

Dear Minister,

The Conservative Councillors from Cotswold District Council have grave concerns on the proposed changes to planning policy and regulations published in the white paper.

Key issues for Cotswolds arising from Planning for the Future White Paper and proposed changes to the current planning system

Sources – Govnt White Paper – Planning for the future

- Govnt Consultation on changes to planning policy and regulations
- Paper and verbal presentation by James Brain to CDC O+S on 1.9.20
- Phone call and e-mails with James Brain on 7.9.20
- Reports by Lichfield and Savills (August 2020)

Background

- CDC have an approved Local Plan from 2011-2031 which took 5 years to produce . It was adopted in August 2018 and is currently being updated . Refer to schedule and tables presented to O+S on 1.9.20
- 87% of the Cotswolds are AONB , SSSI's or SLA's . This is a greater coverage by a national landscape designation than any other District in England. It has 144 Conservation Areas.
- The Cotswolds is a special place and once built on , the countryside cannot be replaced.
- CDC have a housing land supply requirement of 490 dwellings per year. This was increased from 420 per year in 2019 following changes to the standard method of calculation introduced in 2018 and the short term change in 2019 (SMv1)
- This is based on objectively assessed development needs.
- CDC have a 7.6 year supply of housing land based on this , 124% of the Local Housing Land Requirement.
- CDC are delivering over double the residual housing requirement over the last 3 years (2472 dwellings v 1104 dwellings) and has a housing delivery test score of 224%.

Key Issues

- The new proposed standard method of assessment for local housing need would have significant implications for the Cotswolds by increasing its annual requirement based on SMv1 from 490 to 1209 dwellings per year based on the proposed SMv2 . This increase of 188% is the highest in the South West and one of the highest in England (based on numbers calculated by Lichfield and Savills). It is a gross overestimation of the actual need and is calculated to achieve

national targets and not recognise local special conditions (Cotswold AONB). It needs a reality check.

- Swindon increase is 0%.
- Over the next 10 years this would mean the equivalent of another 4 Chesterton developments (1800 dwellings currently proposed)
- This would be impossible to deliver and significantly impact both the Local Plan and adopted Neighbourhood Plans. It would potentially put them in conflict with the NPPF.
- The Cotswolds seek special status based on the impact on its Principal Settlements and its current record of delivery against its adopted Local Plan and its AONB coverage.
- There are many other issues in the White Paper and Proposed Changes to the current planning system and James Brain will be publishing a paper for CDC Full Council.
- Another key issue is the proposal to change the threshold for delivery of affordable housing from 10 dwellings in the Local Plan (5 in AONB areas) to 40 or 50+. This would reduce the number of affordable houses delivered under the current threshold by 60% compared with previous years and would encourage developers to try to re-negotiate current section 106 agreements.
- The Cotswolds seeks special status as a designated rural area to maintain the current affordable housing threshold.
- There are issues around the designation of ' growth ' areas as opposed to ' renewal ' or ' protected ' areas and this could lead to even more pressure to expand Moreton and Cirencester.
- The AONB has lost its status in the planning world. Planners and appeal inspectors give it little regard sadly.
- The Cotswolds plays a big picture in Englands heritage. Conservation, historic buildings , Market towns and amazing landscapes. Once concreted over will never return.
- A major tourist attraction for visitors from abroad and with in the UK.
- Tourism is a hug part of the Cotswold economy.
- With all the issues facing local councils currently (Covid-19 , economic issues , budget shortfalls , unemployment , unitary authority proposals , Brexit etc) this is the wrong time to be introducing significant and substantial changes to the planning system.

We hope that you will understand our concerns and look into any reform at a latter date once all the issues before us today have been settled. The above comments have been put together by Cllr Sue Jepson and Cllr Steve Trotter on behalf of Cotswold Conservatives District Councillors.

