tested very early on but the Council agreed to rule it out for various sustainability and practicality reasons.
- A reversal of the Strategy would contradict all of the decisions taken to date and would put the process back many months or more.
- At the Second Issues and Options stage, up to 19 sustainable settlements had been identified for possible inclusion in the Strategy. However, some of these have dropped out due to a lack of deliverable sites. While it is possible that the latest call for sites might prompt the re-inclusion of one or two such villages, the evidence suggests that, in most cases, deliverable sites of a realistic scale are in short supply beyond the main sustainable settlements.

- Viability has now become a key soundness consideration in gathering the necessary evidence to justify development allocations in plans and this is a potentially costly task for local authorities. The introduction of numerous small-scale sites around rural settlements, therefore, has potentially serious adverse implications for CDC both in terms of timescales and costs.
- There have always been question marks over the reliability of small sites being delivered, which is why they have invariably been treated as windfalls by local authorities and the government alike.

Summary Option 3

Allocating small-scale sites in rural settlements would be costly, time-consuming, impractical, and unlikely to achieve anything that is not already permissible through other policies.

Alternative Option 4: include a list of better-served villages, which do not currently feature in the Strategy, where additional development would be acceptable within the framework of strategy policies 21 to 23.⁵⁵

Pros

- The specific naming of more villages in this context would go some way towards demonstrating a positive/ proactive approach towards certain rural settlements, as advocated by the Motion and along similar lines to the approaches of Vale of White Horse and West Oxfordshire councils.

Cons

- While a number of additional villages would be highlighted, the problem remains that no numbers could be assigned to them for the reasons set out in the options above. Therefore, any dwellings that come forward are not identified and cannot count towards the 6,900 District requirement. They would be counted towards the housing land supply retrospectively.
- Few settlements, beyond those already identified in the Preferred Development Strategy, have many services and facilities. This raises a further question as to what constitutes 'better-served smaller villages'.
- Clearly, criteria would be needed in order to establish which villages are 'better-served', as other authorities have done. However, there is the additional risk of data becoming quickly out-of-date, which could erode the credibility of a village(s) being on the list of better-served villages. For example, several primary schools have recently closed in the District. Keeping evidence of this sort up-to-date is one of the most difficult aspects of preparing plans for districts like Cotswold, which has a huge number of settlements.
- An exhaustive list of 'better-served smaller villages' implies that those not listed would be at a disadvantage if they wished to bring forward development. Some of these villages may well have other unquantifiable attributes, such as a strong

⁵⁵ The approach in the Vale of White Horse Core Strategy has been to list 23 'smaller villages' (with a low level of services and facilities) where "*any development should be modest in scale and primarily to meet local needs*". There is no indication of the amount of housing proposed in these villages. Any other villages or hamlets not listed would normally be considered inappropriate for development.

West Oxfordshire lists 32 villages beyond the 9 service centres, which "*are suitable for limited development which respects the village character and local distinctiveness and would help maintain the vitality of these communities...*" The approach towards all other, unnamed, settlements is similar to that of Vale of White Horse.

community spirit, which can be a catalyst for positive community development initiatives.

Summary Option 4

To date, few rural communities (parish councils) have expressed a desire for any development, though it is accepted that this might change over time. It is this uncertainty that makes the 'catch all' policies proposed in the Preferred Development Strategy (Proposed Strategy 21, 22 and 23), the most flexible and appropriate means of facilitating unidentified development in smaller villages. If a number of 'better-served smaller villages' were to be listed in the Strategy, this would effectively preclude many other villages that are absent from the list.

Conclusions

- The local plan process requires certainty of deliverability and, in the absence of sufficient available and deliverable sites **now**, the Local Plan would not be deemed sound.
- The combination of: (i) allocated sites in the most sustainable locations; and (ii) a policy framework that allows additional housing to meet local rural need; is the most robust approach to housing delivery.
- Far from being 'passive', the Strategy, as proposed, provides a positive policy framework for facilitating rural housing in response to the wishes of communities. It is proactive in the sense that it sets out a presumption in favour of development (e.g. Strategy 23: "... *Where a need has been identified, development of an appropriate scale **will be permitted**...*"). The onus is, rightly, on town and parish councils, supported by District councillors, to play a key role in bringing forward opportunities for development that would deliver what they want for their area. To this end, the Preferred Development Strategy embraces the spirit of Localism by facilitating such community initiatives. An example of where this has already happened is at Tetbury, where councillors have worked with local landowners to bring forward an application to develop housing on two contiguous, disused, brownfield sites. Officers have also been instrumental in supporting towns and parishes to help shape their communities. To date, they have met the following local councils to advise and work with them to help deliver the communities' aspirations:

Tetbury	Moreton-in-Marsh	Kempsford
Tetbury Upton	Bourton-on-the-Water	Somerford Keynes
South Cerney	Chipping Campden	Poulton
Fairford	Willesley	Lechlade
Northleach	Chedworth	Down Ampney
Stow-on-the-Wold	Mickleton	Kemble
Cirencester	Coates	

- There are currently no barriers or insurmountable matters, which prevent new sustainable development taking place in rural areas where it meets identified housing needs, as sought by the Motion. Existing mechanisms do exist to support the release of land to meet rural housing needs, and these would be carried forward and enhanced through the new local plan.
- Extant Cotswold District Local Plan Policy 21 (Affordable Housing) is supportive of schemes for 100% affordable housing outside development boundaries but adjacent to existing settlements subject to there being a proven local need (e.g. Kempsford). Paragraph 54 of the NPPF also supports the release of land for affordable housing in rural areas through rural exception sites. National and local

planning policy and guidance are therefore supportive, in principle, of the release of land adjacent to settlements to meet identified affordable housing needs.

- Paragraph 54 of the NPPF states that: *'local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs'*. It is evident that the Government considers that the provision of some market housing in rural areas can be acceptable in principle if it sits alongside, and supports, the provision of significant additional affordable housing.
- The recent application for new housing in Kempsford was acceptable in terms of the affordable housing provision. It would have received full support had the viability assessment shown that the unusually high percentage of open market housing (62%) was necessary.
- Based on the proposed local plan strategies for rural areas and the provisions of the NPPF, schemes which meet identified need in these areas will continue to be supported. This mechanism therefore delivers on the objective of ensuring that sufficient housing sites are available to meet the present and future needs of local communities.
- There is a role to be proactive in ensuring that local needs are met and local communities can use the evidence base to either support work on a neighbourhood plan, or can work with local land owners to promote sites through the planning application process.

RECOMMENDATION

That, subject to any amendments to the preferred development strategy prompted by representations received in response to the recent consultation, and/ or new evidence arising from the second review of the SHLAA, the general approach set out in the Preferred Development Strategy should be maintained.

APPENDIX C – THE 40 DWELLINGS MINIMUM ‘THRESHOLD’ FOR SETTLEMENTS IDENTIFIED IN THE PREFERRED DEVELOPMENT STRATEGY

One of the main aims of the Local Plan Development Strategy is to demonstrate that the District's housing requirement can be delivered in a sustainable manner over the plan period 2011 to 2031. A minimum 'threshold' of 40 dwellings for settlements was a mechanism used by the Council to help achieve that aim in the Preferred Development Strategy (PDS). The PDS was the first point in the evolution of the Local Plan when the Council assigned broad levels of housing to specific settlements across the District.

The rationale for adopting the threshold was set out in the Development Strategy Evidence Paper (April 2014), at para. 22: *"In order for the Strategy to deliver new housing, there must be reasonable certainty that sites of a sufficiently 'strategic' scale will be developed up to 2031. When considering which settlements to specifically identify in the Strategy, the Council has used a capacity of 40 dwellings as the lowest qualifying limit. The capacities of settlements have derived from the SHLAA's assessment of sites deliverable within 5 years or potentially developable between 6 and 20 years..."*

If the Local Plan is to be deemed 'sound' at examination, it is important to demonstrate that the housing requirement can be delivered in accordance with the provisions of the NPPF. From a practical perspective, strategies should not drill down to a micro level because, by their very nature, they need to be 'high level'. Although 40 dwellings is a small number compared with many other emerging strategies – it was considered to be a pragmatic threshold in the sense that the SHLAA had identified sufficient land to deliver at least 40 dwellings in all of the PDS's 17 'sustainable' settlements over the plan period.

No 'rules' are laid down in national policy/ guidance to state how development strategies should be produced. It is for each LPA to decide which method is appropriate for its own area. The 40 dwellings threshold was considered a realistic lower 'qualifying' limit for a rural area like Cotswold because the District has scores of villages and hamlets with few, if any, 'everyday' services and facilities (e.g. shops, post offices and/or primary schools); minimal employment opportunities; and limited or no access to public transport. Little housing has been built in most of the District's smaller rural settlements over many years, and relatively little appetite for more housing has been forthcoming, to date, from rural parishes in response to consultation papers. The Council took the view that the delivery of less than 40 dwellings in any one settlement over the Plan period was too small to warrant the inclusion of such settlements in the Development Strategy.

The NPPF does not leave an 'open door' to unsustainable residential development in villages, particularly if it would generate significant transport movements and increase the need to travel. Therefore, if the Council is to accord with the NPPF's principles of sustainability, there is no rational basis for encouraging the development of significant numbers of dwellings in poorly served rural locations over the plan period. A number of recent planning appeal decisions have borne this out, notably at Withington and Cowley. Moreover, there is no evidence to suggest that small-scale residential development saves facilities from closure or encourages new ones to open. Conversely, there is evidence of shops and schools closing in sizable villages (e.g. Kempsford, Avening), and where significant housing had been allowed in the past (e.g. Coates, Weston-sub-Edge).

The Council, however, understands the desire of some rural communities to promote development, which would enhance sustainability, together with the need to balance this against the requirements of the NPPF. To these ends the Council has sought,

through engagement with rural communities, to develop a criteria-based rural housing policy applicable to those settlements that are not identified in the Development Strategy⁵⁶. The resulting policy aims to allow for acceptable, sustainable, development in such locations. It is self-evident that any development coming forward is likely to be small-scale in most cases.

To summarise, the Development Strategy identifies sustainable settlements where specific sites will be allocated to deliver the District's housing requirement for the period 2011-2031. Any other unplanned housing that comes forward as 'windfalls' will be back-counted into the supply calculations. This is standard planning practice with all LPAs because it is impossible to plan for the delivery of small, ad hoc, sites with any certainty. The emerging Strategy recognises that even a single dwelling in many Cotswold villages could conflict with the NPPF. It is clear that sustainability remains the overarching principle for all rural housing developments and they should be located in those settlements where the vitality of rural communities would be enhanced/maintained. This is what the emerging Local Plan is seeking to achieve by concentrating development on the District's most sustainable settlements. Exclusion from the Strategy, however, does not necessarily preclude the development of new-build housing.

⁵⁶ Rural Housing Topic Paper (CDC, November 2014)