

Cotswold District Site Allocations Selection Methodology

November 2025



COTSWOLD
District Council

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Appendix A – Site Selection Table

1. Introduction

- 1.1 This methodology supports the identification and selection of site allocations for the emerging Cotswold District Local Plan (2025 to 2043) (the emerging Local Plan). It describes the process and decision making only; it does not identify site boundaries nor replace the detailed analyses contained within the Integrated Impact Assessment, the Strategic Housing and Economic Land Availability Assessment, or other technical evidence. Mapped outputs, detailed scoring, and individual site conclusions are published within those evidence documents.
- 1.2 Cotswold District lies predominantly within the Cotswolds National Landscape, and the Council's site selection methodology has been developed to reflect this sensitive context. The approach provides a clear, proportionate, and structured framework for assessing sites both within and outside the National Landscape, ensuring that national policy tests – including the major development test¹ – are applied consistently and transparently.

2. Purpose and Context

- 2.1 This methodology establishes a transparent, consistent and proportionate framework for moving from the longlist of potential development sites to a list of recommended development allocations for the emerging Local Plan. It provides a clear audit trail linking the factual land availability evidence in the Strategic Housing and Economic Land Availability Assessment with the sustainability and statutory assessments in the Integrated Impact Assessment, and then into a balanced, plan-making judgement on which sites should be allocated.
- 2.2 Approximately 80% of the district lies within the Cotswolds National Landscape area. The methodology therefore embeds National Landscape considerations within the core assessment stage to ensure that statutory protections and local sensitivities are addressed fairly and consistently alongside other sustainability and delivery factors.
- 2.3 The methodology is guided by four principles:
- **Proportionality:** Avoid duplication with the Strategic Housing and Economic Land Availability Assessment and Integrated Impact Assessment; focus detailed work only on reasonable options.

¹ As set out in paragraph 190 of the National Planning Policy Framework (December 2024)

- **Transparency:** Record clear reasons at each stage and maintain a record.
- **Consistency:** Apply uniform thresholds and criteria so sites are assessed on a comparable and consistent basis.
- **Deliverability:** Only recommend sites with a realistic prospect of delivery within the plan period, with regard to infrastructure mitigation and phasing.

2.4 The process covers housing, employment and mixed-use site options. Smaller sites below a threshold (explained later) contribute to the windfall² supply and are counted separately.

3. National Policy and Guidance

National Planning Policy Framework

3.1 The approach being undertaken is aligned with the National Planning Policy Framework (December 2024)³ (the National Planning Policy Framework), which states,

"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area." (paragraph 23)

"...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability." (paragraph 72)

3.2 Regarding development site allocations, the National Planning Policy Framework specifies that policies should identify specific deliverable sites for years 1-5 of the plan period, and specific deliverable sites or broad locations for growth for years 6-10, and where possible, years 11-15 of the plan period. (paragraph 72)

3.3 The National Planning Policy Framework also recognises that *"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to*

² Defined by the Glossary of the National Planning Policy Framework (December 2024) as "Sites not specifically identified in the development plan."

³ As updated by the MHCLG in February 2025

existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities..." (paragraph 77)

- 5.1 The National Planning Policy Framework also acknowledges the extended lead-in times typically associated with large-scale developments and highlights the importance of realistic delivery trajectories. To reflect these long-term processes, strategic sites should be embedded within a vision that looks ahead at least 30 years, ensuring alignment with the anticipated timescales for delivery and the evolution of supporting infrastructure and communities. (paragraph 22) This means that the whole of strategic sites will need to be allocated for development in the Local Plan.
- 3.4 In terms of employment land, the National Planning Policy Framework requires that planning policies must cater to the locational needs of different sectors by:
- Supporting clusters and infrastructure for high-tech, creative, and data-driven industries.
 - Providing accessible sites for storage and distribution to aid supply chains and decarbonisation.
 - Enabling expansion or modernisation of key industries to bolster economic growth and resilience.

Planning Practice Guidance

- 3.5 The Planning Practice Guidance on the Housing and Economic Land Availability Assessment⁴ sets out the approach to identify land that is suitable, available and achievable for housing and economic use over the plan period.
- 3.6 The Council will ensure its evidence to identify the housing and employment land supply for the emerging Local Plan, set out within the Strategic Housing and Economic Land Availability Assessment, is prepared in accordance with this guidance.
- 3.7 Whilst the Strategic Housing and Economic Land Availability Assessment evidence forms an important part of the site assessment and selection process for the Local Plan, it does not consider all the wider sustainability effects of development proposals. It also does not on its own establish the specific sites that should be recommended for allocation in the emerging Local Plan.

⁴ [Planning Practice Guidance: Housing and Economic Land Availability Assessment](#) (MHCLG, last updated 22 July 2019)

4. Evidence Sources Supporting Site Selection

- 4.1 The process draws on a comprehensive suite of evidence, including: the Strategic Housing and Economic Land Availability Assessment (availability, suitability and achievability); the Integrated Impact Assessment (which consolidates Sustainability Appraisal, Equalities and Health considerations); the Habitats Regulations Assessment; the Infrastructure Delivery Plan (IDP); Housing Needs Assessment; Employment Land Assessment; Strategic Flood Risk Assessment; and other evidence base documents. The site selection process is also determined by feedback from public consultations, as well as ongoing engagement with statutory agencies and neighbouring authorities via the Duty to Cooperate. Collectively these form the technical and policy evidence base for site selection.

5. Sources of Supply

- 5.1 Several sources of supply will ensure that there is a continuous supply of land for development across the plan period. For example, sites may be identified from the following sources:
- Existing planning commitments (e.g. sites with planning permission);
 - Allocations from the currently adopted Local Plan without permission;
 - Sites that have been submitted through the 'Call for Sites';
 - Sites on the Council's Brownfield Register;
 - An allowance for windfalls that will be delivered over the Local Plan period;
 - Sites promoted through neighbourhood plans; and
 - The identification of broad locations for growth.

6. Site Size Thresholds

- 6.1 The Planning Practice Guidance on the Housing and Economic Land Availability Assessment explains that "*It may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above*"⁵.
- 6.2 In accordance with this, and to ensure the allocation of sites remains proportionate, the following size thresholds will apply:
- Residential: capable of delivering ≥ 5 dwellings or ≥ 0.25 ha.

⁵ [Planning Practice Guidance: Housing and Economic Land Availability Assessment](#) (MHCLG, last updated 22 July 2019 – paragraph: 009 Reference ID: 3-009-20190722; Revision date: 22 July 2019)

- Employment: $\geq 0.25\text{ha}$ or $\geq 500\text{m}^2$ floorspace.

6.3 Smaller sites will still be able to contribute to the windfall supply but will not be individually assessed for allocation in the emerging Local Plan.

7. Site Selection Process – Overview

7.1 The methodology for selecting sites for the emerging Local Plan is structured into five progressive stages. This sequence ensures that the spatial strategy is applied early to avoid unnecessary technical work on sites that are unlikely to form reasonable alternatives, while keeping a clear and defensible audit trail throughout.

7.2 The Integrated Impact Assessment provides the single, integrated framework for sustainability and statutory assessments; proportionate technical checks and deliverability considerations are embedded within the same stage to avoid duplication.

- **Stage 1** – Site Identification
- **Stage 2** – Spatial Strategy Filter
- **Stage 3** – Sieve of Clearly Undeliverable Sites
- **Stage 4** – Integrated Impact Assessment & Constraints (incl. National Landscape)
- **Stage 5** – Planning Balance & Recommendations

Stage 1 – Site Identification

7.3 Potential sites are identified within the Strategic Housing and Economic Land Availability Assessment dataset, which will incorporate land identified from various Call for Sites campaigns, neighbourhood planning inputs, previously allocated but unimplemented land, etc. The Strategic Housing and Economic Land Availability Assessment will provide a comprehensive longlist of candidate sites with core information on boundary, capacity and availability.

Stage 2 – Spatial Strategy Filter

7.4 Sites are then tested against the emerging spatial strategy and settlement hierarchy. Only sites that are aligned with the spatial strategy will proceed to detailed assessment; sites that do not align may be set aside, except where retained as contingency reasonable alternatives for plan-making purposes.

Stage 3 – Sieve of Clearly Undeliverable Sites

- 7.5 A light-touch filter then removes sites that fail basic suitability or deliverability tests. For example, this may include: land with implemented permissions or where the promoter confirms the site is not available within the plan period; functional floodplain (Flood Zone 3b); locations that are isolated from settlements with no reasonable prospect of integration; sites where safe and suitable access cannot be achieved; and land subject to severe, unmitigable contamination or infrastructure barriers. Remaining sites are deemed as potential developable options for the purposes of the next stage.

Stage 4 – Integrated Impact & Constraints Assessment (including National Landscape Review)

- 7.6 Sites that pass the spatial strategy filter are assessed through the Integrated Impact Assessment and Habitats Regulation Assessment, which consider sustainability, equalities and health, habitats issues, and other considerations in a single framework. These are also compliant with Strategic Environmental Assessment regulations. The Integrated Impact Assessment examines the likely significant environmental, social and economic effects of each site, including housing and employment delivery, accessibility and transport, climate change mitigation and adaptation, flood risk and water resources, biodiversity and geodiversity, green and blue infrastructure opportunities, heritage and townscape, soil and agricultural land quality, and the capacity of local infrastructure such as schools, healthcare, utilities and digital connectivity. Sites receive a qualitative outcome using the following descriptors: ++ significant positive; + positive; 0 neutral; – negative; – – significant negative.

National landscape and landscape assessment

- 7.7 Given the extent of the Cotswolds National Landscape within the district, landscape and visual considerations are embedded within this stage rather than applied as a separate, sequential filter. Proportionate use is made of local landscape character and sensitivity evidence to understand the capacity for change, the sensitivity of key views and skylines, and the potential for effective mitigation through site layout, design, planting and green infrastructure. Where proposals may constitute 'major development' within the National Landscape, the relevant national policy tests are applied proportionately alongside the district's landscape evidence to inform the overall Integrated Impact Assessment outcome and the planning balance.

Technical constraints and deliverability

- 7.8 Alongside the Integrated Impact Assessment themes, proportionate technical checks are recorded for issues such as flood risk (informed by the Strategic Flood Risk Assessment), highways and access (through engagement with the local highways authority), utilities and wastewater capacity, heritage assets and their settings, biodiversity designations and irreplaceable habitats, land contamination and ground conditions, neighbouring land uses and amenity, and topography. Delivery factors are reviewed, including ownership and legal control, market interest, abnormal costs, infrastructure dependencies, lead-in times and anticipated phasing. The purpose is not to duplicate detailed planning application-level work but to establish whether there is a realistic prospect that development is achievable in the plan period and what mitigation is required.

Transport and accessibility

- 7.9 Dialogue with the highway's authorities (Gloucestershire County Council and Highways England) establishes whether safe and suitable access can be delivered, likely network effects, and opportunities to support active travel and public transport. Any mitigation (off-site works, demand management, travel planning, etc.) is identified for potential development principles.

Flood risk and drainage

- 7.10 The Strategic Flood Risk Assessment guides sequential decision-making and, where necessary, exception testing. Surface-water management and foul drainage considerations are recorded, including any known wastewater treatment works constraints and phasing implications.

Biodiversity and green/blue infrastructure

- 7.11 Potential effects on designated and priority habitats are identified, with opportunities for biodiversity net gain and for strengthening strategic green/blue infrastructure links. Irreplaceable habitats and ancient woodland are flagged early to avoid abortive work.

Heritage and townscape

- 7.12 Likely effects on designated and non-designated heritage assets and their settings are noted, with early design and layout principles suggested where harm can be avoided, minimised or mitigated.

Infrastructure capacity and social value

- 7.13 The Infrastructure Delivery Plan and targeted engagement inform judgements on capacity for required infrastructure, such as schools, health facilities, utilities, water supply / treatment and digital networks. Community infrastructure, open space and local services are considered separately to understand social value and place-making potential.

Deliverability, viability and phasing

- 7.14 Ownership and legal control, market interest, potential abnormalities, access works, utility upgrades, lead-in times and delivery trajectories are reviewed in outline. Site viability is also tested – this is not an application-level viability test but establishes whether there is a realistic prospect of delivery within the plan period and the scale/timing of mitigation or phasing that may be required.

Stage 5 – Planning Balance and Recommendations

- 7.15 The Outcomes from Stage 4 are brought together with the spatial strategy to reach a balanced recommendation for each site. The planning balance weighs Integrated Impact Assessment performance, National Landscape / other landscape conclusions, the scale of required mitigation, delivery timing and infrastructure alignment, and any cumulative effects. Sites are categorised as:
- **Preferred allocation** – suitable, available, achievable and aligned with the spatial strategy;
 - **Reasonable alternative** – suitable in principle but less preferred due to relative constraints or timing; or
 - **Rejected** – unsuitable, unsustainable, or unlikely to be deliverable.
- 7.16 Please note, if the identified supply of land is unable to deliver the identified need for a type of development, it may be that all 'deliverable' and 'developable' land – as defined by the National Planning Policy Framework Glossary – will need to be recommended for allocation in the emerging Local Plan.
- 7.17 Conclusions to the site selection assessment will be published setting out reasons for each decision (preferred/alternative/rejected) to provide a clear audit trail (Appendix A) to this document when they are complete.
- 7.18 The application of this methodology will be published alongside the next stage of consultation on the emerging Local Plan (formally known as a Regulation 19 consultation), with site assessment schedules, summary matrices and mapping that shows the distribution of preferred allocations, reasonable alternatives and rejected sites. Mapping will be issued in the Strategic Housing and Economic

Land Availability Assessment, Integrated Impact Assessment and / or site selection appendices rather than within this methodology to keep the process explanation concise.

8. Next steps

- 8.1 This site selection methodology is subject to public consultation alongside the regulation 18 Preferred Options consultation.
- 8.2 The Council welcome views on the methodology as set out in this document and also the approaches to site assessment.

Appendix A – Site Assessment Summary Schedule (template)

Site Ref.	Settlement	Capacity (homes / m ²)	Integrated Impact Assessment Outcome	Key Constraints / Mitigation	Delivery (5/10/15+)	Recommendation
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