Assessment of Broad Strategic Development Locations

November 2025

COTSWOLD
District Council

Contents

Executive Summary

0.1 Cotswold District Council is required to identify sufficient sites to enable the delivery of the number of homes central government calculates to be needed in the district. This report aims to find broad locations that would be suitable for strategic development (developments of five hundred or more homes) in the form of large urban extensions to existing settlements or new settlements.

0.2 There is no set methodology to undertake this work. However, a similar exercise was done for the rest of Gloucestershire in recent years and this report emulates that methodology in order to align Cotswold District as much as possible with the other Gloucestershire authorities.

0.3 An initial assessment of constraints in the district was undertaken to remove any areas that are assessed to be unsuitable for the allocation of strategic development in the Local Plan. Cotswold District is a highly constrained area where 84% falls into designations such as the Cotswold National Landscape and Flood zone 3, which prohibit strategic scale development. The remaining 16%, which was subdivided into 29 Broad Zones for further assessment. This remaining area is not free of constraints either with many heritage and ecological assets, special landscape areas, high grade agricultural land, mineral safeguarding areas etc., although the impact on these constraints can potentially be avoided or mitigated. With Cotswold being a large and rural district, there is also limited availability of sustainable transport options which new strategic development could link up to.

0.4 All this information was brought together in maps and a site assessment sheet for each of the 29 Broad Zones. The assessment shows that there are no realistic opportunities for a large new town of over 10,000 houses, although (parts of) zones have been identified that potentially could accommodate a village or small town. However, this study remains a high level assessment indicating potentially suitable locations for development. The full impact of development in specific locations within the Broad Zones will need to be looked at in more detail to confirm the suitability of those areas for development while considering the balance between housing and other development needs and adverse impacts.

0.5 The next step in the process will be to determine availability to see if landowners within the Broad Zones, which have been identified as potentially suitable, are interested in developing their land. Areas within Broad Zones that have been shown to be potentially suitable for development in this report and which are also available for development can then be assessed in more detail to determine the level of development that could occur (if any).

1. Introduction

Background

1.1 In December 2024, central government introduced a new 'standard method' to calculate the minimum number of homes needed in each local planning authority area. This resulted in an 106% increase to Cotswold District's housing target from 493 to 1,036 homes a year. Cotswold District Council ('the Council') is now required to identify sufficient sites to enable the delivery of this new housing target. Only if the Council has exhausted all options to deliver the housing target, can a lower housing requirement be set in its Local Plan.

1.2 This report is one of the first steps in identifying suitable sites for housing delivery. It aims to identify broad locations that would be suitable for strategic development (defined in this study as developments of five hundred or more homes). These can be either large urban extensions to existing settlements or new settlements. Further detailed research will be needed to confirm whether development in these areas is suitable, and whether it would be feasible and viable.

1.3 A similar report called 'The Assessment of Strategic Development Opportunities in Parts of Gloucestershire Report'[1] was prepared by Land Use Consultants (LUC) for Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Stroud District Council and Forest of Dean District Council in October 2019. At the time, Cotswold District Council was able to deliver its future housing target and therefore did not participate in this study. However, to align as much as possible with the other Gloucestershire authorities, this report takes the same methodology used in the LUC report as set out in paragraphs 2.1 to 2.3 below, with some minor adjustments to the Cotswold context.

1.4 At the time of writing, local government is going through a programme of reorganisation with the aim of removing the two-tiered system of local government, which is the system currently used in Gloucestershire. Cotswold District is set to merge with some or all of the other Gloucestershire districts

[1] https://www.stroud.gov.uk/media/5opif301/gloucestershire-strategic-growth-options-final-report_exl_appendices_lr_redacted.pdf

and the county council in 2028 to become a unitary authority. Aligning our processes and procedures now will help ease this transition.

Policy Context

1.5 The National Planning Policy Framework (December 2024) (NPPF) specifies in paragraph 78 that: "Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old." This housing need figure is calculated using the standard method as set out above. For Cotswold District this is 1,036 homes a year at the time of writing.

1.6 Paragraph 72 of the NPPF shows that to achieve this, local planning authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. This can then be used to create planning policies which identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. These planning policies should identify a supply of deliverable, specific sites for years one to five of the plan period; then broad locations for growth or developable sites for years 6-10 and, if possible, years 11-15. Identifying broad locations for larger scale developments, as this study aims to do, is therefore essential for the Council to meet its housing target. Moreover, paragraph 22 indicates that strategic policies should be set within a vision that looks at least 30 years ahead to take into account the likely timescale for delivery,

1.7 In terms of the scale of development, paragraph 77 of the NPPF states that the supply of a large number of homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing towns or villages, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Paragraph 73 of the NPPF confirms that local planning authorities can meet up to 90% of their housing requirement via larger sites.

2. Methodology

2.1 There is no standard established methodology for undertaking growth option studies of this kind, and appropriate approaches vary depending upon the characteristics of the study area and their overall aims and objectives. However, as explained in paragraph 1.3, a similar exercise was undertaken in 2019 for the rest of Gloucestershire. That report involved two main stages, with the first stage being the development of a methodology and the second stage being the assessment and reporting based on the agreed methodology.

2.2 The development of the methodology by LUC involved four key tasks. For each of these tasks, the study method was developed in an iterative manner: initial methods were formulated and then tested, and the methods were then refined following consultation feedback:

- Defining the extent of land to be considered for its strategic housing development potential (i.e. the study area).
- Subdividing this land into discrete assessment units.
- Defining the appropriate nature and scope of the assessment of housing development potential within these units.
- Consultation on the above.

2.3 Before undertaking the assessment, LUC consulted on the methodology with various statutory stakeholders, such as Gloucestershire County Council, Highways England and the Environment Agency. Where necessary, the methodology was amended in light of the consultation feedback, leading to a robust and defensible method for undertaking the study. It is therefore sensible for Cotswold District Council to use this same tried and tested methodology, with the additional benefit of the Council's evidence base being aligned with the rest of the County. Any adjustments made to the LUC methodology tend to be minor, evidence based and/or informed by the associated consultation responses at Regulation 18 stage of Cotswold's Local Plan's preparation.

3. Site Identification and Assessment

Step 1: Data Gathering and Collection

3.1 The first step of the study involved gathering the required spatial data to undertake the assessment. Both step 2 (page 6) and step 4 (page 16) contain a table listing the data that has been used and the reason for their inclusion. The Council's GIS team maintains a repository of spatial data either created by the Council or published by various organisations.

Step 2: Identification of Land to be Removed from Further Consideration of Development Potential

3.2 An initial assessment of constraints in the district was done to remove any areas that are assessed to be unsuitable for strategic development in the Local Plan. This step defines a suitable pool of land to consider further within this study with respect to its strategic development potential.

3.3 This step of the study involved undertaking a high-level assessment of 'Primary Constraints' to development with the aim of excluding land that would likely be unavailable for strategic development (for example due to already being developed) and land that has constraints that make it unsuitable for strategic development (for example Flood Zone 3). These constraints were defined as 'primary constraints' and are listed in Table 1.

Table 1 – Primary Constraints

Theme	Constraint	Comments
Issues making land unavailable for strategic growth		
Settlement Boundaries	Land within settlement development boundaries	The purpose of the study is to identify strategic development opportunities beyond the settlement boundaries.
Committed Development Sites	Committed housing and employment development sites	Site allocations for housing and employment development within the adopted local plan were excluded as established commitments. Likewise, sites with extant planning permission or were under construction were also excluded on the same basis.

Waste and Employment Sites	Safeguarded and planned waste sites as well as employment sites	Operational waste and employment sites also represent established commitments where development is not possible.
Constraints making land unsuitable for strategic growth		
Historic Environment	Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, Listed Buildings, Conservation Areas.	Historic assets of national significance are referenced in chapter 16 of the NPPF and are required to be conserved in a manner appropriate to their significance. Listed building 'point' data was included with a 20m indicative 'footprint' buffer applied. Although settings of heritage assets may be important constraints, it is not possible to map them in a consistent way as they vary on a case by case basis.
Ecological and Geological Environment	Sites of Special Scientific Interest, Local Green Spaces, Special Areas of Conservation and Ancient Woodlands	International and national ecological assets including irreplaceable habitats are listed in chapter 15 of the NPPF and are required to be protected and enhanced. Footnote 7 of the NPPF also refers to Local Green Spaces as areas of particular importance that need to be protected.
Landscape Designations	Cotswold National Landscape	Paragraph 189 of chapter 15 of the NPPF states: 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscape, which have the highest status of protection in relation to these issues.'
Water Quality	Lakes, reservoirs, rivers and canals	A 2.5m indicative 'footprint' buffer was applied to these waterbodies/features. They are excluded from the assessment because they cannot accommodate strategic scale development.
Flood Risk	Flood Zone 3	Paragraph 170 of chapter 14 of the NPPF states: 'Inappropriate development in areas at

		risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)'. Flood Zone 3 (areas with high probability of flooding) is therefore considered inappropriate for strategic scale development. Although flooding is acknowledged to be a particularly sensitive issue in Cotswold District, Flood Zone 2 has not been excluded as an absolute constraint because strategic development may be appropriate in Flood Zone 2 subject to the NPPF 'Exception Test'.
Infrastructure	High voltage overhead electricity lines, major gas and oil pipelines with relevant buffer zones.	The buffer zones are based on safety guidance from the relevant authority/owner which is the Energy Network Association for overhead electricity lines, Exolum for major oil pipelines and the Health and Safety Executive for major gas pipelines.
Open Access Land	Open Access Land	Open Access Land is protected under the Countryside and Rights of Way Act 2000.

3.4 This stage of the study has been undertaken in accordance with NPPF paragraph 11b and Footnote 7, which specify that, "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses… unless the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area[7]. Footnote 7 specifies that this relates to the policies referred to in the NPPF (rather than those in development plans) on: habitats sites (and those sites listed in NPPF paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in NPPF footnote 75); and areas at risk of flooding or coastal change.

3.5 Compared to the LUC study, some constraints, such as National Nature Reserves, Special Protection Areas and Ramsar sites, were removed from Cotswold's assessment as Cotswold District does not contain any of these areas (although buffer zones around these areas have been taken into account in further steps where applicable). On the other hand, Local Green Spaces in the district have been included as, in contrast to the LUC study, they do not always fall within existing development boundaries of settlements within the district. The CDC study has also added major gas and oil pipelines as a primary constraint as these cannot be built upon.

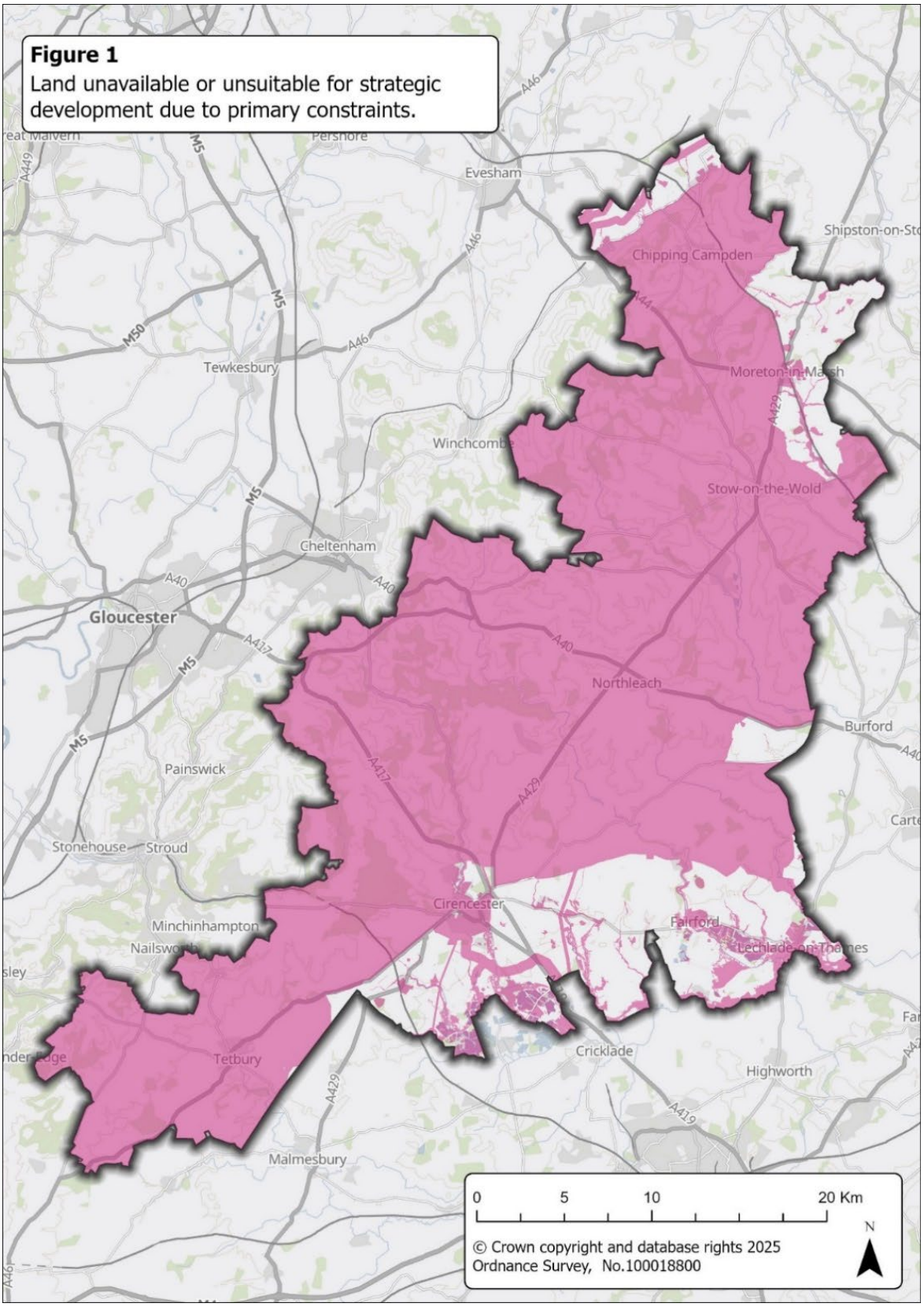
3.6 The LUC study does not take the Green Belt designation into account. Although Cotswold District has a small area of Green Belt land, this consideration was irrelevant to the CDC study as the Cotswold National Landscape wholly covers the Green Belt area.

3.7 The LUC study undertook a high-level review of 'Accessibility to Services' and 'Travel to Work' patterns. However, the report concludes these should not be used to exclude land for further consideration as strategic growth may include housing, new employment provision, services, facilities and public access / transport links. Moreover, the latest dataset available on Travel to Work patterns dates from 2011 and is therefore not guaranteed to still be applicable to the situation today. Both Accessibility to Services and Travel to Work patterns have therefore not been considered in this step of the CDC study. However, they have been considered in Step 4.

3.8 A 'High Level Assessment of Infrastructure Constraints' was also included in the LUC study. However, as Cotswold District is highly constrained with 80% of its area falling into the Cotswold National Landscape, it would not be appropriate to discard areas based on infrastructure needs at this stage. However, it is important to acknowledge that such constraints will need to be assessed, and any necessary infrastructure that will need to be delivered to unlock development in areas that would otherwise be unsuitable, will need to be clearly listed and provided for in accordance with the Infrastructure Delivery Plan (IDP).

3.9 A Geographical Information Systems (GIS) tool was used to identify and visualise the areas within Cotswold District which should be removed from

further consideration in this study. Figure 1 shows the results of this exercise where all the constraints listed in Table 1 have been merged and then overlaid on a map of the district.



3.10 With 80% of Cotswold District being covered by the Cotswold National Landscape, the majority of land in the district is excluded at this stage. The NPPF (paragraph 189) specifically states that development in National Landscape should be limited in scale and extent and is therefore unsuitable for strategic scale development. A further 4% is unsuitable for strategic development due to other primary constraints. However, the exercise shows that the remaining land is relatively free of primary constraints. This leaves 16% of the district available for further assessment.

Step 3: Identification of 'Potentially Developable Land'

3.11 The next step in the process was to identify potentially developable land for further assessment. Additional size and proximity-based criteria were applied to the areas left over after the exclusion of land identified as unlikely to be available and / or being unsuitable for strategic development in step 2. These included:

- All land areas less than 5 hectares (ha) were discarded.
- Oddly shaped areas (such as long thin strips of land) were discarded.
- All remaining areas within 100m of each other were merged.

3.12 The minimum size of a 'strategic development' is defined in the LUC study as five hundred houses[2], which equates to an area of approximately 20.5 ha. Accordingly, all land parcels under this size (after being merged as set out in the paragraph above) were excluded from further review in the study. To be eligible for consideration as an urban extension, the land also had to be near the development boundary of any of the Principal Settlements identified in the Cotswold District Local Plan 2011-2031. Isolated land parcels under 61.5 ha were therefore also excluded as they did not meet the minimum size requirement to accommodate 1,500 dwellings, which the LUC study determined to be the minimum size threshold for a potential new settlement.

3.13 As with the LUC study, this land search process produced large stretches of potentially developable land, made up of more or less continuous areas rather than discrete potential development sites, as is shown in Figure 2 on page 13. The LUC study also showed that automated GIS-based approaches to further

[2] 500 or more homes is also the figure used in the Lichfields' report 'Start to Finish: How quickly do large-scale housing sites deliver? (Third edition, March 2024)

sub-divide these swathes of land that did not give satisfactory results. Therefore, a qualitative approach was needed to subdivide these areas into defined units for assessment purposes, although it was clear that this could not take the form of discrete development sites.

3.14 Following the LUC study methodology, these large swathes of potentially developable land were subdivided using boundaries following (for example) existing geographical features (such as roads), constraints (such as Flood Zone 3) or Landscape Character Areas depending upon what was most appropriate in each case. This subdivision identified 29 'Broad Zones' as shown in Figure 3 on page 14.

3.15 Where potentially developable land was identified close to smaller Principal Settlements, the land has been marked for new settlements instead of urban extensions. Although in practice, these might support development that could reasonably be defined as being of either of these types. Potentially developable land around the larger towns within the district has been marked for large urban extensions. With several of larger towns falling within the Cotswolds National Landscape, only Cirencester, Moreton-in-Marsh, Fairford and Lechlade remain as potential settlements for urban extensions. However, some of the infrastructure and services in these settlements may be at capacity and would need to be expanded before further development can be accommodated. A high level assessment has been undertaking in step 4e of this report. More detailed assessments of the infrastructure and services will be undertaken in the Council's Infrastructure Delivery Plan.

3.16 To define whether an area was sufficiently close to one of the larger towns to be considered an urban extension, a qualitative approach was taken, as setting a fixed distance could result in odd results due to the various shapes of the potentially developable land. Figure 4 or page 15 shows for each Broad Zone whether they will be assessed as a new settlement or as an urban extension.

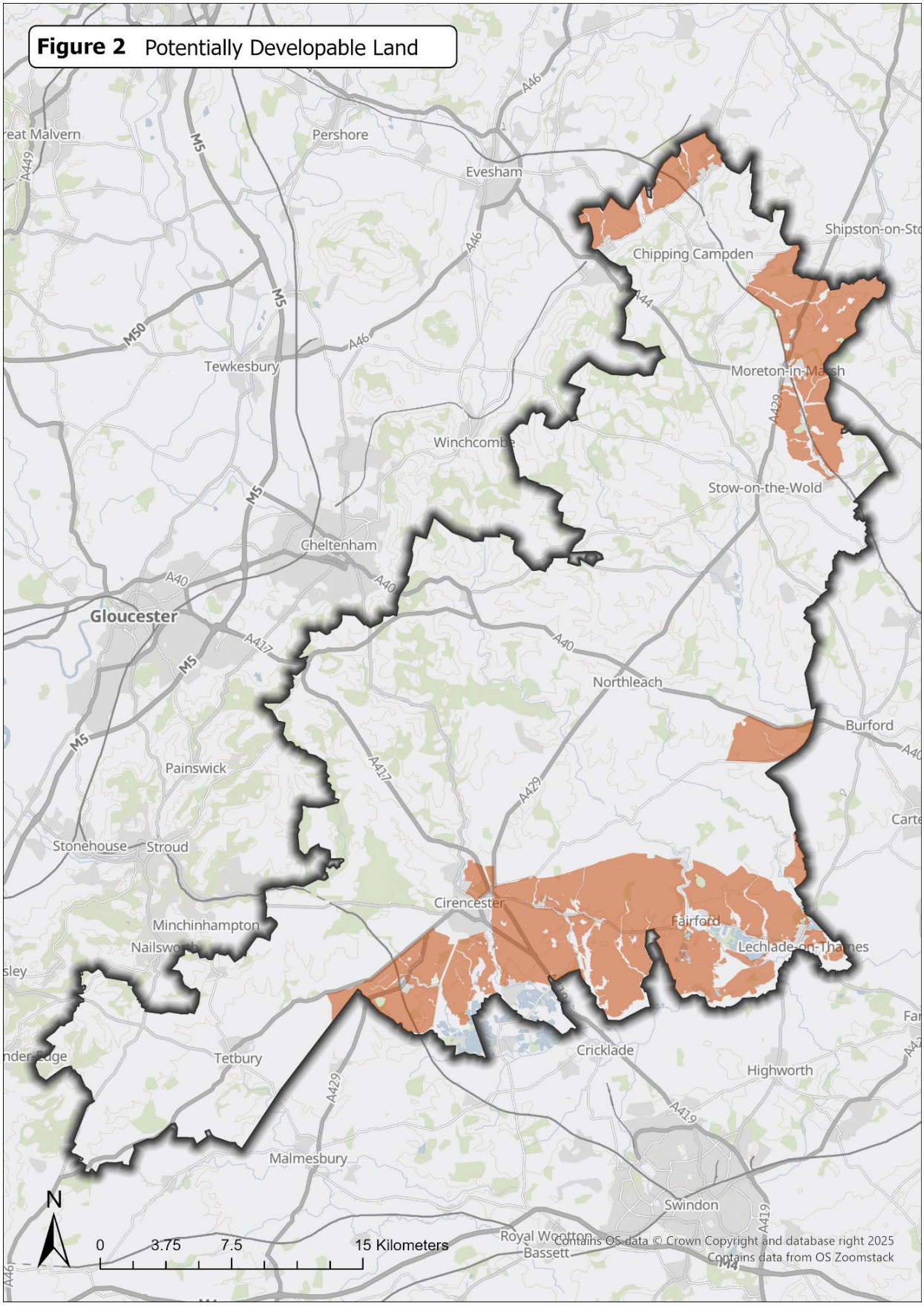


Figure 2 Potentially Developable Land
Pershore
Evesham
Chipping Campden
Moreton-in-Marsh
Tewkesbury
Winchcombe
Stow-on-the-Wold
Cheltenham
Gloucester
Northleach
Burford
Painswick
Stonehouse
Stroud
Cirencester
Fairford
Lechlade-on-Thames
Minchinhampton
Nailsworth
Tetbury
Cricklade
Highworth
Malmesbury
Swindon
Royal Wootton Bassett
N
0
3.75
7.5
15 Kilometers
Contains OS data © Crown Copyright and database right 2025
Contains data from OS Zoomstack

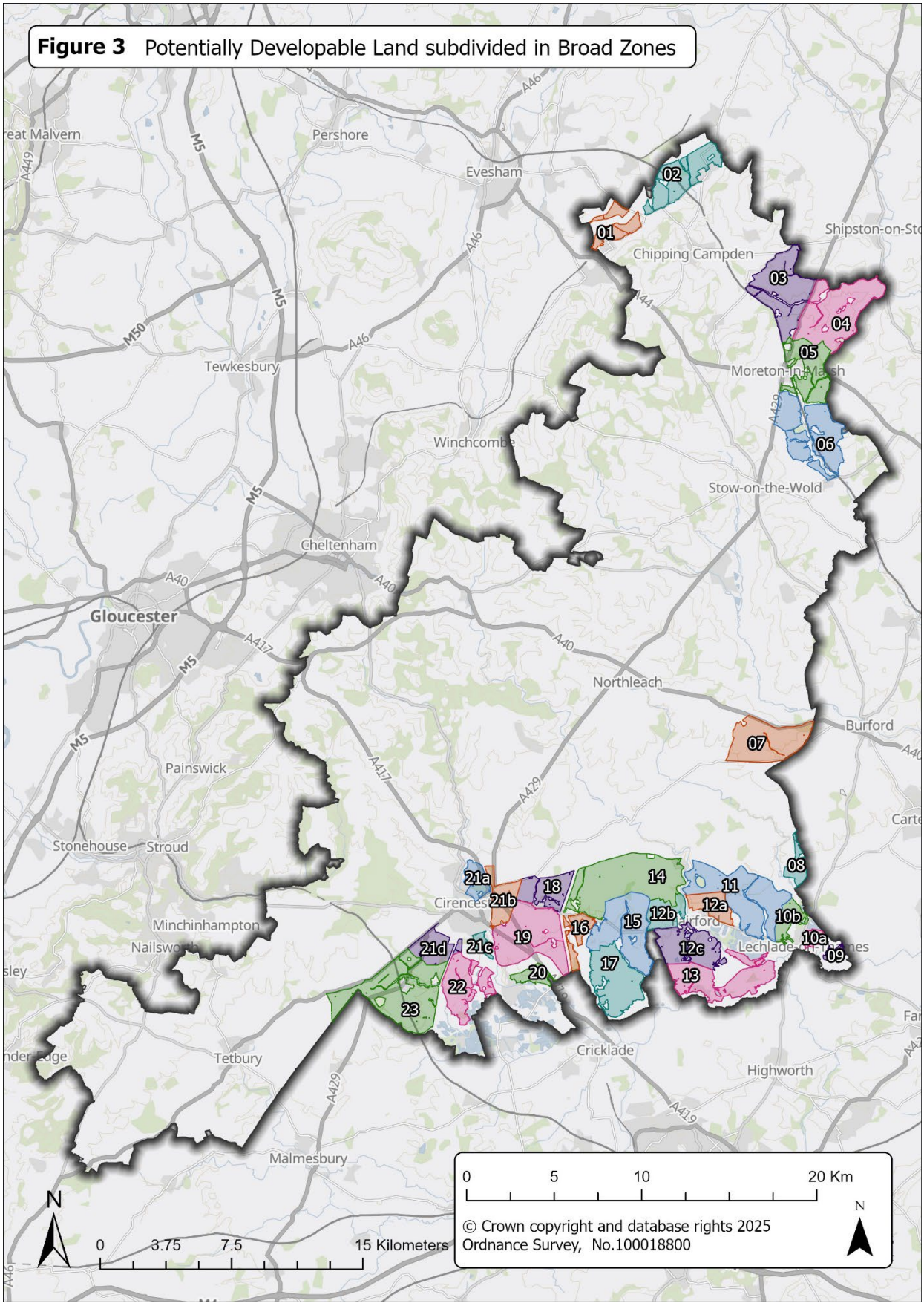


Figure 3 Potentially Developable Land subdivided in Broad Zones
Pershore
Evesham
Chipping Campden
Shipston-on-Stour
Tewkesbury
Moreton-in-Marsh
Winchcombe
Stow-on-the-Wold
Cheltenham
Gloucester
Northleach
Burford
Painswick
Stonehouse
Stroud
Cirencester
Minchinhampton
Nailsworth
Tetbury
Cricklade
Highworth
Malmesbury
Lechlade
01
02
03
04
05
06
07
08
09
10a
10b
11
12a
12b
12c
13
14
15
16
17
18
19
20
21a
21b
21c
21d
22
23
0 3.75 7.5 15 Kilometers
0 5 10 20 Km
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Ordnance Survey, No.100018800

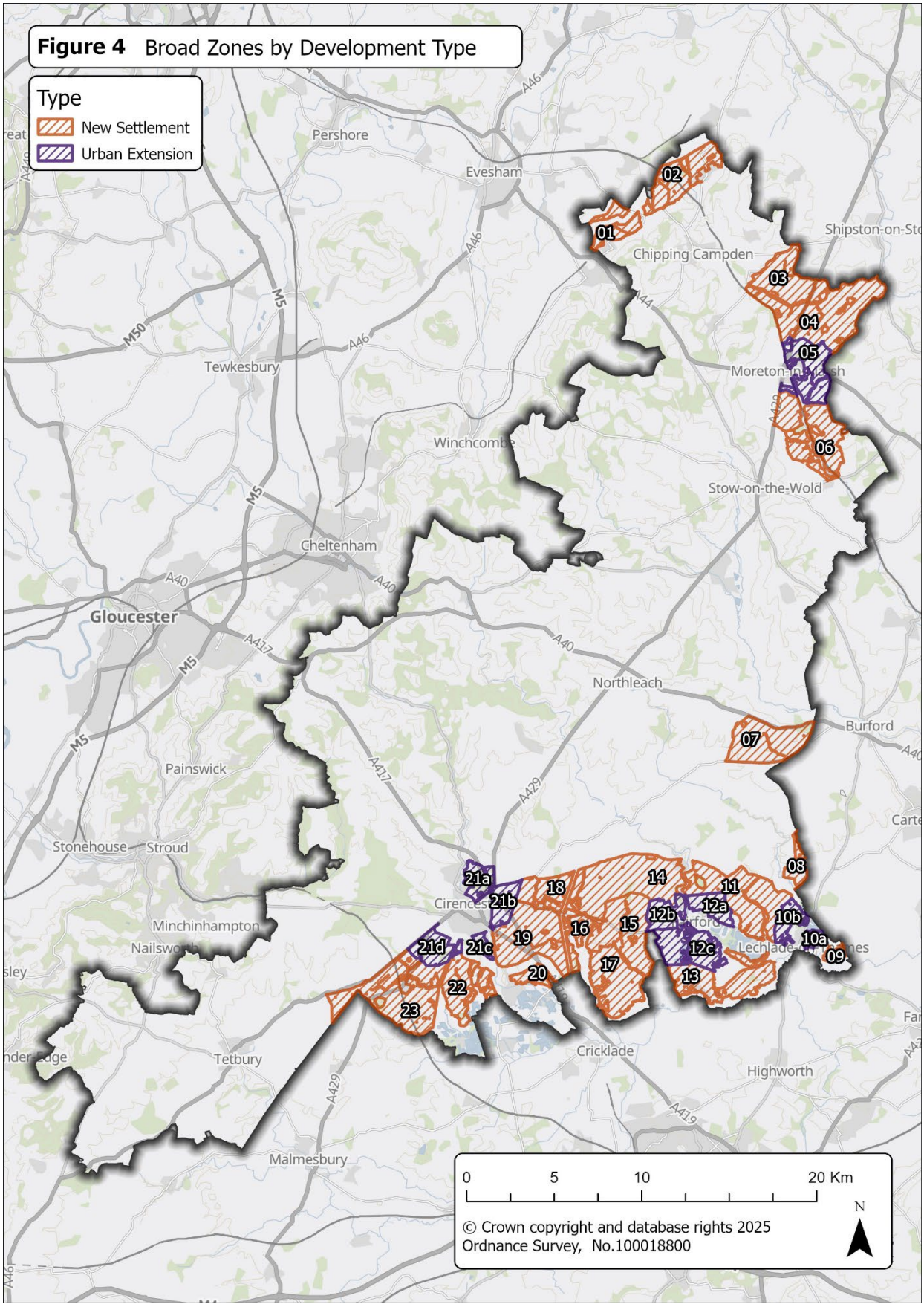
Figure 4 Broad Zones by Development Type
Type
New Settlement
Urban Extension
Pershore
Evesham
Chipping Campden
Shipston-on-Stour
Tewkesbury
Winchcombe
Stow-on-the-Wold
Cheltenham
Gloucester
Northleach
Burford
Painswick
Stonehouse
Stroud
Cirencester
Minchinhampton
Nailsworth
Tetbury
Cricklade
Highworth
Malmesbury
Lechlade
M5
M50
A46
A40
A417
A429
A419
01
02
03
04
05
06
07
08
09
10a
10b
11
12a
12b
12c
13
14
15
16
17
18
19
20
21a
21b
21c
21d
22
23
0 5 10 20 Km
N
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Ordnance Survey, No.100018800

Step 4: Assessment of Development Options

4a. Development Typology

3.17 Each Broad Zone has been assessed against a consistent 'development typology' as set out in Table 2. In line with the LUC study and for the purposes of the map-based assessment of development options, it was concluded that, in regard to density, every five hundred dwellings would require 20.5 ha of land.

Table 2 – Development Typology

Spatial Option	Criteria
New settlements Criteria were based on achieving clear separation from the study area's largest existing settlements and on achieving a sufficient size to support provision of a broad range of services and facilities.	Location has capacity for > **1,500** dwellings. Development Scales: Village: **1,500-5,000** dwellings Large village/town: **5,000-10,000** dwellings Large town/city: **10,000+** dwellings
Urban extensions Criteria were based on identifying locations that are adjacent the edge of the study area's larger settlements. This type did not include extension to lower tier settlements (e.g. villages).	Development Scales: Small urban extension: **500-1,500** dwellings Medium urban extension: **1,500-3,500** dwellings Large urban extensions: **3,500+** dwellings

4b. Review of Secondary Environmental Constraint

3.18 The environmental constraints assessment initially involved identifying a range of spatially defined constraints and sensitivities additional to the 'primary constraints' listed in Table 1. These additional constraints were defined as 'secondary' constraints: features that might be affected to a lesser or greater degree by strategic development, dependent upon its scale and siting. However, it was considered that they did not justify the exclusion of land from the 'potentially developable' area. The full list can be found in Table 3. The secondary constraints were mapped and can be found in the site assessment sheets (see Appendix A).

Table 3 – Secondary Constraints

Theme	Constraint	Comments
Historic environment	Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments (and other Gloucestershire Historic Environment Record (HER) data)	Footnote 75 of NPPF paragraph 213 indicates that such assets should be considered subject to the policies for designated heritage assets.
Ecological and Geological Environment	Priority Habitat Inventory (PHI) Nature Improvements Areas Local Nature Reserves Sites of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ)	Priority Habitats are recognised as being of 'principal importance' for the conservation of biological diversity in England under section 41 of the Natural Environment and Rural Communities Act 2006. Nature Improvements Areas (NIAs) do not have a specific designation, however, they are set by the Gloucestershire Local Nature Partnership and aim to ensure that land is used sustainably to achieve multiple benefits for people, wildlife and the local economy. They have now been superseded by Nature Recovery Areas and the Local Nature Recovery Strategy; however, these datasets are not available yet. The study therefore relies on the previous datasets of NIAs. Local Nature Reserves (LNRs) are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949. SSSI IRZs are defined by Natural England as zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.
Soil quality	Grade 1 (excellent quality) Grade 2 (very good) and	Paragraph 187 of Chapter 15 of the NPPF recognises the benefits of the county's best and most versatile agricultural land.

	Grade 3a (good) agricultural land	It is not possible to distinguish between grades 3a or the lower quality 3b soils from available data, although this distinction is important in policy terms as 'Best and Most Versatile Land' includes Grades 1, 2 and 3a. This will result in a degree of uncertainty in the results which has been made clear in the assessment proforma.
Water Quality	Drinking Water Quality Safeguarding Zones Source Protection Zones (SPZ)	Drinking water safeguard zones are designated areas in which the use of certain substances must be carefully managed to prevent the pollution of raw water sources that are used to provide drinking water while Source Protection Zones aim to protect groundwater supply sources. Both are designations by the Environment Agency. All SPZ categories were included (1, 1c, 2, 2c, 3).
Flood risk	Flood Zone 2 Flood Storage Areas	Paragraph 170 of Chapter 14 of the NPPF states: 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Strategic development in Flood Zone 2 may or may not be appropriate in Flood Zone 2 subject to the necessary 'Exceptions Test'
Mineral resources	Minerals Safeguarding Areas	Paragraph 225 of Chapter 17 of the NPPF states: 'Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.'.
Noise	Strategic Noise Maps: Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB	The DEFRA strategic noise maps illustrate the noise generated by main road and rail routes based on World Health Organisation guidelines for noise exposure. This is considered to be a secondary constraint as adverse effects can potentially be mitigated.

Open space, sport and recreation	Public Rights of Way Sustrans national cycle routes Protected routes of Former Railway Lines Former Cheltenham to Stratford Railway Line	Although these are important features, developments can mitigate any impact in their design. The constraints are therefore showing on the maps but were not included within the scope of the assessment of development options.

3.19 A colour coded rating system was used to show the potential effects associated with the development options. Due to the strategic scale of assessments, there was a degree of uncertainty in relation to some ratings. However, when uncertainty is high it is indicated by '?'. Where there is a clear prospect of effects being mitigated, this is indicated by '*'. Please note that to improve the accessibility of the report, a more diverse colour range was used instead of the standard 'green to red' scale.

	Development may have negligible or no effects
	Development may have minor adverse effects
	Development may have significant adverse effects

3.20 The impacts of development options with respect to environmental constraints was considered through the application of a set of criteria allowing a consistent assessment that was at the same time proportionate to the study scale and purpose. The criteria have been adopted from the LUC study to remain consistent with the other Gloucestershire authorities. The assessment considered effects in relation to both the secondary constraints (see Table 3) and the primary constraints (see Table 1). This is because, although areas subject to primary constraints did not fall within the 'potentially developable land', they could still be subject to effects from development (for example, effects on the settings of heritage assets). The detailed assessment criteria for each topic are set out in Table 4.

Table 4 – Detailed Assessment Criteria for Constraints

Topic	Assessment Criteria

Historic Environment	A high-level review of potential physical and setting effects to heritage assets was undertaken in accordance with the relevant policy and guidance. As required, by policy and guidance, this assessment has been informed by the following data:
	• Historic England (HE) designated asset datasets:
	  ○ Listed Buildings;
	  ○ Scheduled Monuments;
	  ○ Registered Parks and Gardens; and
	  ○ Registered Battlefields;
	• Gloucestershire Historic Environment Record (HER) data; and
	• Cotswold District Council Conservation Areas.
	
	The following principles were be applied in the judgement of effect levels:
	• **Highly likely to cause considerable harm** to the setting of designated heritage assets.
	• **Potential to cause harm** to the setting of designated heritage assets. Further detailed assessment, including views analysis, required to establish extent of harm. Generally any potential would be modest in scale, in the form of hamlet or very small village type development.
	• **Limited potential to cause harm** to the setting of designated heritage assets. Further assessment of the setting of any such assets would still be required. Potential in the form of smaller scale development and maybe larger scale development.

Soil Quality	• The scale of development can be accommodated without intersecting with grades 1-3 agricultural land: **negligible effect**. • The scale of development cannot be accommodated without intersecting grades 1-3 agricultural land: **significant adverse effect**. Uncertainty is present concerning grade 3 agricultural land as there is no data available distinguishing whether it is grade 3a or the lower quality grade 3b.
Water Quality	• The scale of development can be accommodated without intersecting Drinking Water Safeguarding Zone and Source Protection Zones: **negligible effect**. • The scale of development cannot be accommodated without intersecting with Drinking Water Safeguarding Zones and Source Protection Zones: **significant adverse effect.**
Flood Risk	• The scale of development can be accommodated without intersecting with flood zone 2: **negligible effect.** • The scale of development cannot be accommodated without intersecting with flood zone 2: **significant adverse effect**.
Mineral Resources	• The scale of development can be accommodated without intersecting with a Mineral Safeguarding Area: **negligible effect**. • The scale of development cannot be accommodated without intersecting with a Mineral Safeguarding Area: **significant adverse effect**.

Noise	• The scale of development can be accommodated without intersecting with an area recognised as having noise levels in exceedance of 55dB at night or 60dB on average during the period 07:00-23:00 hours: **negligible effect**. • The scale of development cannot be accommodated without intersecting with a Strategic Nosie Buffer: **significant adverse effect**.
Ecological and Geological Environment	Ratings were based on proximity to a defined range of assets. Assessment on this basis was reviewed by specialists within LUC's ecology team and supplemented by qualitative consideration of Priority Habitats. Proximity-based criteria were based on whether development options: • Intersect or fall within 250m of locally designated sites. • Intersect, fall within 250m, or fall within 2km of national/internationally designated sites. The criteria applied were as follows: • The scale of development cannot be accommodated without falling within 250m of one or more internationally or nationally designated biodiversity and geodiversity sites, and/or intersecting with a locally designated site: **possible significant adverse effect**. • The scale of development cannot be accommodated without falling within 250m-2km from one or more internationally or nationally designated biodiversity or geodiversity sites, and/or within 250m of a locally designated site: **possible minor adverse effect**. • The scale of development can be accommodated over 2km from any internationally or nationally designated biodiversity or geodiversity sites and over 250m from any locally designated sites: **possible negligible effect**. There are two Special Areas of Conservation (SAC) which lie outside of the district but have a Zone of Influence (ZoI) that reaches within the district. For the Cotswold Beechwoods SAC, the ZoI is 15.4km for North Meadow (and Clattinger Farm) SAC, there is an inner zone of 4.2km and an outer zone of is 9.4km. These constraints are not necessarily blockers to development, however, development in this area will be subject to Habitats Regulations consideration, which will come in the form of providing "suitable alternative natural greenspaces" and/or financial mitigation contributions. A note is made on the assessment sheets of any Broad Zone that falls within these Zones of Interest. Ancient Woodlands were subject to assessment on the same basis as 'local designations', as a special case. Although not a designation as such, the value of Ancient Woodland (as referenced for example in the NPPF) was considered too important for it to be omitted from assessment as an explicit consideration (notwithstanding the fact that it had been included as a primary constraint within the land search). However, due to the likelihood of material impacts on Ancient Woodland only occurring at relatively close proximities, it was not considered necessary to treat it in the same manner as national and local designations, where impacts were considered up to around 2km. Priority Habitats were noted as additional indicators of ecological sensitivity within the assessment areas. It was considered appropriate to provide additional information on

	these within assessments, as in a number of cases they were identified as important considerations for future development, in a number of respects: • as indicators of varying ecological sensitivity across the assessment areas; • as potential pathways for wider development impact (positive or negative); • and as important potentially important focuses for development mitigation and enhancement measures. A discussion of Priority Habitats was provided for additional information only and did not inform the ratings.

3.21 Two different teams of specialists were used to assess potential impacts on the Historic Environment:

- Cotswold District Council's Natural, Built and Historic Environment Team looked at Designated Heritage assets with a focus on listed buildings and conservation areas.
- Gloucestershire County Council's Heritage & Ecology Team looked at both non-designated heritage assets and designated assets of a more archaeological nature, including scheduled monuments.

3.22 The comments of both teams have been added to the site sheets of each Broad Zone. The level of effect was combined into one judgement, by applying the principles set out in Table 4.

3.23 The following assumptions and limitations should be noted in regard to the assessment of the Historic Environment:

- It has been assumed that any listed buildings in the assessment areas would not be subject to any physical change. No such assumption has been made in relation to setting change.
- The study provides a strategic assessment of the risk of harm to heritage assets arising from development within the study area. As detailed proposals for the sites are not available, the assessment cannot draw conclusive statements regarding the significance of the potential impacts or definitive levels of harm. More detailed assessments would need to be undertaken as part of any subsequent site allocation process and/or planning applications.
- Any development carries the risk of encountering unexpected archaeological remains. Given the rural nature of many of the search areas, limited numbers of known archaeological assets are likely to represent an absence of investigations rather than an absence of archaeology.

- Potential effects to setting are desk-based only and have not been tested in the field.
- Due to the high-level nature of the assessment, no consideration has been given at this stage to mitigation options or the opportunity to enhance the significance of heritage assets.

3.24 With regards to ecology, the study has used the same approach as taken by the LUC study. Ratings have been determined based on proximity criteria and specialist ecological input by the Council's Biodiversity Officer was added with additional analysis and discussion, however, this input did not impact on the proximity-based ratings for two reasons:

- Most of the Broad Zones fell within multiple Impact Risk Zones (IRZs) for SSSIs where potential risk has been identified for the scale of development being considered. In these cases, the presence of the IRZ is a trigger for consultation with Natural England on potential development effects. Procedurally, it was therefore considered advisable not to pre-empt the outcome of this consultation process.
- Residential developments of the scale under consideration for the present study can have impacts on designated areas via recreational activity. These impacts can take place at relatively large distances from the development in question, and to predict them with high confidence generally requires detailed analysis beyond that which can appropriately be undertaken for a high-level study of this nature.

3.25 It would not be possible nor appropriate, to attempt to map and assess all potential spatial permutations of development options within the Broad Zones: the number of separate assessments required would be huge, disproportionate to the requirements of the study, and would have compromised the study's practical usefulness. The study follows the pragmatic approach taken by the LUC study whereby:

- Consideration of the potential impact/sensitivity of development options at various scales is based on the potential for developments at these scales to be sited 'optimally' within the Assessment Area e.g. avoiding (where possible) constraints that affected part of the Assessment Area only.
- Where it would not be possible for developments of particular scales to be sited optimally with respect to all constraints/sensitivities (e.g. where

avoiding one constraint would involve encroaching on another) this was indicated both through the provision of constraints maps and in the site summaries in chapter 5, from which the potential 'balancing' of multiple constraints and the implications of this balancing for optimal development siting might be extrapolated.

4c. Landscape Sensitivity Assessment

3.26 The landscape sensitivity assessment was undertaken by Planscape Consultants. Their approach is grounded in best practice and national guidance, notably Natural England's "An approach to landscape sensitivity assessment to inform spatial planning and land management" (2019) and LUC's established methodology. A detailed methodology of the consultant's approach can be found in Appendix B.

3.27 The purpose of the landscape sensitivity assessment is to identify the value and susceptibility of the landscape to accommodate new strategic development without causing undue harm to landscape character and visual amenity.

3.28 The landscape sensitivity assessment was undertaken for each of the defined Broad Areas of search, which were subsequently broken down into smaller Assessment Areas for more detailed consideration where necessary. Sensitivity was assessed for different scales of development, as defined in the development typology. The assessment focused on the principle of strategic development in broad terms, rather than assessing specific layouts or masterplans.

3.29 A structured set of criteria was used to assess each Broad Zone, including:

- Landscape character and features;
- Visual sensitivity and skylines;
- Settlement pattern and edge character;
- Tranquillity and remoteness; and
- Perceptual qualities (e.g. naturalness).

3.30 Each criterion was rated and then synthesised into an overall sensitivity judgement using a five-point scale as per table 5 below.

Table 5 - Landscape Sensitivity Assessment Scale

Sensitivity Level	Definition
High (H)	The key characteristics and qualities of the landscape are highly sensitive to change from strategic development. Development is likely to result in significant adverse effects on landscape character and visual amenity.
Moderate–High (M-H)	The key characteristics and qualities of the landscape are sensitive to change from strategic development. There is limited capacity to accommodate development without significant character change.
Moderate (M)	Some of the key characteristics and qualities of the landscape are sensitive to change from strategic development. Development may be acceptable in some locations or with appropriate mitigation.
Low–Moderate (L-M)	Few of the key characteristics and qualities of the landscape are sensitive to change from strategic development. There is generally greater scope to accommodate change.
Low (L)	The key characteristics and qualities of the landscape are robust and are less likely to be adversely affected by strategic development. Landscape has high capacity to accommodate change.

3.31 The assessment combined desk-based analysis (GIS data, landscape character assessments) and fieldwork undertaken in June-July 2025 to validate and refine judgements. Fieldwork was especially valuable for appraising visual character, skylines, and experiential qualities such as tranquillity.

3.32 The results were summarised in Assessment Area proformas with accompanying commentary and mapping, which can be found in Appendix C. Sensitivity ratings helped inform the potential suitability of areas for different scales and types of strategic development. However, the study explicitly cautioned against using sensitivity ratings as absolute judgements on development acceptability. These must be tested through detailed, site-specific assessments at the plan-making or planning application stage.

4d. Transport Accessibility Assessment

3.33 Each Broad Zone was then assessed with respect to their transport accessibility. Accessibility of the Broad Zones was appraised against four separate metrics. A summary of the criteria applied in relation to each of these metrics is set out in Table 6 below with further details below the table. For each metric, a 'RAG' colour coding was used for the purposes of rating. Please note that to improve

the accessibility of the report, a more diverse colour range was used instead of the standard 'red/amber/green' scale.

3.34 For the purpose of this assessment, accessibility is given the same meaning as in the LUC study, being the ability to get to a given place – such as a workplace, healthcare facility, supermarket, or place of education – by different modes of travel.

3.35 The assessment is also based on the principle that, although transport accessibility can often be influenced through improvements to public transport routes/services and the highway network, certain locations are more advantageous than others in terms of their scope for people to complete everyday journeys by sustainable transport options (walking, cycling, public transport) if they were developed for housing or employment purposes. This is typically due to the presence of existing routes and services, and/or the proximity of locations to existing important destinations such as workplaces, urban centres, schools, and healthcare facilities. The assessment was therefore based upon the existing accessibility of the Broad Zones.

3.36 No weightings have been applied to the colour scores as this would go beyond the high level assessment appropriate for this study. As such, there is no overall colour coded score for each Broad Zone since it would overly simplify the transport accessibility assessment results.

3.37 To be consistent with Net-Zero Carbon transport, all major and strategic development will need to enhance accessibility and public transport provision. Accessibility of employment and key services, including through delivering mixed-use developments, plays an important role in the necessary mode-shifts and overall carbon reduction required to be consistent with the Climate and Ecological crises. In isolation, the presence of an Orange score does not necessarily mean that an assessment area should be removed from consideration, but it is a reasonable indication of significant barriers to site sustainability. The presence of Blue scores is considered a reasonable indication that greater investment in sustainable transport connections will also be required to improve accessibility to potential development locations within an assessment area and to reduce private car reliance.

Table 6 – Detailed Assessment Criteria for Transport Accessibility

Metrics	Rating
Access to employment	**Public transport:** Number of jobs (derived from the 2021 Census) accessible within 45 minutes travel time by walking and public transport from a single point (either the geo-spatial centroid, or a chosen point close to the existing public transport network if in a large assessment area) within each Broad Zone: **More than 20,000 jobs** **10,000 – 20,000 jobs** **Less than 10,000 jobs** **Road:** Number of jobs (derived from the 2021 Census) accessible within 30mins travel time by road / private car from a single point of the Broad Zone (chosen point which is centrally located in the assessment area and close to existing highway network where possible): **More than 250,000 jobs** **150,000 – 250,000 jobs** **Less than 150,000 jobs**
Access to other key services and facilities by public transport	Ability to access supermarkets, healthcare and education facilities from the postcode of the centroid within each Broad Zone: Education **Green: Accessible within 20 minutes** **Blue: Accessible between 20 and 40 minutes** **Orange: Accessible in over 30 minutes** GP (General Practitioner) **Green: Accessible within 20 minutes** **Blue: Accessible between 20 and 30 minutes** **Orange: Accessible in over 30 minutes** Hospital **Green: Accessible within 20 minutes** **Blue: Accessible between 20 and 40 minutes** **Orange: Accessible in over 40 minutes** Food Store / Supermarket **Green: Accessible within 10 minutes** **Blue: Accessible between 10 and 30 minutes** **Orange: Accessible in over 30 minutes**
Private car use by commuters	Car mode split, derived from Method of Travel to Work question in the 2021 Census. Thresholds (based on identifiable gaps between groupings of areas) defined as: **Less than or equal to 45% by car.** **46% to 54% by car.** **55% or more**

Proximity to sustainable transport networks	**Located along existing strategic walk / cycle routes, area centroid within 2.5km of a rail station and/or outline area within 500m of high frequency bus routes to Town / City centres / employment areas** **Development option within 500m of medium/low freq. bus routes (where there are least 2 medium frequency bus routes, this is indicated by '++'), and / or area centroid 5km from rail station serving Gloucestershire. Not directly on, but linked to strategic walk / cycle routes.** **Divorced from existing strategic walk / cycle routes, rail, or frequent bus corridors.**

3.38 The LUC study also includes an additional metric which is the capacity of the road network. This was based on a study that only covered part of the assessment area and was therefore not applied to all sites that were assessed (and did not cover Cotswold District). Moreover, the area assessed in the LUC study is highly constrained in regards to road capacity due the M5 junctions within the area being at capacity. The only trunk road within Cotswold District is the A419/A417 which runs from Swindon to Gloucester which does not suffer from such issues (for the section within Cotswold District).

3.39 Notwithstanding this, road capacity of minor roads can still be a problem (e.g. there are known issues with the capacity of mini-roundabouts on the A429 in Moreton-in-Marsh). Such capacity considerations will need to be considered at a later stage in the site allocation process.

3.40 The potential of the Broad Zones to support investment infrastructure supportive of modal shift to more sustainable transport options than the private car was considered separately (see 'Deliverability/Infrastructure' below). As the assessment of accessibility did not incorporate any assumptions regarding alteration of accessibility through investment to support, or mitigate the impact, of new development, ratings did not vary by development scale.

Metric 1: Access to employment

3.41 In regards to public transport, the Office for National Statistics has published isochrones for walking and public transport in England[3]. These show the theoretical distance a person could go within a set time via public transport and walking from a central point within an Output Area. The data is available for 15, 30, 45, and 60 minute limits. To align with the LUC study, a 45 minute travel time

[3] https://geoportal.statistics.gov.uk/datasets/ons::uk-travel-area-isochrones-nov-dec-2022-by-public-transport-and-walking-for-north-west-north-generalised-to-10m/about

was used from the centroid of the nearest Output Area to the Broad Zone. The number of workplaces within the district and surrounding areas was derived from 2021 Census data. The two sets of data were then overlaid in the Council's GIS tool to see how many jobs could theoretically be reached by public transport within a 45 minute travel time on an average Tuesday.

3.42 With regards to car use, the Council GIS system 'ArcGIS Online' allowed for the creation of 'Drive-Time Areas' which indicate how far a person could theoretically drive from a single point within a set time. To align with the LUC study, a 30 minute travel time was used with the starting point centrally located in the assessment area and close to the existing highway network where possible. The number of workplaces within the district and surrounding areas was derived from 2021 Census data. The two sets of data were then overlaid in the GIS tool to see how many jobs could theoretically be reached by car within 30 minutes travel time at 9am on a Tuesday morning (Tuesday being chosen to stay in line with the public transport assessment).

3.43 The accessibility analysis outputs from across all 29 Broad Zones were used to iteratively determine the score thresholds, rather than defining the thresholds prior to conducting the analysis. This reflects the reality that accessibility levels can vary widely across the country, and that a local baseline needs to be established to then define what reflects a good / average / sub-optimal degree of job accessibility. This approach is consistent with the overarching principle that the assessment areas are being compared to one another to help identify the most sustainable options available in the District. For this reason, the thresholds vary from those used in the LUC study.

3.44 Cycling accessibility was not considered as this was not looked at in the LUC report, which concluded that the provision of dedicated and safe cycling infrastructure, and the topography of routes, plays a key role in shaping the extent to which people are prepared to cycle for everyday journeys. These routes are seldom sufficiently well-mapped to facilitate such journey time accessibility analyses, and therefore the cycle accessibility profiles derived are unrealistically positive. Metric 4 considers the physical proximity of assessment areas to National Cycle Network infrastructure, thereby ensuring some representation of cycling as a travel mode is provided in this early stage assessment of potential areas for growth.

Metric 2: Access to other services and facilities by public transport

3.45 To assess the accessibility of each Broad Zone in relation to key services and facilities, the report used the Accessibility Matrix created by Gloucestershire County Council. This was created using the Visography TRACC software tool, which is the same tool used in the LUC study.

3.46 As a starting point, the postcode of the centroid of each Broad Zone was determined via the Council's GIS system. This postcode was then fed into the Accessibility Matrix which provided the estimated travel time for a range of services. These results were then divided into the categories set out in table 6 above. The division was informed by the LUC study and local accessibility standards consulted on by CDC at a previous consultation in April 2024.

3.47 The sites were then scored and categorised in two stages.

- First a score was given, 1 for green, 2 for blue, 3 for orange for each facility and total score thresholds were set: **5-10**, **11** or **12-15**.
- Then the accessibility thresholds established as part of the Net-Zero Transport evidence base were used**: no orange score for Hospital, GP or Supermarket**, **maximum of 1 orange score Hospital, GP or Supermarket** or **more than 1 orange score Hospital, GP or Supermarket.** Education is normally on-site or via bus provision and was therefore not included as an accessibility threshold in this second step.
- Finally an overall colour score was given based on the two stages above.

Metric 3: Private car use by commuters

3.48 Commuter data was derived from responses to the 2021 Census question related to 'Method of Travel to Work' for the Parishes contained within each Broad Zone. Patterns of travel were significantly affected by the Covid 19 Pandemic, including an increase in homeworking, and these are reflected in the data. The 2021 Census was considered the best available data, with higher homeworking rates also being consistent with a shift to Net-Zero carbon transport for the District.

3.49 As with the LUC study, responses from unemployed people (as defined in the Census table for 'method of travel to work) were removed from the dataset to derive a new total number of people travelling to work, from which the mode

split for each Broad Zone was calculated. For the purpose of this assessment the car (including car driver and car passenger) mode split was subsequently used to define the status of each assessment area, on the basis that it provides a good proxy for the sustainability (or otherwise) of existing commuter travel patterns.

3.50 Thresholds were determined through natural breaks in the data, so as to iteratively group the Broad Zones into reasonable consistent groups between which there are evidence gaps in the proportions of commuter trips made by car. Please note that due to this reason, the thresholds vary from the ones used in the LUC study.

Metric 4: Proximity to sustainable transport networks

3.51 A qualitative assessment of how well connected each Broad Zone is (in spatial proximity terms) to existing sustainable transport infrastructure and services was done using the Council's GIS tool based on the following criteria:

- Proximity to bus routes (rather than stops, on the basis it is typically straightforward to provide additional bus stops for new development locations where an existing bus service runs nearby).
- Proximity to rail stations (rather than lines, on the basis it is expensive and challenging to provide additional railway stations – even if a development location is immediately adjacent to an existing railway line).
- Proximity to the National Cycle Network.

3.52 Scoring criteria were applied in relation to each Broad Zone, with the aim of highlighting those which are located close to existing sustainable transport services and infrastructure.

3.53 Buses were categorised by frequency, but as there are no 'high frequency' routes which run every 10-20 minutes (green category). The blue category shows zones with either:

- 1 Route with medium frequency and/or 2 routes with low frequency (3-5 services per day); or
- 2+ routes with medium frequency (at least 1-2 hour frequency / 6-12 services covering 8am-6pm). This is indicated by a '++'.
- Access to only very infrequent services (1-2 / day or week) or no services scores in the orange category.

3.54 Distance thresholds to rail stations (2.5km and 5km) and bus routes (500m) were used to be in line with the LUC study which notes that these thresholds have been successfully tested through Examination in Public of Cherwell District Council's Local Plan Review.

3.55 At this stage, no account was taken of the capacity implications associated with transport infrastructure – simply whether it was present or not in relation to each Broad Zone. Capacity considerations, in regards to both the highway network and sustainable transport, will need to be considered in a later stage of the site allocation process.

4e. Deliverability/Infrastructure Assessment

3.56 The final part of the assessment looked at potential infrastructure requirements and constraints for the relevant development options within each Broad Zone. Assessments were undertaken for utilities (waste water, drinking water, electricity, gas) and transport (rail, road including bus, bicycle).

Utilities

3.57 For utilities, each of the respective providers informed the assessment by completing a matrix based on the criteria set out in table 7 below.

Table 7 – Utilities Deliverability Assessment Criteria

Rating	Criteria
	There is currently not enough capacity on the network to accommodate the development type and it is unlikely this can be provided during the Local Plan period (up to 2043).
	There is currently not enough capacity on the network to accommodate the development type but this can be provided during the Local Plan period (up to 2043).
	There is enough existing capacity on the network to accommodate the development type.

3.58 The relevant utilities providers are as follows:

- Waste water: Severn Trent Water and Thames Water (there are more providers within the district but they do not serve any of the proposed Broad Zones)

- Electricity: Scottish and Southern Electricity Networks and National Grid (formerly Western Power Distribution)
- Gas: Wales & West Utilities

3.59 Thames Water, which covers zones 5 to 23, notes that on the network side of wastewater, impacts can be difficult to assess. Upgrades to the network take on average 3 years, although major upgrades could take longer. However, the main barrier to overcome tends to be the ability to treat the sewage. The assessment shown is therefore in terms of Sewage Treatment Works capacity where significant upgrades can take up to eight years.

3.60 Thames Water also provides drinking water in all the Broad Zones. No specific assessments were provided, but they noted that anything above a small urban extension would likely require either upgrades to existing facilities or a new water treatment facility.

Transport

3.61 The LUC report found a different approach was required for the transport element and concluded that assessment of development options with respect to transport infrastructure should be based on the fundamental principle that development will need to support travel by transport modes other than the private car for the majority of trips. This would involve increasing capacity on the rail and bus network and expanding cycling networks, which aligns with Cotswold District Council's corporate objective of the Local Plan being 'Green to the Core.'

3.62 The LUC study collaborated closely with all relevant stakeholders to work out a suitable way of assessment, hence this study followed the approach taken in that study. The assessment focused on whether development options within each of the Assessment Areas, by virtue of location and potential scale of housing/employment land delivery, have the potential to:

- secure opportunities from existing and proposed transport infrastructure;
- maximise opportunities to promote walking, cycling and public transport use; and
- limit the need to travel and offer a genuine choice of transport modes.

3.63 Colour coded ratings were provided within the assessment based on the criteria set out in table 8 below. As with the LUC study, a key principle for the assessment was that investment efficiencies will generally be the highest

where they involve strengthening or expansion of the current infrastructure network, rather than creation of new infrastructure remote from this network. As such, less accessible sites would require additional investments on and off-site to meet sustainability criteria which must be factored into land values and viability assumptions.

Table 8 – Transport Deliverability Assessment Criteria

Criteria	Rating		
RAIL INFRASTRUCTURE: Potential to support/fund/deliver new rail stations and services and/or significant rail station and service improvements that are intrinsically linked to housing and/or employment growth in the assessment area	Broad Zone not near existing rail stations or lines and/or development not likely to be at a scale that either supports investment in existing rail stations/services or delivers strategically significant new stations on the rail network.	Broad Zone is near existing rail lines/stations and could potentially support investment in existing rail stations/services and/or deliver strategically significant new stations, subject to the scale of development achieved.	Broad Zone is adjacent to existing rail lines/stations and likely to support significant investment in existing rail services and/or deliver strategically significant new stations (particularly at larger scales of development).
BUS INFRASTRUCTURE: Potential to support/fund/ deliver new bus services and/or significantly improve the journey times and journey time reliability and service frequency/capacity.	Broad Zone not near existing bus routes and not likely to be at a scale that either increases the use of existing services, warrants their diversion to meet future travel demand, or brings forward significant bus priority infrastructure that limits the increases in journey times to offset service diversions.	Broad Zone is near existing bus routes and could potentially increase their patronage, warrant their diversion to meet future travel demand, and/or bring forward significant bus priority infrastructure that reduces journey times and service reliability, subject to the scale of development achieved.	Broad Zone is adjacent to existing bus routes and likely to increase their patronage, with minimal diversion to meet future travel demand. Where necessary, also delivers significant bus priority infrastructure that reduces journey times and service reliability for both new and existing service users.
CYCLE INFRASTRUCTURE: Potential to support/fund/ deliver identified priority cycle network improvements and/or deliver new dedicated cycle connections to existing	Broad Zone not near existing/proposed strategic cycle infrastructure and offers limited opportunity to improve or extend dedicated cycle networks to key destinations within a reasonable	Broad Zone is near existing cycle networks or offers a reasonable prospect of delivering dedicated high-quality cycle infrastructure that would connect it to key destinations that are within a reasonable cycling distance (5km/20mins).	Broad Zone is adjacent to/served by existing cycle networks and is likely to deliver significant improvement to the extent and quality of cycle routes serving key destinations within a reasonable cycling distance (5km/20 mins).

jobs and services within reasonable distances.	cycling distance (5km/20mins).		

4f. Viability Assessment

3.64 The LUC study includes a high level viability assessment of the Broad Zones. However, this CDC study forms part of the preparation of a new Local Plan, which will include specific site allocations which are currently unknown but will need to be viability tested before the new Local Plan is submitted to for examination. Moreover, the new Local Plan will include new policy requirements in regards to climate change and Net-Zero carbon transport, affordable housing, etc. which will impact on viability. Therefore, no viability assessment has been undertaken at this stage. If any of the Broad Zones in this study are identified in the new Local Plan as broad locations for growth, they will be viability tested before submission of the plan.

Step 5: Reporting

3.65 For each Broad Zone of Potentially Developable Land, a site assessment sheet was created showing the results of the assessments as set out in Step 4. The site sheets can be found in Appendix A. Summaries of the findings and overall conclusions can be found in the following chapter.

4. Summary Findings and Conclusion

4.1 This final chapter sets out a summary of the findings for each Broad Zone. However, it is important that these summaries are read in conjunction with the detailed site sheets in Appendix A as the commentary in those sheets provides more information on the potential spatial variations and for mitigation options.

4.2 These summaries do not provide an overall rating or score in regards to the environmental impact as this would involve a balancing of potential impacts that is beyond the scope of the present study.

Table 9 – Broad Zone summaries

Broad Zone 01 (Around Willersey)
A high pressure gas pipeline splits this Broad Zone in two. The remaining space would not be big enough to accommodate a large town, so this option was not further assessed. There are multiple constraints around the zone in regards to the Historic Environment, Ecology, Soil Quality and Flood Risk and significant negative effects can be expected for all of these categories in regards to a town. The zone does have a high level potential to accommodate a village although this would still have a Medium-High impact on landscape. A new settlement could come in the form of a separate village in the northern area of the Zone or halfway in between Willersey and Weston Subedge. Alternatively, it could come in the form of a large extension to Willersey. The impact of development in the southern area would be greater, especially in regards to the historic environment. Flood Zone 3 to the west of Weston Subedge prohibits any expansion of this settlement into the Broad Zone. Any development should also improve the accessibility of the area which is limited.
Broad Zone 02 (Around Mickleton)
The zone is split in half from north to south by a watercourse (Norton Brook) which is surrounded by both Flood Zones 2 and 3; although flooding is not an issue for the rest of the zone except around the far western edge. The area west of this watercourse has a high density of priority habitats and is covered by a Special Landscape area, while the area east of the watercourse has multiple areas of grade 2 agricultural land. There are also multiple constraints around the zone in regards to the historic environment. Therefore, significant negative effects can be expected for any strategic development above a village. Strategic development would therefore likely be limited in scale and could only come in the form of an urban extension to Mickleton. Further detailed assessment would be required to determine the availability and suitability of this option.

Broad Zone 03 (North West of Moreton)
The zone is split in half from east to west by a watercourse (Knee Brook) which is surrounded by both flood zones 2 and 3; although flooding is not an issue for the rest of the zone. The central area of the zone is less sensitive in regards to the historic environment. Development in the central area would also avoid the grade 2 agricultural land along the north western border, although ecology related mitigation would still be required. However, the zone falls fully into both a Minerals Safeguarding area (MSA) and a Special Landscape Area (SLA). Any level of strategic development would therefore have a significant negative impact on these. The accessibility of the area is currently also limited. More detailed availability and suitable work could be undertaken in regards to the central area accommodating a village, but the MSA and especially the SLA would likely prohibit strategic development.
Broad Zone 04 (North East of Moreton)
The picture for Broad Zone 04 is similar to Broad Zone 03 with the main issue being the zone falling fully into both a Minerals Safeguarding area (MSA) and a Special Landscape Area (SLA). Any level of strategic development would therefore have a significant negative impact on these. The western and northern areas are broken up by flood zone 2 and 3. Todenham, which has multiple historic environment constraints, lies centrally in the east. This only leaves an area in the south east of the zone where more detailed availability and suitable work could be undertaken in regards to accommodating a village, but the MSA and especially the SLA would likely prohibit strategic development.
Broad Zone 05 (Around Moreton)
Zone 5 was assessed in regards to options for urban extensions to Moreton-in-Marsh, as the western edge of the town abuts the Cotswold National Landscape this side has not been further assessed. Moreover, only the area directly east of the town does not fall within the Special Landscape Area. Any other strategic level development would therefore have a High impact in regards to landscape. Although there is potential for harm to the historic environment, the risk in this regard for all development types is lower compared to many other Broad Zones. The overall picture on accessibility is also more positive due to the proximity of Moreton-in-Marsh and its train station. The majority of the zone is with a Drinking Water Safeguarding Zone, so any development would need to take this into account and provide mitigation where necessary. Moreover, the southern part of the zone contains multiple watercourses as well as the trainline between Moreton and Kingham. The Council is currently undertaking a separate feasibility study of development options to expand Moreton-in-Marsh.

Broad Zone 06 (South of Moreton)
Zone 6 is split into a western and eastern half by the river Evenlode and the associated Flood Zone 3. Centrally in the zone lies an Ancient Woodland and the settlement and conservation area of Evenlode, both of which should be avoided for strategic scale development. Negative impacts on historic environment and ecology assets in other parts of the zone could potentially be mitigated. However, any level of development in the zone will have significant adverse effects on water quality, mineral resources and landscape. Especially the latter, with the presence of the Special Landscape Area, makes the zone unlikely to be suitable for strategic scale development. Moreover, the zone is constrained in regards to Sewage Treatment Works capacity.
Broad Zone 07 (South of Windrush)
Development in the southern edge of the zone is less likely to impact on the historic environment, although this area would not be able to accommodate more than a village. The impacts on ecology and flooding in this area could be mitigated. However, current access to services and facilities as well as public transport options are poor and there is limited opportunity to connect the site to the existing public transport network. A village is unlikely to raise enough funds to overcome this issue. Moreover, the zone lies almost fully within a Drinking Water Safeguarding Zone, fully within a Mineral Safeguarding Area and Special Landscape Area as well as being completely enclosed by the Cotswold National Landscape (with High impact on landscape across the board as a result). The combination of these constraints makes the zone unlikely to be suitable for strategic scale development. Moreover, the zone is constrained in regards to Sewage Treatment Works capacity.
Broad Zone 08 (Around Eastleach)
Broad Zone 08 is a small zone which could only accommodate a village due to its size. However, a village would likely cause significant harm to the surrounding historic environment, would fall fully within a Mineral Safeguarding area and due to the proximity of the Cotswold National Landscape would have a High landscape impact. As with zone 07, the current access to services and facilities as well as public transport options are poor and there are limited opportunities to connect the site to the existing public transport network. A village is unlikely to raise enough funds to overcome this issue.
Broad Zone 09 (West of Kelmscott)
Broad Zone 08 is a small zone which could only accommodate a village due to its size. Development is less likely to be harmful to the historic environment and although the impact on ecology is significant, this could be mitigated. One of the main issues is water related with the zone falling fully within a Drinking Water Safeguarding Zone and Flood Zone 2, as well as being completely surrounded by Flood Zone 3. Moreover, the majority of the site is grade 2 agricultural land and it also falls fully within a Minerals Safeguarding Area. Landscape impacts would be

Medium-High and accessibility is low. Further detailed investigation into availability and suitability could be done but are unlikely to yield results to the level of constraints on the site. Moreover, the zone is constrained in regards to the Sewage Treatment Works capacity.

Broad Zone 10a (Lechlade East)

Zone 10a assessed options for urban extensions to the east of Lechlade. The zone is not big enough to accommodate a large extension so this option was not further assessed. The site lies fully within a Minerals Safeguarding Area and Nature Improvement Area, the latter most likely ruling out a medium sized extension. In historic environment and landscape terms, the proximity of Lechlade makes development likely to cause significant harm, especially around the south and south east of the zone. The zone is also mostly in Flood Zone 2 and bar the side that abuts Lechlade, it is fully enclosed by Flood Zone 3. The north western area of the zone is potentially less constrained and could benefit from further detailed assessment to determine its suitability for an urban extension.

Broad Zone 10b (Lechlade West)

Zone 10b assessed options for urban extensions to the west of Lechlade. A large scheduled monument abutting the western edge of Lechlade prohibits directly connecting any urban extension to the town, leaving either the southern edge along the A417 or the north eastern area around the lakes to connect any urban extension to the town. As with zone 10a, the site lies fully within a Nature Improvement Area although the impacts could be mitigated, especially in regards to a small or medium sized urban extension. For these development types, the landscape impacts would also be Medium and Medium-High respectively and especially the south western area has less impact in this regard. This area does partly fall into Flood Zone 2, although development in the flood zone could be avoided. Large areas of the zone fall within a Minerals Safeguarding Area and accessibility remains an issue in this part of the district but there is enough potential to warrant more detailed assessment to determine availability and suitability.

Broad Zone 11 (South of Southrop)

Broad Zone 11 is one of the largest zones that have been assessed and it abuts the Cotswold National Landscape to the north. Landscape wise, the eastern area is less sensitive, but impacts would still be Medium-High even for a village. Similarly, from an historic environment point of view, development in the southern area would be less detrimental. Although large parts of the zone fall into a Minerals Safeguarding Area, this southern area does not. On the other hand, the whole eastern and south eastern side of the zone (and also a section on the western edge) falls into a Nature Improvement Area. It is therefore not possible to mitigate against the significant negative impact of a large town. The zone could accommodate a village or small town with the necessary mitigation for ecology, but this would be better located away from the eastern and southern area. This part of the Broad Zone also has several watercourses and has therefore more areas covered by Flood Zone 2 and 3.

Although there is development potential in this zone it will have significant negative effects on several constraints, wherever it is placed. Moreover, with most of the zone squeezed between Lechlade and Fairford, urban extension to those area would likely be less detrimental and therefore favourable.

Broad Zone 12a (Fairford North)

Zone 12a assessed options for urban extensions to the north/east of Fairford. The western area of the zone falls into a Special Landscape Area, is sensitive in regards to the historic environment and ecology and is more likely to flood. The picture for the rest of the zone is more positive with impacts being less severe and/or easier to mitigate against. The zone does fall almost fully into a Minerals Safeguarding Area, which will need to be further assessed if more site specific options come forward. Accessibility is also limited and needs to be improved. The zone could benefit from further detailed assessment to determine its suitability for an urban extension.

Broad Zone 12b (Fairford West)

Zone 12b assessed options for urban extensions to the west of Fairford. The zone is more constrained than that of 12a. It is fully located within a Source Protection Zone and half of it intersects with a Drinking Water Safeguarding Zone and it is almost completely covered by a Minerals Safeguarding Area. Landscape, historic environment and ecological impacts are more significant which is especially pertinent in regards to the latter as the area falls within the North Meadow Special Area of Conservation Outer Zone of Influence. With the right mitigation there are still opportunities, away from the eastern edge, for a small (or potentially even a medium) sized urban extension. Accessibility is limited and needs to be improved. The zone could benefit from further detailed assessment to determine its suitability for an urban extension.

Broad Zone 12c (Fairford South)

Zone 12c was assessed in regards to options for urban extensions to the south of Fairford. Large parts of the zone are covered by the settlement of Horcott. Several lakes centrally in the zone split it from north to south. This zone is also more constrained than 12a and is on a similar level to 12b being fully located within a Source Protection Zone, intersecting with a Drinking Water Safeguarding Zone and being almost completely covered by a Minerals Safeguarding Area. The whole area also falls within a Nature Improvement Zone and the North Meadow Special Area of Conservation Outer Zone of Influence resulting in significant negative impacts regarding ecology. There is also the added issue that the northern area where the extension would meet Fairford is more sensitive from an historic environment viewpoint. Of the three zones around Fairford, 12c is the least suitable for strategic scale development.

Broad Zone 13 (Around Kempsford)
The western side of Broad Zone 13 is one of the least sensitive in regards to landscape of all the zones assessed. However, this is due to the presence of RAF Fairford which is not available for development. The rest of the western side is made up of the settlement of Kempsford meaning no strategic scale development can be placed there. The eastern area of the zone is less sensitive in regards to historic environment and not fully covered by the Minerals Safeguarding Area, however, it is more sensitive in landscape terms and heavily constrained in regards to ecology to the point it cannot be fully mitigated against for anything larger than a village. Most of this eastern side is also in a Drinking Water Safeguarding Zone, a Source Protection Zone, large parts fall in Flood Zone 2 and there are several sections of grade 2 agricultural land. There is also limited accessibility. Overall, there do not seem to be any parts of this zone that are suitable for strategic sized development. Moreover, the zone is constrained in regards to the Sewage Treatment Works capacity.
Broad Zone 14 (East of the Ampneys)
Broad zone 14 abuts the Cotswold National Landscape to the north and a small part to the east is covered by a Special Landscape Area. Landscape impacts are therefore expected to be High. There is potential for a village, although the landscape impact would still be Medium-High. Impacts on the historic environment and ecology are likely but could potentially be mitigated or avoided. Significant adverse effects can also be expected on water quality and mineral resources for any development across the zone. Accessibility is currently poor and any strategic development should aim to improve this. There is enough potential to warrant more detailed assessment to determine availability and suitability of at least a village centrally in the zone. However, the zone is constrained in regards to Sewage Treatment Works capacity .
Broad Zone 15 (East of Poulton)
Broad Zone 15 is a large zone which is intersected by the A417 running from east to west centrally through the zone. There is potential for harm to the historic environment, but likely less so in the most southern tip or the northern side of the zone. Ecological impacts are also likely to be high but have to potential to be mitigated for a village and perhaps even for a town. Significant adverse effects can also be expected on water quality for development anywhere in the zone and for mineral resources unless development is located in the south east of the zone. Landscape impacts would be high and the landscape assessment notes that, overall, the zone is not well suited to a new settlement. Moreover, the zone is constrained in regards to Sewage Treatment Works capacity.

Broad Zone 16 (West of Poulton)
Broad Zone 16 is one of the smallest zones assessed for a new settlement and would only be able to accommodate a village due to its size. Moreover, the zone is split into two distinctive parts due to a watercourse (Ampney Brook) and the surrounding Flood Zones 2 and 3. The zone is highly constrained with significant negative impacts to be expected on the historic environment, ecology, water quality, mineral resources and landscape. The zone is also restricted on the western side due to a major oil pipeline and is constrained in regards to Sewage Treatment Works capacity. Altogether, the zone is not suitable for strategic scale development.
Broad Zone 17 (Around Down Ampney)
Development in Broad Zone 17 has a potential to harm the historic environment, but there is scope for all development types to potentially avoid/mitigate this. The site is much more restricted regarding ecology being covered completely by a Nature Improvement Area as well as the nearby Cotswold Water Park Site of Special Scientific Interest and lying fully in the North Meadow Special Area of Conservation Inner Zone of Influence. However, harm could be avoided and/or mitigated for a village in the right location (and potentially even for a town). However, over half of the zone is grade 2 agricultural land and it is fully located within a Source Protection Zone and a Drinking Water Safeguarding Zone. Most of the Broad Zone is located within a Mineral Safeguarding Area (MSA) and a large area in the southern half of the Broad Zone (around the former Down Ampney airfield) is covered by the 'Land SE of Down Ampney' Mineral Infrastructure Safeguarded Site which would likely prohibit any development there. There is more potential in the northern part of the zone with less areas of grade 2 agriculture land and more areas that fall outside of the MSA. However, this part of the zone lies in the flight route of RAF Fairford. The zone also has limited accessibility and is constrained in regards to Sewage Treatment Works capacity.
Broad Zone 18 (North of the Ampneys)
Broad Zone 18 is restricted by Flood Zone 3 in the south, an oil pipeline in the east and the Cotswold National Landscape in the north. Due to the elevated and open character of the zone, development would therefore likely have High landscape impacts in relation to the National Landscape. Due to the size of the area, a large town could not be located in the zone in any case and even a small town would have significant negative impacts in regards to the historic environment, ecology and water quality. There is potential for a village to be accommodate while avoiding and/or mitigating the above impacts, although site specific assessments would be needed to determine suitability and especially landscape impacts could prohibit strategic development completely. Moreover, large parts of the zone are covered by a Mineral Safeguarding Area (MSA) and even a village could not be located within the zone without overlapping with the MSA. The zone is also constrained in regards to Sewage Treatment Works capacity.

Broad Zone 19 (South and East of Preston)
Development in Broad Zone 19 has a potential to harm the historic environment, but there is scope for all development types to potentially avoid/mitigate this. Ecological impacts will be limited for a village and could potentially even be mitigated for a town. Note that the zone is not large enough to accommodate a large town. Impacts on Landscape will be High for anything other than a village and significant adverse effects can also be expected on water quality and mineral resources. There is enough potential to warrant more detailed assessment to determine availability and suitability of at least a village. However, the zone is constrained in regards to Sewage Treatment Works capacity.
Broad Zone 20 (North of South Cerney)
Broad Zone 20 is one of the smaller zones assessed and is not large enough to accommodate any development over a village. Alternatively, a small to medium sized urban extension to South Cerney could be considered, although development near South Cerney would have more detrimental impacts on the historic environment. Significant adverse effects can also be expected on water quality, mineral resources and ecology for development anywhere in the zone with Medium-High impacts regarding landscape. It is unlikely a new settlement can be achieved without coalescing with South Cerney. Further assessment could be done regarding the impacts of expanding South Cerney although the presence of flood zone two and grade 2 agricultural land on the western side on the zone will make it difficult to connect an urban extension to the settlement.
Broad Zone 21a (Cirencester North)
Zone 21a was assessed in regards to an urban extension north of Cirencester. The zone is highly constrained in regards to the historic environment, ecology, water quality and mineral resources with significant negative effects to be expected for (in most cases) all development options. Landscape impacts would also be High across the board. The assessment shows there might be small pockets suitable for development, but this will unlikely be of strategic scale.
Broad Zone 21b (Cirencester East)
Zone 21b was assessed in regards to an urban extension east of Cirencester. Although there are still multiple assets in regards to historic environment and ecology that could be harmed, the site is less constrained in this regard compared to zone 21a. Similarly, in regards to landscape, the impacts for a small and medium sized urban extension would be Medium and Medium-High respectively. The impact for a large extension remains High. Significant adverse effects can also be expected on water quality and mineral resources for all development options. Further detailed assessment could identify specific suitable locations for a small or medium urban extension. However, while writing this report a development of 280 dwellings was permitted in the south western part of this zone, reducing the amount of land available for further assessment.

Broad Zone 21c (Cirencester South)
Zone 21c was assessed in regards to an urban extension south of Cirencester. It is not large enough to accommodate a large extension, so this option was not further assessed. Moreover, the zone contains most of the settlement of Siddington, further reducing potentially suitable land. Strategic scale development in the norther part of the zone would also remove any rural buffer between Cirencester and Siddington. An urban extension south of Siddington would effectively be an urban extension to Siddington rather than to Cirencester. The southern part of the site is also more constrained in regards to ecology and landscape. Significant adverse effects can also be expected on water quality and mineral resources for any development across the zone. The western part of the zone is grade 2 agricultural land. There is enough potential for a small urban extension to warrant more detailed assessment to determine availability and suitability.
Broad Zone 21d (Cirencester West)
Zone 21d was assessed in regards to an urban extension west of Cirencester. Any development in this area would be a continuation of the Chesterton strategic site allocation in the Cotswold District Local Plan 2011 to 2031. Off all the zones assessed, this is the least sensitive in regards to the historic environment. Similarly, impacts on ecology are expected to be relatively low and/or can be mitigated. However, as with all zones assessed around Cirencester, significant adverse effects can be expected on water quality and mineral resources. Moreover, large parts of the area are grade 2 agricultural land and most of the zone falls into a Special Landscape Area, meaning landscape impacts for anything greater than a small urban extension will be High. An urban extension might be possible, but further detailed assessment is required to determine whether the identified impacts can be avoided and/or mitigated.
Broad Zone 22 (West of South Cerney)
Broad zone 22 consists of an eastern and western part which is divided by large areas of active mineral extraction. There is potential harm in regards to the Historic Environment and even more so in regards to ecology with multiple non-designated assets, a SSSI and the zone of influence of the nearby Special Area of Conservation with limited options to mitigate against harm caused by development. There are multiple patches of grade 2 and even grade 1 agricultural land across the zone and significant negative effects can also be expected on mineral resources and water quality. Impacts on landscape will also be high, although less so in the eastern part, but this area is not sufficiently large to accommodate even a village by itself. It may be possible to locate a village centrally in the zone, although this not likely to be successful due to the amount of mitigation required.

Broad Zone 23 (Around Kemble)

Although there is potential harm in regards to the Historic Environment across all development types, this is likely to be less in the southern area of the zone. The zone is more constrained in regards to ecology, with multiple non-designated assets, SSSIs and two zones of influence of nearby Special Areas of Conservation, with limited options to mitigate against harm caused by development. Landscape impacts would be Medium-High to High especially around the northern area of the zone which abuts the Cotswold National Landscape and is covered by a Special Landscape Area. Due its strong rural identity, any development south of Kemble would require substantial mitigation landscape wise. Any development will likely also have significant negative effects on mineral resources and water quality. Accessibility in this area is high due to the presence of Kemble train station and better (but not necessarily great) bus connectivity compared to many other parts of the district. There is enough potential for strategic development in the southern part of this zone in the form of a village or and urban extension to Kemble to warrant more detailed assessment to determine availability and suitability.

4.3 Cotswold District is a highly constrained area where 84% of its land falls into a designation, such as the Cotswold National Landscape, Flood zone 3 etc, which prohibit strategic scale development. The remaining 16% is not free of constraints either with a large amount of heritage and ecological assets, special landscape areas, high grade agricultural land, mineral safeguarding areas etc., although the impact on these constraints can potentially be mitigated.

4.4 The assessment shows that there are no realistic opportunities for a large new town of over 10,000 houses, although (parts of) zones have been identified that potentially could accommodate a village or small town. However, this study remains a high level assessment indicating potentially suitable locations for development. As indicated in the site assessment sheets, the full impact of development in specific locations within the Broad Zones will need to be looked at in more detail to determine the actual suitability of those areas for development while considering the balance between housing needs and adverse impacts.

4.5 The next step in the process will be to determine the availability of sites to see if landowners within the Broad Zones are interested in developing their land. Areas within Broad Zones that have been shown to be potentially suitable for development in this report and which are also available for development can

then be assessed in more detail to confirm the level of development they would be suitable for (if any).

Study Limitations

4.6 Given that this study is a high level assessment of a large area, it cannot be fully exhaustive in the scope of the development options that have been considered, or in the detail in which these options have been assessed. Instead, it has applied high level assessment with the aim of identifying Broad Zones which may be suitable for further, more detailed, consideration.

4.7 The study does not look at specific development sites and therefore does not assess site-specific considerations such as development access options and topography. Nor does it rely on evidence provided by the general public or developers in relation to specific sites. Although such studies may include evidence which is more up-to-date than the information used in this study, they do not contain comprehensive, consistent and verified judgements which can be applied across the whole district.

4.8 The study assesses all development options individually, rather than considering the combined impact of Broad Zones that are adjacent to each other. Nor does it look at the potential cumulative impact of multiple developments within the same Broad Zone. Consideration of such cumulative impacts will need to be taken once land availability has been assessed and more detailed development options have been identified.