



COTSWOLD
DISTRICT COUNCIL

Strategic Housing and Economic Land Availability Assessment Update

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Contact Details

Forward Planning
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

Tel: 01285 623000
Email: local.plan@cotswold.gov.uk
Web: www.cotswold.gov.uk

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I. Introduction

- I.1 This main purpose of the Strategic Housing and Economic Land Availability Assessment (SHELAA) is to identify land that could potentially be allocated for development in the Local Plan, which is needed to deliver the District's housing and economic development requirements. The SHELAA assesses sites to establish their availability for development, as well as their suitability and achievability / viability.
- I.2 The SHELAA has no policy status. It effectively creates a shortlist of sites that can be taken forward for further more detailed assessment. It also does not seek to comprehensively assess every site. The Government's Planning Practice Guidance recommends that SHELAA site assessments should be proportionate to the level of detail required.
- I.3 The SHELAA is one of a number of evidence base documents, in addition to Local Plan consultations, that contribute towards the decision of which sites to allocate in the Local Plan. For example, assessments will also be undertaken on contender sites on their level of accessibility to services; whether they are classified as major development in the Area of Outstanding Natural Beauty and, if so, whether there are any exceptional circumstances for development; natural capital mapping and how biodiversity net gain can be delivered; their infrastructure requirements; and so on.
- I.4 The SHELAA should be read alongside the Council's Housing Land Supply Report, which takes account of residential planning permissions and provides a housing trajectory. It should also be read alongside the Council's Economic Land Monitoring Report, which identifies economic planning permissions. Both reports are available to download from the [evidence base and monitoring](#) page of the Council's website.
- I.5 A site being recommended to be taken forward for further detailed assessment does not necessarily mean that the site will be allocated in the Local Plan. Additional evidence that comes from other Local Plan evidence base documents may identify additional constraints that make a site unsuitable for development or that mean that an alternative site is more preferential for allocation in the Local Plan. The SHELAA's recommendations on site suitability and capacities may also be updated in light of subsequent information that emerges.
- I.6 As a technical document, the SHELAA is not subject to a formal consultation period, although the Council welcomes any additional site information that may affect the delivery of a site. Anyone wishing to make a formal representation about the suitability of sites for development has the opportunity to do so through the Local Plan consultation process.

Why undertake a SHELAA?

- I.7 Paragraph 68 of the National Planning Policy Framework (2021) (the NPPF) requires strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. This is used to inform planning policies to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. In particular, planning policies need to identify a supply of:
 - a) specific, 'deliverable sites' for years one to five of the plan period; and
 - b) specific, 'developable sites' or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

1.8 The NPPF Glossary provides definitions of both ‘deliverable’ and ‘developable’:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”¹

1.9 The Cotswold District SHELAA identifies and assesses sites that have the potential to deliver development for residential and economic development and the timescales of when sites may come forward. In so doing, it is able to inform the Local Plan and Neighbourhood Planning process and other Council strategies.

How the SHELAA fits in the Local Plan process

1.10 The primary role of the Cotswold District SHELAA is to pro-actively identify and assess sites that have the potential to deliver development for residential and economic development. However, the inclusion of a site within the SHELAA does not determine whether a site should be allocated for development. That will only be done through the Local Plan process. The inclusion of a site in the SHELAA will also not necessarily mean that planning permission will be granted. Planning applications will be determined in accordance with the Cotswold District Local Plan, unless material considerations indicate otherwise.

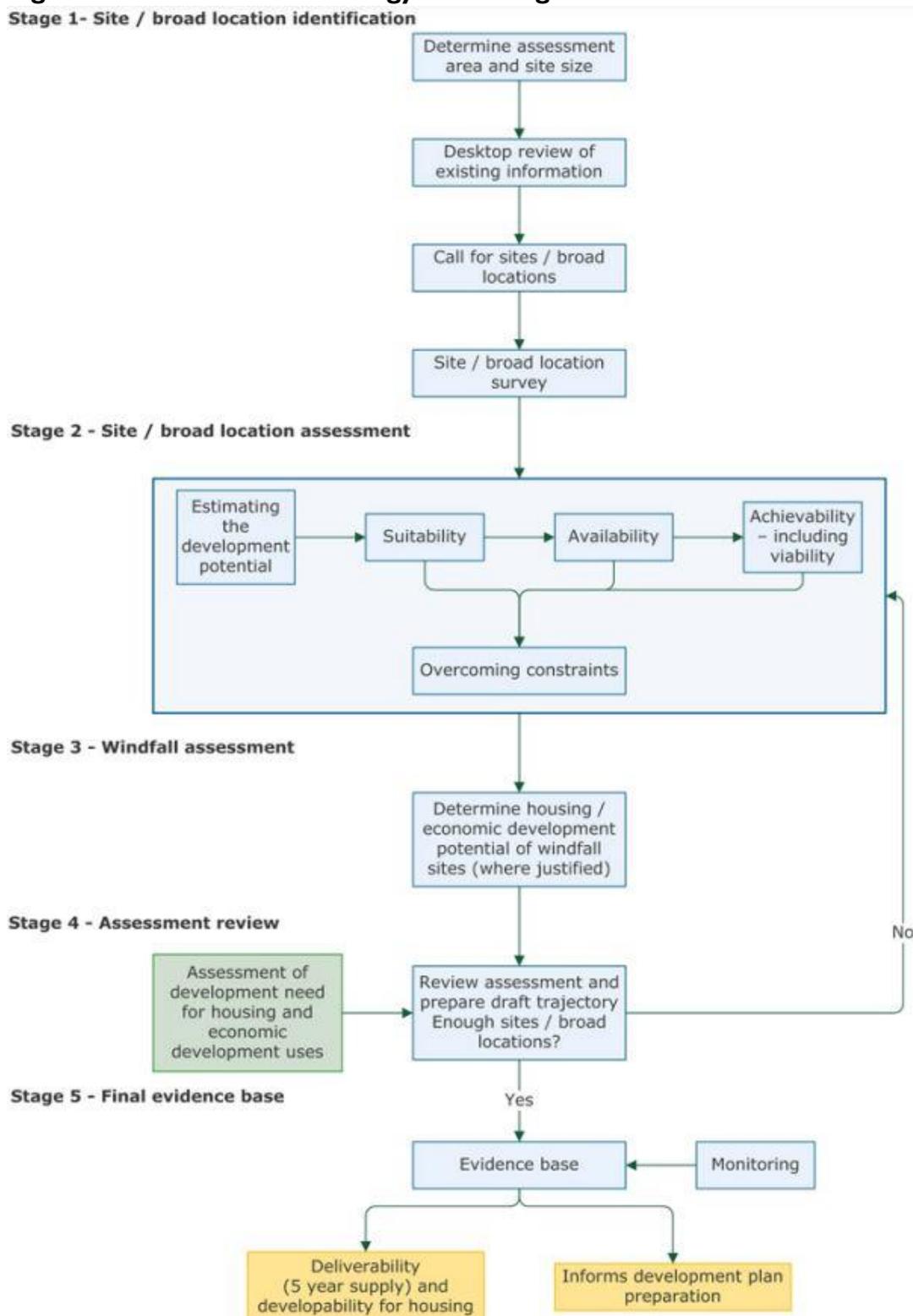
1.11 The suitability of a site and its capacity will need to be fully tested through either the development management (planning application) or Local Plan process. Indeed, the Council's recommendations on site suitability and capacities are informed by evidence that is proportionate to the role of the SHELAA. The SHELAA's recommendations on site suitability and capacities may also change in light of more detailed evidence.

¹ NPPF (2021) Annex 2: Glossary

2. Methodology

2.1 The SHELAA has been prepared in accordance with the NPPF and the Methodology recommended by the [Planning Practice Guidance \(PPG\) on 'housing and economic land availability assessment'](#)². The Assessment has followed the process identified in the following flow diagram shown in Figure 1.

Figure 1: SHELAA Methodology Flow Diagram



² [Planning Practice Guidance on Housing and Economic Land Availability Assessment](#) (MHCLG, July 2019)

Identification of sites

2.2 This SHELAA review has identified sites from a variety of sources, including:

- A review of all sites previously assessed in the SHELAA;
- A review of existing housing and economic development allocations in the adopted Cotswold District Local Plan 2011-2031;
- 'Call for Sites' campaigns undertaken in 2008, 2013, 2016, 2019 and 2020;
- Cotswold District Brownfield Register;
- Planning applications for housing and economic development;
- Site submissions from representations to previous Local Plan consultations.
- Register of surplus public sector land (English Partnerships);
- Engagement with strategic plans of other public sector bodies such as County Councils, Central Government, National Health Service, Police, Fire Services, utilities providers, statutory undertakers;
- Local authority empty property register (residential, industrial and commercial);
- English House Condition Survey (CLG);
- National Land Use Database Commercial property databases (e.g. estate agents and property agents);
- Valuation Office database;
- Active engagement with sector;
- Council Tax information;
- Ordnance Survey maps;
- Aerial photography;
- Planning applications; and
- Site surveys.

Assessing availability, suitability and achievability

2.3 The PPG Planning Practice Guidance (PPG) on housing and economic land availability assessment recommends that site surveys should be proportionate to the detail required for a robust appraisal and that more detail should be provided for sites that are considered to be realistic candidates for development. Site assessments must also be undertaken with a 'policy on' so that the assessment conclusions are realistic and robust.

2.4 In the process of creating a shortlist of potential sites, some sites were discounted at the first stage of the assessment process. For example, sites not within or adjacent to the Development Boundary of Principal Settlements identified in the adopted Local Plan are contrary to the Local Plan development strategy and are therefore not considered to be sustainable locations for development at the present time.

2.5 The adopted Local Plan also permits 'small-scale' residential development in Non-Principal Settlements providing that it (amongst other criteria) is of a proportionate scale and maintains

and enhances sustainable patterns of development. The Council does not expect such 'small scale' developments to be of a strategic scale and sites in these settlements will not be allocated in the Local Plan. Sites in Non-Principal Settlements have therefore not been assessed in detail, although the identification of all available land is still a valuable exercise in case the future development strategy changes.

- 2.6 Sites in Flood Zone 3b³ were also discounted for their housing or economic development potential, although consideration has been given to whether any green or blue infrastructure enhancements could be provided on sites with higher flood risk. Similarly, in line with the PPG, sites that already had planning permission, where development was complete or where the site would not deliver five or more dwellings or was under 0.25ha or 500m² of floorspace were also discounted.
- 2.7 Consideration was given to each site's general suitability and achievability before undertaking detailed site assessments. This included an assessment of relevant planning history, Local Plan evidence base studies and assessments undertaken in previous revisions of the SHELAA. The availability of all remaining contender sites was checked and written confirmation was obtained from landowners and / or property agents to demonstrate this. Sites that were unsuitable, unavailable or where development was not achievable were classed as being 'not currently deliverable'.
- 2.8 The remaining sites underwent a desktop assessment using GIS mapping software and other online resources. This was followed by a site visit assessment.
- 2.9 Sites were assessed as being 'not currently deliverable' where:
 - Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination were so severe that development would currently be unacceptable in the context of the existing Local Plan, national or emerging planning policy; or
 - Landscape features, nature or heritage conservation impacts or environmental / amenity impact were so severe that development would be unacceptable in the context of the existing Local Plan, emerging plan policy and national policy.

Site capacities

- 2.10 A conservative approach has been used when assessing the capacities of sites to ensure that development trajectories are not over-optimistic. The adopted Local Plan policies have guided the assessment of development potential and site capacities, which provides robust and deliverable estimates.
- 2.11 As a starting point, the capacities of residential sites have been calculated using a Density Multiplier Assumption. This uses a basic assumption of 30 dwellings per hectare but takes account of the patterns of development. For example, larger developments would be required to provide sustainable drainage, green infrastructure, walking and cycling facilities, some new roads and parking areas, recreational space, and so on. This affects the overall density of the development. To reflect this, the Density Multiplier Assumption makes a deduction on the capacity of larger sites. This method has proven to be realistic and deliverable for the site allocations of the adopted Local Plan.

³ As identified by the Cotswold District Strategic Flood Risk Assessment Level 2

2.12 Table I illustrates how residential densities have initially been calculated:

Table I: Density Multiplier Assumptions

Site size (Ha)	Discounted site area	Area for housing
0 - 0.4	0	100%
0.4 - 2	17%	83%
2+	37%	63%

2.13 For economic development, the site capacities are calculated using the site area in hectares. This is because the proposed uses of some site submissions will be undefined or will take in several different types of employment or retail use, which will all have different average floorspace densities (e.g. an office building, which would typically be multi-storey, would be expected to have a much larger assumed floorspace than a single-storey warehouse). Furthermore, using the site area is a consistent and reasonable approach for the purpose of the SHELAA. However, the proposed floorspace is referenced and taken into account in the circumstances where it has been specified in the site submission.

2.14 The capacities of some sites have been further refined where there is reasonable justification to do so. For example, justification might include information from previous planning application history, indicative masterplans of how sites could be laid out, or other relevant information. This assists the robustness of the site assessments.

Design briefs

2.15 The SHELAA sites assessment recommendations include design briefs on sites that are contenders for further consideration for allocation the Local Plan. The design briefs provide guidance about how the sites could be developed, as well as providing an indication on some more essential aspects of a development that would be required. They are not an exhaustive list and additional items may be added but they are intended to eventually form part of the Local Plan site allocation policy, should the site be allocated. However, they are not set in stone yet. They can be updated following ongoing engagement and the Local Plan consultation process.

Assessing economic viability

2.1 The economic viability of potential development sites will be assessed independently to the SHELAA in a similar way to the Cotswold District Whole Plan and Community Infrastructure Levy (CIL) Viability Assessment (April 2016). This report is available to download on the Monitoring and Evidence Base page of the Council's website.

2.2 Residential sites were previously categorised into 13 typologies that are specific to sites in Cotswold District. The typologies take consideration of varying site size, location, the proportion of open space, the density of development, housing types, and whether the land is greenfield or brownfield. The assessment uses a Residual Valuation Model and tests build costs, abnormal costs, infrastructure costs and financial assumptions, including different levels of affordable housing, s106 contributions, mitigation measures and the introduction of CIL.

2.3 The report's recommendations are incorporated within the adopted Local Plan to ensure that the policies are set at a viable level. This ensures that the Local Plan's policies do not prevent sites from being delivered.

- 2.4 Site-specific viability issues are also taken into consideration within this report where there is clear evidence that viability may be an issue.

The organisations and communities involved in the SHELAA process

- 2.5 In producing the SHELAA and throughout the Local Plan process, the Council works with Duty to Cooperate partners; landowners and promoters; local property agents; developers; local communities; Local Enterprise Partnerships; businesses and their local representative organisations; parish and town councils; and neighbourhood forums preparing neighbourhood plans.
- 2.6 The SHELAA is regularly reviewed and the Council will continue to work with these organisations and community groups to help identify development constraints, solutions to overcome constraints, and opportunities for planning gains. This engagement process also helps to make estimations of lead-in times and build-out rates, as well as the final conclusions on the deliverability and capacities of sites.

Actions required to overcome constraints

- 2.7 The SHELAA provides a broad outline of potential constraints. A full planning application will require a much more detailed analysis of site constraints and actions to overcome them. Further discussions with Council officers will almost certainly be needed and it is recommended these are undertaken as early in the [pre-application process](#)⁴.
- 2.8 The site assessments provided within Sections 3 and 4 contain several constraints that would require a standard action to overcome them. For example, an indication that further investigation / information would be needed before a planning application is submitted. Rather than reproduce this action against each individual site, Table 2 summarises some standard actions needed to overcome specific constraints.

Table 2: Actions required to overcome constraints

Constraint	Actions required to overcome constraints
Flood Zone 2 or 3a	The site will be required to undergo the Sequential Test and the Exception Test in line with paragraph 161 of the NPPF.
Source Protection Zone	Consult with the Environment Agency to ensure that the proposed development will not cause any contamination to groundwater.
Waste water treatment facility buffer zone	The developer will need to consult the local sewerage undertaker (e.g. Thames Water or Wessex Water) to establish whether the proposed development is affected by the Odour Consultation Zone of the sewage treatment facility.
Noise or odour issue	An odour or noise impact assessment may be required, which will require further investigation and could require an Odour or Noise Impact Assessment.
Potential waste water treatment infrastructure capacity issues	Developers may be required to demonstrate that there is adequate sewerage infrastructure capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing sewerage infrastructure. Developers are advised to consult their local sewerage undertaker from the outset of their development designs.
Filled quarry or landfill buffer zone or any potential contamination issues	A 'Phase 1 Study' (desktop study and site reconnaissance) should be submitted with a planning application. Depending on the findings of the Phase 1 Study, there may be a need for a more intrusive 'Phase 2 Study'.
Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.	NPPF paragraph 112 states that " <i>Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality</i> ". DEFRA provides information on land use classification.

⁴ [Cotswold District Council Planning Application Advice](#)

Constraint	Actions required to overcome constraints
	<p>For some sites, detailed survey work has been undertaken that marks out the exact areas of best and most versatile agricultural land. In such cases, NPPF paragraph 112 implies that it will need to be demonstrated that other areas of poor quality land cannot be used first.</p> <p>For sites in active or non-active agricultural use where a detailed survey of best and most versatile agricultural land has not been carried out, a ground survey will be required to establish whether the land is best and most versatile agricultural land.</p>
Heritage assets and their setting including Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Registered Battlefields, Conservation Areas, Listed Buildings, parks and gardens and non-designated heritage assets.	Liaise with Cotswold District Council and Gloucestershire County Council heritage teams to determine the evidence/assessment required to inform key design principles and ensure the conservation (protection and enhancement) of affected heritage assets and their setting. There may also be a requirement to liaise with Historic England. Within Scheduled Monuments there is a presumption that development that further damages archaeological deposits would not be appropriate.
Archaeology issues	Assessment and evaluation may be required prior to the determination of any planning application (where this has not already been carried out), to include an assessment of the impact of the development on the significance of any heritage assets and their settings. Contact Gloucestershire County Council heritage team for further details.
Habitats Regulations Assessment Screening	In line with the precautionary approach applied by the Habitats Regulations Assessment Screening Report, a number of settlements have been identified where development could have an impact on European designated wildlife sites. Until significant effects can be ruled out, any development within the following settlements must undergo Habitats Regulations Assessment Screening: Cirencester; Strategic site south of Chesterton, Cirencester; Andoversford; Blockley; Fairford; Kemble; Lechlade-on-Thames; Mickleton; Siddington; South Cerney; Tetbury; and Willersey.
Ecology issues	Ecological assessment required
Consultation Zone for an Airport	Consult the Civil Aviation Authority at the earliest stage of the planning application process.
Consultation Area for the Minerals Local Plan	Consult the Gloucestershire County Council Minerals and Waste Development Management service at the earliest stage of the planning application process.

Site Assessments

- 3.1 The site assessments are separated into the 17 Principal Settlements identified in Policy DS1 of the adopted Local Plan. The assessment of sites in the Non-Principal Settlements and rural areas have been grouped together. These appear as appendices to this report as follows:

Appendix 1: Andoversford

Appendix 2: Blockley

Appendix 3: Bourton-on-the-Water

Appendix 4: Chipping Campden

Appendix 5: Cirencester

Appendix 6: Down Ampney

Appendix 7: Fairford

Appendix 8: Kemble

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