

ASSESSMENT OF HOUSING DISTRIBUTION

ON BEHALF OF CIRENCESTER TOWN COUNCIL

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1. INTRODUCTION

- 1.1 Cirencester Town Council has instructed Pegasus Group to undertake an assessment of the distribution of housing proposed within the emerging Cotswold District Local Plan. This assessment will provide information in support of representations to the Local Plan and/or to the planning application that is expected at the Chesterton strategic allocation at Cirencester.
- 1.2 This assessment relies solely on a desktop study and relates to the distribution of housing across the District, with particular emphasis on the levels of housing proposed for Cirencester. It does not provide any comment on the objectively assessed need for Cotswold District, or the impact of particular levels of development on any settlement and how these can be addressed through appropriate design and mitigation.

2. NATIONAL PLANNING POLICY

- 2.1 A Local Plan is being prepared for Cotswold District in the context of the National Planning Policy Framework (NPPF) which provides the Government's planning policies for England. The NPPF and the supporting National Planning Practice Guidance (NPPG) provide guidance on the considerations that inform housing requirements and these will inform the structure of this assessment.
- 2.2 The NPPF identifies that the full objectively assessed need for housing should be established and that this should inform the housing requirement/s within a Local Plan. Cotswold District Council have identified an objectively assessed need for 7,600 homes from 2011 to 2031 in the emerging Local Plan.
- 2.3 The NPPG identifies that the objectively assessed need should be informed by the Department for Communities and Local Government's household projections with appropriate adjustments to take account of demographic factors. It also requires that employment trends are taken into account to ensure that proposed economic growth is supported by an appropriate level of housing. Additionally it identifies a range of market signals which may indicate particular stresses in the housing market for which an additional allowance made need to be incorporated in the housing requirements. The objectively assessed need for housing is not considered further within this paper as it is beyond the scope of this project. However, similar factors are considered in terms of the proposed housing requirement for Cirencester.
- 2.4 The NPPF and NPPG do not provide particular guidance on how the distribution of growth should be formulated in a Local Plan. Without such guidance, it is down to the District Council to establish a distribution to support the Vision and Objectives of the Local Plan. The resulting distribution will inevitably represent a policy response to meeting identified need rather than a precise mathematical calculation.
- 2.5 One such policy response that is common within Local Plans is to focus growth at the larger settlements. Providing this does not dismiss the needs of rural communities or result in needs being met remotely from where they arise, and that the levels of development proposed at the larger settlements are sustainable this is likely to be considered to be sound.
- 2.6 This report does not seek to examine the soundness of the proposed housing distribution as this would entail a detailed consideration of the potential harm

which could arise from the proposed distribution, which is beyond the scope of this project. Instead, it examines:

- the housing needs of Cirencester Town and considers whether (or not) these will be provided for (or exceeded);
- how well the proposed distribution aligns with the needs across Cotswold District and considers whether an alternative distribution should be considered; and
- any alternative distributions based on the known capacity of development across Cotswold District.

3. LOCAL POLICY DEVELOPMENT

- 3.1 The emerging Local Plan proposes a total of 3,387 homes in Cirencester Town of the total of 7,726 across Cotswold District from 2011 to 2031 that responds to a housing requirement for 7,600 homes. This equates to 43.8% of all the development proposed. The distribution of other homes across the district can be estimated from Policy SP5 as presented in Table 3.1:

Table 3.1 – distribution of growth proposed

Settlement	Total housing delivery proposed	% of housing delivery
Cirencester (including Chesterton)	3,387	43.8%
Andoversford	108	1.4%
Blockley	59	0.8%
Bourton-on-the-Water	337	4.4%
Chipping Campden	208	2.7%
Down Ampney	54	0.7%
Fairford	442	5.7%
Kemble	70	0.9%
Lechlade	114	1.5%
Mickleton	149	1.9%
Moreton-in-Marsh	840	10.9%
Northleach	96	1.2%
South Cerney	155	2.0%
Stow-on-the-Wold	121	1.6%
Tetbury	763	9.9%
Upper Rissington	394	5.1%
Willersey	85	1.1%
Other locations	341	4.4%
TOTAL	7726	100%

- 3.2 The distribution of this housing development has been developed through a wealth of evidence based papers and consultation documents. A short summary of these follows.
- 3.3 The **Core Strategy Settlement Hierarchy Topic Paper**, November 2008 scored the settlements in terms of facilities with Cirencester and Bourton-on-the-Water receiving the joint highest scores. It then identified a number of options for the settlement hierarchy with Cirencester identified in its own tier (owing to it being the “Capital of the Cotswolds”) or in a tier along with all other Market Towns (comprising Tetbury, Moreton-in-Marsh, and Bourton-on-the-Water). Representations to this document identified a preference for Cirencester to be recognised as the only settlement in the highest tier.

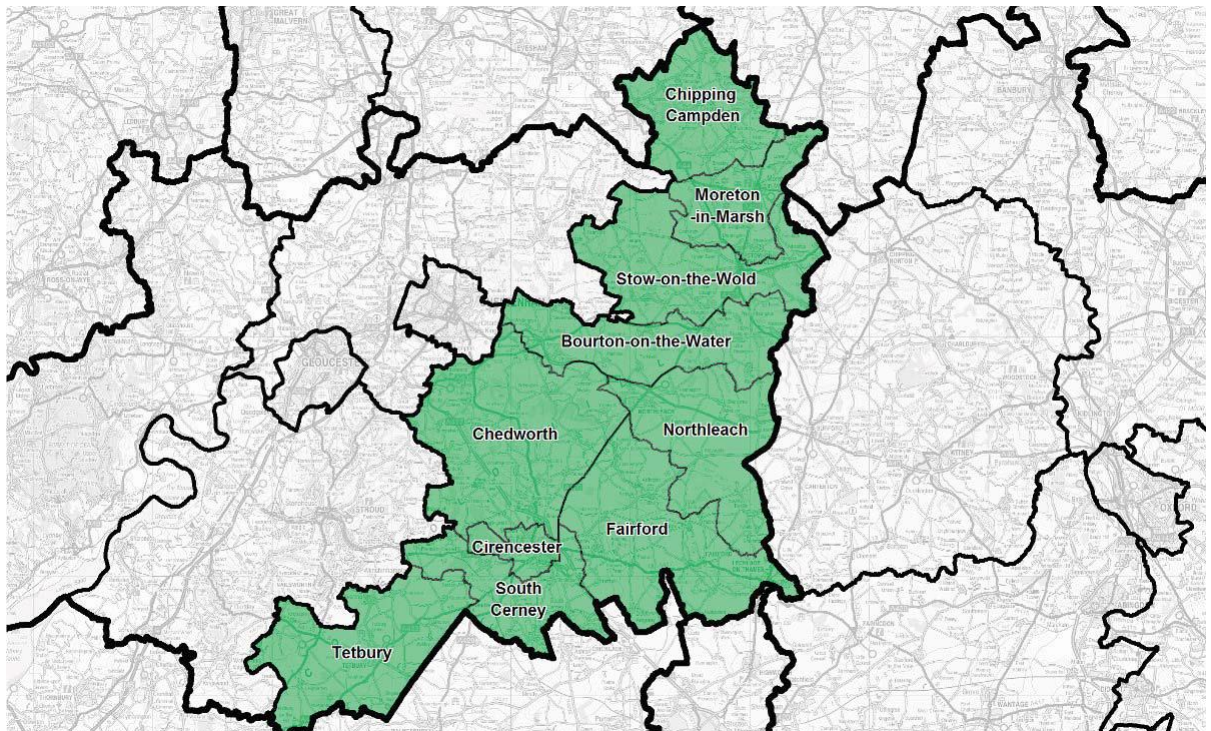
- 3.4 The **Core Strategy Second Issues and Options Paper**, December 2010 identified a number of options for the spatial strategy. The representations to the consultation indicated support for a distribution which balanced focussing growth at the main settlements whilst also providing for rural needs.
- 3.5 The **Role and Function of Settlements Study**, July 2012 assessed the role and function of a large number of settlements within Cotswold District. It concluded that Cirencester had the potential for its employment role to increase, but that it would require additional housing to maintain its economically active population.
- 3.6 The **Preferred Development Strategy**, April 2013 identified a housing requirement for Cirencester Town (namely 3,360 homes of a total of 6,900). This again provided commentary on the role and function of the town but the proposed distribution appears to have been largely based upon the capacity of the town for development.
- 3.7 The **Local Plan Preferred Development Strategy**, May 2013 provided the opportunity to consult on the proposed housing distribution. One of the main points raised in representations was that the level of growth in Cirencester was considered disproportionate.
- 3.8 The **Development Strategy Evidence Paper**, December 2014 then took account of the evidence on the objectively assessed need for housing which prompted the Council to revise its proposed housing requirement to 7,600 homes. It also identified the number of homes that had been built or were already subject to planning permission to establish the need for allocations to provide for the needs of Cotswold District. In paragraph 12.2 it identified that the housing requirement could not be achieved without the allocation at Chesterton. The housing distribution was therefore developed on the basis that the only opportunity to meet the overall needs was by concentrating development at Cirencester and in particular at Chesterton.
- 3.9 The NPPF requires that the objectively assessed housing needs are met in full and Cotswold District Council propose that the only way to achieve this is through the allocation of the Chesterton site. Therefore, regardless of the soundness of the housing distribution, assuming that Cotswold District Council are correct and there are no reasonable alternatives, the NPPF would require that this site is allocated.

- 3.10 The robustness of the distribution and the robustness of the evidence is assessed in subsequent sections. However, unless alternative sites can be identified the distribution identified by the Council may be required regardless of its robustness owing to a lack of alternatives.

4. AREA OF ASSESSMENT

- 4.1 The distribution of housing across Cotswold District is assessed using a hierarchy of areas. Firstly, in recognition of a perceived boundary between the South Cotswolds and the North Cotswolds, the proposed housing numbers between these two areas is considered to establish whether there is a north-south divide in terms of housing provision. For the purposes of this assessment the North Cotswolds are defined as the sub-areas of Chipping Campden, Moreton-in-Marsh, Stow-on-the-Wold and Bourton-on-the-Water. The South Cotswolds are defined as the sub-areas of Chedworth, Cirencester, Fairford, Northleach, South Cerney and Tetbury.
- 4.2 Secondly, the distribution of growth is considered for a number of sub-areas that were identified in the Cotswold District Housing Needs Assessment 2009, as presented in Figure 4.1.

Figure 4.1 – Map of sub-areas



© Crown Copyright, Source: Cotswold District Council (2009), ONS Boundary Data, Fordham Research (2009)

- 4.3 Finally, the distribution of growth is also assessed for the Cirencester Town Council area which corresponds to the Cirencester sub-area.

5. ASSESSING THE NEEDS OF CIRENCESTER

- 5.1 The following section assesses the housing needs of Cirencester Town. Pegasus Group have not been commissioned to undertake detailed projections and the following conclusions are therefore based only upon a review of the existing evidence. All figures are rounded so that they are not taken as being overly precise.

Demographic Need

- 5.2 The NPPG identifies that demographic projections should form the starting point for assessing the objectively assessed need for housing in a Housing Market Area. Whilst Cirencester is not a Housing Market Area it is informative to estimate the demographic needs of the town. However, this cannot easily be replicated for Cirencester Town without employing a detailed population projection model which is beyond the scope of this exercise. Nevertheless based on secondary information and using reasonable assumptions an indication of these demographic needs can be calculated.
- 5.3 The 2011 Census identified that Cirencester Town accommodated 23% of the population (19,076) of Cotswold District. Of these 18,545 lived in 8,417 households with the remainder living in communal establishments. This provides a headship rate of 2.20 persons per household. The households were accommodated in 8,717 dwellings which equates to a vacancy rate of 3.6%.
- 5.4 Across Cotswold District the average headship rate according to the DCLG sub-national household projections was 2.24 persons per household in 2011 but this is expected to decline to 2.11 persons per household by 2031. Assuming that this proportional decline also occurs in Cirencester, the headship rate would be 2.07 persons per household in the town by 2031.
- 5.5 As a result, there would be a need to provide an additional 550 homes to accommodate an additional 530 households within the existing population alone as people live in smaller household groups (including children moving out of the family home, older people living alone following the death of a partner, increased levels of household breakdown and young people choosing to live alone).
- 5.6 However, the population of the District is expected to increase across the plan period and sufficient homes will also be required to accommodate this new population. The OAN Report, October 2014 which has informed the housing

requirement proposed for Cotswold District identifies that 6,300 additional homes would support an additional population of 8,300 people. Applying this rate to the proposed 7,600 homes would result in an additional 10,000 people resident in the District by 2031. A proportion of these will be resident within Cirencester Town.

- 5.7 The 2012 based household projections (DCLG) identify that across the plan period there will be more deaths than births and that all of the population growth will arise from net in-migration.
- 5.8 As Cirencester is the largest town within the District with the greatest employment offer, and with comparatively affordable housing (compared to the remainder of the District), it is likely that a significant number of these 10,000 additional people will be attracted to the town.
- 5.9 Indeed, the 2011 Census identifies that 1,287 of the 5,236 in-migrants into Cotswold District in the year preceding the Census came to Cirencester (24.6%). Assuming that this proportion of the total population increase will also come to Cirencester this results in an additional 2,460 people within the town. Applying the headship rate of 2.07 persons per household results in an additional 1,190 households.
- 5.10 Therefore, if recent trends continue it can be expected that there will be an additional 1,720 households in Cirencester ($=1,190 + 530$) by 2031. Applying the vacancy rate (including an allowance for second homes) this would result in a requirement for 1,780 homes in Cirencester to meet the demographic needs.

Economic Need

- 5.11 The NPPG requires that appropriate provision is made to accommodate workers to support the economic growth of a Housing Market Area. Whilst Cirencester is not a Housing Market Area, it is informative to assess the number of homes that would be required to provide for the economic growth of the town.
- 5.12 The 2011 Census identified that 26.1% of workers (7,788) within Cotswold District lived within Cirencester, but that 32.9% of the jobs (10,493) were within the town. This indicates that over 2,700 workers are required to commute into Cirencester on a daily basis currently as there are insufficient homes within the town to meet their needs.

- 5.13 If Cirencester was to provide sufficient homes for all of those who work in the town currently then this would equate to a need for an additional 1,460 homes (assuming 1.975 working age people per home, a 3% unemployment rate and a 3.6% vacancy rate) before any of the need arising from the change to the workforce or to support economic growth are considered. This would not prevent people from commuting but would at least provide sufficient accommodation such that people could choose not to.
- 5.14 Additionally, the existing working population of Cirencester will decline (as a result of the ageing population) and the town would not be able to maintain the existing number of jobs without providing for younger working people. Sufficient accommodation will therefore be required to ensure that the working age population is at least maintained.
- 5.15 Of the 19,076 persons resident within Cirencester Town some 5,060 were aged between 45 and 64 in 2011. A substantial element of this population are likely to retire by 2031. In previous generations these retirees would have been replaced by younger people becoming economically active. However, in Cirencester there were only 3,621 people under the age of 18 who could contribute to the workforce. As a result, owing solely to the ageing of the population the current levels of economic participation will not be able to be sustained without additional homes to accommodate additional workers.
- 5.16 If it is assumed that based on the current population the workforce would decline by circa 1,000 people owing to the levels of retirement within the town, then this would require an additional circa 560 dwellings to maintain the current level of jobs. This is all before any economic growth is considered.
- 5.17 A key driver to support economic growth in an area is the existence of a sufficient and suitably qualified workforce in that area. Therefore, not only does the comparative lack of homes in Cirencester result in commuting flows it also may serve to constrain the future economic growth of the town. Therefore it is entirely consistent with the NPPF to seek to focus development in Cirencester Town to provide for economic growth.
- 5.18 The emerging Local Plan proposes that 9.1ha of a total of 28.27ha employment land is delivered in Cirencester. If this is taken as being indicative of the proportion of jobs likely to arise in Cirencester then circa 2,790 jobs would be expected to arise in the town. To accommodate these 2,790 jobs approximately

1,510 additional homes would be required (assuming 1.975 working age people per home, a 3% unemployment rate and a 3.6% vacancy rate).

- 5.19 The Local Plan aims to support economic growth by providing an additional 8,680 jobs over the plan period within the District. If it is assumed that Cirencester maintains its share of jobs (namely 28.2%) then it would be expected to accommodate an additional 2,850 jobs by 2031. To accommodate the assumed 2,850 jobs circa 1,540 additional homes would be required (assuming 1.975 working age people per home, a 3% unemployment rate and a 3.6% vacancy rate).
- 5.20 In summary, there are insufficient homes in Cirencester to provide for the jobs in the town currently and therefore focussing housing growth at this location would be consistent with the NPPF which encourages reducing the need to travel. Furthermore, in order to maintain the current number of jobs in the town and provide for economic growth there is a need for housing development.
- 5.21 The extent of these economic needs depends on the Vision of the Local Plan:
- If sufficient homes were delivered to provide for the needs of all workers in the town (although they may still choose to commute from elsewhere) as well as to provide for economic growth then it is likely that circa 3,530 to 3,560 homes would be required.
 - If the current commuting flows are planned to be maintained as well as proportionate economic growth there would be a need for circa 2,070 to 2,100 homes.
- 5.22 The proposed 3,387 homes can therefore be seen to support Cirencester as a focus for economic growth as well as providing for a reduction in the propensity to commute. Both of these are consistent with the principles of the NPPF.

The Housing Market

- 5.23 The provision of housing should also seek to respond to address particular stresses in the housing market, such as a particular affordable housing need or the lack of affordability for young people to remain in the area.
- 5.24 The Cotswold Housing Needs Assessment, November 2009 identified the affordable housing needs that prevailed at that time across a series of sub-areas. One of these sub-areas was Cirencester Town. The assessment identified that

there was an annual gross need for 379 affordable homes in Cirencester of a total annual gross need for 861 affordable homes across the District. This equates to 44% of the total current affordable need.

- 5.25 Similarly, following a Freedom of Information request by Save our Cirencester, Cotswold District Council have identified that 551 of the total 1,331 active applicants on the housing register have identified a preference for Cirencester. This supports the findings of the Housing Needs Assessment with circa 42% of the gross affordable need being within Cirencester.
- 5.26 This indicates that there is a significant need for affordable housing within the town. Indeed, 42% to 44% of the total gross affordable housing need across the District lies within Cirencester Town.
- 5.27 However, in order to convert this to the net affordable need those households in need that are already within affordable homes, an allowance for relets and any committed supply need to be deducted from this figure. These figures are not available. However, the Gloucestershire SHMA, 2014 updates this assessment and indicates that there is a net affordable need for 11,480 homes across the District (or 574 per annum).
- 5.28 Assuming that the proportion of affordable need within Cirencester identified in the Housing Needs Assessment is maintained this would equate to a net need for 5,050 ($= 11,480 \times 0.44$) affordable homes in Cirencester. Market housing would be in addition to this.
- 5.29 The emerging Local Plan requires that 50% of housing is delivered as affordable units in Principal Settlements, subject to viability. However, the actual delivery is likely to be lower in order to fund infrastructure items. Even assuming that 50% affordable delivery was achieved on all sites (on average), this would require that 10,110 homes were built in Cirencester in order that the full affordable needs are met.
- 5.30 The 2011 Census identifies the number of households that are considered to have too few bedrooms for their size. This provides a proxy for the level of overcrowding within an area, which in itself is a proxy for the suitability of the housing offer. There were 209 households in Cirencester Town that did not have a sufficient number of bedrooms. This equates to 33.7% of the total of overcrowded households in the District.

- 5.31 This evidence indicates that Cirencester is subject to particular housing market issues which have resulted in unmet affordable housing needs and overcrowding. There may also be other associated issues such as unsuitable housing and homelessness. In order to address such issues, the NPPG recommends that additional housing is proposed.
- 5.32 In summary, there is a need for additional housing in Cirencester to provide for economic growth, to reduce the propensity to commute and to address the existing issues with the housing market. On the basis of the preceding analysis the proposal for 3,387 homes appears to exceed the demographic need but reflect the aspirations of the NPPF in economic terms. However, across the District there is insufficient housing proposed to meet the full affordable needs and this is also the case in Cirencester.

6. WILL THE RURAL NEEDS BE MET

- 6.1 The housing distribution focusses growth at Cirencester as the most sustainable settlement within the district, and this is to be supported providing this doesn't compromise the delivery of housing to meet needs elsewhere. The identified affordable needs are therefore considered in order to assess whether the policy decision to focus growth at Cirencester has negative effects elsewhere.
- 6.2 The Housing Needs Assessment identifies the gross affordable housing need by sub-area and for 17,220 affordable homes across the District over 20 years. This affordable need has been superseded by that provided in the Gloucestershire SHMA, 2014 which identifies a net need for 11,480 affordable homes over the plan period. This equates to 67% ($=11,480/17,220$) of the gross need (based on the ratio of the net need identified in the SHMA to the gross need identified in the Housing needs Assessment).
- 6.3 The Local Plan now proposes a housing requirement of 7,600 homes which will only provide for 66% ($=7,600/11,480$) of the net affordable need if every single house was delivered as an affordable unit.
- 6.4 The Housing Needs Assessment still provides the most recent breakdown of the affordable need below District level. If it is assumed that the proportional need of each sub-area remains then the figures in Tables 6.1 and 6.2 arise. Table 6.1 assumes that the full affordable need for 11,480 homes should be provided for (although this would need to be supported by a corresponding level of market housing) whereas Table 6.2 assumes that the housing requirement of 7,600 homes remains.

Table 6.1 – full affordable housing need

Sub-area	% of gross need	% of need applied to 11,480 homes	Planned housing provision	Under/over supply
Chipping Campden	1.28%	147	501	+354
Moreton-in-Marsh	6.39%	733	840	+107
Stow-on-the-Wold	1.28%	147	121	-26
Bourton-on-the-Water	7.32%	840	839	-1
NORTH COTSWOLDS	16.26%	1,867	2301	+434

Northleach	5.11%	587	96	-491
Chedworth	4.18%	480	0	-480
Fairford	13.82%	1,587	610	-977
South Cerney	9.76%	1,120	225	-895
Cirencester	44.02%	5,053	3387	-1666
Tetbury	6.85%	787	763	-24
SOUTH COTSWOLDS	83.74%	9,613	5081	-4532

Table 6.2 – constrained affordable housing need

Sub-area	% of gross need	% of need applied to 7,600 homes	Planned housing provision	Under/over supply
Chipping Campden	1.28%	97	501	+404
Moreton-in-Marsh	6.39%	485	840	+355
Stow-on-the-Wold	1.28%	97	121	+24
Bourton-on-the-Water	7.32%	556	839	+283
NORTH COTSWOLDS	16.26%	1,236	2301	+1065
Northleach	5.11%	388	96	-292
Chedworth	4.18%	318	0	-318
Fairford	13.82%	1,050	610	-440
South Cerney	9.76%	741	225	-516
Cirencester	44.02%	3,345	3387	+42
Tetbury	6.85%	521	763	+242
SOUTH COTSWOLDS	83.74%	6,364	5081	-1283

- 6.5 This demonstrates that only two of the sub-areas are identified with a housing requirement that is more than sufficient to meet its full affordable need, namely Moreton-in-Marsh and Chipping Campden. However, the Local Plan does not propose sufficient homes to meet the full affordable need across the district and so this is to be expected.
- 6.6 Assuming that it is appropriate that only 66% of the full affordable needs are provided for as proposed by the Local Plan and that all of the houses delivered are affordable (which is clearly unrealistic), even then it is clear that some sub-areas will not be providing sufficient numbers of affordable homes including Northleach, Chedworth, Fairford and South Cerney. Indeed, in the South Cotswolds the Local Plan appears to provide a very significant unmet need for affordable housing.

- 6.7 In this unrealistic scenario (with only 66% of the affordable need being met and assuming that all completions are affordable) the housing proposed in Cirencester is broadly appropriate. However, it is inevitable that the full affordable needs will not be met with this level of provision.
- 6.8 Therefore it can be concluded that whilst there are unmet needs elsewhere this is not as a result of over-provision in Cirencester but rather as a result of the housing requirement for the District not reflecting the full affordable need.

7. THE HOUSING DISTRIBUTION

- 7.1 The preceding analysis indicates that there is a need for significant levels of housing in Cirencester and that this is not to the detriment of other rural areas.
- 7.2 However, it is useful to assess the overall distribution of housing in accordance with section 5 to indicate whether the growth proposed is disproportionate between the various sub-areas or between the North and South Cotswolds. The comparative figures for each sub-area are presented in Table 7.1. It must be noted that these figures have not been generated in a projection model and so should not be afforded undue weight. However, they provide a reasonable indication of the sufficiency of the proposed levels of housing for each sub-area.
- 7.3 It identifies that the Moreton-in-Marsh, Bourton-on-the-Water, Cirencester and Tetbury sub-areas are proposed to accommodate more than sufficient homes to provide for their demographic growth. These sub-areas are over-providing in demographic terms to such an extent that they more than offset the under-provision elsewhere.
- 7.4 Similarly, the Moreton-in-Marsh, Bourton-on-the-Water and Cirencester sub-areas are proposed to accommodate sufficient homes to provide for economic growth. However, owing to the comparative under-provision elsewhere it is likely that the proposed 8,680 jobs across the district will not be able to be delivered without increases to commuting.
- 7.5 Only the Chipping Campden sub-area is proposed to accommodate sufficient homes to stand a prospect of meeting its full affordable needs.
- 7.6 It is interesting to note that no homes are proposed in the Chedworth sub-area as a result of no sustainable settlements being identified in this sub-area. These needs will therefore be required to be in other sub-areas or on windfall sites.
- 7.7 In summary, no sub-area is providing enough homes to meet its demographic, economic and affordable housing needs. As such arguments could be created for an increase in any of the sub-areas.
- 7.8 However, Cirencester is exceeding its demographic needs and is proposed to provide for a number of homes which is towards the top end of the range of its likely economic needs. The proposed housing requirement for Cirencester appears to be broadly in accordance with the NPPF and NPPG despite the fact that the full affordable needs are not being provided for.

Table 7.1 – the distribution of growth

Sub-area	Homes to accommodate current population	Homes to accommodate population growth	Total demographic need	Homes to provide for current workers	Homes to maintain proportion of jobs	Homes to accord with Local Plan employment land distribution	Total economic need based on current proportion of jobs (maintaining commuting flows)	Total economic need based on current proportion of jobs (addressing commuting flows)	Full affordable need	Full need assuming 50% delivery	Proposed housing
Chipping Campden	260	510	770	360	520	500	1020	1380	150	290	501
Moreton-in-Marsh	180	400	580	30	300	300	600	630	730	1470	840
Stow-on-the-Wold	190	370	560	60	450	300	750	810	150	290	121
Bourton-on-the-Water	110	210	320	-70	180	180	360	290	840	1680	839
NORTH COTSWOLDS	730	1490	2220	380	1410	1260	2670	3050	1870	3730	2301
Northleach	120	270	390	-340	230	110	340	0	590	1170	96
Chedworth	150	340	490	230	330	340	670	900	480	960	0
Fairford	340	600	940	-590	690	460	1150	560	1590	3170	610
South Cerney	230	520	750	260	350	570	920	1180	1120	2240	225
Cirencester	550	1230	1780	1460	560	1540	2100	3560	5050	10110	3387
Tetbury	270	540	810	-200	480	460	940	740	790	1570	763
SOUTH COTSWOLDS	1670	3500	5170	820	2610	3480	6090	6910	9610	19230	5081
Unspecified locations	-	-	-	-	-	-	-	-	-	-	341
TOTAL	2400	4990	7390	1210	4050	4740	8790	9960	11480	22960	7723

8. CAPACITY

- 8.1 The Council have identified a housing requirement for 7,600 homes. Regardless of the distribution of this need it is critical that this is able to be delivered and accordingly the Council have based their distribution on the capacity of housing sites rather than the distributed needs as identified previously. Nevertheless, the proposed housing requirement for Cirencester would appear to be in broad accordance with the NPPF and NPPG.
- 8.2 It is still useful to review the capacity of settlements to understand whether there are alternative sites which may equally provide for a distribution that is consistent with the NPPF. If any such alternatives can be identified then the sustainability credentials of these should also be examined.
- 8.3 The emerging Local Plan indicates that 4,858 dwellings were either built (1,317) or subject to planning permission (3,541) at April 2014. The Residential Land Availability 2015 report identifies that this had increased to 4,944 by April 2015 with 1,783 complete and 3,161 subject to planning permission.
- 8.4 However, it must be recognised that not all of the permitted dwellings will be built, owing to a range of factors. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy has tested a lapse rate of 10%, 5% and 0% in order to provide some confidence that the proposed housing requirement will be achieved. Applying the same rates in Cotswold results in 4,623 (assuming 10%), 4,786 (assuming 5%) or 4,944 (assuming 0%) dwellings that have already been identified, leaving a remainder of between 2,656 and 2,977 dwellings to be identified from allocations or other sources.
- 8.5 The Council do not make an allowance for windfall development but instead seek to allocate the entirety of the remainder. This represents positive planning and will ensure that sufficient homes are delivered to meet the housing requirement (even if some of the allocations fail to deliver).
- 8.6 However, the Council do identify that from year 4 onwards (2019) an average of 73 dwellings would be expected to be delivered from windfall sites per annum in the Five Year Housing Land Supply Report. This would equate to 876 dwellings across the plan period. This means that the number of dwellings to be identified on allocations could be as low as 1,780 assuming that all of the permitted sites and proposed allocations delivered within the plan period and that windfall development was forthcoming as it has been in the past, but this is a high risk

strategy as it would only take the non-delivery of a single site to undermine the delivery strategy of the Local Plan.

- 8.7 At the other end of the spectrum there could be a need to allocate 2,977 dwellings assuming a 10% lapse rate on permitted sites and that the need arising from any allocated sites which failed to be delivered would be met on windfall sites. This would provide a much more robust approach to housing delivery.
- 8.8 The Council accordingly propose to allocate 2,881 dwellings which lies towards the upper end of this range.
- 8.9 The Evidence Paper to Inform Non-Strategic Housing and Employment Site Allocations considers the capacity of sites in Cotswold District (excluding the Chesterton site) using a wealth of information including that gathered from Town and Parish Councils. This evidence indicates capacity for 531 dwellings on preferred sites and 732 dwellings on reserve sites, both of which provide opportunities for sustainable development although there is less certainty that the reserve sites could deliver.
- 8.10 The result of this, is that even assuming the most high-risk delivery strategy and assuming that all the constraints on reserve sites could be overcome there would be a need to deliver 517 dwellings on strategic allocations. Therefore, at least one strategic allocation is required.
- 8.11 However, the requirement for delivery on the strategic allocation/s need to be established. As identified above (and depending on the lapse rate applied) somewhere between 2,656 and 2,977 homes will be required from allocations and windfall. Once the identified non-strategic allocations are taken account of this reduces by 531 to between 2,125 and 2,446 homes. Other than at strategic allocations all the remaining housing will be then need to be delivered from windfall sites and reserve sites both of which are uncertain. Indeed, the reserve sites are not considered developable and unless information is made available to the contrary these should not be relied upon.
- 8.12 Assuming that 50% of the windfall allowance was forthcoming, and a 5% lapse rate which is considered to provide for a medium risk strategy, then only 1,845 houses would be required at the strategic allocation. However, the greater the number of dwellings that are allocated will result in a greater proportion of the affordable housing needs of Cirencester being provided for, and a greater proportion of the economic and affordable needs of the District being provided

for. Providing the proposed 2,350 homes does not result in harm, these will therefore be considered sustainable in the planning balance.

- 8.13 In terms of the options for strategic allocations, the Council have proposed the Chesterton strategic site for 2,350 dwellings. However, through the Local Plan consultation Commercial Estates Group have put forward an alternative (or complementary) proposal for Kemble Airfield. These are the only known options for strategic sites to deliver the remaining requirement.
- 8.14 Commercial Estates Group have presented a number of options including replacing the Chesterton site with the Kemble site; or delivering circa 1,000 dwellings on each.
- 8.15 The Kemble Airfield site is remote from a sustainable settlement and is therefore effectively a new settlement in its own right. It is likely that given the close proximity of this site to Cirencester it would increase the number of trips to and from the town with impacts upon the transport infrastructure. Nevertheless, this appears to provide a reasonable alternative that should be tested by the Council although it is likely to perform less sustainably than Chesterton.

9. CONCLUSIONS

- 9.1 Cotswold District Council have adopted a policy approach to the distribution of housing by focussing development in some areas. Indeed, the demographic and economic needs of many sub-areas within Cotswold District are not being proposed to be met, with a few sub-areas picking this up including Moreton-in-Marsh, Bourton-on-the-Water and Cirencester. However, the full affordable needs will not be met across the District or within the vast majority of sub-areas including Cirencester. This is not uncommon in the South of England although increases in housing delivery to provide for affordable needs should be supported.
- 9.2 The strategy of focussing development on the larger settlements is well-established in planning policy as this provides for economic growth where there is potential as well as seeking to align services with the population. On this basis the housing requirement for Cirencester appears to be broadly consistent with the NPPF and NPPG.
- 9.3 The result of focussing development at the largest centres could result in rural affordable needs not being met in some instances. However, in Cotswold District whilst these rural needs will not be met, this is consistent with the approach in all sub-areas such that the full affordable needs will not be met anywhere (with the exception of the Chipping Campden sub-area) and it is not therefore a result of focussing development in the largest centres.
- 9.4 Therefore, the proposed distribution of the Local Plan with a focus on Cirencester is consistent with the NPPF, although additional provision anywhere to meet the affordable and/or economic needs could be supported providing this can be sustainably delivered.
- 9.5 Whilst this analysis suggests the housing requirement for Cirencester is appropriate in principle, the sustainability of this level of development may (or may not) indicate that this can be achieved sustainably. If there is demonstrable harm which outweighs the benefits of this delivery at Cirencester then this should be taken account of in the housing distribution.
- 9.6 The Local Plan proposes that Cirencester's growth should be focussed at the Chesterton site. However, it is clear that there is at least one strategic alternative, although this is likely to be less sustainable.

- 9.7 The sustainability of the proposed levels of development in Cirencester or at Chesterton may cause demonstrable harm which outweighs the benefits. This will be discussed throughout the examination of the Local Plan but is beyond the scope of this assessment. If such harm is demonstrated to exist that outweighs the benefits then either alternative deliverable sites will need to be identified preferably within Cotswold District, but if no such sites exist then the District Council may need to work with neighbouring authorities to ensure that unmet needs are met outside of the District.