Cotswold Housing Delivery Study

Final Report

Iceni Projects Limited on behalf of
Cotswold District Council

July 2026

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1. INTRODUCTION

1.1 Cotswold District Council is preparing a new Local Plan to guide development in the District over the 2026-43 period. The Council has commissioned Iceni Projects ('Iceni') to prepare this Housing Delivery Study.

Purpose of the Study

1.2 National planning policies require councils to meet local housing need ('LHN') through their local plan where it is sustainable to do so. The LHN in Cotswold District is 1,054 homes per year, which is substantially higher than historical delivery in the District which has averaged 471 homes per year over the last 15 years[1]. This Housing Delivery Study seeks to examine and develop understanding of historical housing delivery issues in the District and then consider future housing growth potential.

1.3 The Study then seeks to test the emerging Local Plan growth scenario. It has involved working alongside the Council to develop a Housing Trajectory to sit alongside the Regulation 19 Local Plan. It draws conclusions on the scale of growth which can be supported in the District and justification for a stepped housing trajectory as proposed in the draft Local Plan. It provides advice on how the policy framework through the Plan, and other potential actions by the Council, can help boost housing delivery in the District. The Study has been prepared alongside a report providing housing needs evidence.

Report Structure

1.4 The remainder of this report is structured as follows:

- Section 2: Context;
- Section 3: Characteristics of Cotswold's housing market;
- Section 4: Historic housing delivery trends;
- Section 5: Factors affecting lead-in times and build-out rates;
- Section 6: Proposed strategic allocations;
- Section 7: Testing the draft housing trajectory; and
- Section 8: Conclusions.

[1] Dwelling stock (including vacants), Table 125: dwelling stock estimates by local authority district, ONS, 21 May 2026

2. CONTEXT

2.1 The Government prescribes, through the National Planning Policy Framework (December 2024) ('NPPF'), that planning policies within local plans should be informed by an assessment of ILHN conducted using the Standard Method which is set out in the Planning Practice Guidance ('PPG'). Local plans are then expected (as a minimum) to meet the local housing need and contribute to meeting any unmet need arising from neighbouring areas, where it is sustainable to do so.[2]

2.2 The LHN is therefore not necessarily the same as the housing target ('the requirement') within a Local Plan – but to set a *lower* housing requirement there must be strong reasons (based on evidence) to demonstrate that it is not sustainable to do so and that the impacts of doing so would be significantly and demonstrably outweighed by the benefits (which include the social and economic benefits associated with meeting housing need). This is typically considered through the Sustainability Appraisal (SA) which is prepared alongside the Plan and considers the evaluates different growth options.

2.3 The Plan is being prepared by Cotswold District Council ('CDC') but must then proceed through an independent examination, led by a Planning Inspector appointed on behalf of the Secretary of State, who considers whether the Plan is 'sound.' To be sound, the Plan is expected to be *positively prepared, justified, effective* and *consistent with national policy*. If it is unsound, it cannot be taken forward and adopted by the Council and used to determine planning applications.

2.4 For the Plan to be sound, it is expected to meet the District's housing needs (unless – as above – this can be shown to be demonstrably unsustainable). It needs to be based on proportionate evidence and shown to be deliverable over the plan period. The latter means (in the context of this report) that the Plan can reasonably be expected to deliver the scale of housing growth set out within its housing requirement.

Cotswold's Local Housing Need

2.5 In this context, a key starting point for the preparation of the Local Plan is the District's LHN. At the current time (July 2026), the Standard Method formula indicates a need for 1,054 homes a year. This is based on a baseline stock of 374 homes a year, but then the significant uplift of 282% based on the ratio of average (median) house price against the average (median) income of people working in the District ('the affordability ratio'). For Cotswold District this affordability ratio, at 14.56 based on the average data over the last 5 years (2020-25), points to very significant affordability constraints. The ratio is the 16th highest of any local authority nationally; and is the 5th highest of any local authority

[2] 2024 NPPF Paras 11 and 62

outside Greater London. The high housing need figure is thus essentially a function of evidence of particularly acute affordability issues in the District.

Table 2-1: Cotswold District's Local Housing Need

	Cotswold District
Dwelling Stock, 2025	46,772
Baseline: 0.8% Annual Dwelling Stock Increase	374
Average Median House Price-to-Income Ratio, 2020-25	14.56
Affordability Uplift	282%
Annual Local Housing Need	1,054

2.6 The Council's Local Plan should look 15 years forward from the envisaged point of its adoption[3] (following the independent examination). The plan period envisaged therefore runs for 17 years, from 2026-43 with the expected point of adoption being early 2028. The housing need over the plan period is based on multiplying the LHN figure by the plan period. This, as Table 2.2 shows, generates a need for 17,918 homes over the period to March 2043.

Table 2-2: Housing Need over the Plan Period (2026-43)

	Dwellings
Annual Local Housing Need	1,054
Plan period - years	17
Housing Need over the Plan Period	17,918

2.7 The Council's monitoring data shows 240 homes were completed in 2025/26, giving an estimated housing stock of 47,012 in 2026[4]. Relative to this stock position, the scale of housing growth required to meet housing need is substantial and would require housing stock growth averaging 1.9% per annum over the 17 year plan period (or a total of 38% growth over the plan period, relative to the current housing stock). As explored later in this report, this is at the top end of what other local authority areas have historically achieved and is therefore an ambitious scale of housing growth.

Geography and Strategic Constraints

2.8 There are strategic constraints affecting development in Cotswold District. Approximately 80% of the District's land area falls within the Cotswolds National Landscape, as Figure 2.1 shows. The NPPF sets out that great weight should be given to conserving landscape and scenic beauty in National Landscapes which are afforded the highest status of protection, with an expectation that the scale

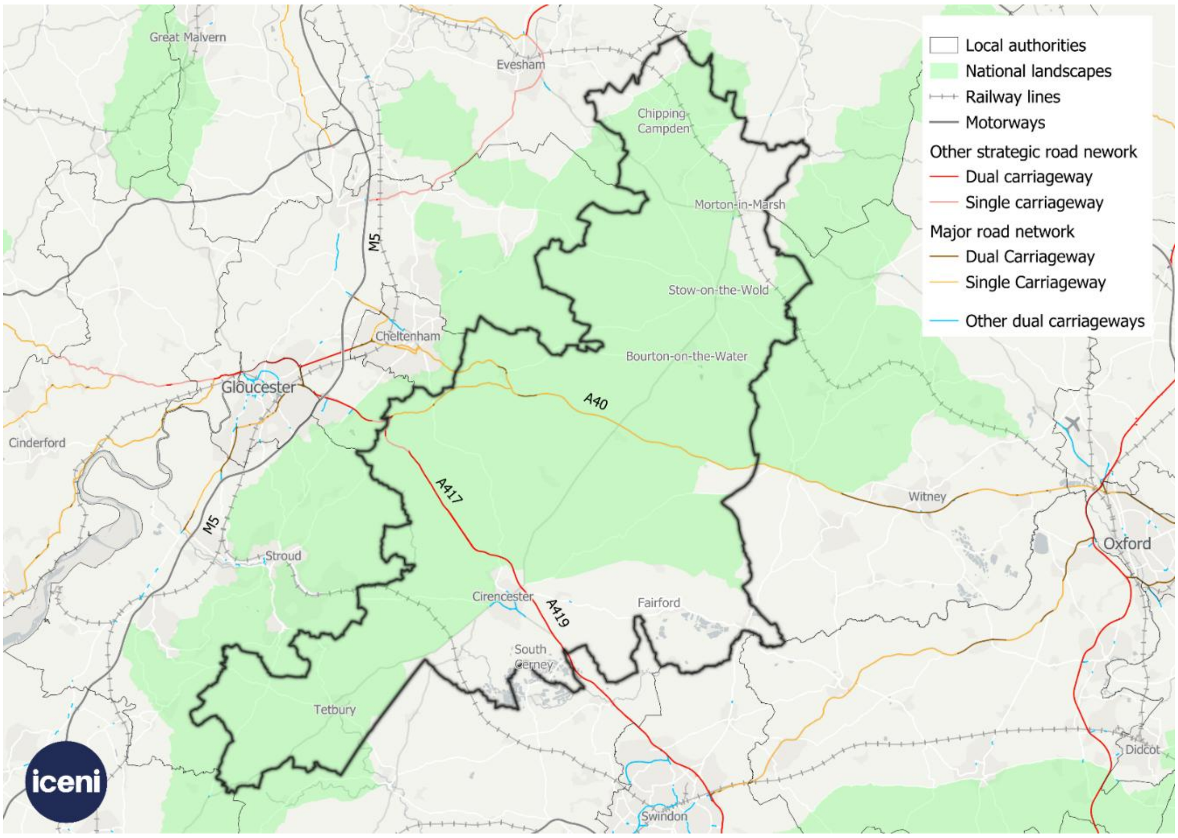
[3] 2024 NPPF Para 22

[4] Note this would not be used to calculate the Standard Method housing need, which is based only off Central Government data

and extent of development within them should be limited (Para 189). For major developments (as described by paragraph 190 of the NPPF), it requires there to be exceptional circumstances and for the development to be demonstrated that the development is in the public interest – including in doing so considering whether development cannot be met in some other way.

2.9 Whilst national policy thus does not preclude development within the Cotswolds National Landscape, the policies relating to it mean that – in effect – it is reasonable to expect the majority of residential development in the Plan to be concentrated in the relatively confined areas which sit outside of the National Landscape. These relate in particular to the south-east of the District, which includes Cirencester – the District's largest settlement – as well as Fairford, Kemble, and Lechlade; as well as the north-east of the District, which includes Moreton-in-Marsh.

Figure 2-1: Geography of Cotswold District



3. CHARACTERISTICS OF COTSWOLD'S HOUSING MARKET

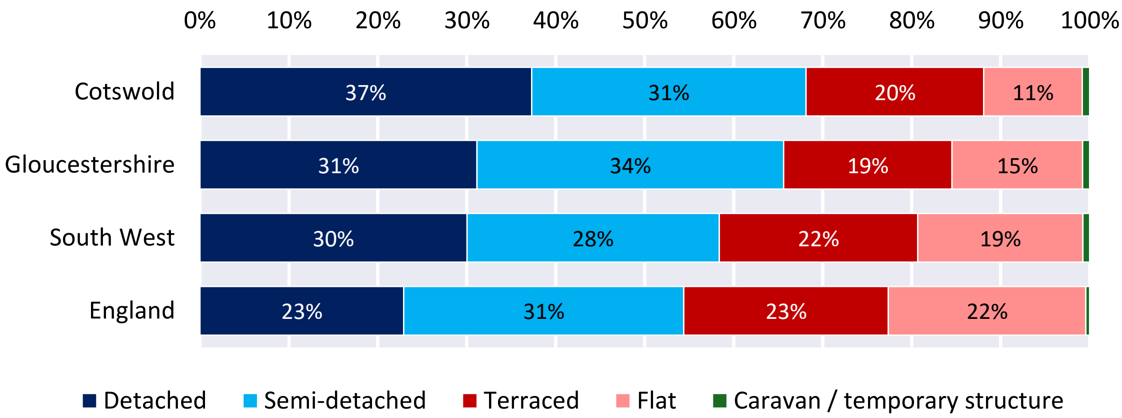
3.1 The emerging Gloucestershire Housing and Economic Needs Assessment (HENA), which is also being produced by Iceni, provides a review of Cotswold's housing offer, socio-economic characteristics and housing market dynamics. This section, drawing on the HENA analysis, seeks to summarise key characteristics of Cotswold's housing market. Further analysis is set out within the Cotswold District Housing Needs Evidence report (July 2026), prepared by Iceni.

Housing Offer

3.2 Cotswold District has a dwelling stock of 46,800 dwellings (rounded) in 2025. 2021 Census data indicated that two thirds (67%) were owner occupied, with the remainder split between private rented (17%) and social rented homes (15%). The affordable housing stock overall equates to around 7,100 dwellings, has been growing and sits slightly above other that in parts of Gloucestershire.

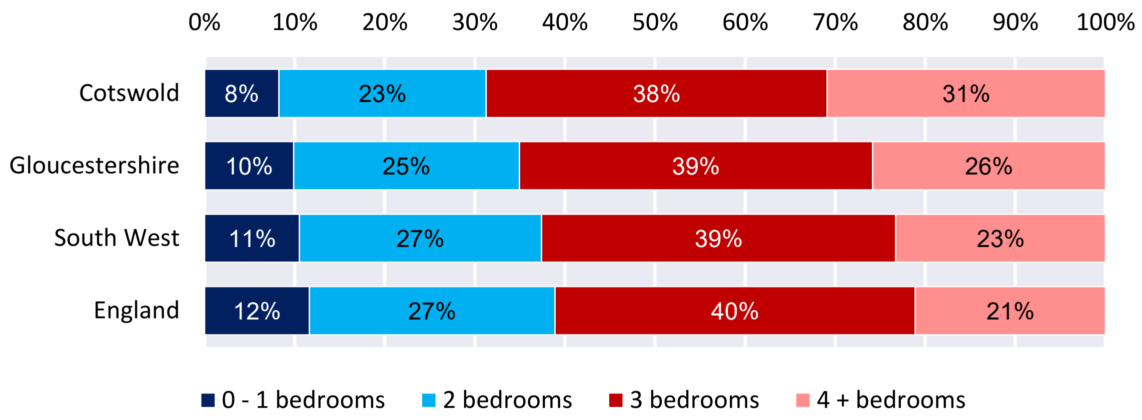
3.3 Much of the District's geography is rural and the housing offer reflects this with a relatively higher proportion of detached housing (37%) and 4+ bed homes (31%). In contrast, there is a relatively modest provision of flats (11% of stock) and 1-bed homes (8%). The overall focus of the current housing offer is on larger, family-sized homes.

Figure 3-1: House Types



Source: Census 2021

Figure 3-2: House Sizes



Source: Census 2021

3.4 The Cotswolds are well known tourist destination with the result that many of the homes in Cotswold District are second homes or holiday homes. The 2021 Census indicated that 10.8% of homes in the District were unoccupied (vacant or second homes), a much higher rate than seen in Gloucestershire overall in the southwest region or England. This is likely to include some homes used for short term lets or AirBNB. Second homes are particularly common in the rural parts of the District where they make up 3.3% of homes. Overall, 12% of homes are classified as unoccupied, including both vacant properties and second homes. This is likely to contribute to higher housing demand and housing prices in the District and reduce affordability.

3.5 It is noted that specific holiday home developments have occurred in the District, for example at Cotswold Lakes. However, demand for second homes is also likely to increase demand in the general housing market particularly in smaller towns and villages.

Table 3-1 Housing occupancy (2021)

Location	% Vacant	% Second homes with no usual residents	% Unoccupied (Vacant or second home)
Cotswold Rural	8.7%	3.3%	12.0%
Cotswold Urban[5]	5.3%	0.7%	6.0%
Cotswold Overall	8.0%	2.8%	10.8%
G'shire Urban	4.8%	0.3%	5.2%
G'Shire Rural	6.7%	1.7%	8.4%
G'shire Overall	5.4%	0.7%	6.1%
South West Region	5.7%	1.3%	7.0%
England	5.4%	0.6%	6.0%

Source: Iceni analysis of ONS Census 2021

Housing Market

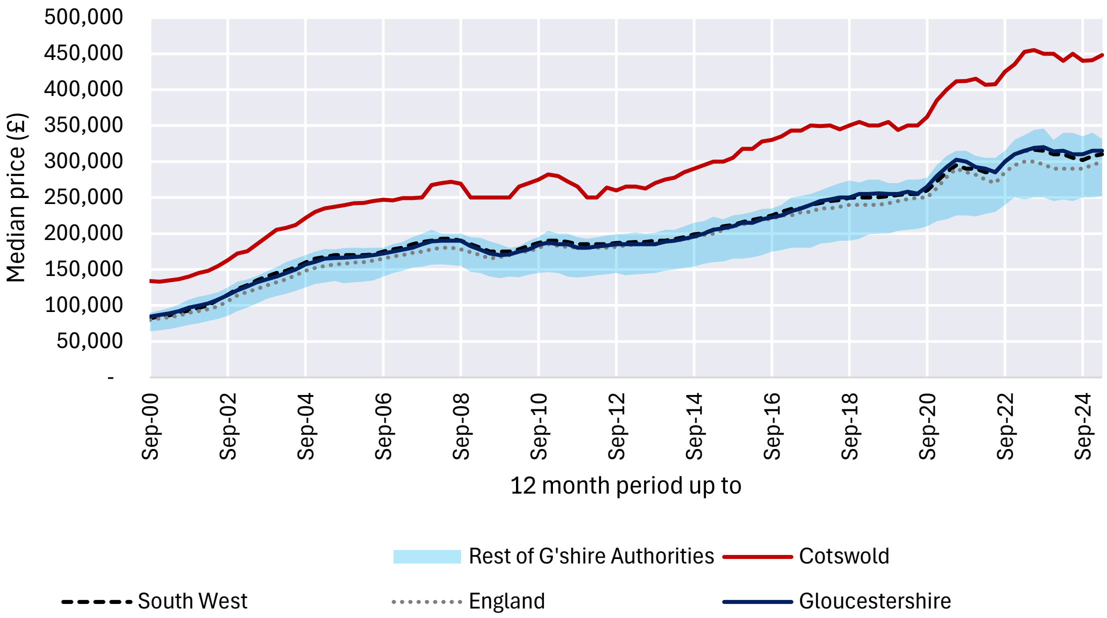
Sales Market Dynamics

3.6 The District is an attractive place to live with attractive settlements and landscape and this is reflected in high housing costs. The median house price stood at £448,000 in the District for sales in the year to March 2025; with the median price for detached properties reaching £680,000.

3.7 Relative prices across house types are higher than in other parts of Gloucestershire and for houses are above wider (regional/ national) benchmarks. As shown below, house prices have seen long-term growth, with rapid growth in values in particular between 2020-22 as households re-evaluated their living circumstances (as a result of the Covid-19 pandemic) with changing working patterns enabling people to move further away from workplaces but seeking space to work at home. The more recent trend – since early 2023 – has been of relative price stability (and in effect a real terms' fall) as market demand has been sensitive to higher interest rates.

[5] Cotswold Urban relates to the Cirencester Urban Area

Figure 3-3: Housing price changes over time



Source: ONS *Median house prices for administrative geographies*

3.8 The trend over the last year (Spring 2025 – Spring 2026) has similarly been relatively flat, with the Land Registry House Price Index showing 2% growth in values over the year, but focused towards Summer 2025; with more recent months seeing flat or modestly falling values.

3.9 The Cotswolds market attracts a high number of prestige buyers including from abroad, particularly from North America. Recent research by Savills showed that international buyers accounted for just over 20% of sales above £1,500,000 in 'the Cotswolds' during 2025, almost double the proportion seen in the regional market[6]. Over the same period, London buyers accounted for 48% of high value sales, and cash buyers 89%. Demand from North American buyers is influenced by tourist visits, common language, quality of place and accessibility to London and Heathrow.

3.10 The demand from wealthy international buyers or those from London contributes to the District's high housing costs and its affordability position.

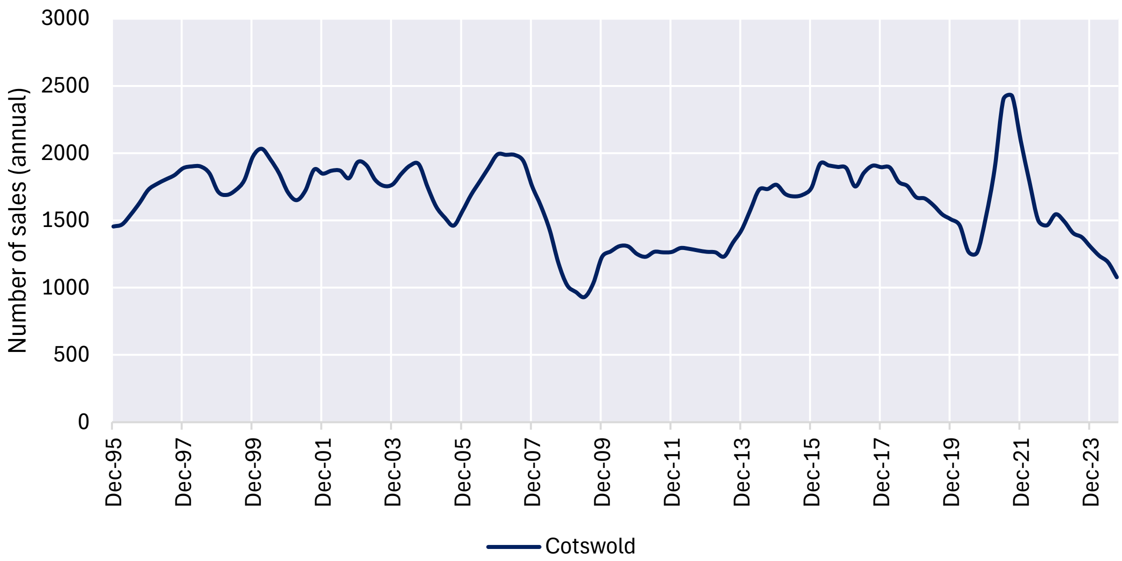
3.11 The chart below track trends in sales in the District, based on HM Land Registry data. It shows both short-term volatility in the market, but it is nonetheless possible to pick out the effects of the credit crunch and subdued lending between 2008-13, to stronger market circumstances between late 2013 to 2018, the spike in demand seen in 2020 and 2021 as households reconsidered where to live and with the Stamp Duty Holiday, and a weakening in demand since 2022 in a context of higher interest

[6] https://www.savills.co.uk/research_articles/229130/387120-0 Note this applies to the broader Cotswolds area, not just Cotswold District.

rates. It is notable that at the time of writing, sales volumes (at around 110 per month) sit at historically weak rates.

3.12 There are broadly similar trends for cash purchases as against those buying with a mortgage with cash purchasers accounting for 47% of sales; and purchasers with a mortgage accounting for 53% of sales over the last 5 years.

Figure 3-4: Sales Trends – Cotswold District

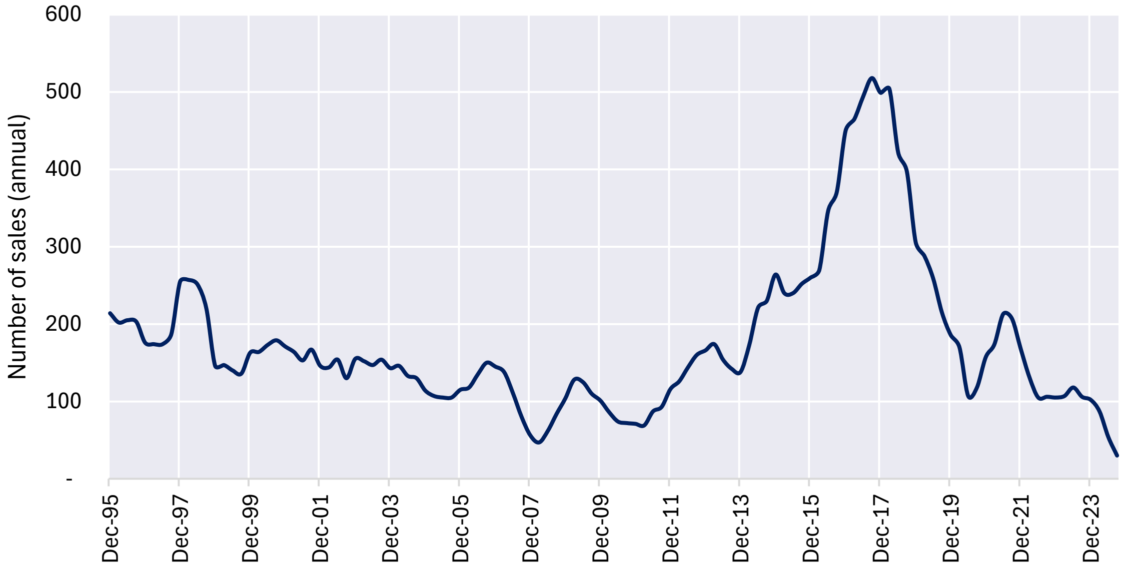


Source: HM Land Registry House Price Index/ Iceni analysis

3.13 The Local Plan is however looking at housing delivery over a 17 year period looking forwards and it is reasonable to expect this will include periods of weaker and stronger housing market conditions – reflecting the cyclicality of the housing market and different macro-economic influences on it.

3.14 The chart below shows new-build sales. It illustrates that these have varied over time – influenced by land supply issues – with a particular peak of delivery in 2016/17 and 2017/18 where annual sales peaked at 500 per annum. Over 20 years, new-build sales have accounted for 11.5% of sales in the District with a lower 5 year figure of 9.2%. The trend in new-build sales has been influenced by historical supply and planning policies – this is considered further in Section 4. Comparing the position to Tewkesbury, where the 10 year position has seen 22% of sales being of new-build properties, illustrates the potential for the sales market to support additional new-build development.

Figure 3-5: New-build sales – Cotswold District



Source: ONS *Residential property sales for administrative geographies (newly built dwellings)*

3.15 Affordability pressures for housing for sale are significant, with the average house price over the last 5 years (2020-25) being 12.1 times earnings of residents, but 14.6 times earnings of those working within the District. This affordability position feeds directly into the housing need.

3.16 What the HENA evidence shows is that there is notable in-commuting, with just 48% of workers living in the District (based on the 2021 Census). The District has a very high jobs density of 1.09 which indicates that there are 109 jobs for every 100 residents of working age (16-64) with about 6,000 more jobs than there might be expected based on applying the regional ratio to the District's resident workforce. The jobs density has generally been rising over the last decade – pointing to a housing supply constraint which has resulted in growth in net in-commuting to the District to work.

3.17 The southern part of the District, including Cirencester, falls within a Swindon focused Travel to Work Area (TTWA) with Swindon being a large and growing town. Moreton-in-Marsh on the other hand falls within an Evesham-focused TTWA.

3.18 The housing market and demand for housing is also likely to be influenced by the ageing of the population and the large number of older people in Cotswold District. As of 2024 (the most recent available data), 27.5% of Cotswold's population is aged 65 or older. This is substantially higher than Gloucestershire as a whole (22.1%), the South West Region (22.8%) or England (18.7%).[7] People aged 65 or older make up over 30% of the population in many of Cotswold's rural parishes and in

[7] ONS 2024 Mid-Year Population Estimates

some cases nearly 50%. Iceni estimate the median age in Cotswold to be 50 compared to 43 for the southwest and 40 for England.

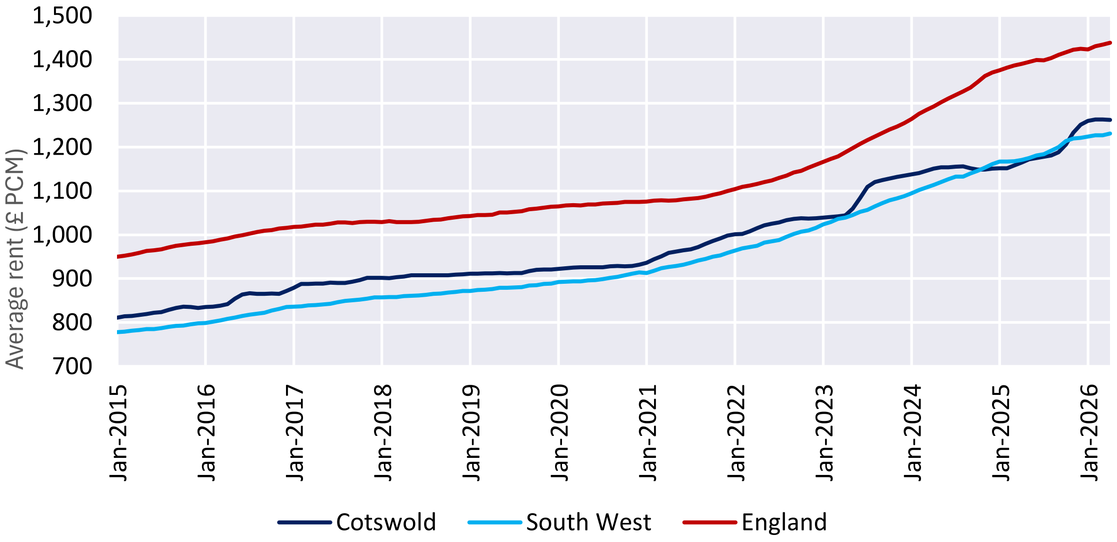
3.19 The high average age of the District's population speaks to the district's status as a retirement destination, poor housing affordability for younger people and the aging of the existing population. Nonetheless the District's large and growing older population is likely to contribute particularly to demand for retirement housing and specialist accommodation for older people.

3.20 The student population of the Royal Agricultural University ('RAU') at Cirencester is also likely to make a modest contribution to local housing demand. The University currently has around 1,100 – 1,200 full-time students and 150 - 200 part time and post graduate students, but provides only 346 student accommodation bed spaces. Based on consultation with the University only around 15-20% of students live at home with their parents, and so many students live in the private rental sector locally. The growth of the RAU is thus an influence on demand in the Cirencester area.

Rental Market Dynamics

3.21 As with house prices, private rents are similarly above those in other parts of Gloucestershire and average £1,260 per month in January 2026, with a particular premium evident for larger family-sized homes. Whilst rents have generally tracked wider regional trends, it is notable that we have seen strong relative growth in rents since 2022 – influenced by weaker sales market conditions and indicative of a supply/demand imbalance for rented properties.

Figure 3-6: Rental Costs over time



Source: ONS *Price Index of Private Rents*

3.22 ONS analysis points to particular issues with rental affordability, with the average rent in 2023/24 being 37% of median gross household income, well above the regional average and also above the other Gloucestershire districts. This is a level which the ONS consider points to the District being 'unaffordable' as a place to rent.

Affordable Housing Need

3.23 These issues with the affordability of market housing play into a significant need for affordable housing, which has been assessed as part of the housing needs evidence. This has assessed affordable housing need over the 2026-43 plan period and shows a need for 336 affordable homes per annum. This is equivalent to 32% of the Standard Method LHN. Iceni's Cotswold District Housing Needs Evidence report (July 2026) recommends that the Council seek 40% affordable housing on major development sites.

3.24 Policies for affordable housing provision within the Local Plan will however be influenced by the Council's Viability Study. For mixed tenure schemes, higher affordable housing delivery can be expected to translate directly into higher potential absorption rates for housing.

Table 3-2: Annual Affordable Housing Need – Cotswold District, 2026-43

	Unable to rent or buy	Able to rent but not buy	Total
Current housing need (annual flow)	24	9	33
Need from newly-arising households	290	166	456
Existing households falling into need	69	20	89
Total gross need	383	195	578
Supply through re-lets	193	49	243
Net need	190	146	336
% in affordability category	57%	43%	100%

Source: Housing Needs Evidence Report/ Iceni

3.25 The level of affordable housing provision has a direct influence on the build-out rate. The table below shows overall housing delivery with market housing delivery of 50 homes per year (equivalent to 1 sale per week) and delivery of the affordable housing in tandem with the market homes. At 30% affordable housing, completions of 71 homes per year could be achieved. But this rises to 77 homes a year with 35% affordable and 83 homes per year with 40% affordable.

Table 3-3: Influence of Affordable Housing on Build-Out-Rate

	Affordable @ 30%	Affordable @ 35%	Affordable @ 40%
Market	50	50	50
Affordable	21	27	33
Total	71	77	83

Source: Iceni analysis

3.26 Whilst there are some issues at the time of writing with Registered Providers' (RP) financial resources and the extent to which they are investing in development, these are influenced by current economic circumstances - including interest rates, which impact on development costs. It is notable that, looking forwards, the current Government has signalled a significant increase in funding for affordable housing. The Social and Affordable Homes Programme 2026-36 includes a significant £39 billion investment over a 10 year period. This is considered further in Section 4. There is potential for grant funding to support supplementary affordable housing over and above that achieved through developer contributions.

3.27 The Council is also working in partnership with several registered providers to buy land for 100% affordable housing schemes, to deliver affordable housing on existing Council-owned sites and utilise its assets more broadly to support affordable housing delivery.

4. HISTORIC HOUSING DELIVERY TRENDS

4.1 In this section we provide an overview of historical housing delivery trends in Cotswold District. It is important however that this is interpreted in a context in which it is broadly recognised, including by successive national Governments, that there has been insufficient housing delivery across England over recent decades.

4.2 The NPPF sets out the Government's objective of "*significantly boosting the supply of homes.*"[8] It has set an ambitious target to deliver 1.5 million new homes over the course of the current parliament, which equates to 300,000 homes annually. Delivering 300,000 homes a year has been an aspiration of successive Governments, and was for instance set out in the 2017 Housing White Paper[9] and can ultimately be traced back to the Barker Review – Review of Housing Supply – in 2004. However this aspiration to deliver 300,000 homes nationally across England is a significant 58% above the average housing delivery of 190,000 homes a year across England over the last 25 years, and has essentially not been achieved since the 1960s. Many local authorities will need to plan for significantly higher housing delivery than they have seen historically if this is to be achieved.

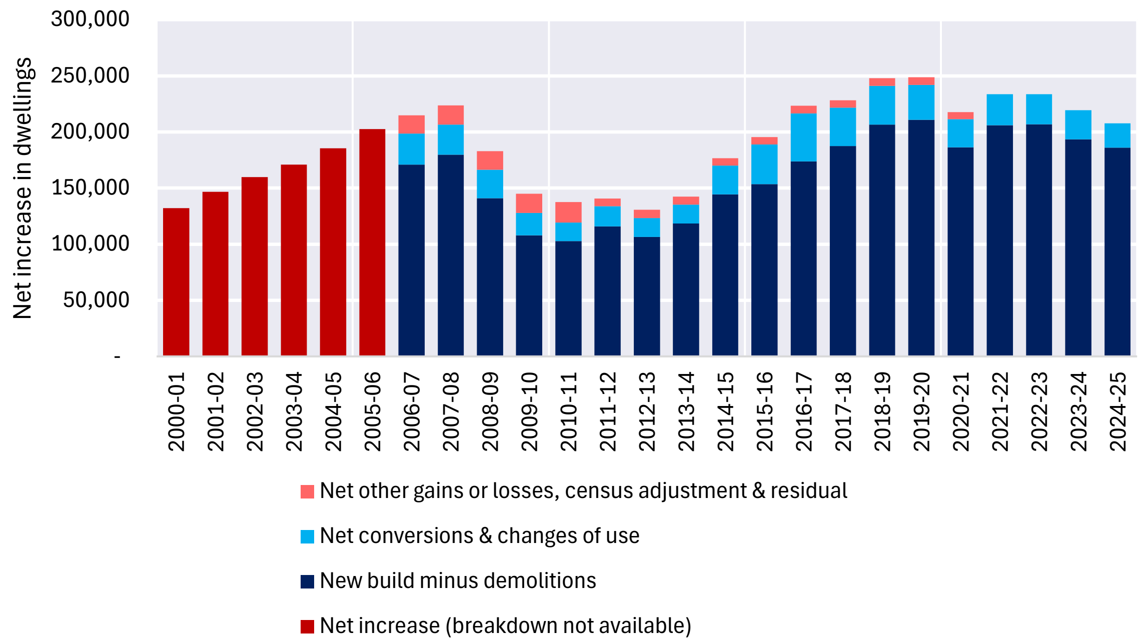
National Housing Delivery Trends

4.3 As Figure 4.1 shows, housing delivery is cyclical. It is influenced by a range of macro-economic factors – including economic performance, interest rates and the availability of mortgage finance. Housing delivery nationally increased between 2000-2008 in a context of a stable and growing economy, strong availability of mortgage finance and the attractiveness of housing as an investment. The credit crunch, driven by sub-prime mortgage lending in the US, led to a rapid shift in lending practices and reduced availability of mortgage finance (and finance for new development) and underpinned the low housing delivery seen through to 2013. The new-build market then improved, supported both by the Bank of England's Funding for Lending Scheme and demand-side support for housebuilding through the Government's Help-to-Buy Equity Loan Scheme through which the Government provided a 20% equity loan to help households buy new-build homes. This scheme ran to 2023 and enabled buyers to purchase a new home with just a 5% deposit.

[8] 2024 NPPF Para 61

[9] Housing White Paper, Fixing Our Broken Housing Market (2017) HM Government

Figure 4-1: Historical Housing Delivery (Net Additional Dwellings) across England, 2000-25



Source: MHCLG Live Table 118, November 2025

4.4 Covid-19 lockdowns resulted in a dip in housebuilding in 2020-21. However, Figure 4.1 shows that the last few years have seen a modest fall off in housing delivery nationally.

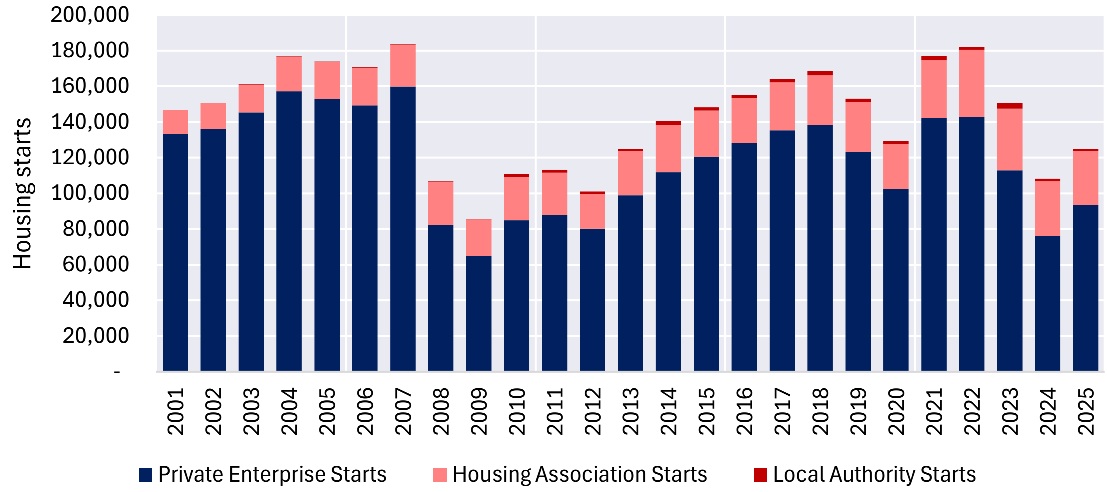
4.5 Housing starts provide a forward-looking indicator of housing completions and a closer reflection of recent market conditions (noting that completions lag starts by several years). The national housing starts position is shown in Figure 2.3 below.

4.6 House building in recent years has also been influenced by rapid increases in construction and labour costs since COVID-19. Together with higher interest rates (which feed through to finance costs for development and households' borrowing abilities), that has contributed to viability challenges on some schemes and a short-term reduction in effective demand for 'for sale' housing. There are other factors which have contributed to different market segments – with the impact of changing building safety standards on urban flatted schemes (and flatted markets) particularly notable.

4.7 These factors, together with the demand-side factors for the sales market described earlier, have led to a notable drop in new build housing starts from a peak of 182,070 reached in 2022 to a low point of 108,140 in 2024, and then 124,860 in 2025. Over the available data which stretches back to 1978, lower levels of starts were only recorded between 2008 – 2013 during the Great Financial Crash (GFC) and credit crunch. Private enterprise starts have been the most affected, with only 76,010 starts observed in 2024 and 93,570 in 2025. We are thus currently at a potential low point in a market cycle.

4.8 The national housing starts position therefore underlines the scale of the challenge facing housing development. There is a clear prospect that nationally, housing completions could continue to decline or remain low for several years.

Figure 4.2: Trends in House Building Starts across England, 2001-2025

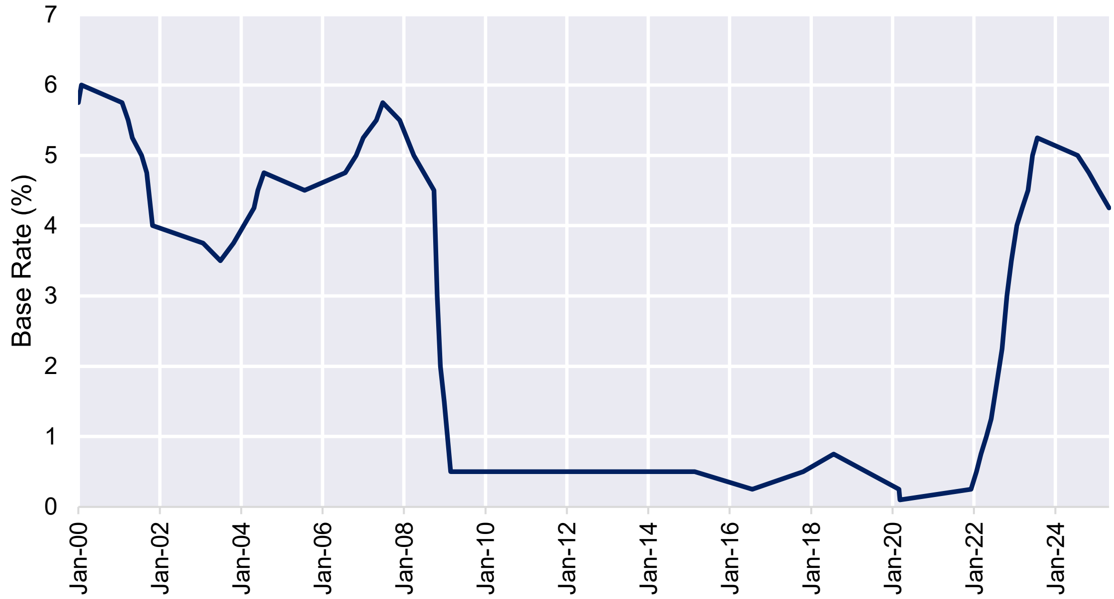


Source: ONS, Table 244, March 2026

4.9 These housing delivery trends have been influenced (as ever) by a multitude of factors, but with a key driver in recent housing delivery trends been an increase in interest rates during 2022 and the first half of 2023 as the Bank of England sought to control inflationary pressures in the economy (driven in part by the influence of rising energy costs driven by the War in Ukraine). Whilst interest rates have started to fall since 2024, with the base rate having dropped from 5.25% to 3.75%, the expected downward trajectory (which Banks had been building into their pricing on fixed rate deals) has been curtailed by the onset of the Iran War in Spring 2026. The short-term trajectory is therefore less certain.

4.10 Figure 4.2 below shows the Bank's base rate since 2020. The recovery in housing delivery nationally between 2013-20 was supported by a period of very low interest rates in a historical context together with the Help-to-Buy scheme which supported a significant quantum of new-build sales. However, these factors also supported house price inflation in real terms, contributing to current affordability challenges which in turn influence the sales market position.

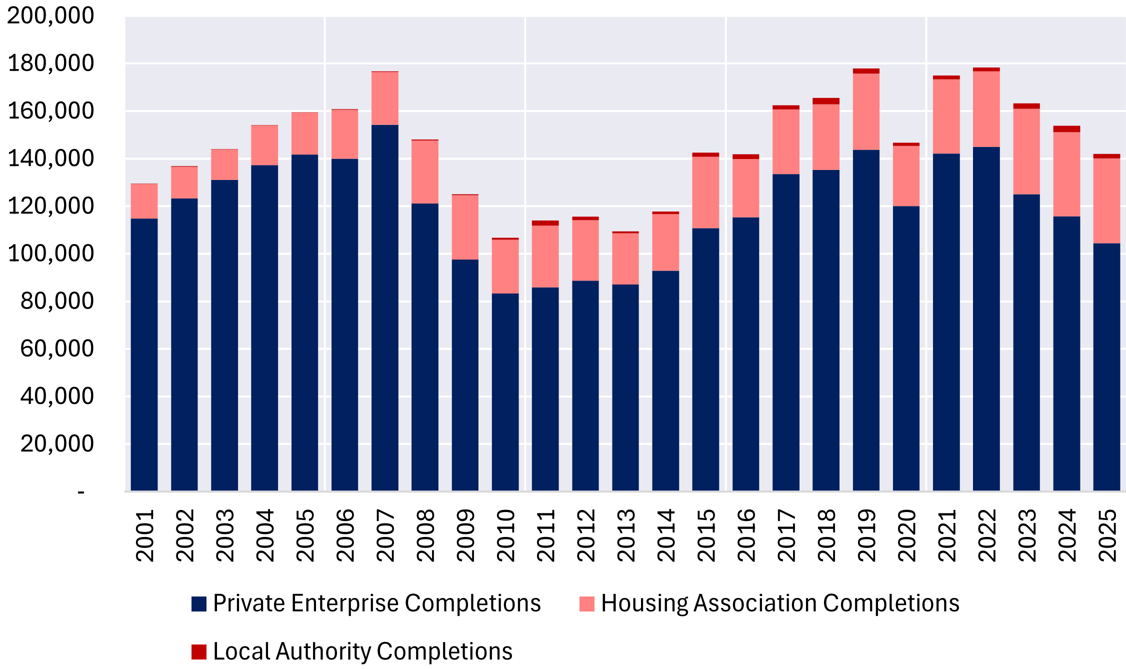
Figure 4-3: Bank of England Base Interest Rate



Source: Bank of England/Iceni

4.11 At a national level, the profile of new-build housing over the last 25 years has been driven by private enterprise, which have accounted for 82% of new-build completions. Housing delivery by housing associations and local authorities is significantly below the levels achieved in the post-war period through to the 1970s and is influenced by the capital funding available to support housebuilding.

Figure 4-4: Delivery of New-Build Housing across England, 2001-25



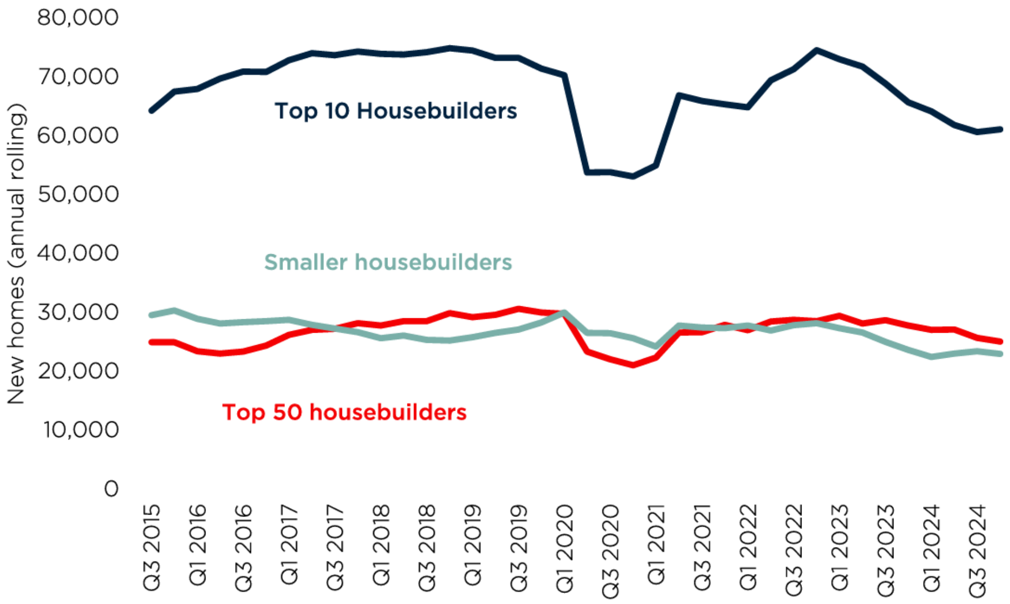
Source: MHCLG Live Table 244

4.12 It is invariable difficult to precisely predict what future capital resources may be made available by successive governments over the 17 year plan period to support affordable housing delivery; or whether the Government may reintroduce demand-side support in the short-term to support housing delivery. Macro-economic dynamics will invariably vary over time. This report needs to be treated within this context and considers potential housing delivery trends based on longer-term dynamics and evidence rather than placing particular reliance on market conditions at the time of writing.

4.13 The mainstay of housing delivery over the past 25 years has been delivery of homes for sale by housebuilders. The housebuilding market in the UK is dominated by a limited number of PLC housebuilders, with the 11 largest housebuilders responsible for around 40% of output.[10] Weakened market conditions have made the market more challenging for SME builders.

4.14 Figure 4-5 below profiles the trend in housing completions across England by different size of housebuilders. It illustrates the importance of delivery by large national housebuilders to the overall trend – with new home delivery declining since late 2022, but the latest data pointing to some levelling off of the trend.

Figure 4-5: Housing delivery by size of housebuilder



Source: NHBC Residential Construction Statistics/ Savills

Note: a similar chart showing data for subsequent quarters is not available

4.15 Both economic factors and planning system issues are likely to have contributed to these trends. HBF survey data indicating that the proportion of developers considering labour cost/availability a major constraint peaked in 2021 and has declined since and sits at a low 8%. Materials availability

[10] Competition and Markets Authority, Final Report

was a major issue for the industry in 2021 and 2022 in particular, but again has eased significantly and is cited as an issue by 10% of developers in the latest survey evidence.

4.16 Set against this, land availability is cited as a major constraint by 42% of developers with those citing planning delays a major constraint running at 75%+. There has been particular growth in the identification of viability pressures (57%) and regulatory/tax burdens (38%) as key supply-side factors inhibiting housing delivery.

4.17 The appetite from Housing Associations for s106 opportunities continues to remain muted at the time of writing. However, the June 2025 Spending Review has earmarked a substantial £39 billion national investment for affordable housing, which is equivalent to £3.9 billion per year – significantly (70%) above the £2.3 billion figure in place under the previous Government. This, together with a long-term rent settlement should go some way to supporting a recovery in affordable housing delivery.

4.18 The new Social and Affordable Homes Programme 2026-36 is expected to see spending reach £4 billion per year in 2029/30 and then rise in line with inflation. This aims to deliver 300,000 homes over the course of the programme; albeit that part of the increase in funding will be necessary to offset higher construction costs.

4.19 At the time of writing in Summer 2026, there are also a range of factors which are putting pressure on residential development viability. These include rising construction costs since Covid-19 – driven in particular by growth in energy costs and labour costs; rising regulatory or policy burdens – which include the Building Safety Levy which is set to come into force in October 2026, biodiversity net gain requirements and the future homes standard; and higher finance costs – influenced by interest rates (as described above). These costs for some schemes or forms of development have grown substantially more than the gross development value (GDV) putting pressure on viability and what planning obligations (including affordable housing) can be supported. These issues are considered further in the Council's viability evidence. For the reasons explained at the end of Section 3, there is an inter-relationship between the scale of affordable housing which a development scheme can support and the potential absorption and build-out rates which can be sustained.

4.20 Planning uncertainty and delays are cited as one of the influences on national housing delivery. Less than 30% of Councils across England have an up-to-date local plan (measuring this as one which has been adopted within the last 5 years). Regular changes to national policies and housing need figures in recent years, together with political changes within individual authorities, have made it difficult for a range of authorities to progress with plan-making. Uncertainties associated with Local Government Reorganisation are the latest prospective challenge.

4.21 There are also evident challenges with local authority planning resources. The RTPI's *State of the Profession 2025: England* report[11] indicates quite clearly that funding for planning services in local authorities was affected significantly by budget cuts in the 2010s and beyond and sits 17% below levels in 2010, adjusted for inflation, with planning policy teams amongst the hardest fit with spending down 29% in real terms. It shows that the times for determining planning applications have increased, with increasing common use of 'Extensions of Time' agreements. It indicates that at the current time, most authorities have one or more vacancies – with particular concentrations at the mid and senior levels. Challenges to filling vacancies included the lack of qualified or experienced applicants; with the Study finding too few younger people joining the profession. Capacity challenges were flagged by two-thirds of public sector planners.

4.22 Recent research by Searchland and the Strategic Housing Group[12] has shown how the combination of the increasing complexity of the planning process combined with these resource challenges have seen the time taken to determine residential major residential planning application increase 3 fold between 2010 and 2025, with median application rising from 107 days in 2010 to 349 days in 2025; with a four fold increase for outline applications from 118 to 439 days. Invariable what goes up can however also come down – with we note the current Government making housing delivery a central tenet of its Growth Strategy and supporting additional investment in the planning system.

Housing Delivery Trends in Cotswold District

4.23 Housing delivery at the local level is significantly influenced by the planning policy context. The chronology of plans prepared to guide development in the District is as follows:

- The Gloucestershire Structure Plan set a requirement for 6,150 dwellings in Cotswold District over the period 1991 – 2011 (average of 307.5 homes a year).

- Cotswold District Local Plan 2001-2011 (adopted April 2006): set a housing requirement for 3,070 homes over the 2001-2011 plan period (average of 307.5 homes a year) to meet the Gloucestershire Structure Plan requirement.

- Cotswold District Local Plan (adopted August 2018): set a housing requirement for 8,400 homes (average of 420 homes a year) over the 2011-2031 plan period, to meet the District's objectively-assessed need.

[11] https://www.rtpi.org.uk/media/sszn0kfz/england-sotp.pdf

[12] https://cdn.prod.website-files.com/62601c0298a844029bd9a1dd/6a27f81817e3d75881d16cd1_The%20Planning%20Slowdown%20-%20Final%201.2.pdf

4.24 In addition, during periods when there was no up-to-date local plan for the District other assessments of objectively assessed need (OAN), and more recently the Standard Method for calculating housing need, provided the level of need considered for decision making on individual development schemes. The chronology of relevant such assessments is as follows:

- The draft Regional Spatial Strategy for the South West, including proposed changes by the Secretary of State (as of 2008), proposed an annual requirement for 345 homes from 2006-2026. This would have been relevant in the late 2010s.

- An assessment of the objectively assessed housing needs carried out in 2013 identified a need for 345 homes per annum,[13] consistent to the scale of need identified in the RSS albeit based on a fundamentally different methodology.

- A report on the objectively assessed housing needs for a broader Housing Market Area including Stroud, Cotswold and Forest of Dean in 2014 identified an OAN for Cotswold of 380 homes per annum from 2011-2031[14]The 2014 OAN assessment was then updated in 2016, increasing the Cotswold OAN between 2011-2031 to 420 dpa[15]. This formed the primary evidence base for the current Cotswold Local Plan, which was adopted in 2018.

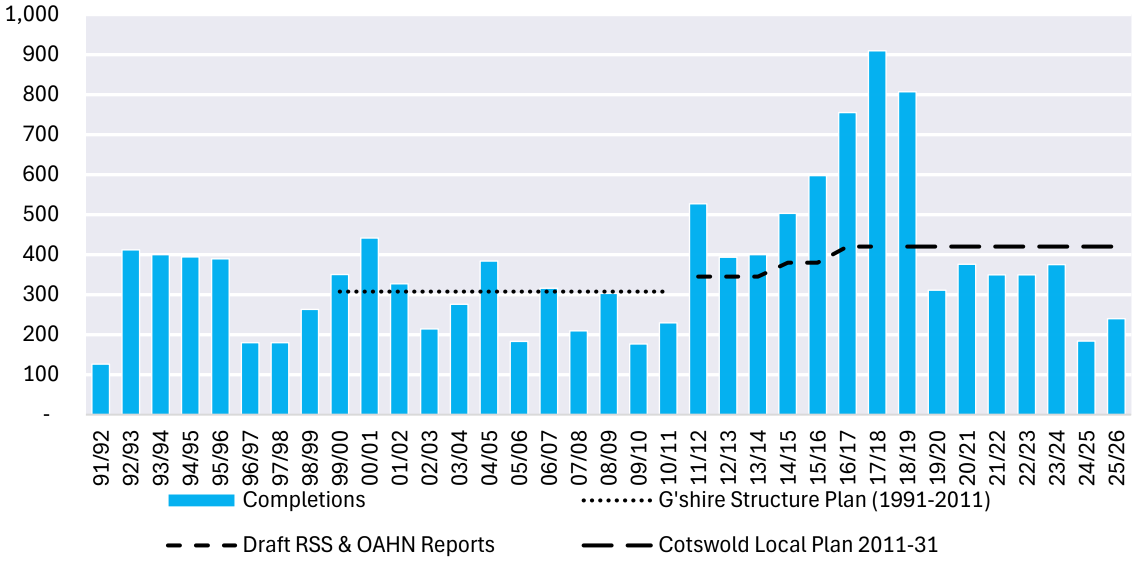
4.25 Historical housing delivery in the District looking back to 1999 is shown in Figure 4.5 below. The chart compares this with the housing requirement figures for the District set in local plans and with the objectively assessed need between 2011-18 when there was no up-to-date plan requirement, as detailed above.

[13] A review of future housing requirements for Cotswold District, Keith Woodhead, Updated March 2014

[14] Objectively Assessed Housing Needs of Stroud, Forest of Dean and Cotswold, NMSS, October 2014

[15] An Updated Estimate of the Objectively Assessed Housing Needs of Cotswold District, Neil McDonald, March 2016

Figure 4-6: Historical Housing Delivery in Cotswold District, 1999-2025



Source: CDC Residential Land Monitoring Statistics (CDC, July 2026)

4.26 The quantum of net completions has evidently varied over time, influenced by both the planning policy position and market cycles. Looking back over 15 years, there is an evident trend of increased housing delivery from 2012 (when the NPPF was introduced) until the point of adoption of the current Local Plan in 2018. There was short period leading up to 2015 when the Council did not have a 5 year housing land supply, which resulted in additional sites being brought forward. However, the Council did not adopt its Local Plan until 2018, and further sites were granted to enable the Council to continue to maintain its 5 year housing land supply.

4.27 The adopted Local Plan strategy for the 2011 to 2031 plan period anticipated higher than average rates of housing delivery in the first half of the plan period, balanced with lower than average rates of delivery on the second half of the plan period. Over the 2014-19 period there was an average of 714 homes a year delivered. As planned, delivery has reverted to lower levels over the last 5 years, averaging 299 dwellings per annum (dpa).

4.28 Over the period since 1999, overall housing delivery has exceeded the requirement being planned for in individual years by 8%. If the current adopted Local Plan period since 2011 is considered, delivery has exceeded the housing requirement by 12%.

Table 4-1: Average Housing Delivery in Cotswold District over different time periods

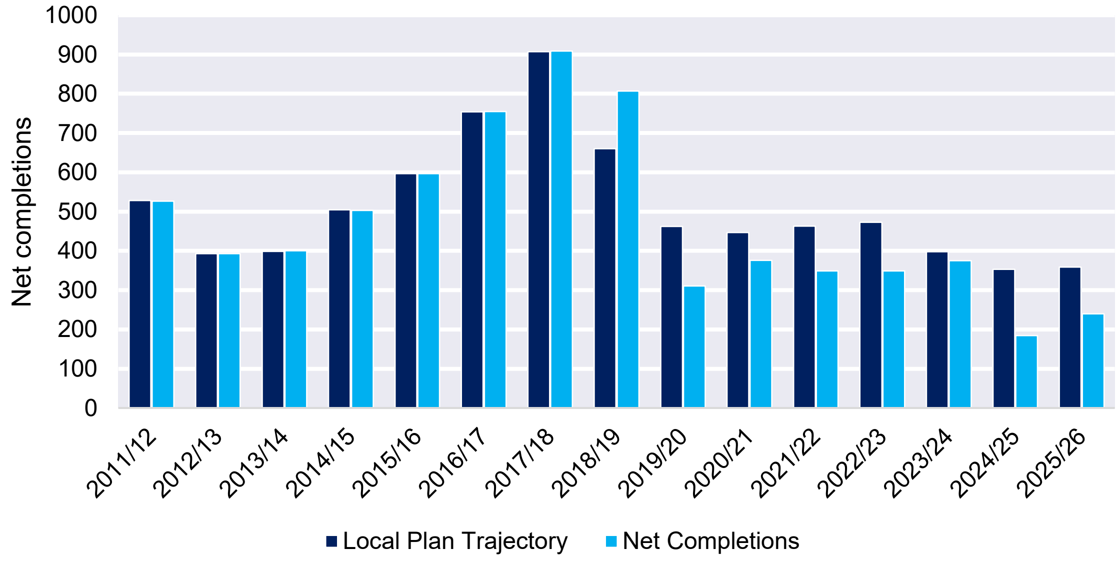
	Average homes per year
5 years (2021-26)	299
10 years (2016-26)	466
20 years (2006-26)	415
30 years (1996-26)	370

Source: CDC Monitoring Data/ Iceni

4.29 As a result of the high levels of delivery above requirements from 2015 – 2019, overall delivery of homes from 2011 – 2026 (7,075 homes) exceeds the local plan requirement over the same period (420 homes per annum over 15 years making 6,300 total) by a significant 12%. This highlights that overall, the District has a good track record in housing delivery.

4.30 Figure 4-7 below compares delivery to the housing trajectory in Figure 1 of the adopted Local Plan. It illustrates that the weaker housing delivery over the period since 2019 was to be expected, but shows that housing delivery over this period has fallen slightly below was anticipated when the Plan was adopted – with weaker delivery in particular in the last 2 years.

Figure 4-7: Comparison of Net Completions to Local Plan Trajectory

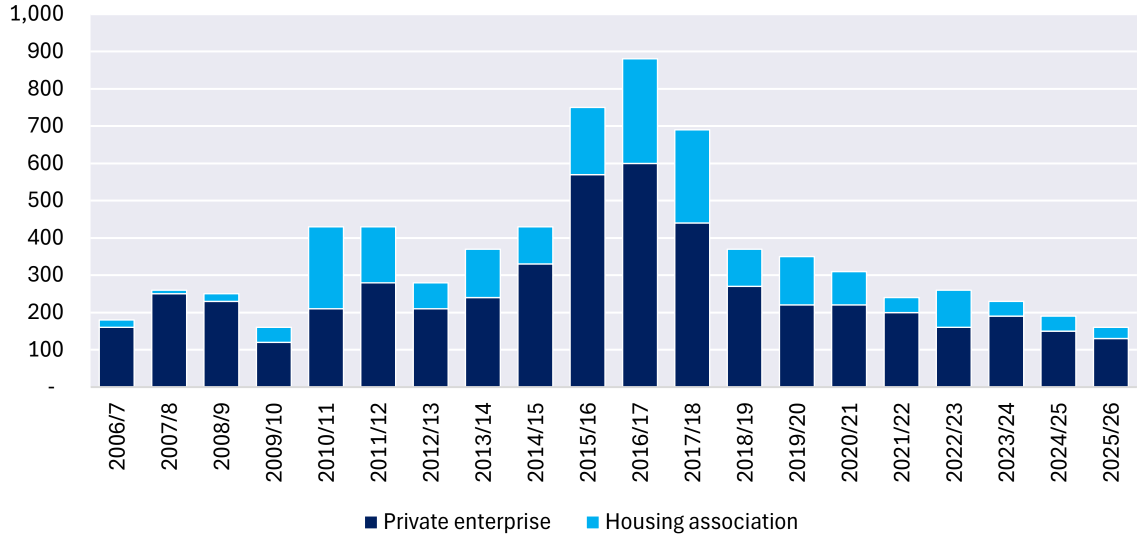


Source: CDC Monitoring Data/Iceni

4.31 This reduced recent delivery is in large part due to delays in development of the Steadings scheme south of Cirencester, which was the only strategic-scale site allocated in the Local Plan. This scheme is around three years behind expected timeframes. There have been delays at multiple points to negotiation, lodgement and approval of planning applications, infrastructure provision and the s106 agreement. These delays are in part due to resourcing issues during and following COVID-19. There have also been viability issues more recently due to cost price inflation during COVID-19. The progress of the scheme, and delays to it, are discussed in more detail in Chapter 6.

4.32 Housing starts show a picture of declining housing delivery in the District, in line with the very low delivery observed in the last two years. While housing delivery peaked in 2017/18 and 2019/20, starts had already started to decline after 2016/17 (noting that housing completions lag starts by a few years). Housing starts have declined steadily since then, with data for 2025/26 reaching a low not seen since 2009/10. The decline has been most pronounced in housing association starts, which as of 2025/26 sit at 11% of their 2016/17 peak compared to 22% for private enterprise starts. This is potentially indicative of recent viability challenges.

Figure 4-8: Housing starts – Cotswold District



Source: MHCLG Live Table 253

4.33 A breakdown of housing delivery in different settlements within the District since 2011 is shown below. In interpreting the data it needs to be borne in mind that the delivery will be influenced by land supply and past planning policies. The evidence indicates:

- Whilst Cirencester is the largest settlement in the District (and by some margin) it has seen relatively low housing delivery with an average of 85 dpa delivered over the 2011-24 period considered; but just 56 dpa delivered over the 2014-24 decade. The low delivery rate for a settlement of its size points to particular supply-side constraints.

- Moreton-in-Marsh has delivered new homes on a fairly consistent basis, averaging 74 dpa.

- Tetbury similarly has seen stronger delivery at some points, with for instance 123 dpa achieved between 2016-21; but saw very low delivery between 2011-15.

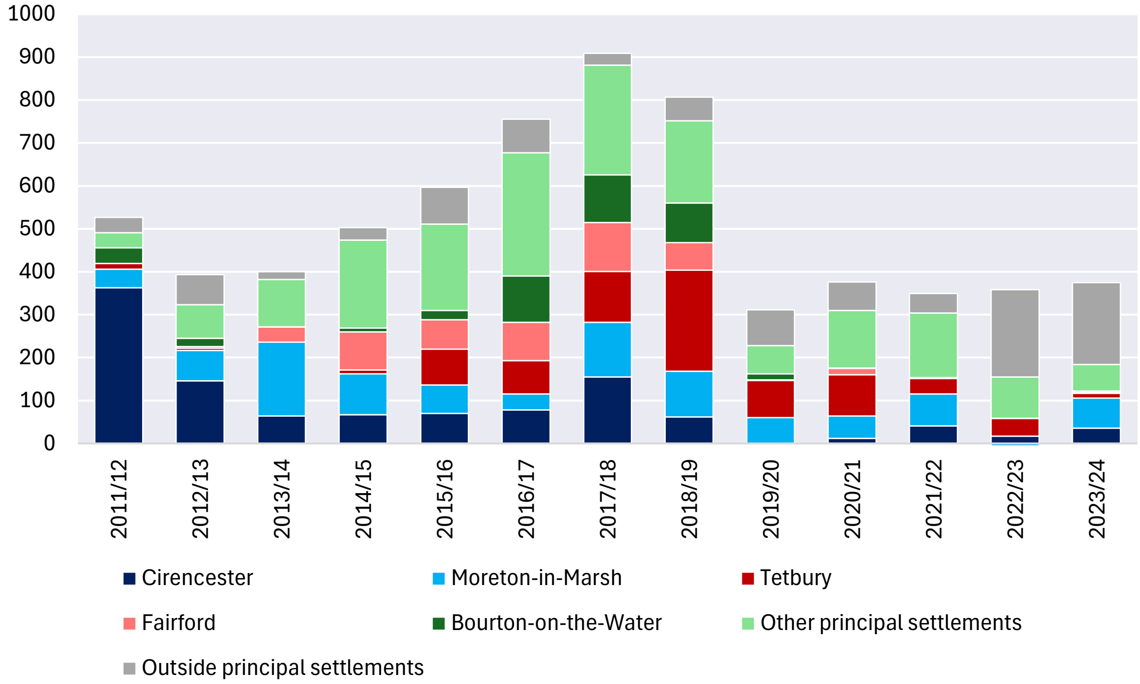
- Fairford saw delivery of an average of 85 dpa between 2014-19; but has seen very limited delivery since.

- Bourton-on-the-Water has seen the weakest delivery of the settlements considered; but did see over 100 dpa delivered between 2016-19.

4.34 These distinctions are very influenced by when larger development sites have come forwards in individual settlements. **The highest delivery rates have come in years when larger sites are**

being delivered in multiple settlements. The analysis highlights the potential to boost housing delivery overall by seeing concurrent delivery in multiple locations in the District.

Figure 4-9: Housing Delivery by Principal Settlement, 2011-24



Source: CDC Monitoring Data/Iceni

4.35 Whilst the historical effect which delay to the Steadings scheme has had on the District's trajectory is notable, with a higher scale of growth being planned for – and the potential for multiple strategic sites – there is the potential for greater resilience. In particular, the wider evidence from the stock growth rates analysis (as considered later in this section) is that those authorities which have sustained overall higher housing delivery rates tend to be those where there has been delivery of multiple strategic sites. Strategic sites often require upfront infrastructure investment, but the economics of development mean that once they are underway delivery tends to be less susceptible to changes in the housing market as initial cost outlays need to be recouped.

4.36 A mix of strategic and non-strategic sites, and a positive approach to windfall developments, are therefore critical to boosting housing delivery rates overall, recognising that smaller sites can come forwards quicker, but that whilst strategic sites have a longer lead-in time, they can play a key role in driving overall housing delivery in the middle and latter parts of a plan period.

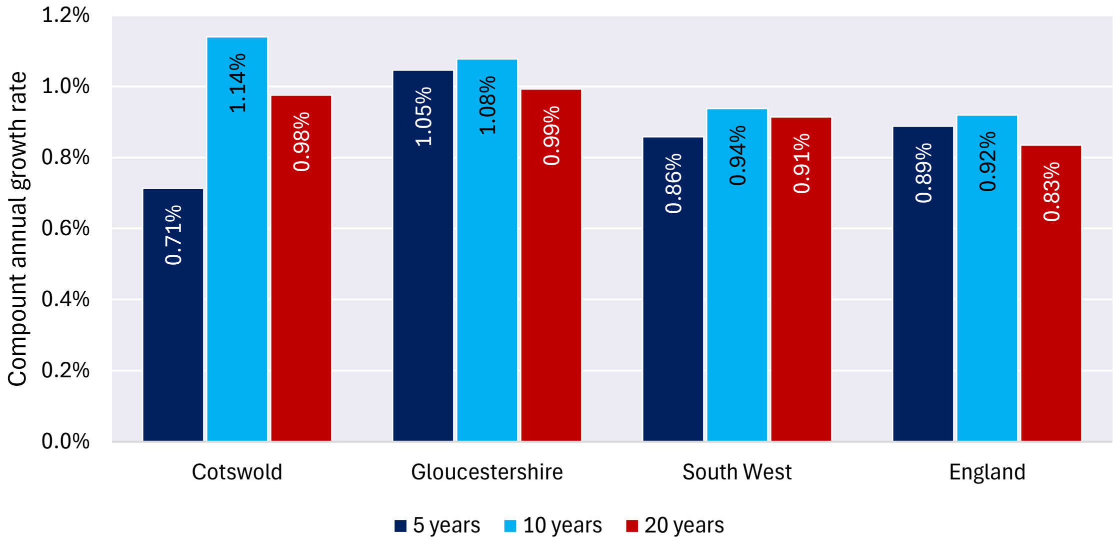
Stock Growth Rates

4.37 To compare rates of housing delivery against other places, we express housing delivery as the rate of growth in housing stock. This uses MHCLG dwelling stock estimates and expresses housing delivery as a Compound Annual Growth Rate (CAGR).[16] Over the last 10 years (2015-25), the District's housing stock has grown by an average of 1.1% per annum. Taking a longer 20 year timespan (2005-25), the rate of stock growth seen is slightly lower at 1.0% per annum.

4.38 By comparison, England as a whole has been delivering around 0.9% growth per annum, with a slightly lower rate in the longer-term 20-year time period due to low delivery following the global financial crisis and credit crunch. Similar rates are seen for the South West, and slightly higher rates for Gloucestershire (as shown in the figure below).

4.39 Comparing Cotswold to these benchmark geographies, Cotswold's housing stock growth rate over the last five years has been relatively low, while the 10-year growth rate has been above average and the 20-year rate broadly in line with benchmarks.

Figure 4-10: Stock growth rates over last 5, 10 and 20 years



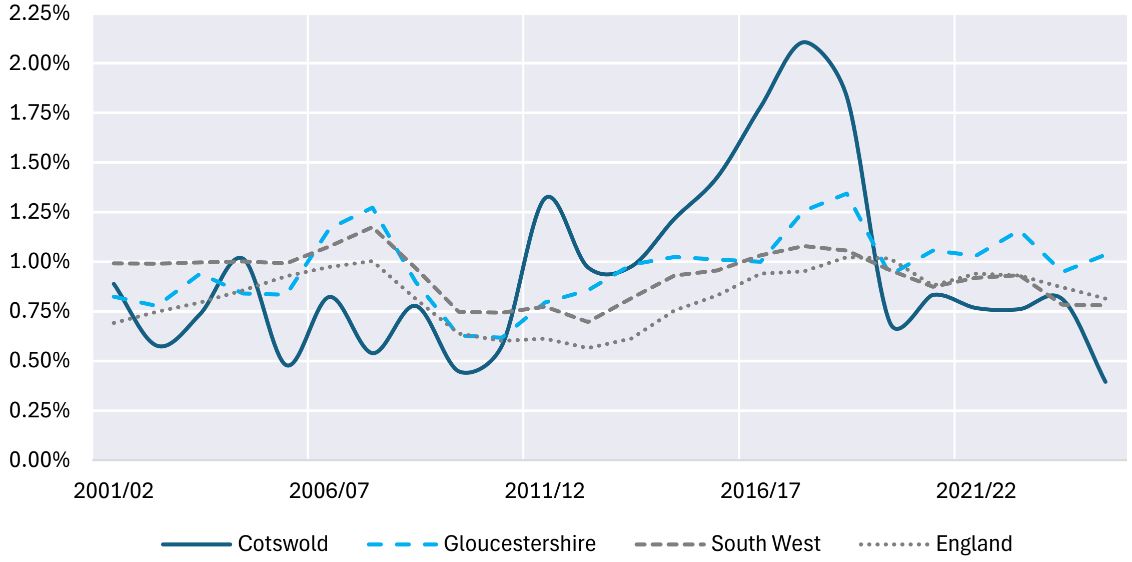
Source: MHCLG Live Table 125/ Iceni

4.40 The figure below provides more detail on how Cotswold's housing growth rate has varied over time in comparison to these benchmark areas. It illustrates that both through the 2000s and since 2020, housing delivery in the District has fallen below wider benchmarks. It did however exceed that across the wider benchmark geographies between 2011-19, corresponding with the increased completions

[16] MHCLG Live Table 125

in this period. Over the 5 year period from 2013-19, a 1.5% pa growth rate was achieved in the District.

Figure 4-11: Housing Stock Growth against wider geographies

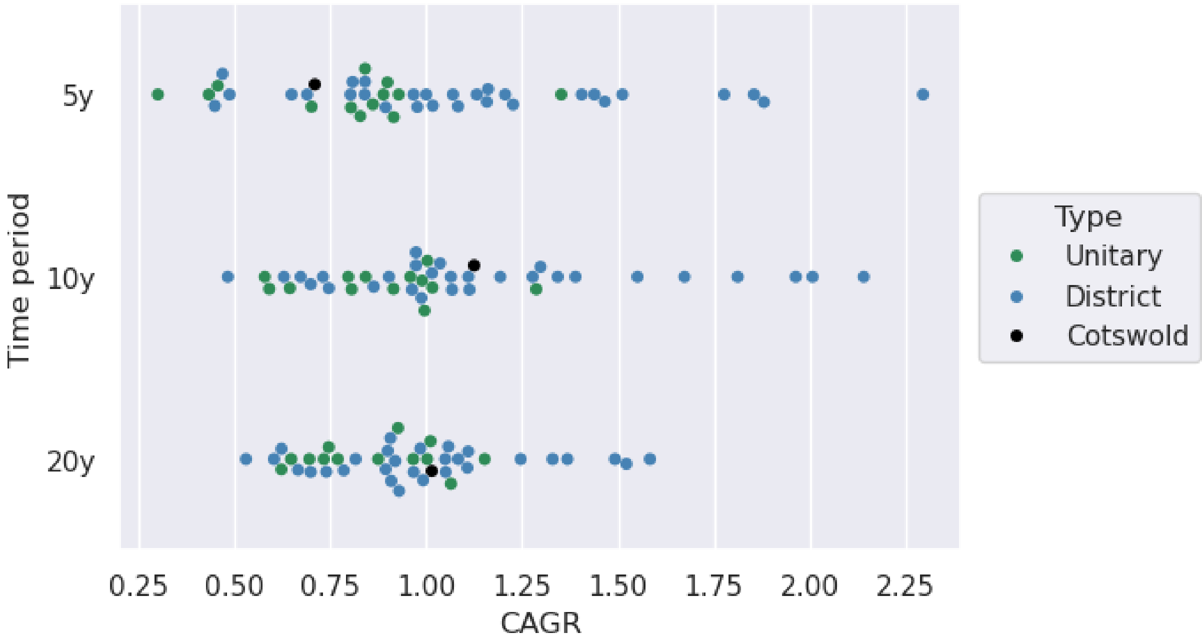


Source: MHCLG Live Table 125/ Iceni

4.41 It should be recognised that many authorities have delivered housing at well above the national rate in recent years. To assess this, the following figure shows the maximum housing stock growth rates achieved since 2001 over 5 years, 10 years and 20 years in each authority in the South-West Region. As Cotswold sits on the border of the region, authorities in counties adjoining Gloucestershire (i.e. Oxfordshire, Warwickshire, Worcestershire and Herefordshire) have also been included.

4.42 This illustrates that while many authorities have performed more poorly than Cotswold, **there are clear precedents for higher rates of housing growth being sustained**. High growth rates achieved in other authorities have been around 1.4% - 1.6% over a full economic cycle (20 years), up to around 2.0% or somewhat above over the medium term (10 years), and over 2.0% in the short term (5 years).

Figure 4-12: Housing stock growth rates over last 5, 10 and 20 years in South West and in counties bordering Gloucestershire



Note: Each dot represents one local authority

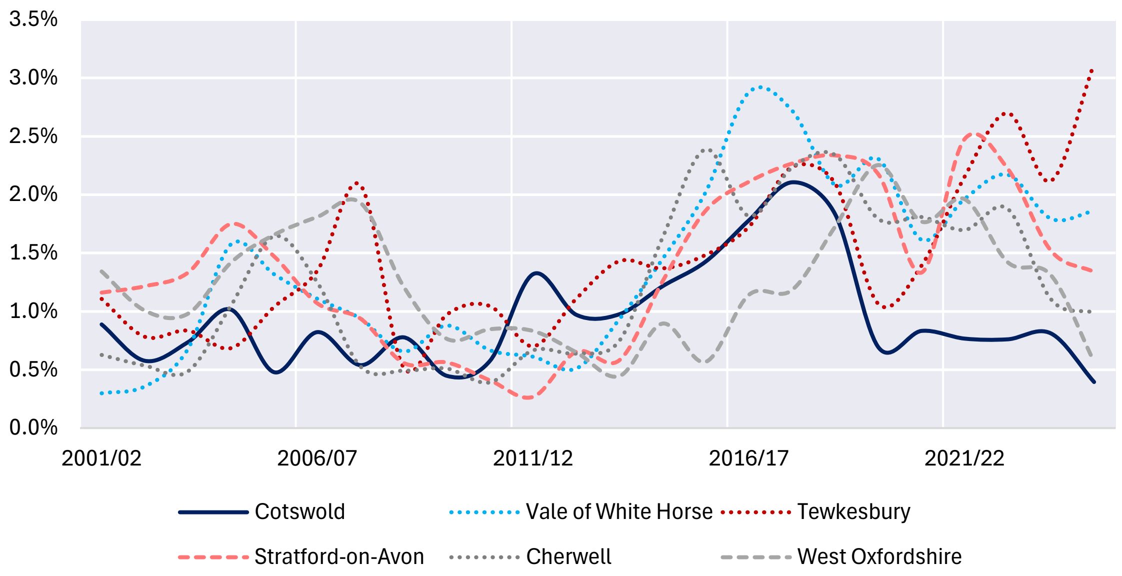
Source: MHCLG Live Table 125/ Iceni

4.43 In considering the potential to support higher housing delivery performance, it is instructive to compare housing delivery performance against nearby higher growth areas – which include similar higher value housing markets in Oxfordshire. Analysing the performance in the some of the best performing areas is helpful in considering what housing delivery rates (in terms of stock growth) may be potentially achievable. The analysis is shown in Figure 4.9 below, while Table 4.2 shows the authorities from the South-West region or counties bordering Gloucestershire with the highest 5-year housing stock growth rates.

4.44 There is a context to the trends seen in different areas which is important in understanding changes in housing delivery performance over time. Stratford-on-Avon District for example saw a moratorium on new housing development in the late 2000s (intended to support investment in the metropolitan areas in the West Midlands region), but has seen increased delivery since the adoption of its Core Strategy in 2016.

4.45 The Oxfordshire authorities published a Strategic Housing Market Assessment in 2014 which set out higher housing need than previous plans were based on. This has contributed to significantly higher housing delivery in Vale of White Horse, Cherwell and West Oxfordshire – albeit that in the latter, the recent trend reflects the delay to the delivery of the number of strategic allocations in the 2018 Local Plan.

Figure 4-13: Comparing Housing Stock Growth against nearby Higher Growth Locations



Source: MHCLG Live Table 125/ Iceni

Table 4-2: Maximum stock growth rates achieved since 2000 in highest-growth authorities in the South West and in counties bordering Cotswold District

Authority	5-year	10-year	20-year
Vale of White Horse	2.4%	2.1%	1.5%
Tewkesbury	2.3%	2.0%	1.6%
Swindon UA	2.2%	1.7%	1.3%
Stratford-on-Avon	2.2%	2.0%	1.4%
Cherwell	2.1%	1.9%	1.3%
Rugby	2.1%	1.7%	1.5%
South Oxfordshire	1.8%	1.6%	1.1%
West Oxfordshire	1.8%	1.4%	1.3%
Wychavon	1.8%	1.5%	1.1%
West Devon	1.7%	1.5%	1.1%
Torridge	1.6%	1.5%	1.2%
Cotswold	**1.6%**	**1.3%**	**1.1%**

Source: CDC Monitoring Data/ Iceni

4.46 The analysis illustrates how a number of local authorities have seen the market respond positively to planning for significantly higher housing delivery than they have seen historically. Drawing the analysis together, we would note in particular the following:

- Housing delivery is typically cyclical influenced by macro-economic factors which influence demand and viability. The local plan period for Cotswold's Local Plan is likely to include periods of stronger and weaker macro-economic circumstances;

- At a local level, the evidence shows that historical planning policies play a key role in influencing housing delivery. It is therefore very important to understand these in interpreting historical housing delivery figures. In Cotswold District, housing delivery has exceeded the level of housing provision being planned for by between 8-12% (depending on how this is appraised and the time period used).

- The District has historically been planning for between 308 – 420 homes a year. The Standard Method LHN is substantially higher than this at 1054 dpa, by a factor of over 2.5, but historical delivery alone cannot be said to imply that this cannot be delivered – as the District has not been planning to do so.

- The Standard Method implies sustaining 1.9% pa growth in stock across the plan period. There are some limited examples of other authorities achieving similar growth rates over the last decade, and therefore this is not unachievable *per se* – albeit the evidence shows that it is very ambitious.

- Achieving this ambitious rate of growth will likely require variety in the delivery of housing – spatially, with growth at a number of different locations with the District; and in terms of products – with a clear case for considering how broader 'product differentiation' can help to build resilience into the housing trajectory.

4.47 We test the potential trajectory for growth in Section 7.

5. FACTORS AFFECTING LEAD-IN TIMES & BUILD-OUT RATES

5.1 Build rates – how fast sites will deliver homes – are an important component of developing and considering the housing trajectory has part of the plan-making process. In this section we consider both national and local evidence of build rates, and factors which could affect what the build rate might be. We also address potential lead-in times, which describe the time for submission of an initial planning application for a site to first completions.

National Research

5.2 Research by Lichfields' entitled *Start to Finish* has considered lead-in times and build-out rates for different sizes of residential sites. The latest evidence is set out in the 3rd Edition of the research, which was published in September 2024. The research focuses on sites of 500+ dwellings.

Lead-In Times

5.3 Lichfields' analysis of lead-in times considered and disaggregated a 'planning approval period' which related to the time from the validation of the first application to when the first detailed permission was issued; and then a 'planning to delivery period' which extended from this point to the completion of the first home. The overall 'lead-in time' covers both elements.

5.4 Table 5.1 shows the average (mean) lead-in time shown in the Lichfields data by site size; but also median figures which remove the skewing effect of a selected number of schemes which can be 'stuck in planning' for an extended period and which we consider therefore constitute a more appropriate starting point. It also shows the 'upper quartile' (UQ) and 'lower quartile' (LQ) values which show that there is a reasonable range across the lead-in times of the schemes examined – from those that are delayed somewhat (either at the planning stage or thereafter) as well as credible examples, at the LQ level, of schemes progressing notably quicker.

Table 5-1: Median and LQ/UQ Lead in Times (Years) by Site Size in Lichfields national research

Scheme size	LQ Lead-in Time	Median Lead-in Time	UQ Lead-in Time
50-99	1.4	2.7	5.9
100-499	2.6	5.2	9.0
500-999	2.7	4.0	6.6
1000-1499	3.7	5.4	8.3
1500-1999	3.7	5.3	6.9
2000+	4	6.3	7.9

Source: Lichfields Start to Finish (3rd Edition, Nov 2024)

5.5 The time period from submission of outline applications of larger sites through to first completions takes into account that in a range of instances, the outline application will be pursued by a land promoter; and then the site will be marketed to housebuilders with outline consent. The 'planning to delivery period' also allows for the discharge of pre-commencement conditions and preparatory works on site as well as the building of initial homes before 'first completions' are achieved.

Build-Out Rates

5.6 Lichfields' analysis of build-out rates again focuses on larger sites and is based on taking annual completions data and then extrapolating build rates from this. Their report sets out that the data excludes any sites which have less than three years of completions data as such completions data would (often) not cover whole monitoring years which could distort the analysis. This means in particular that the results will be less reliable for smaller sites.

5.7 The core outputs of the research show mean and median build out rates, which we have replicated below.

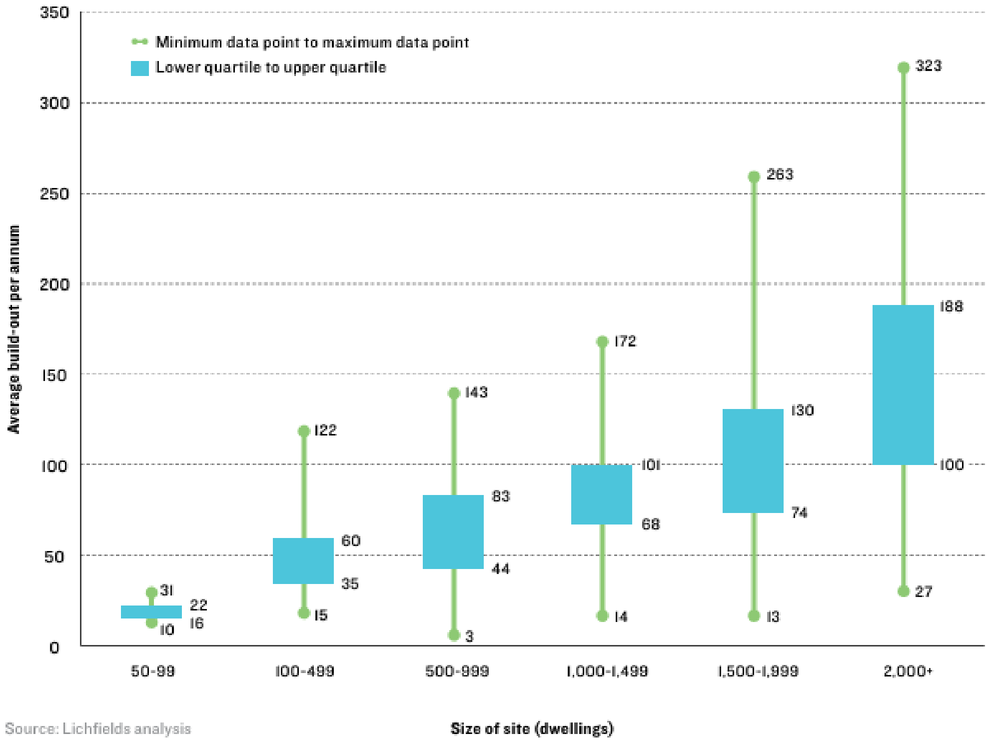
Table 5-2: Mean and Median Build Out Rates by Site Size in Lichfields national research (annual sales)

Scheme size	Mean	Median
50-99	22	18
100-499	55	44
500-999	68	68
1000-1499	107	87
1500-1999	120	104
2000+	160	138

Source: Lichfields Start to Finish (3rd Edition, Nov 2024)

5.8 However again, their analysis shows a notable spread of build rates across the sample of sites considered, as Figure 5.1 below shows; and the report itself comments on the wide range of factors which can influence the build-out rate.

Figure 5-1: Variance in Build Out Rates by Site Size in Lichfields' national research



Source: Lichfields Start to Finish (3rd Edition, Nov 2024)

5.9 Factors which can influence the build-out rate include the strength of the local market, macro-economic influences (from interest rates to support to new-build sales from the Help-to-Buy scheme) to the level of affordable housing provision. The Lichfields' research showed higher housing delivery on

- Greenfield sites, which deliver on average 32% higher build out rates then brownfield sites, which tend to be more complex to deliver and may require remediation. Flatted brownfield development tended to have a more lumpy build-out (as blocks of flats are typically completed at a single point) and be more susceptible to market downturns.

- Sites in areas with more acute affordability pressures (e.g. high affordability ratios). Higher demand areas (those with work a workplace affordability ratio above the national average) were found to have built-out rates 26% higher than lower demand areas.

- Higher levels of affordable housing (this is discussed in more detail below).

5.10 It also identified that the number of outlets was a key factor influencing the build-out rate. This aligns with our experience. The number of outlets is therefore directly relevant to the built out rate which sites might support.

Table 5-3: Average Completions per Outlet in Lichfields' national research

No of Outlets	Average annual completions	Average completions per outlet
1	69	69
2	123	62
3	164	55
4	230	57
5	286	57

Source: Lichfields Start to Finish (3rd Edition, Nov 2024)

5.11 It is worth highlighting the potential for the high levels of affordable housing delivery to support high build out rates overall if viable. This is because affordable housing is a separate source of demand to general market sales, and so given the same sales rate a higher percentage of affordable housing can lead directly to a higher overall build out rate, as explained is Section 3

5.12 This is consistent with Lichfield's findings that schemes with higher percentages of affordable housing had higher build out rates than those with lower percentages, however Lichfields note that those schemes delivering high percentages of affordable housing are also likely to be those in higher value areas with strong markets.

5.13 Housing product mix and diversity also has a role in driving higher build out rates. Lichfields research notes a lack of consistent data on housing mix and type to support this conclusion. Nonetheless, mixed tenure is noted as a factor facilitating higher build out rates in both the Central Government's recent working paper on speeding up build out rates[17] and in the Letwin Review. Build to rent or specialist housing types like older persons accommodation can be delivered independently of the market for general sales and so facilitate higher delivery rates. They can also have a role in improving scheme viability particularly in the context of a downturn or otherwise constrained housing sales market.

5.14 Comparing the factors identified to increase build out rates with Cotswold District, Cotswold's adopted Local Plan (2011-31) sets a 40% affordable housing requirement on Greenfield sites and a 30% requirement on brownfield sites[18], is a high demand-area as measured by a very high workplace affordability ratio, and has a land supply composed almost entirely of Greenfield sites. All of these factors would support higher build out rates, particularly on larger schemes providing tenure and products diversity. However, it is also noted that Cotswold is a relatively rural district, parts of which are relatively far from major employment centres, which would suggest some constraints on potential build-out rates.

[17] Planning Reform Working Paper: Speeding Up Build Out, MHCLG May 2025

[18] The requirement in the emerging Local Plan will be informed by updated viability evidence

Local Evidence

5.15 There are only a few recent sites of larger scale which have been developed in Cotswold district to provide local evidence of lead in times and build out rates. The only strategic site which has been coming forwards in recent years is the Steadings in Cirencester, which includes 2,350 homes and 9.1ha of employment land, but of which only an initial phase (Phase 1a) has been delivered to date. The progress of this scheme up to now as well as future build-out prospects are discussed in more detail in the next chapter.

5.16 However, it is noted that development of this scheme is running around 3 years behind the time frame initially envisaged in Council's current local plan, and that the lead in time until first home delivery has been unusually long and initial delivery rates low as only a single 68 dwelling phase has come forward to date. It is understood that this has resulted in large parts from delays in the s106 and planning approvals processes, in part due to resource limitations resulting from COVID-19.

5.17 As discussed in the next chapter, it is anticipated that build out rates at the Steadings will accelerate now that multiple phases of reserve matters have been approved and enabling infrastructure is now in place.

5.18 It is considered that the factors that have slowed development at the Steadings would not necessarily apply to other sites, and so the Steadings is of limited utility in providing local evidence of likely lead in times. However, this does highlight the need for planning approval and infrastructure negotiation processes to be adequately resourced and supported by Council in order to deliver the scale of housing required by the Standard Method and proposed in Council's emerging Local Plan.

5.19 Given that there are relatively few larger scale sites that have been developed recently in Cotswold, a broader area than the District is needed to provide local evidence on potential build out rates. Iceni has completed analysis of local build out rates through the emerging Gloucestershire HENA. To do so, Iceni analysed data for Gloucestershire showing the number, timing and location of lodged EPC certificates for new dwellings across the six Gloucestershire authorities. The analysis spans different economic cycles.

5.20 Postcode-level data was manually grouped to identify development sites of different scales, with the number of certificates per year then providing an indication of the build out rate on each site. This analysis intended to assess build-out-rates in a typical year, and so any data for the first or last year of development in which only a few homes were completed (i.e. development was just starting or finishing) was excluded.

5.21 EPC certificate lodgement timing can differ slightly from housing completions as recorded in Council monitoring data, which should be considered as a more accurate picture of development progress and build out rates. However, the analysis intended to provide an estimate of build out rates across Gloucestershire's six authorities, noting differences in monitoring data availability and format (and that in many cases detailed and consistent monitoring data for a longer time period was not available).

5.22 The Gloucestershire-wide results for greenfield development are shown in the table below, grouped by site size.

Table 5-4: Build out rates in Gloucestershire (2008 – 2025) – Greenfield development sites

Scheme size (number of units)	Lower quartile	Median	Upper quartile	Number of sites considered
50-99	25	31	47	54
100-199	32	37	55	29
200 – 499	54	61	78	26
500 – 999	105	112	121	8
1,000+	130	133	155	3

Source: Iceni analysis of EPC data

5.23 Observed build out rates were generally slightly faster than those found nation-wide in the Lichfields research. However, only a limited sample of very large sites (1,000+ homes) was able to be profiled in Gloucestershire, and detailed analysis of site-by-site constraints / considerations was not undertaken.

5.24 When considering sites in Cotswold District specifically, there were average build-out rates of 34, 42 and 70 per annum for sites of 50-99 units, 100-199 units and 200-499 units respectively. **These local rates for sites in Cotswold District again sit at the upper end of those detailed in the Lichfields research** (noting that Lichfields provides value for 100 to 499 units and does not break this down further). In the 200-499 unit category there were schemes in multiple parts of the district including Tetbury, Cirencester and Moreton-in-Marsh. Several of these achieved peak delivery rates of 90 homes per annum or higher.

5.25 No 500+ unit schemes within the Cotswold District were available for inclusion in the analysis. As a result, local evidence for Cotswold District is too limited to provide detailed figures to be directly applied in the Cotswold trajectory for large strategic allocations.

5.26 Nonetheless, the Gloucestershire-wide analysis and more limited results for Cotswold suggest that **build out rates in line or towards the top of ranges shown in national evidence** (for example as provided in Lichfields Start to Finish) **should be achievable**.

Infrastructure

5.27 Infrastructure availability can act as a constraint on when planning permission can be granted and development can start on site. These issues are being considered more fully in Council's Water Cycle Study and Infrastructure Delivery Plan. The Water Cycle Study deals with both water supply and waste water. For water supply, the majority of the District falls within Thames Water's Swindon and Oxfordshire Zone. A surplus in water supply in this zone is identified to 2030, but potential deficit beyond this requiring implementation of demand management and supply measures. It will be important that the Council continues to engage with Thames Water on these issues, and that the growth trajectory in the Local Plan feeds into the preparation of future Water Resource Management Plans.

5.28 It is understood, based on work underway, that there could be constraints on waste water treatment capacity in several settlements within Cotswold District later in the plan period, including potentially Ampney St Peter, Northleach, Fairford and Moreton-in-Marsh. These areas are served by Thames Water[19]. There is a further issue relating to storm overflows in the Moreton-in-Marsh area. Additionally, there is some potential investment which could be required to support development around Mickleton and Willersey, where waste water is managed by Severn Trent.

5.29 The timing and scope of Sewage Treatment Work (STW) upgrades required is unknown at the time of writing, and subject to further engagement with Thames Water. Thames Water may therefore require Grampian conditions to be placed on planning consents where there are infrastructure constraints, which could impact on site lead in times, and may limit delivery within the plan period.

5.30 On waste water collection, there is a need for early engagement between the utilities providers, Council and developers and joint working to develop foul drainage strategies for sites including the use of SuDS to manage surface water run-off.

5.31 To be included within the housing land supply, sites must be capable of being delivered within the relevant timeframe and satisfy the deliverability requirements. However, inclusion within the housing land supply does not guarantee that a site will be delivered, as delivery ultimately depends on a range of factors outside the Council's control, including market conditions, landowner intentions and developer decisions.

[19] Parts of the district are served by Severn Trent Water and Wessex Water

6. PROPOSED STRATEGIC ALLOCATIONS

6.1 In this section of the report we move on to consider the delivery of potential strategic sites within the Plan. Our analysis is informed by information provided by site promoters to Iceni as part of the preparation of this Study and selected further meetings or discussions to interrogate the delivery position and timescales. It is also informed by emerging masterplanning of the strategic sites – the masterplans were still evolving at the time of writing to reflect further evidence, and our advice on the capacities of these sites is based on the version of the masterplans that was shared with us in June 2026.

The Steadings, Cirencester

6.2 The Steadings is an existing strategic site which was allocated for up to 2,350 dwellings, and approx. 9.1 ha of employment land in the extant Local Plan, which was adopted in 2018. An outline planning application for development was submitted in January 2016, supported by technical evidence, an indicative layout and phasing plan; with the position at the time of the previous local plan examination being an expectation that Phase 1a could come forward first whilst development main part of the site could start on site in 2021 with c. 1,800 homes completed on the site by March 2031.

6.3 The Council also adopted a Community Infrastructure Levy (CIL) Charging Schedule in June 2019. The Steadings was zero rated for CIL, meaning that's all infrastructure delivery would be secured through S106 contributions.

6.4 The January 2016 outline planning application (16/00054/OUT) was consistent with the Local Plan allocation (up to 2,350 homes etc.) but set a 30% affordable housing requirement. The scheme also included provision for up to 100 units of student accommodation and 60 homes for the elderly. Outline consent was granted in April 2019, indicating a 39 month determination period for the outline application.

6.5 Bathurst Developments Limited (BDL) is acting as a master developer for the site and is delivering infrastructure to provide serviced parcels to the market. The eastern section of the spine road through the site, from Spratsgate Lane to open up Parcels 2A/B/C, has been constructed and was completed in Spring 2025. Improvements to the Fire Station Roundabout were completed in Autumn 2025. Spratsgate Lane has been realigned.

6.6 Reserved Matters (RM) for Phase 1a of the development, for 68 dwellings, was subsequently approved on 29th November 2021 (20/04343/REM). This has been completed by regional housebuilder, Harper Crewe.

6.7 RM applications for infrastructure to support the development – including earthworks, remodelling and SUDS infrastructure for Phase 2 (23/02253/REM) and for the road infrastructure to serve Sub-Phases 2a, 2b and 2c (23/02252/REM) were subsequently approved in December 2023. The RM for extension of the spine road to serve Phases 2D and E was approved in January 2026 (25/02186/REM).

6.8 Parcels 2A, 2B and 2C were acquired by Homes England from BDL in mid 2021. Homes England selected Keepmoat to take forwards Phase 2A who are due to start construction on site in Autumn 2026 for 100 homes (including 31% affordable). A Reserved Matters application was submitted in September 2025 and permitted in January 2026 (25/02763/REM). Development partners have now also been appointed on Parcels 2B and 2C.

~~6.9~~ HarperCrewe has been selected by BDL to deliver Parcel 2D (129 homes including 31% affordable). A Reserved Matters application has been submitted to the Council for Phases 2D and E (26/01237/REM) and construction of these parcels is due to start on-site in Autumn 2026. This will progress alongside extension of the primary street through Parcels 2D and 2E.

6.10 In addition to the above, BDL is progressing the detailed design code for Parcels 2F, 2G, 3D and 3H. Once the detailed design code is in place, reserved matters applications for the spine road and open space can be progressed; and housebuilders selected to develop these parcels.

6.11 The site has progressed more slowly than was envisaged at the time of the last Local Plan Examination with around a three year delay. This is due mainly to the time taken to finalise the S106 agreement, together with delays associated with supply shortages associated with Brexit and the impact of Covid-19 which influenced the timings for the approval and delivery of initial infrastructure. It took longer than envisaged from the granting of outline consent to the first discharge of conditions applications to be submitted, to agree the design of Parcel 1A, discharge planning conditions and agree the Detailed Design Code for sub-phases 2A, 2B and 2C. The Covid-19 pandemic also impacted both the promoter’s progress and the Council’s resources and ability to discharge planning conditions as staff were redeployed to assist with the Council’s response to the pandemic.

6.12 However, the position now is that there is significant on-site and off-site infrastructure in place to support delivery at pace. Completions on Phases 2A and 2D/E are both expected to come forwards from mid 2027 with 2B/C delivery completions starting in 2029 bringing the number of sales points to three. This increased delivery is supported by Homes England’s involvement whose specific remit is to accelerate housing delivery and support an increase in the build-out rate to 120-160 dpa, based on 2-3 outlets delivering concurrently.

6.13 To accelerate the pace of delivery further, it will be necessary to open up further sales points at the northern end of the site, accessed from the A419 Tetbury Road. Based on engagement with BDL, Iceni understand that there is a significant infrastructure cost associated with doing so – including the realignment and dualling of the road and construction of a new roundabout. We consider that there is a clear case for the Council, Homes England and BDL to work together to consider how the delivery of this infrastructure could be brought forwards to accelerate the delivery of The Steadings site. Homes England is already involved in the site and has capital grant programmes to support strategic infrastructure, such as the Brownfield, Infrastructure and Land Fund and New Homes Accelerator; whilst the National Housing Bank has been established and has loan funds available to support the infrastructure financing and attract institutional capital to support schemes such as this.

6.14 The trajectory assumes that this can support opening up initial completions on the western parcels from 2032/33. This could see the built rate potentially increase above 160 dpa through opening up new land parcels off the Tetbury Road.

6.15 The trajectory provided by BDL assumes average delivery rates of around 140 dpa is achieved on this site, and indicates the potential for up to 4 developers to delivering concurrently (together with affordable housing provision). Whilst this is informed by current evidence, in a longer-term context we would consider this to be conservative and cautious – with evidence of stronger market conditions supporting sales of up to 1 per week. In addition, there is potential for the site to support broader product differentiation, and whilst it includes some provision for specialist housing, provision of single family build-to-rent development would also be possible, would cater for a different market segment and could support higher overall build-out rates (BORs). The potential for this is particularly in the second half of the plan period when a second major access point from the Tetbury Road opens up further land parcels. The potential for higher delivery rates to be achieved is supported by Homes England involvement in the site – where developers are contractually obligated to deliver homes at pace.

6.16 There is clear evidence that as multiple parcels come forwards, the pace of delivery of this site will increase. Our conclusions on the trajectory take this into account resulting in a build rate of 140-150 dpa which remains cautious and could be exceeded. This would result in at least 2,100 homes (rounded) being delivered over the plan period on this site, and a contribution of 600 homes in the assumed five year period from adoption of the Plan (2028-33). We would recommend that the Council considers further the potential for slightly higher delivery rates to support the build out of the full 2,282 remaining homes over the plan period.

The Steadings southern extension, Cirencester

6.17 A southern extension to The Steadings, on 116.5 ha of land, is being promoted by BDL through the local plan preparation process. BDL envisage that these will come forwards concurrently with The Steadings site above, with its emerging masterplanning work envisaging a more rural or semi-urban character to the development on this site and different housing product offer.

6.18 The Council's capacity work and preparation of concept framework plans indicates that the site has capacity for c. 1,400 homes. It would include a local centre together with a 2FE primary school (collocated with the neighbourhood centre) and employment land, which is envisaged to be located close to Spratsgate Lane. Higher density development is envisaged around the local centre and public transport corridor running through the site. The development would also deliver open space and Suitable Alternative Natural Greenspace (SANG).

6.19 It is envisaged that access to the site would be taken from both Spratsgate Lane to the east, and from Tetbury Road (A333) and from the A429 on the western side of the site. Much like The Steadings above, this provides the potential to support multiple sales points.

6.20 The enhanced scale of site, through the allocation of this land, would open up the potential to deliver additional sales points; with the development utilising some of the key upfront infrastructure which has (or will) be delivered as part of the existing Steadings site. Its inclusion within the Plan can be expected to help fund and deliver infrastructure and indeed helps to support a business case for public investment in infrastructure provision to accelerate delivery. We understand that discussions between Homes England, BDL and the Council on these matters are underway.

6.21 Our assumptions on the build out of The Steadings in the sub-section above take account of the expectation that this additional land will come forwards. There is potential for initial development to come forwards off Spratsgate Lane, taking account of existing infrastructure investment in this area to support initial phases. We understand that a technical team is in place, and baseline reports have been prepared; with the potential for an early application to be made on this eastern parcel by the end of 2027. An outline or hybrid application for the wider site is then expected to progress following adoption of the Local Plan. There is potential for the site to support up to 3 sales points delivering concurrently, as well as other specialist forms of housing which could include self/custom-build and retirement/ care provision.

6.22 Taking account of the above, we consider that it would be reasonable to assume first completions in 2031/32 and that the additional land would increase the build rate at the Steadings by c. 50 dpa in the middle part of the plan period, and potential for 60 dpa in the latter years as delivery at the Steadings existing allocation and other sites at Cirencester slows. We estimate that the site on this basis would support delivery of 585 dwellings over the plan period.

Land south-east of Cirencester and south of Preston

6.23 This strategic site includes two land parcels, totalling c. 100 ha, and is envisaged to accommodate c. 1,300 homes. The south-western side of the site is being promoted by Bloor Homes who have a hybrid option agreement in place with the landowners. Significant due diligence work has been undertaken and technical survey work is underway at the time of writing; with a pre-application advice applications submitted to Gloucester County Council to agree the scope of the transport assessment, site access and active travel measures. Pre-development service enquiries with utilities providers are also underway.

6.24 Access to the site is envisaged from Cirencester Road and will need to be delivered to open the site up. The site is envisaged to include key infrastructure including a 2FE primary and 6FE secondary school co-located with a local centre, strategic open space and a large area of Alternative Natural Recreational Greenspace (ANRG). It will also include employment provision on land adjoining the A419, mobility hub plus active travel improvements along A419 Cirencester Road. Phasing and delivery triggers would be negotiated as part of the planning application.

6.25 Bloor intends to engage the District Council in pre-application discussions in 2026 and subject to the outcome of these, intends to submit an outline planning application in 2027. It intends to enter into a Planning Performance Agreement (PPA) with the Council to support timely determination. Bloor's intention is to manage the delivery of the site. It has indicated that they envisage a start on site in 2029/30 with first completions around mid-2030 with a minimum of two sales points (flags), either through its own brands[20] or through involvement of other housebuilders. Bloor has indicated that this would support a build-out rate of 100 dpa initially rising to 150 dpa.

6.26 The northern part of the site is controlled by promoter, Robert Hitchins. This land would be necessary to support the northern access to the site from the existing Siddington Park roundabout on the A419 Cirencester Road. However, the emerging Masterplan envisages limited development in this area with it mostly dedicated to SANG and providing a buffer between the new development and the existing village of Preston. We note this is contested by Robert Hitchens and remains an area where further housing development may materialise.

6.27 Cooperation and dialogue between the two promoters will be necessary to support the development of the site, with limited evidence of this at this stage. This suggests that the timeframes for submission of an outline application for the wider strategic site could slip. However, the current housebuilder involvement in the site should help to support early delivery. We recommend that a more reasonable assumption for first completions is therefore mid-2031.

6.28 With the potential for multiple sales points, we consider that a build-out rate of 100 dpa once the site is up and running is achievable; with potential for this to increase to 150 dpa having regard, in particular, to the site's strong accessibility to wider employment centres via the A419, and the delivery of key education infrastructure and a local centre onsite, and 40% affordable housing provision. This would see the site completed, with a total of the full c. 1,300 homes (based on the capacity analysis) delivered in the plan period. The site would contribute 94 dwellings over the five year period from

[20] Bloor and Fitchett

adoption (2028-33). If further land is allocated for housing on the Robert Hitchens controlled part of the site, we foresee there is some headroom in the delivery estimations for further housing to be delivered on this site within the plan period.

Land east of Kingshill Lane, Cirencester

6.29 This strategic site (c. 42 ha) is located to the north of Preston and is bounded by Kingsmill Lane to the west and the A417/A419T dual carriageway to the east. The Council's capacity testing and work on concept framework plans indicates the potential to accommodate c. 600 dwellings together with a primary school, local centre and strategic open space. It indicates the potential for three points of access to the site from Kingshill Lane. The existing Kingshill Secondary School is located to the north-west of the site; with a 33kV power line running alongside the southern boundary of the site.

6.30 In addition to on-site infrastructure, it is reasonable to expect that the development would also need to contribute to off-site infrastructure – such as improvements to the A419 Cirencester Road Corridor and sustainable travel improvements. SANG provision is currently expected to be provided off-site.

6.31 The site is being promoted at the time of writing by the landowner, RTG Chester-Master Will Trust who has engaged a planning consultant. It is in single ownership but there is no current development partner or promoter involved. It seems likely that the Trust will enter into a promotion agreement once the Reg.19 version of the Local Plan is published, with work to support an outline planning application to progress thereafter. The site would then be sold with outline consent to a housebuilder. Iceni consider that with a draft allocation, the site could equally be attractive to a housebuilder.

6.32 At the time of writing there is not therefore a clear timetable for submission of an outline or hybrid planning application. Whilst the site could progress quickly once its allocation is confirmed, taking account of the current position it would be sensible to therefore schedule delivery beyond the 5 year period at adoption.

6.33 Iceni consider that a build-out rate of 100 dpa would be realistic on this site given its size and the potential to support multiple access points. As above, the provision of education infrastructure, access to employment at Cirencester, 40% affordable housing provision and the site's broader accessibility via the A417/A419 support the realism of this. Whilst the site would thus not contribute to the five year supply at adoption, it is reasonable to expect it to be built out in full over the plan period contributing c. 600 dwellings.

Land south-west of Siddington

6.34 This site (c. 22 ha) is located to the south of Cirencester, and to the south-west of Siddington. The principal access to the site is envisaged to be from Spratsgate Lane – improvements to which have been brought forwards as part of the delivery of upfront infrastructure to support the development of

The Steadings. Broader active travel connections are envisaged running north to Park Way. A landscape-led development is envisaged with a single point of access.

6.35 The Council's capacity testing and concept framework for the site indicates the potential to accommodate around 380 dwellings and strategic open space. SANG provision is envisaged to be provided off-site.

6.36 The site is being promoted by Bathurst Developments Limited (BDL). They have indicated their intention to bring forward an outline or hybrid application for development in the short-term (most likely with a development partner), with potential submission in late 2027/ early 2028.

6.37 As above, the site benefits from the investment in key infrastructure which has come forward as part of The Steadings development including water and waste water infrastructure upgrades and improvements to the Spratsgate Lane. The scale of this site would make it an attractive proposition for a housebuilder, which can help to reduce the lead-in time to development.

6.38 BDL has indicated potential for the site to accommodate a mix of house types, including affordable, self-build and retirement homes; with potential for up to two sales points. Iceni consider that having regard to the single access and scale, a single housebuilder is more likely.

6.39 Whilst BDL envisages the potential for first completions in 2031/32, the Council's draft trajectory is more realistic taking account of current progress – scheduling initial completions in 2033/34. Iceni consider that a build-out rate of 50 dpa is reasonable. This would see the site completed in 2040/41 with the full c. 380 dwellings delivered in the plan period.

Land north of Ampney Crucis

6.40 This strategic site is located on the northern side of the village of Ampney Crucis, to the east of Cirencester. The site is c. 36.5 ha in size. The emerging Concept Framework Plans envisages that it has the potential to accommodate 400-600 homes together with a local centre and 2FE primary school.

6.41 The site is being promoted on behalf of the landowner (Crucis Park Estate). It is in single ownership. There is no current known developer involvement at the time of writing. The landowner's agent, Savills, has however indicated that a range of site assessment work has been undertaken to date, including on transport, drainage, ecology, archaeology and heritage to understand constraints and inform capacity assessments.

6.42 Key infrastructure to support development includes the provision of a new road to provide access; and new foul and surface water drainage – together with the primary school and local centre as above.

6.43 The site is evidently not as substantively progressed as other sites in the District at the current time, but taking account of its scale, it would be highly attractive to both promoters and housebuilders. We assume that commercial discussions will progress on its confirmation as a draft allocation in the Reg.19 Plan. Savills, the agent, indicate the potential for a planning application to progress post adoption of the Plan, with first completions in 2031/32 and with a build-out rate of 60 dpa based on 1-2 sales outlets.

6.44 Work is ongoing on the capacity of the site which will influence the ultimate yield. We envisage that given the current progress, it would be appropriate to phase this site beyond the five year period at adoption (2033 onwards) but this can be reviewed over time. There is the potential for multiple accesses and the site could support 2 housebuilders delivering concurrently with potential therefore for a built out rate of 100+ pa to be supported. We consider the full scheme can be delivered over the plan period.

Land surrounding Down Ampney

6.45 Land at Down Ampney is proposed as a strategic growth location by a combination of two land promoters. Development is envisaged to significantly expand the village to the north and east, with Suitable Alternative Natural Greenspace (SANG) provided on the southern side of the village based on the emerging Concept Framework Masterplan. The total site area is c. 135 ha and is assessed to have an indicative capacity for c. 1,660 homes. Growth is anticipated to deliver a new local centre, primary school, strategic open space and on-site Alternative Natural Recreation Greenspace (ANRG) provision. A new spine road is expected to serve the site, with a landscape buffer delivered to maintain separation with the existing settlement.

6.46 Robert Hitchins, a land promoter, control part of the site, including plots adjoining the existing village (to the west and east). On Land east of Down Ampney, they are working up an outline application for submission in Autumn 2026; with technical work to inform this progressing. The evidence assesses the capacity of this site as c. 80 dwellings. They envisage that this would support the built out and completion of homes between 2028-31. The submission of a screening opinion in Autumn 2025 supports the prospect of planning progress on this land in the short-term. Robert Hitchens have indicated baseline surveys and initial technical work is underway in respect of Land North of Down Ampney, with the potential for an outline application to be submitted in Summer 2027.

6.47 It would be appropriate to however to adopt more cautious assumptions on the lead-in time to development in the context of the need to rationalise contributions to common infrastructure including for education, SANG etc.

6.48 The broader strategic development north and east of Down Ampney is being promoted by Urban & Civic who are a promoter and master-developer. They specialise in bringing forwards larger strategic sites. Now owned by the Wellcome Trust, Urban & Civic's business model is act as a master developer which delivers infrastructure to support development, including social infrastructure, facilities and placemaking. They serviced parcels to the housebuilders and curate the mix of housing which in our experience on other strategic sites includes range of different housing products.

6.49 Urban & Civic's existing sites include Alconbury Weald in Huntingdonshire, Houlton at Rugby in Warwickshire, Middlebeck in Newark, Nottinghamshire, Priors Hall Park in Northamptonshire, Wintringham in St Neots and Manydown at Basingstoke. These are being delivered, with a number of further sites in the pipeline.

6.50 The evidence suggests that technical work is currently at an early stage, with an initial masterplanning having been undertaken and enquiries with utilities providers regarding likely capacity and connections. Urban & Civic have however indicated their intention to bring forwards a hybrid planning application (including seeking detailed consent for access, site preparation and attenuation) to support early delivery and the potential for housebuilding to start 1 year post grant of the initial (hybrid) application.

6.51 Urban & Civic have indicated that the development could support up to 6 sales points supporting delivery of up to 300 dpa; but this is based on a broader scale of development than being taken forwards in the Plan. The potential for 3-4 concurrent sales points is more realistic – but will be influenced by the pace of delivery of the link road through the site which opens up development parcels.

6.52 Key infrastructure requirements relate in particular to the delivery of the spine road to open up development; bus routes to Cirencester and Swindon; delivery of a new local centre; strategic open space, delivery of a 3FE primary school and contributions to secondary school provision; and ANRG provision as part of the development.

6.53 Our experience is that the master developer role can help to facilitate delivery at pace, including through investment in upfront infrastructure delivery to support place-making. Urban & Civic also tends to design sites with a range of different sized development parcels to enable involvement of a range of development partners – including SME builders. They have indicated the potential for both the sale of served parcels and arrangements where homes are built under licence; as well as noting the potential of the site to accommodate specialist market specific operators such as later living and their own build-to-rent arm.

6.54 Urban & Civic have indicated the potential for a planning application to be submitted alongside the local plan process, supporting first completions in 2030. They envisage a peak build out rate of 170-220 dpa from the mid 2030s onwards. The Council's draft trajectory builds in more time for development and determination of a planning application, pre-commencement conditions and infrastructure works resulting in first completions on the Urban & Civic components in 2032 which is more realistic and reflective of current progress. We note however Urban & Civic's ability in other locations to bring forwards strategic sites at pace.

6.55 Iceni would also note that the settlement's accessibility from the A417/A419 corridor supports the potential pace of delivery which can be achieved, with the site a c. 15 minute drive to employment sites at Swindon and Cirencester.

6.56 Drawing together the above, we envisage that first completions would be in 2031/32 with the pace of delivery growing over the plan period to around 200 dpa in the latter years. This would see the strategic site built out in the plan period in full, delivering 1,660 dwellings. It would contribute 140 dwellings to the supply over the five year period from adoption (2028-33).

Land south of Driffield

6.57 This site is located adjacent to the A419T, to the south-east of Cirencester and to the south of the village of Driffield. As with the Land surrounding Down Ampney site, it provides strong access to key employment locations. The Concept Framework Plan developed for the site envisages the potential for around c. 2,200 homes overall, together with 11ha of employment provision provided between the A419T and residential development. The proposals envisage provision of a new local centre, mobility hub, primary school, strategic open space and on-site Alternative Natural Recreational Greenspace (ANRG) provision (to meet the needs of the development and wider area). A substantial green buffer would maintain separation between the site and the existing village of Driffield. Two primary vehicular accesses are envisaged. The delivery of the primary road infrastructure may influence how different parcels come forwards.

6.58 We understand that the site has been promoted to date by two landowners who control the majority of the land. There is no current involvement of a promoter or developer. On this basis, limited reliable information has been provided on the potential delivery programme or intentions. It is likely however that once the Reg.19 Plan is published, significant interest in the site could be expected and this position could evolve rapidly in the short-term.

6.59 It is considered that an outline application could come forwards by 2028/29 to support first completions in 2033/34. There are higher potential risks associated with the current progress of the site, but it should be recognised that the potential that this could evolve rapidly. We have assumed, based on the current position, that the site does not contribute to the five year supply from adoption but sees initial completions in 2033/34.

6.60 The scale of the site will necessitate a layout which can support multiple sales points to support a build-out rate which provides a return on the upfront infrastructure investment and to manage finance costs associated with the development. 40% affordable housing provision is envisaged. We consider that at least 3 sales points should be assumed, with the potential for the site to therefore support a build-out rate of up to 150 dpa. On this basis, we envisage delivery of around 1,200 homes over the plan period to 2043.

Land north-east of Fairford

6.61 This site is located on the north-east side of Fairford and is being promoted by Gleeson Land, which has a Promotion Agreement with the landowner, Ernest Cook Trust.

6.62 One parcel adjoining (but essentially within) the strategic site has existing detailed planning consent – Land West of Hatherop Road (25/01717/FUL), which was granted in December 2025 and is to be taken forwards by Cala Homes. This parcel separates the majority of the site from most westerly parcel, Plot F57A.

6.63 The Concept Framework Plan prepared for the Council identifies the potential for development of c. 1,130 homes on the site, together with delivery of a new local centre, strategic open space, 2FE primary school, on-site Alternative Natural Recreational Greenspace (ANRG) provision and c. 4ha of employment land provision on the A417 London Road. The layout of the site provides the potential for two main development parcels, to the north and south of Southrop Road; with a further (smaller) parcel accessed from Leafield Road on the northern side of Fairford. Primary accesses are envisaged from Leafield Road (serving c. 700-750 homes) and London Road (serving 450 homes).

6.64 The promoter has indicated that technical evidence is being prepared at the time of writing to feed into the development of a planning application with masterplanning work underway. The current programme anticipates submission of an Outline planning application in Autumn 2027; with the intention of marketing the land via a competitive tender process with outline consent in due course. This is envisaged to support a start on site in Summer 2031 following reserved matters approval.

6.65 Gleeson indicate the potential for three sales points, each supporting a range of product types; which seems reasonable given the site layout with the potential to support a build-out rate of 200 dpa. 40% affordable housing provision is anticipated. Given the site's location and distance from larger employment centres, we regard this BOR as overly optimistic and consider that 150 dpa is more realistic with initial completions on the main parts of the site in 2034/35. However, Plot F57A could come forwards earlier than this. Given the layout, there are lower potential infrastructure requirements for this site relative to some other strategic site options, however the lead-in time builds in time for site disposal with consent.

6.66 Taking account of the above, we envisage that the site could deliver c. 1,100 homes over the plan period; with an initial 25 homes (as part of the development of Plot F57A) being completed within the 5 year period from adoption (2028-33).

Land south-west of Kemble

6.67 This strategic site sits to the south-west of the village of Kemble and south-east of Cotswold Airport. It is being promoted by Kemble Farms Limited who have indicated that they would appoint a development partner/housebuilder if the site is allocated in the Reg.19 Local Plan.

6.68 The Concept Framework Plan prepared for the Council indicates the potential for c. 1,020 dwellings, focused on the eastern part of the site – but separated from the existing village by the rail line. The Plan envisages delivery of a new local centre within the development, 2FE primary school, strategic open space and on-site SANG together with employment development on the western part of the site opposite the existing Kemble Enterprise Park. As with the site above, the infrastructure requirements are reasonable given the scale of the site. A small further parcel is then envisaged to the south of the village, off Old Vicarage Lane.

6.69 The promoter indicates that a full technical team has been appointed to support site assessment work, and discussions with utilities providers initiated. They indicate an outline or hybrid application (with detailed consent sought for infrastructure and Phase 1) could be submitted by late 2028 to support a start on-site in 2030 and first completions by 2031. This is optimistic given the progress to date.

6.70 The scheme size and layout can support potentially 3-4 sales points, but these currently run off a single primary access. The delivery of additional access points could potentially help support the pace of delivery.

6.71 We consider that a build-out rate at this location of up to 150 dpa could be supported with the first completions in 2033/34. This takes account of the accessibility of the site to the rail station at Kemble, which facilitates access to Cheltenham, Gloucester and London; together with access via the A429 to the M4. The potential delivery rate is supported by an anticipated 40% affordable housing provision. This will see the site delivered in full over the plan period (1,020 dwellings).

Land north and west of Mickleton

6.72 This strategic site comprises development parcels to the north and west of the existing village. The Concept Framework Plan envisages potential for c. 1,250 homes together with delivery of a new local centre in the northern parcel and colocation of a 2FE primary school with this; and strategic open space provision. Development to the north comprises c. 730 homes, accessed from Broad Marston Road and Stratford Road; with c. 500 homes to the west accessed from Broadway Road and Broad Marston Road.

6.73 Within the West of Mickleton area, Newlands Homes, an SME housebuilder, control a parcel north of Broadway (known as Tops Nurseries). An outline application on this was submitted in August 2025 (25/03351/OUT) for 95 homes, with a resolution to grant permission agreed by Committee in May 2026. First completions are envisaged on this plot, from 2031/32, if not before given the housebuilder involvement and small scale of the site.

6.74 Catesby Estates, a promoter, submitted an outline application to the west of this (Land North of Broadway Road, 25/04010/OUT) in December 2025 for up to 170 homes. This remains pending determination.

6.75 A further planning application has been submitted in September 2025 by Northern Trust Land Limited for up to 60 dwellings at Foxwood House, Broad Marston Lane (25/02213/OUT). Again, this remains pending determination.

6.76 There is a potential need for some amendments to these pending applications to support the coordination of infrastructure and provision of the secondary road shown in the Concept Framework Plan; but the applications demonstrate promoter/ developer appetite to move quickly forwards with delivery West of Mickleton.

6.77 On the northern side of Mickleton, land is promoted by jointly by Ashberry Strategic Land and Bellway Strategic Land, with land to the west of Stratford Road being promoted separately by Savills on behalf of the landowner. We understand that a consultant and design team has been appointed by Ashberry and Bellway, who are working together with the same planning consultant. The agent has indicated that work is underway to progress an outline planning application with submission currently targeted at late 2026, which would support first completions in Q2 2029. There is however a need for collaboration with the other land parcels, one of which does not have a professional land promoter and another which has only recently appointed one.

6.78 There is a potential influence on the pace of delivery from development planned across the District boundary to the north of Mickleton. The emerging South Warwickshire Local Plan includes provision for a new community at Long Marston Airfield for 4,500 dwellings. This is c. 3 miles north of Mickleton.

The draft trajectory in its Local Plan envisages this being delivered from 2031/32 onwards with delivery reaching 250 dpa within the Cotswold Local Plan period. A planning application for this site[21] has been submitted by CALA Homes but remains pending determination. We understand there remain outstanding highways issues related in particular to the delivery of the South Western Relief Road, which is needed to deliver this site. Phase 1 of the development has been progressed in advance of this with delivery of 363 dwellings (of a total of 400) over a 5 year period.

6.79 In addition, residential redevelopment is coming forwards in the short-term at Meon Vale[22] – the Long Marston Storage Depot – but this scheme is well progressed and likely to be largely completed in advance of strategic development at Mickleton.

6.80 The scale of delivery at Long Marston may influence the pace of delivery at Mickleton given their proximity; albeit that we would expect different developers to be involved. Mickleton nonetheless offers potential for multiple sales points with different housebuilders to be supported concurrently. With an assumed 40% affordable housing delivery, we envisage the potential for a build out rate of at least 120 dpa to be supported based on concurrent delivery by 2+ housebuilders, with the first completions on the western parcels starting in 2031/32 followed by the northern parcels in 2033/34. We do not consider that the current evidence is sufficient to support development from the northern parcels within the 5 years from adoption, although the position could evolve rapidly given the housebuilder involvement and should be kept under review. We estimate that this strategic site will deliver c. 1,250 – 1,300 homes over the plan period to 2043.

Land north, east and south of Moreton-in-Marsh

6.81 This strategic site comprises a range of development parcels located to around Moreton-in-Marsh. The primary focus for development in the emerging Plan is an arc of growth to the south, south-east and west of the existing settlement which supports the delivery of a link road connecting the A429 Roman Road to A44 London Road. A broad location is also being considered to the north of the settlement, but it is envisaged that this comes forwards beyond the plan period. We therefore focus herein on the development envisaged within the plan period.

6.82 The emerging Concept Framework Plan for this strategic location identifies c. 135 ha of land which it estimates can support development of c. 2,000 homes. The site includes a local centre, employment land provision, open space together with primary and secondary school provision,

[21] Stratford-on-Avon District Reference 18/01892/OUT

[22] Stratford-on-Avon District Reference 09/00834/FUL – 8,000 homes, granted consent in February 2010. Phase 4c delivery of 109 homes phased by SOADC between 2027-30.

6.83 There are a number of different land parcels in different parts of the area. To the north of the A44, the emerging Plan envisages development on the southern part of the Fire Service College site. The draft Framework Plan envisages that this will include a local centre and education provision. This site is in single ownership, with development supporting investment in the wider Site. Part of the site is allocated in the adopted Plan for employment land provision. At the current time there is no developer or promoter involvement. Proposals for development of this land will need to address the interaction with the retained land including potential implications of its ongoing use on residential amenity. This is a potential influence on the tenure mix of residential development, with the potential for higher affordable housing provision. With two potential accesses to the land, there is potential for 2-3 sales points to be supported.

6.84 To the south of the A44 London Road, an outline planning application has been brought forward by Bloor Homes (25/01036/OUT). This was submitted in March 2025, refused by the Council but granted at appeal in June 2026. The application envisages development of up to 195 dwellings, accessed from London Road. It includes provision for 40% affordable housing. The timing of development could however be influenced by the timings of improvement to the Moreton-in-Marsh Wastewater Treatment Works (WWTW), located adjacent to the site, the upgrade of which Thames Water indicated would come forwards by 2030. Improvements are required prior to occupation.

6.85 To the south-west of the above site, an outline application has been submitted by Catesby/ Urban and Civic for development of up to 110 units on Land east of Evenlode Road (25/04041/OUT). This relates to Parcel M70. At the time of writing this is pending determination. The promoter envisages first completions within 2-3 years of grant of outline planning permission. A further parcel of land (3.25 ha), immediately to the north of this, is owned by Gloucestershire Country Council.

6.86 Land to the west of Evenlode Road includes a number of different land parcels in separate ownerships. Some parcels are being promoted by the landowner at this stage; whilst Parcels M9C&D are being promoted by Terra Strategic and Parcels M76 and M77 by Narvo Asset Management. M76 and M77 are in single ownership, which is working through probate, but envisage that an application can progress quickly to support first completions in 2028/29. The agent for Land at Evenlode Road (part of Parcel M9) has indicated the intention to submit an outline application in 2026 for up to 30 dwellings.

6.87 Land at Dunstall Farm, to the south of Moreton, is being promoted by agent Newton LDP on behalf of the landowner. The landowner has previously brought forward the adjacent site, which is now being developed out by Spitfire Bespoke Homes. This site is in a single ownership and we understand a promotion agreement is currently being negotiated to support development. Initial site assessment work, including ecological surveys, is underway with the agent indicating that initial work to support a planning application will commence later in 2026 with the potential for an outline application to be submitted in early 2027. The agent indicates the potential for two housebuilders to deliver development with a build-out rate of 100 dpa, and we note that the layout would support up to four separate parcels with separate accessed from the link road; but with the western parcels having potential to be accessed from A44 London Road.

6.88 Drawing the above together, it is clear that the Bloor development south of London Road has been granted outline consent. There are further live applications for other development parcels, with the potential for additional applications to be submitted in the short-term. However we are mindful of the need to coordinate infrastructure investment across this area, and in particular the need to coordinate the funding and delivery of the relief road and education provision to support the development across this strategic location. This is an influence on the lead-in time.

6.89 The Council's transport evidence and Infrastructure Delivery Plan will need to further consider details related to the phasing of delivery of sections of the relief road and how this is coordinated to support growth across this strategic site. There is potential for the road to be delivered in phases as individual land parcels are brought forwards; but there may be a need to consider whether there are triggers required in terms of the scale of growth which can be supported prior to its completion or delivery of certain sections. The Council will need to consider these issues and the role it can play in coordinating the funding and delivery of the link road and education infrastructure, working alongside Gloucestershire County Council.

6.90 Our conclusions on the trajectory envisage the potential for first completions to come forwards in 2029/30 and development of c. 400 homes over the five year period from adoption (2028-33). This is influenced in particular by the now consented Bloor scheme, east of Cotswold Business Village, together with the potential for initial phases of development south-east of Moreton (depending on highways issues and education capacity). Over the plan period it is envisaged that c. 2,000 homes could be delivered, with build-out rates of up to 200 dpa supported by development across multiple sites at different locations in the town. There is a need for development at pace to support the funding and delivery of the relief road.

7. TESTING THE DRAFT HOUSING TRAJECTORY

7.1 It is important that the Council's housing trajectory is deliverable and that the Council can demonstrate a five year housing land supply on adoption and maintain this throughout the plan period. This section considers and reviews the Regulation 19 development strategy, drawing on our review of the market and proposed site allocations in the preceding sections.

Overview of Methodology

7.2 In this update report, our analysis has involved the following two key stages:

- **Council's Draft Housing Trajectory** – Iceni has used the Council's latest draft Housing Trajectory including strategic sites identified in the Regulation 19 Local Plan. We have then drawn on our review in Section 5 of the lead-in times and build out rates of the Council's strategic sites to ensure that the assumptions used are realistic and supported by the evidence base and the promoter's own submissions. Iceni has then adjusted the Council's Housing Trajectory accordingly; and

- **Sub area Trajectory Analysis** – we have then developed trajectories for sub areas of the District, taking account of new permissions and allocations as well our adjustments to strategic sites where appropriate.

7.3 Through these two steps, we have sought to provide commentary on the realism of the Housing Trajectory at a District and local level to determine whether there are any risks in market capacity terms or whether it is realistic for the Council to move forward with this strategy.

7.4 It is noted that there are several strategic sites in or near Cirencester. Many of these are likely to be delivering homes at similar times, raising issues of competition and overall market capacity. These are considered in assessing a trajectory for the Cirencester area and more broadly for the South of the District, recognising the relative proximity of Cirencester to other key growth locations.

Construction Capacity and Materials Supply Issues

7.5 Consideration has been given to whether there are any issues of industry capacity (i.e. potential skills, labour and material shortages in the construction industry) and whether these could impact on delivery. The sub area trajectory analysis addresses these issues by considering the realism of the level of delivery required across the strategic sites in Cirencester and more broadly in the southern part of the District.

7.6 In terms of skills and labour, we would note in particular that construction labour is typically drawn from a wider geographical area than an individual District or part of a District. Research by the Construction Industry Training Board (CITB) in 2022[23] indicated for construction workers the mean distance between their home and site is 17 miles but many travel further: with a third of workers (33%) living within 20 miles; a third (33%) within 21-50 miles; and a third (32%) that have worked more than 50 miles away from home. We would expect that typically those in more specialist roles will be willing to travel further.

7.7 We would anticipate that the relevant labour market for construction workers for sites in the south of the District would therefore draw workers from Gloucestershire, Swindon and Oxfordshire. The focus of development sites on the A417/A419 corridor provides access to workforce concentrations in Cheltenham, Gloucester, Stroud and Swindon. On the other hand development in Moreton-in-Marsh could see construction workers drawn from Banbury, Evesham, Stratford-upon-Avon, and Cheltenham.

7.8 Materials shortages were an issue for the construction industry in the 2020-22 period. However these pressures have since eased, and in January 2026, the Construction Leadership Council's Material Supply Chain Group was not identifying any product availability issues, with issues more of weaker demand than materials' supply challenges. As a result of weaker construction output, brick producers were for instance holding large stockpiles. This is corroborated by information from the Building Cost Information Service (BCIS). Whilst invariably this means that challenges could arise at specific points in time in the future, such as at peaks in the market cycle, there is insufficient evidence to suggest that materials shortages will hold back housing delivery. We would note that supply chains typically operate on larger than local level; and whilst, for instance, there is brick production in the District by Northcot Brick we would equally expect housebuilders to draw on other suppliers including those in the Midlands and elsewhere in the South West Region.

District-wide Housing Trajectory

7.9 As set out in Chapter 2, Cotswold's housing need over the 2026-43 period will be for 17,918 homes, equivalent to 1,054 dwellings per annum. This equates to a need to sustain an average compound annual growth rate of 1.9% over the plan period as a whole. As examined in Section 4, this is at the higher end of what has been achieved in other areas and is thus a particularly ambitious rate of housing delivery.

7.10 The Council's draft housing trajectory was supplied to Iceni on 8th June 2026 and incorporates the delivery of small sites with planning consent in the District, saved allocations from the existing Cotswold Local Plan (such as at The Steadings), proposed strategic and non-strategic sites and a

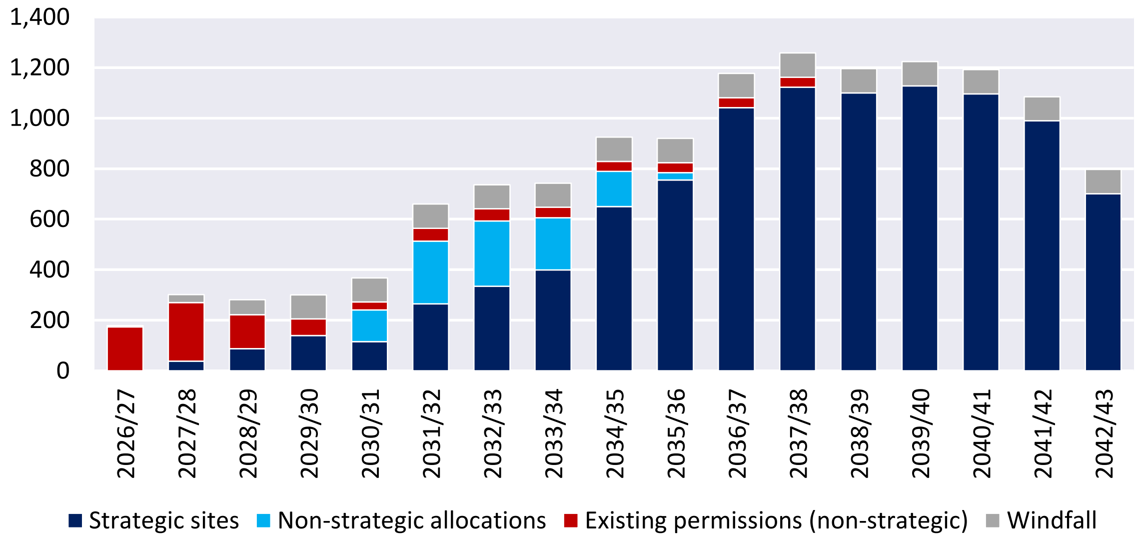
[23] https://www.citb.co.uk/media/s0zhshfv/2272_bmg_workforce_mobility_and_skills__uk_wide_report_v1.pdf

windfall allowance. The trajectory has a base date of 1st April 2026. It is understood that minor further amendments to the trajectory may be made prior to Regulation 19 consultation (e.g. to reflect further evidence base documents that were still under production at the time of writing); and it may also be updated during the Plan's Examination to take account of further information and housing monitoring, as housing supply issues are invariably dynamic and change over time.

7.11 Figure 7-1 below shows the Council's draft housing trajectory with adjustments reflecting our analysis of the evidence base and latest submissions and discussions with the strategic site promotors. This trajectory sees housing delivery over the 2026-43 period of around 1,100 homes per annum on average, with peak delivery of c. 1,600 homes in 2037/38. Delivery at close to peak levels would be required for 6 years (2036/37 – 2041/42).

7.12 The total housing supply based on the current trajectory figures would be c. 18,500 homes and would therefore provide headroom of 3.3% across the plan period. Some headroom is necessary to provide contingency for delay or slippage in site delivery while ensuring that the housing requirement can still be met. There is however in effect additional supply-side headroom provided by the additional supply on strategic sites which is anticipated to be deliver beyond the plan period, but could be delivered within it if demand is sufficient.

Figure 7-1: Cotswold District Council Housing Trajectory (with Iceni adjustments)



7.13 Housing delivery rates are relatively low in the first few years of the plan period, reflecting the low recent rate of housing development in the District in comparison with the Standard Method Housing Need introduced at the end of 2024. As strategic sites ramp up, delivery increases steadily, exceeding 1,000 dpa in 2031/32 and rising to a peak of c. 1,560 dpa over the 2037-41 period.

7.14 The evidence points to some ‘pent up demand’ (not just in the Cirencester area but across the whole district, wider Gloucestershire Housing Market Area and in neighbouring authorities) which is likely to help support higher delivery rates in the latter half of the plan period. Average housing development rates across the plan period in the housing trajectory (1,124 dpa) are over double the average rate seen over the last ten years (501 dpa) although only 24% higher than the peak housing delivery rate of 909 net additional dwellings seen in Cotswold in 2017/18. However, as described the Council has not been historically planning for the scale of growth now needed.

7.15 Sustaining a compound annual growth rate of 1.9% per annum over the 17 year plan period is ambitious and sits very much at the top of what has been achieved in other local authorities nationally. The growth rates envisaged by the trajectory over the 2037-41 period average 2.7% per annum which are likely to be particularly ambitious – especially for a predominantly rural District such as this. There are evident risks associated with the ability to sustain this level of housing delivery; but as described in Section 2, the NPPF places significant emphasis on meeting housing need.

7.16 The housing trajectory is heavily dependent on strategic sites (including eleven new strategic sites and one saved strategic site allocation for The Steadings), which account for 71% of proposed housing delivery. While large sites are the largest part of this category and will be critical to housing delivery overall, there are also several proposed strategic allocations (for example around Moreton-in-Marsh and Mickleton) which consolidate several smaller sites.

7.17 In response to increased housing need, the Council’s Regulation 19 strategy is proposing a much larger number of strategic allocations than were included in previous local plans. The Council’s current Local Plan (Cotswold District Local Plan 2011-2031) adopted in 2018 provides a single strategic-scale allocation for 2,350 homes (1,800 homes delivered in the plan-period) at the The Steadings, with other non-strategic site allocations providing 577 homes in total (2,870 homes of supply were provided by extant planning permissions and 1,191 homes were provided for by windfalls). This strategy balanced higher rates of housing delivery early in the 2011 to 2031 plan-period with lower rates of delivery later in the plan period. Although The Steadings has had a longer lead-in time than originally thought, higher than expected windfall delivery has more than compensated for the delay and the adopted Local Plan development strategy has played out broadly as planned overall.

7.18 Notwithstanding this, the change to the Standard Method in December 2024, which more than doubled the District’s housing need and more than quadrupled the residual Local Plan housing requirement, has changed the situation significantly. The adopted Local Plan spatial strategy has contributed to the slower rate of housing development in recent years, which now falls a long way short of the number required by the Standard Method. However, allocating a large number and range of strategic scale sites will support a continuous housing land supply that will not experience the peaks and troughs in delivery seen in the last Local Plan period. Furthermore, the strategic sites will in time support significantly higher housing delivery rates than seen in the past.

7.19 The disadvantage of strategic site development is the lead-in time associated with planning for such sites, however once such sites are underway they help to drive overall housing delivery and – in our experience – are more resilient than smaller sites to changes in economic/ market conditions.

7.20 The housing trajectory would see an average housing stock growth rate in Cotswold District of 2.0% per annum across the plan period to 2043. This is above the minimum requirement of 1.9%, as the trajectory provides some headroom for slippage.

7.21 As evidenced in Chapter 4, there are several examples of other authorities achieving a similar growth rate over a 5-year or even 10-year period, for example Vale of White Horse has achieved a housing stock growth rate of 2.4% over five years and 2.1% over ten years, while Stratford-on-Avon has achieved 2.2% over five years and 2.0% over ten years. Since 2001, a number of high-growth authorities have averaged growth rates over a 20-year period of around 1.4 to 1.6% per annum. It is relevant to note that few have been planning for the scale of growth now required by national planning policies and the December 2024 Standard Method .

7.22 Central Government policy is currently seeking to significantly increase rates of housing delivery across the country in the face of persistent historical under-delivery. In addition, higher rates of housing delivery than achieved historically can be delivered if facilitated through a local planning process and supportive development management and supported by infrastructure delivery. In this context, growth rates achieved in the past in other authorities provide some level of guidance for achievable rates of housing delivery, but historic growth rates should not be seen as a ceiling.

7.23 The evidence therefore suggests that sustaining a growth rate of 1.9% per annum over the 2026-43 plan period in Cotswold District (to meet the housing requirement) would be ambitious but are possible to achieve on the basis of delivery performance in other authorities and a degree of pent-up demand. The higher growth rates envisaged in latter years (2032 onwards) will be supported in pent up demand from earlier periods; but it will be necessary for the Plan to carefully craft policies to support the higher delivery envisaged in these latter years.

7.24 In particular it will be important to ensure that delivery is supported through appropriately resourcing the planning approval process, accelerating required infrastructure where possible and facilitating housing product diversity. These issues are considered further in Section 8.

Table 7-1: Annual housing stock growth rates for Cotswold District

Category	Compound annual growth rate
Housing requirement (2026-43)	1.9%
Housing trajectory stock growth (2026-43)	2.0%

Sub area analysis

7.25 Iceni has sought next to break down Council's housing trajectory (i.e. the Regulation 19 strategy), as amended by Iceni, into sub areas to consider the distribution of development and market capacity within different parts of the District.

7.26 Sub area analysis has been conducted first on the three strategy areas considered by Council in their emerging development strategy. A more detailed description of the parishes within each sub area is provided in the table below.

- The Cirencester and Surrounding Villages strategy area, which is focused around the town of Cirencester and immediate surrounds and which includes the parishes of Cirencester, Preston and Siddington,

- The South Strategy Area, which covers roughly the southern half of the district and includes parishes (apart from Cirencester, Siddington and Preston) which lie broadly south of the A40. This includes the larger settlements of Fairford, Tetbury, South Cerney and Lechlade, and

- The North Strategy Area, which covers roughly the northern half of the district and which includes parishes lying broadly north of the A40. This includes the larger settlements of Bourton-on-the-Water, Stow-on-the-Wold, Moreton-in-Marsh and Chipping Campden.

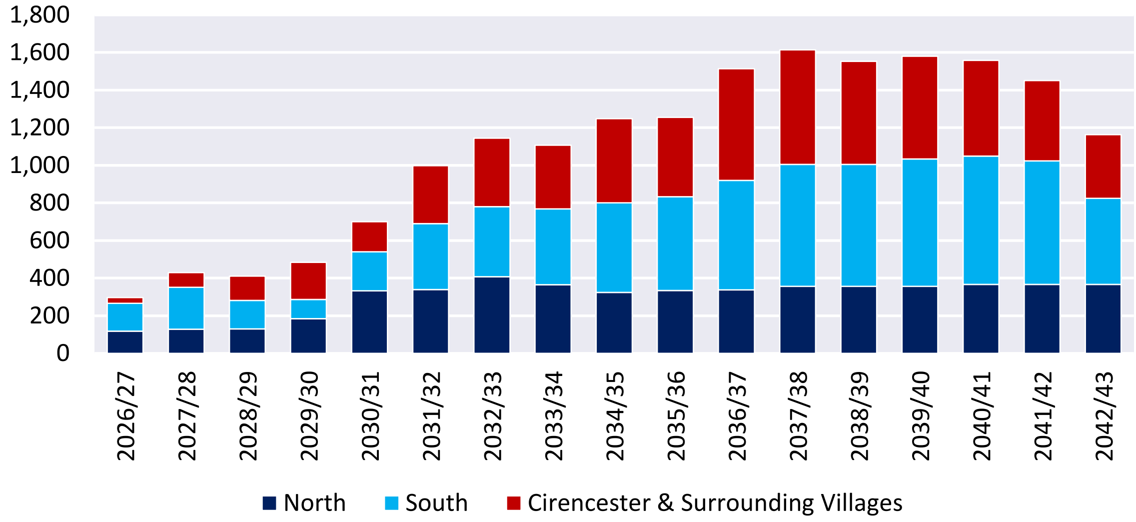
7.27 As well as these, Iceni has also considered a South Combined area containing both the South and Cirencester and Surrounding Villages strategy areas. This is to consider potential market capacity issues in the broader area around Cirencester, noting the proximity of a number of proposed strategic sites within the South Strategy Area (such as at Ampney Crucis, Kemble, Driffield, Down Ampney and Fairford) to Cirencester.

Table 7-2: Cotswold sub area definitions

Sub area	Parishes
North	Adlestrop, Aston Subedge, Barrington, Batsford, Bledington, Blockley, Bourton-on-the-Hill, Bourton-on-the-Water, Broadwell, Chipping Campden, Clapton, Cold Aston, Condicote, Cutsdean, Donnington, Ebrington, Evenlode, Farmington, Great Rissington, Guiting Power, Hazleton, Icomb, Little Rissington, Longborough, Lower Slaughter, Maugersbury, Mickleton, Moreton-in-Marsh, Naunton, Notgrove, Oddington, Saintbury, Sevenhampton, Sezincote, Sherborne, Shipton, Stow-on-the-Wold, Swell, Temple Guiting, Todenham, Turkdean, Upper Rissington, Upper Slaughter, Westcote, Weston Subedge, Whittington, Wick Rissington, Willersey, Windrush
South	Aldsworth, Ampney Crucis, Ampney St. Mary, Ampney St. Peter, Andoversford, Ashley, Avening, Bagendon, Barnsley, Baunton, Beverston, Bibury, Birdlip, Boxwell with Leighterton, Brimpsfield, Chedworth, Cherington, Coates, Coberley, Colesbourne, Coln St. Aldwyns, Coln St. Dennis, Compton Abdale, Cowley, Daglingworth, Didmarton, Dowdeswell, Down Ampney, Driffield, Duntisbourne Abbots, Eastleach, Edgeworth, Elkstone, Fairford, Hampnett, Hatherop, Kemble and Ewen, Kempsford, Kingscote, Lechlade, Long Newnton, Maiseyhampton, North Cerney, Northleach with Eastington, Ozleworth, Poole Keynes, Poulton, Quenington, Rendcomb, Rodmarton, Sapperton, Shipton Moyne, Somerford Keynes, South Cerney, Southrop, Syde, Tetbury, Tetbury Upton, Westonbirt with Lasborough, Winson, Winstone, Withington, Yanworth
Cirencester and Surrounding Villages	Cirencester, Preston, Siddington
Combined South	All parishes in the South and Cirencester and Surrounding Villages sub areas

7.28 As a starting point, the figure below shows the share of the District's housing provision in each of the sub areas. This shows a relatively even distribution of development between each sub area, with the most development provided in the South sub area. However, as noted above much of the development in the South sub area is relatively proximate to Cirencester. This is a result of development being concentrated in the parts of the District which are outside of the Cotswolds National Landscape, and also to some degree reflects market demand which is likely to be high along the major transport corridor of the A417/A419T.

Figure 7-2: Cotswold District Council Housing Trajectory (with Iceni adjustments) by sub area



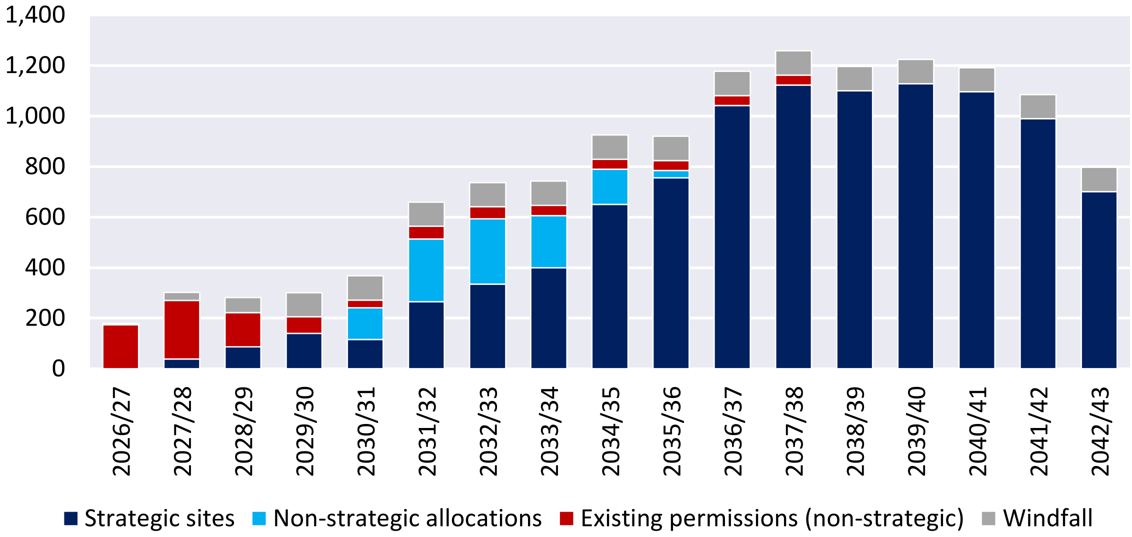
7.29 A comparison of the sub area trajectories indicates that there would be an average delivery of 429 homes per annum in the South Sub area, which accounts for 39% of the District's supply. This is above the portions in the North sub area (304 homes per annum or 28% of the District total) and Cirencester and Surrounding Villages sub area (356 homes per annum or 3% of the District total). Nonetheless there is a reasonable balance of growth across the three defined sub areas.

7.30 Our analysis considers each of the sub areas in turn below, and considers the achievability of the trajectory in each.

North Sub area

7.31 The following figure shows the housing trajectory for the North sub area. Iceni has followed the Council's approach to the windfalls, which allocates them into parishes and so sub areas in line with past development trends. The North sub area sees 38% of the estimated district-wide windfall development over the plan period on this basis.

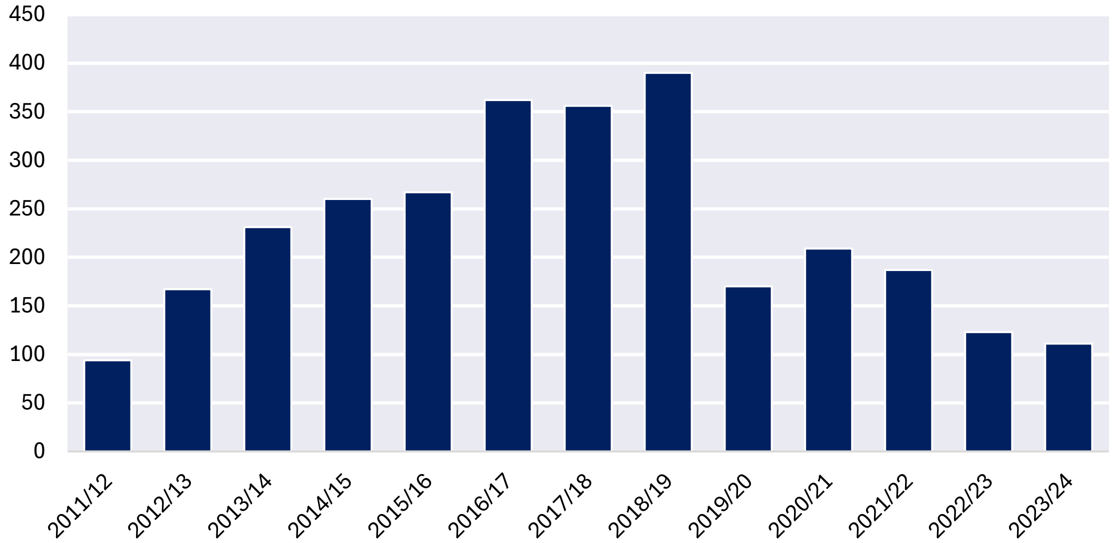
Figure 7-3: North Sub area Housing Trajectory (with Iceni adjustments)



7.32 Our analysis shows that the North sub area would deliver an average of 304 homes per annum over the plan period. Delivery rates sit at between 120 – 150 homes per annum in the first three years, ramping up to a sustained delivery of around 330-410 homes per annum from 2032/33 onwards as first non-strategic and then strategic allocations begin to deliver homes. Over the plan period this would equate to an average annual stock growth rate of around 1.6%, below the District-wide rate (2.0%).

7.33 Historical completions for the North sub area (shown in the figure below) show a peak of between 350 – 390 homes per annum over three years from 2016/17 – 2018/19. This is similar to the sustained rate of development that would be required from 2032/33 onwards under the housing trajectory. A higher stock growth rate would also be needed in the future, with the North sub area achieving a growth rate of 1.6% between 2011-24, slightly below the 1.9% required from 2030-43. However, it is noted that the during the five-year period of high housing delivery from 2014-19, the North sub area saw a stock growth rate of 2.3%. This provides some precedent for delivering the scale of growth needed over the plan period to 2043.

Figure 7-4: North sub area historical housing completions

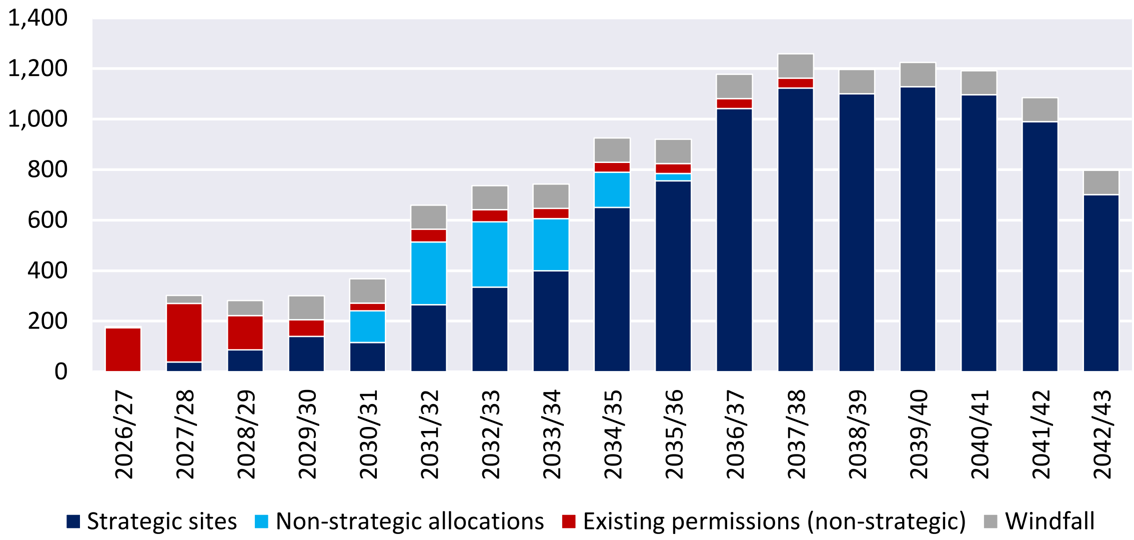


7.34 There is a potential cross-boundary influence of significant housing delivery in South Warwickshire are proposed at Long Marston Airfield (a proposed strategic site allocation in the emerging South Warwickshire Local Plan including 10,300 new homes including 4,500 homes to 2050). At the time of writing this remains a proposal within an emerging Plan, and the site is not yet allocated nor does it have planning permission. Nonetheless we would note that the peak delivery of 350 – 390 dpa historically in this area has recently been achieved alongside the delivery of the Meon Vale development, immediately to the south-west of Long Marston. The local economic drivers in this area are not as strong as in some other sub areas, with the area at some distance from larger employment centres. However it offers a high quality of place. Thus whilst there are evident risks associated with market capacity in the North sub area, we have taken these factors into account in considering the assumed build-out rates. In the absence of significant growth just across the district boundary at c. 3 miles distance, higher housing delivery could potentially be achieved.

South Sub area

7.35 The following figure shows the housing trajectory for the South sub area. As noted above, Iceni has followed the Council's evidence and approach to the windfalls, with the South sub area seeing 38% of estimated district-wide windfall development over the plan period.

Figure 7-5: South Sub area Housing Trajectory (with Iceni adjustments)



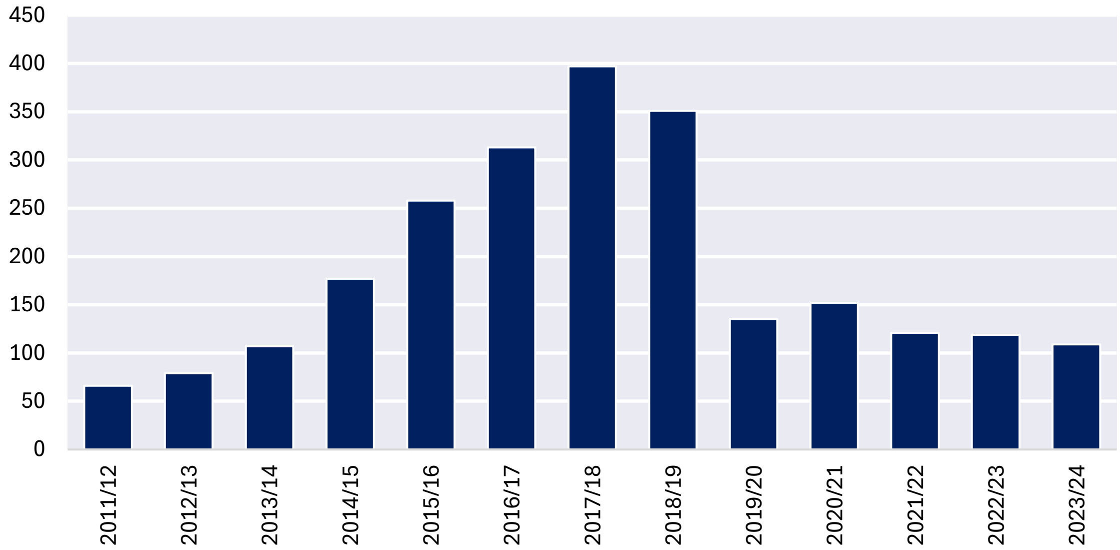
7.36 Our analysis shows that the South sub area would deliver an average of 429 homes per annum over the plan period. Delivery rates are lower than average for the first five years at around 225 homes per annum or less, with site allocations only beginning to deliver from 2030/31 onwards. Following the ramp up of strategic site delivery, the trajectory shows an average of 650 homes per annum being delivered each year from 2037/38 to 2041/42. Over the plan period this would equate to an average annual stock growth rate of around 1.9%, similar to what would be required for the South sub area and again slightly below the District-wide rate (2.0%).

7.37 Historical completions for the South sub area (shown in the Figure 7.6) have been only around 288 per annum on average from 2011/12 to 2023/24. This corresponded to an annual housing stock growth rate of 1.0% per annum over the period. However, this average is boosted by peak delivery in the late 2010s, with 397 homes delivered in 2017/18. More recently, delivery has been only 193 per annum on average over the last five years.

7.38 The South sub area thus has a particularly large gap between average delivery historically and what is required under the housing trajectory. The rate of housing development (429 dpa) implied by the housing trajectory is 49% higher than the average historical rate from 2011-24. The sustained delivery of over 600 homes per annum required towards the end of the plan period is even further above historical delivery, and also well above the peak achieved in 2017/18.

7.39 However, historical delivery in the South sub area has been shaped by Council's historical spatial strategy. As noted earlier in this chapter, the only large strategic site included in Council's Local Plan 2011 – 2031 was at the Steadings. The towns with the most housing delivery since 2011 which have seen the highest levels of delivery are Cirencester and Moreton-in-Marsh (both in other sub areas), which will have been influenced by historical spatial strategies. Given a different spatial strategy which allocates multiple strategic sites within the South sub area it should be possible to see higher delivery rates in the future, particularly recognising the proximity of many of the principal settlements to Cirencester and the A417/A419T and the connectivity which this provides to Swindon and the M4.

Figure 7-6: South sub area historical housing completions



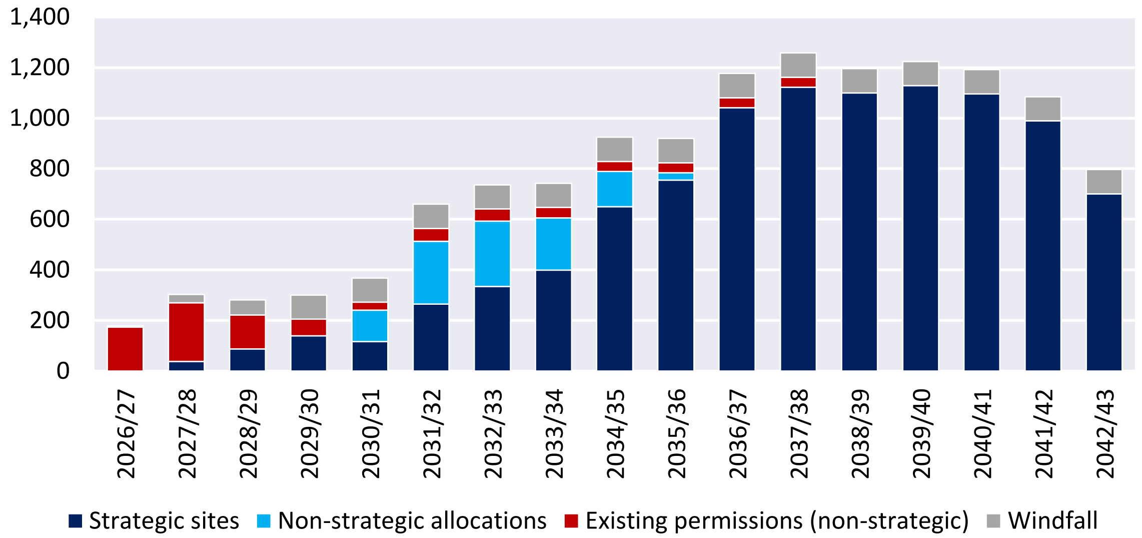
7.40 There are opportunities for strategic sites in this area to bring forwards different housing products and we would expect involvement of multiple different housebuilders, including both national as well as regional/ local firms. Alongside homes built for market sale, strategic sites in this area can support delivery of build-to-rent development, affordable housing and other specialist housing provision. These issues are considered further in Section 8.

Cirencester and Surrounding Villages Sub area

7.41 The following figure shows the housing trajectory for the Cirencester and Surrounding Villages sub area. As noted above, Iceni has followed the Council's evidence and approach to the windfalls, with the Cirencester and Surrounding Villages sub area seeing 24% of estimated district-wide windfall development over the plan period[24].

[24] This is indicative as windfalls, by their nature, cannot be accurately predicted

Figure 7-7: Cirencester and Surrounding Villages Sub area Housing Trajectory (with Iceni adjustments)



7.42 Our analysis shows that the Cirencester and Surrounding Villages sub area would deliver an average of 356 homes per annum over the plan period based on the current trajectory. Lower completions are anticipated in 2026/27, but delivery would increase steadily thereafter as first The Steadings, and then other strategic allocations, ramp up delivery. Delivery would peak at c. 600 homes pa in 2036/37 and 2037/38, before declining towards the end of the plan period.

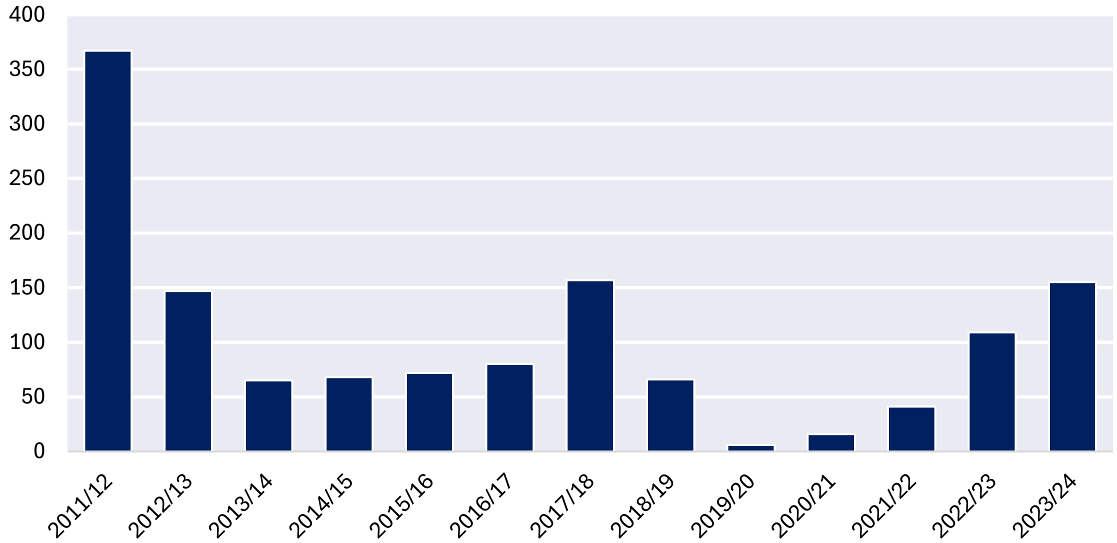
7.43 The decline in housing delivery from the 2037/38 peak in this sub area shown in Figure 7-7 provides some resilience to the housing trajectory in that growth could still be accommodated within the plan period even in the event of lower than anticipated delivery rates. However, it is noted that this decline is in part counter-balanced by the stronger delivery in the South sub area later in the plan period.

7.44 This delivery profile would see an average stock growth rate of 2.6% per annum in this sub area across the plan period. This is somewhat higher than seen in the North and South sub areas (1.6% and 1.9% respectively) and the total for the District (2.0%). It is reasonable that the Cirencester and Surrounding Villages sub area would see a higher growth rates than other sub areas given that Cirencester is by far the largest town in the District, and the largest employment centre (noting that Cirencester currently has a high inflow of commuters from outside the district, who may wish to live in the town if housing was more readily available), and serves a much larger catchment area than other towns in the District. Cirencester also has the best transport (including public transport) connections in the District and is readily accessible from places such as Swindon and Gloucester and Cheltenham (via the A417/A419). Consequently, it is likely to be able to support higher housing delivery rates provided there is land available for development supported by infrastructure. This part of the District is also expected to be the focus for employment growth and employment land provision.

7.45 The historical development profile for the Cirencester and Surrounding Villages Sub area sees consistently low delivery across most of the 2011–24 period, with fewer than 100 homes delivered in most years. Delivery has only been higher in a handful of years in which particular housing schemes were delivered. Across the period shown, there has been an average of only 104 homes delivered per annum. The evidence points to a degree of pent-up demand.

7.46 This low recent delivery rate in this sub area has been influenced by the time taken for The Steadings to gain planning approval and delays to phases of the site delivering homes (noting that only Phase 1a has been delivered so far). If multiple sites are allocated in line with the Regulation 19 Draft Local Plan, and planning approvals for these are progressed within agreed timescales, much higher delivery rates should be possible in the future.

Figure 7-8: Cirencester and Surrounding Villages Sub area historical housing completions



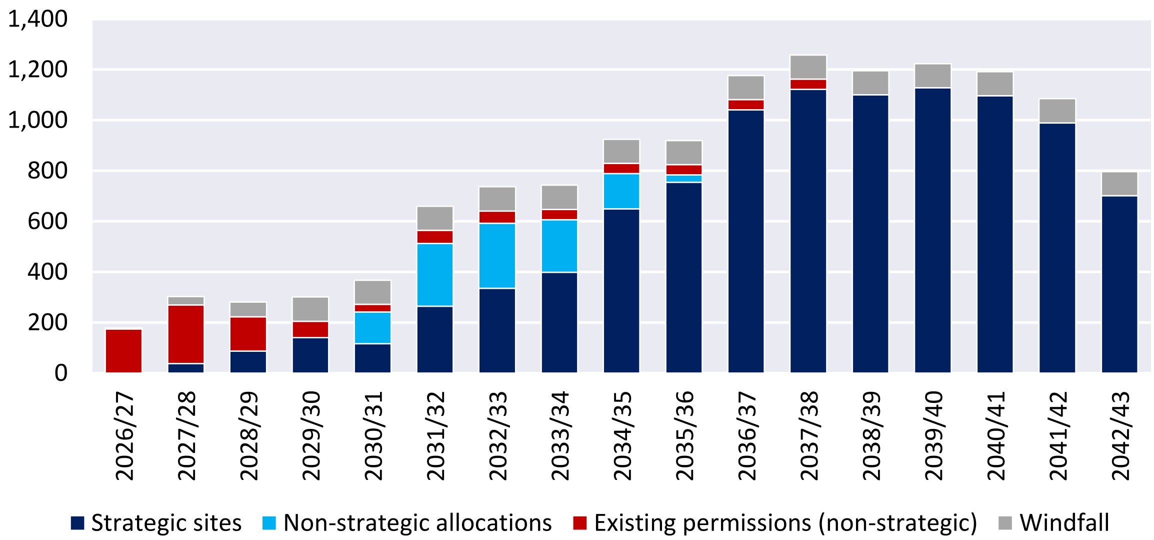
Combined Southern Sub area

7.47 As noted earlier in this chapter, many of the proposed allocations in the Southern Sub area are proximate to Cirencester, meaning that there is likely to be a degree of market overlap between the Southern Sub area and the Cirencester and Surrounding Villages Sub area. In order to more fully consider questions of market capacity, Iceni has therefore additionally considered these two sub areas in combination (termed the Combined Southern Sub area).

7.48 The following figure shows the housing trajectory for this combined sub area. Consistent with the trajectories for the South and Cirencester and Surrounding Villages sub areas, delivery is low in the first five years of the plan period before increasing as delivery increases on strategic sites. In this combined area delivery would peak at c. 1,250 homes in 2036/37 and would be around 1,200 per annum for a five-year period from 2036/37 – 2040/41. As with the Cirencester and Surrounding Villages Sub area, some decrease in completions is seen in the last few years of the plan period, which provides a limited amount of resilience in the event of slower build-out of selected strategic sites.

7.49 The peak delivery in the South Sub area occurs in 2040/41, and in the last few years of the plan period. By contrast, the Cirencester and Surrounding Villages sub area sees a somewhat earlier peak in 2037/38. The difference in these trajectories provides for a more even spread in delivery in the combined sub area, making delivery more achievable when considering local market capacity.

Figure 7-9: Combined Southern Sub area Housing Trajectory (with Iceni adjustments)



7.50 This trajectory would see average delivery of 785 homes per annum across the plan period, which equates to an average stock growth rate of 2.2%. This stock growth rate is very similar to the growth rate required for the District as a whole (2.0%), and that for the North sub area (1.8%). This provides supporting evidence that the growth strategy is spatially balanced to support the pace of delivery.

7.51 By comparison, the Combined Southern sub area has seen a historical stock growth rate of 1.0% from 2011-24, and an average of 287 homes delivered per annum. This means that delivery to 2043 will need to be 174% above the historical rate, a very substantial increase. As with the constituent sub areas discussed above, this will be quite challenging, but it is likely that future development rates well in excess of historical rates will be possible given evidence of suppression of demand and the few strategic sites which have been progressed through local planning in recent years.

Realism of stock growth rates and distribution of growth

7.52 The housing trajectory would see similar housing stock growth rates in each sub area, and in the District as a whole, over the plan period. These are summarised in the Table 7-3 below.

Table 7-3: Sub area housing stock growth rates

Sub area	Housing stock growth rates 2026 - 43
North	1.8%
South	1.9%
Cirencester and Surrounding Villages	2.6%
Combined South	2.2%
Cotswold District (overall)	2.0%

7.53 As noted earlier in this chapter for the District-wide housing stock requirements, these are relatively high stock growth rates which will be ambitious but are considered achievable over the plan period.

7.54 is the growth rates implied are a direct result of the high level of housing need in the District, which is calculated using the Standard Method for Housing Need. As noted in the District-wide analysis, in this context Cotswold District Council is required to plan for this level of growth and it is appropriate to consider the best distribution of growth across the District to deliver housing in line with need, as well as how high housing delivery can otherwise be supported.

7.55 A housing trajectory which requires a much higher stock growth rates in one sub area than others would face risks regarding small area market capacity.

7.56 By contrast, Council's housing trajectory achieves similar stock growth rates in each sub area, particularly when the more market-relevant Combined South sub area is considered. This latter area, where the implied stock growth rate is marginally higher, is more capable of supporting a higher stock growth rate given its potential for employment development and economic growth and its accessibility to other larger employment centres beyond the District. As a result, and despite a concentration of strategic sites around the Cirencester area, we would conclude strategic sites appear to be well distributed throughout the district in the Regulation 19 Local Plan development strategy from a housing delivery point of view (particularly noting the constraints on housing distribution posed by the Cotswolds National Landscape, which creates pent-up demand for housing that to a large degree can be met in the nearby locations within the District that are outside the Cotswolds National Landscape).

8. CONCLUSIONS AND RECOMMENDATIONS

8.1 In this final section, we have sought to draw together key findings and set out conclusions in respect of the housing requirement and the actions which the Council could take to support the delivery of this.

Overall Housing Provision

8.2 The Standard Method identifies a LHN of 1,054 dwellings per annum, generating a need for 17,918 homes over 2026–43 plan period. The high housing need is driven in particular by the District's high affordability ratio, which is the 5th highest of a local authority outside of London. National policy expects the Local Plan to meet this need unless the Council can demonstrate that doing so would be unsustainable. The Cotswolds National Landscape, which covers approximately 80% of the District, results in a spatial focus of development into the south-east (around Cirencester, Fairford, Kemble and Lechlade) and north-east (around Moreton-in-Marsh).

8.3 Whilst the LHN is substantially greater than historical housing delivery, which has average 471 dwellings per annum over the last 15 years, the evidence shows that historical housing delivery has relatively closely matched what is being planned for.

8.4 The housing need for 17.918 homes over the plan period would imply an average stock growth rate of 1.9% per annum. Comparative analysis with nearby higher-growth authorities (Vale of White Horse at 2.4%, Tewkesbury at 2.3%, Stratford-on-Avon at 2.2% over five years) demonstrates that stock growth rates approaching the 1.9% required in Cotswold have precedents elsewhere, particularly where multiple strategic sites have come forward concurrently.

8.5 Iceni's analysis thus shows that the stock growth rates implied by meeting the proposed housing requirement of 17,918 homes (equivalent to 1,054 dpa), at 1.9% per annum compound growth over 17 years) and by necessarily also the Council's housing trajectory (2.0% per annum) are ambitious, but achievable. There are precedents for other authorities in adjoining counties achieving similar or slightly higher growth rates– where this is planned for.

8.6 This high housing growth reflects the high underlying level of housing need as provided by Standard Method for calculating housing need, which Cotswold District Council is required to plan for. Our analysis shows that there is a strong relationship between the level of growth planned for through the local planning process and ultimate housing delivery. As such, there is scope for future development to significantly exceed past delivery rates and historical delivery cannot be considered as a limit to what can be achieved in the future. However, it is necessary to consider policy approaches to boost housing delivery rates, which are considered below.

8.7 Cotswold District has a high-value housing market, with evidence of some recent under-delivery of housing (both within the district and surrounding areas). This would be expected to support high rates of housing delivery in the future.

8.8 Whilst current housing market conditions are relatively weak, the housing market is cyclical and we are at a low point in the market cycle at the time of writing. In this report we have been careful not to place too much emphasis on short-term housing market trends, recognising that the housing market is cyclical and over a 17 year plan period there can be expected to be periods of stronger and weaker market conditions. Furthermore, Cotswold has delivered over 900 homes in a single year in 2017/18, demonstrating that higher levels of housing delivery are possible given a supply of developable land (noting that even delivery of 900 homes was constrained by land availability).

8.9 Given the need to plan to meet housing needs under the Standard Method, the distribution of growth within the District appears to be reasonable, with broadly similar stock growth rates across the defined sub areas and the highest growth around Cirencester, which has the best access to services, employment and transport infrastructure and serves a much wider catchment area.

8.10 The version of Council's trajectory from June 2026 that we have advised on provides headroom of 3% above the Standard Method housing need, which is lower than would typically be recommended. However, there is additional supply-side headroom within the trajectory in the form of identified capacity on allocations expected to be delivered beyond the plan period. This provides the potential for higher housing delivery in the event that the housing market performs better than expected; or the potential for faster delivery on some sites where there are delays in other sites progressing. In this context, Cotswold's emerging plan is identifying sufficient supply. Ultimately market factors will influence the number of homes delivered – the role of the planning system is to identify sufficient supply to enable housing need to be met.

8.11 The capacity for additional development identified on strategic sites but which are shown within the June 2026 trajectory as delivering beyond 2043 amounts to 3,160 additional dwellings, which is 17.6% of the plan period housing requirement. Along with the headroom within the trajectory to 2043, this amounts to total headroom of over 20%.

Stepped Housing Requirement

8.12 As set out below, the PPG sets out that a stepped housing requirement may be appropriate where there is a significant change in housing requirement between previous and emerging policies, or where strategic sites are likely to be delivered later in the plan period.[25] Requirements are still to be

[25] Reference ID: 68-021-20190722

met in full over the plan period and are not to be unnecessarily delayed. Both of these circumstances apply here.

8.13 There is a clear case for a stepped housing requirement in Cotswold given that the scale of housing growth required under the Standard Method (1,054 dpa), which is being taken forward in Cotswold's emerging plan, is 2.5 times larger than the average housing requirement under the adopted Cotswold Local Plan (2011-31) (420 dpa). Given this, the Council has identified a variety of additional strategic sites to meet housing needs, which will naturally have long lead-in times and cannot begin delivering homes until later in the plan period.

8.14 Given lead in times for strategic sites and the step change in housing development required, a five-year housing supply on adoption would not be possible without a stepped housing requirement.

8.15 An alternative approach focusing on small sites (which may have lower lead in times) would not support the scale of growth required, particularly as it would become more challenging to deliver infrastructure necessary to support the scale of development envisaged. This could potentially both delay delivery of homes, and would not represent sustainable development.

8.16 The Council's housing trajectory is still evolving at the time of writing. Taking account of the trajectory modelling undertaken herein, we consider hat the stepped requirement could the following steps:

- 400 dpa between 2026-31;
- 1,050 dpa between 2031-36; and
- 1,524 dpa between 2036-43.

8.17 This stepped requirement essentially aligns with the current Standard Method over the middle part of the plan period (2031-36); and addresses the shortfall in the early years from 2036 onwards as multiple strategic sites are delivering concurrently. It nonetheless achieves the Government's objectives in significant boosting housing supply – not least in supporting a rapid increase in housing delivery to over 1,000 dpa from the early 2030s.

8.18 As the trajectory evolves through further work, it may be necessary to consider further the steps envisaged. The Council should continue to review this.

Boosting Housing Delivery

8.19 In the context of the sustained high level of housing delivery, and associated high stock growth, required in Cotswold District over the plan period, it is appropriate to consider how other planning policies could boost housing delivery and increase delivery resilience. One of the key means of doing this is through supporting ‘product differentiation’ in the range/ types of homes delivered, particularly on larger strategic sites.

8.20 The housing needs evidence, and analysis in Section 3 of this report, highlights that Cotswold’s housing offer is dominated by larger family-sized properties, with comparatively limited supply of flats and smaller homes. High market housing costs contribute to affordability pressures. Smaller homes can provide opportunities for younger people to get on the housing ladder; with the evidence showing notable in-commuting at the moment as such households are unable to find suitable homes more locally. There is a key role for planning policies in seeking to diversify the housing mix, and opportunities in doing so to support higher housing delivery by catering for a range of different markets. National research also shows that product differentiation has a key role to play in supporting the pace of delivery of housing at a site level.

Built to Rent

8.21 As discussed in Chapter 3, Cotswold has seen a large rise in rents in recent years, at the same time as static house prices and a poor sales market. The 2021 Census shows that 17% of households (7,050 households rounded) lived in the private rented sector in the District.

8.22 The wider context has been of changing market dynamics for smaller landlords/investors in recent years, with legislative and tax changes making the management of individual properties or small portfolios more challenging and eroding margins. In this context, supporting institutional investment in the sector through build-to-rent development is important to maintaining supply and rental affordability (which in turn can help manage affordable housing pressures through addressing homelessness presentations). It also ensures that strategic sites are catering for different potential segments of households, including those who have insufficient deposits or savings to buy outright. It broadens the range of households which sites cater for, contributing to providing mixed and balanced communities (by income and tenure) in this way.

8.23 Savills reported in March 2025 that £.2.5 billion was invested across the UK in single family housing in 2024[26], with now 14,000 completed homes and a further 13,000 under construction. It identifies that the market for family housing remains supply constrained and identified potential nationally for this market segment to deliver c. 32,000 homes per annum nationally. There is clear potential for larger strategic sites to contribute to boosting delivery in these terms through inclusion of build -to-rent alongside build to sale and affordable housing provision. This would typically form part of the market housing provision on strategic sites.

8.24 Iceni would recommend that the Council consider policies promoting the delivery of build to rent development as part of the larger schemes within the District, i.e. those providing over 600 dwellings

[26] https://www.savills.co.uk/research_articles/229130/374423-0

(including committed phases). While it may be appropriate to review the consistency of the size threshold with that taken forward nationally by Government, there may equally be a case for applying a lower threshold given the concentrations of specific prospective allocations in the District.

Retirement & Other Specialist Housing

8.25 Housing needs evidence for Cotswold identifies that District has a relatively old population, with 27.5% of people aged 65 or older, above rates seen elsewhere in Gloucestershire or the regional (22.8%) or national (18.7%) positions. Rapid population growth of 44.1% is also expected in this cohort cross the plan period, outpacing change in younger age groups (even in the context of high housing growth which would ordinarily boost growth in primarily younger cohorts).

8.26 There are number of barriers to movement amongst older households, including in particular the high transaction costs associated with moving (principally through Stamp Duty). However there is a prospect of Stamp Duty reform in the coming years which support turnover within the housing market. Changes in these areas could help support housing delivery.

8.27 Equally there is potential to develop the offer of specialist housing targeting older households. The Cotswold District Housing Needs Evidence report (Iceni, July 2026) identifies a net need for further additional specialist older persons housing by 2043 as follows:

- Housing with support (496 homes)
- Housing with care (467 homes)
- Residential and nursing care (685 bedspaces)

8.28 There is also likely to be demand for further retirement housing, noting the appeal of the Cotswolds as a retirement destination.

8.29 In the context of the clear identified need the case for greater product diversity to build resilience in the housing trajectory, Iceni consider that there is a strong case for working with site promoters as part of the plan-making process to encourage further provision of specialist housing. The Council may also wish to require specialist housing provision on certain sites, either through site allocations or through a size cutoff. We would recommend that planning policies for larger strategic sites (1,000+ homes) should be expected to include provision of specialist housing with the potential for both housing and care provision on the largest sites.

Affordable Housing

8.30 Housing needs evidence for Cotswold identifies an annual need for 190 units of rented affordable housing and 146 units of affordable home ownership units across the 2026-43 plan period. Cotswold has a very high housing affordability ratio and among the highest house prices in the South West region.

8.31 In the context of the needs position, opportunities to support higher affordable housing delivery will feed directly into higher build-out and absorption rates, as set out in this report. Policy requirements for 40% affordable housing contributions on strategic sites, which we understand is supported by the emerging Viability Study, are therefore one of the ways of seeking higher build out rates to meet the overall housing need.

8.32 The Council might also reasonably encourage developers to engage Registered Providers in partnerships to bring forwards larger sites, in particular to help secure funding through the National Affordable Housing Programme to deliver additional affordable housing (over and above the base policy requirements). There are also examples of Registered Providers buying land in the District to deliver 100% affordable housing, and the Council has worked in partnership with several such providers to support this. This can directly feed into absorption rates. Funding can be used to support additionality, boosting affordable housing delivery above that supported by developer contributions alone and supporting the pace of delivery.

Placemaking investment

8.33 The Council will need to examine as part of the plan-making process the inter-relationships between infrastructure provision, the delivery of strategic development schemes and viability. A report by Savills on the Value of Placemaking[27] has shown that upfront investment in the delivery of social and community infrastructure makes developments more appealing and can have a positive effect on both the pace of sales / delivery and residential values. It particularly highlights the role of schools in supporting buyer demand. The report however demonstrates that to support this upfront investment requires ‘patient capital’ whereby essentially land is paid for over time rather than upfront creating more financial capital to invest in place.

Planning Process

8.34 As noted in this report, there have been delays at multiple points in the planning process for the Steadings scheme, and as this is the primary strategic site in the current Cotswold Local Plan this has resulted in overall under-delivery of housing in the last few years. These delays followed in part from resourcing constraints within Council, some of which were caused by redeployment of staff during COVID-19.

[27] https://pdf.euro.savills.co.uk/uk/residential---other/spotlight-the-value-of-placemaking-2016.pdf

8.35 The scale of increase in housing delivery implied by the revised Standard Method points provides the potential for a step change in housing delivery in the District. It equally would see potentially a significant number of large applications being submitted to the Council within a relatively short period of time; but with a significantly increased planning workload sustained over time as a result of the scale of development envisaged.

8.36 There are clear resource implications of this, and it will be important that the Council (and successor organisations as appropriate in the context of Local Government Reorganisation) carefully considers this – and seeks to fully utilise both the prospect of growth in planning application fees (as being considered nationally) and planning performance agreements to invest in growth of its in-house staffing resource.

8.37 Under proposed local government reorganisation, Cotswold District is likely to become part of a larger unitary authority regardless of which of the competing proposals for new authorities are taken forwards. The District would thus fall under the jurisdiction of a larger organisation with greater critical mass of resources and more experience of handling strategic sites elsewhere in Gloucestershire. This would help to mitigate risks to strategic site delivery timeframes. But the scale of increase in housing delivery nonetheless has evident resource implications for the Council and its successor.

8.38 Equally an increase in housing applications will potentially put pressure on other bodies involved in the planning application process – including statutory consultees. The Council will need to work carefully with organisations external to it including Gloucestershire County Council, the Environment Agency, Natural England and utility providers to ensure timely input to planning applications, to the resolution of S106 Agreements and to discharging planning conditions.

8.39 The Council might reasonably consider how the process for engagement with such external bodies is managed, where there are opportunities to set jointly expected standards for engagement / input. Equally the Council might consider how it works proactively to identify and address blockages which are holding up delivery of key schemes.

8.40 The resourcing of planning departments is a recognised issue nationally. Government has however consulted on revisions to planning application fees which aim to support 90% recovery of the costs associated with determining planning applications; with a surcharge to support resources within statutory consultees with the aim of speeding up the process. In this context, it will be important there is adequate resource planning progressed alongside the local plan preparation process so that the Council (and its successor organisation) is able to support the significant increase in number and scale of application which could be expected to come forwards.

8.41 Other local authorities who have seen significant strategic site developments have set out a specific Strategic Sites Team which pools specific expertise in the planning and delivery of strategic sites, including coordination of infrastructure delivery working with multiple stakeholders. Wokingham Borough Council is one such example. This model should be investigated by the Council.

Supporting Infrastructure Delivery

8.42 Infrastructure delivery will be a critical factor in achieving the required scale of housing growth. The timing of infrastructure provision has a direct influence on lead-in times, the opening of new development parcels and overall build-out rates. In addition, infrastructure upgrades may be required to allow some sites to be developed (for example upgrades to water infrastructure as noted in Chapter 5).

8.43 There is therefore a strong case for the Council to take a proactive role in supporting infrastructure delivery proactively working with Homes England, Gloucestershire County Council, utility providers and other infrastructure partners. Opportunities should be explored to secure forward funding for key infrastructure which can unlock housing delivery at an earlier stage of the development process.

8.44 Key opportunities include the proposed relief road at Moreton-in-Marsh, and road infrastructure upgrades along Tetbury Road (A429), Cirencester, needed to open up the northern part of the Steadings. There are also likely to be further major infrastructure requirements which may benefit from forward-funding on other sites which are less well understood at this stage.

Homes England offers a range of funding mechanisms for bringing forwards enabling infrastructure and reducing delivery risks. For example, the Brownfield, Infrastructure and Land Fund provides funding to unlock housing-led development where infrastructure, viability or land-related constraints prevent delivery. Homes England also provides capital through programmes like the National Housing Bank to support housing and regeneration delivery, which may assist with brining forward infrastructure particularly where access to commercial finance may be constrained. Its Investment Prospectus sets out current products[28], albeit that these may vary over time. There is a particular role for public sector investment in some schemes in the District where it can help to unlock and accelerate delivery, in particular where it can help to address cashflow issues arising from substantial upfront infrastructure costs. The Council will need to work proactively with other stakeholders to access funding to support accelerated housing delivery.

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28 https://assets.publishing.service.gov.uk/media/69ccde98a2e82c1bd822d7cf/Homes_England_Investment_prospectus_2026.pdf