

## PLANNING & INFRASTRUCTURE WORKING GROUP

**Summary:** To review the progress of the Planning and Infrastructure Working Group and planning-related activity.

**Recommendation:** That the Executive Committee notes the report.

**Report by:** John Mills, Planning Lead

## PLANNING & INFRASTRUCTURE WORKING GROUP (PIWG) MEMBERS

- Nigel Adcock, Local Authority Board Member
- David Broad, Parish Council Board Member
- Jon Grantham, SoS Board Member
- Liz Hodges, Parish Council Board Member
- Graham Hopkins, Secretary of State (SoS) Board Member (Chair)
- Cate Le Grice Mack, SoS Board Member
- Caroline Mumford, Cotswold Voluntary Warden
- Liz Reason, Parish Council Board Member
- Ray Sanderson, Parish Council Board Member
- Officers: John Mills, Planning Lead; Simon Joyce, Planning Officer

## PIWG MEETINGS SINCE THE LAST EXECUTIVE COMMITTEE

- The last PIWG meeting was on 12 January 2025. At this meeting we discussed: the draft Executive Committee paper; the Government's consultation on reforms to the statutory consultee system; and the Government's consultation on the National Planning Policy Framework.

## KEY PERFORMANCE INDICATOR (KPI) DATA

- In Q3 (October - December 2025) we provided a substantive response to 90% (19/21) of pro-active consultation on planning applications and appeals, above our primary consultation thresholds, by the original deadline. Our target range is 70-94%.
- Q3 saw the largest number of pro-active consultations on applications above our primary consultation thresholds so far this year:
  - Q1 (April – June 2025): 94% (17/18)
  - Q2 (July – September 2025): 89% (16/18)
  - **Q3 (October – December 2025): 90% (19/21)**
  - Q1-3 (April – December 2025): 91% (52/57)
- By comparison, Q3 2025 saw the same number of pro-active consultations above primary consultation thresholds and the same response rate as Q3 2024:
  - Q2 2024 (July-September 2024): 78% (14/18)
  - Q3 2024 (October-December 2024): 90% (19/21)

## MANAGEMENT PLAN LOCAL MONITORING INDICATORS<sup>1</sup>

- **Outcome 1 – Climate Action / Policy CC1 – Climate change mitigation**
  - **Local\_10** (Total predicted output from new renewable energy schemes permitted in the Cotswolds National Landscape each year)
    - Q1: 3,147 MWh per annum
    - Q2: 0
    - **Q3: 4,380 MWh per annum<sup>2</sup>**
    - Q1-3 total: 7,527 MWh per annum
    - For reference the figure for the equivalent period Q1-3 2024/2025 was 0.
- **Outcome 2 - Working Together / Policy CC3 – Compliance with Section 85 of the Countryside and Rights of Way Act 2000**
  - **Local\_11** (% of decisions that are made in line with the CNL Board recommendations, where the Board has objected):
    - Q1: 66% (2 out of 3).
    - Q2: 100% (5 out of 5)
    - **Q3: 50% (3 out of 6)<sup>3</sup>**
    - Q1-3: 71% (10 out of 14)
    - For reference, the average for the equivalent period Q1-3 2024/2025 was 82%.
  - **Local\_12** (% of decisions, for development management proposals that we have commented on, that explicitly refer to the 'seek to further' duty):
    - Q1: 19% (6 out of 31)
    - Q2: 31% (8 out of 26)
    - **Q3: 33% (12 out of 36)**
    - Q1-3: 28% (26 out of 93)
    - For reference, the figure for the equivalent period Q1-3 2024/2025 was 19%.
  - **Local\_13** (% of decisions (for development management proposals that we have commented on) that, in the CNL's opinion, adequately address the 'seek to further' duty):
    - Q1: 19% (6 out of 31)
    - Q2: 27% (7 out of 26)
    - **Q3: 33%<sup>4</sup> (12 out of 36)<sup>5</sup>**
    - Q1-3: 27% (25 out of 93)
    - For reference, the figure for the equivalent period Q1-3 2024/2025 was 11%.

<sup>1</sup> As set out in Appendix 6 of the [Cotswolds National Landscape Management Plan 2025-2030](#). This paper just shows the local, planning-related indicators.

<sup>2</sup> This figure relates to planning permission granted for a 2MW wind turbine at Dyrham (SGC ref. P25/00901/F). No estimated annual figure was stated within the application, but assuming a 25% capacity factor, such a turbine would produce somewhere in the region of 4,380 MWh per annum.

<sup>3</sup> With small sample base (i.e. six decisions), each decision can significantly affect the percentage figure. With this indicator, it is more appropriate to consider the longer term trends (e.g. the annual figure or the figure for several quarters).

<sup>4</sup> This is the same as for 'Local\_12' (i.e. in Q3, all of the decisions that explicitly referred to the 'seek to further' duty adequately addressed this issue).

<sup>5</sup> During Q3, we shared our review of planning decisions in 2024/25 with our local planning authorities. When circulating that paper, we explicitly requested the LPAs to make explicitly address the 'seek to further' duty. With this in mind, we are hopeful that this figure (and the figure for Local\_12) will continue to improve in future quarters).

- **Outcome 11 – Development and Infrastructure / CE13 – Development and transport principles**
  - **Local\_16** (Number of adopted Local Plans with policy-level reference to the Cotswolds National Landscape Management Plan):
    - 10 out of 15 (i.e. 76%) (This is the same as for 2024/25 because no new Local Plans have been adopted in 2025/26).
- **Outcome 11 – Development and Infrastructure / CE14 – Major development**
  - **Local\_17** (Number of development proposals that the CNL has commented on, which have been permitted, that the Board considers to be major development<sup>6</sup>):
    - Q1-3 2025: Two<sup>7</sup>
    - 2024/25: Three<sup>8</sup>
- **Outcome 11 – Development and Infrastructure / CE15 – Development priorities and evidence of need**
  - **Local\_18** (Number of new housing units (i.e. dwellings) permitted within the CNL through planning applications that the CNL Board has commented on):
    - Q1: 0
    - Q2: 1
    - **Q3: 52**
    - Q1-3: 53
    - For reference, the figure for the equivalent period Q1-3 2024/2025 was 138.
- **Outcome 11 – Development and infrastructure / CE16 – Waste management and circular economy**
  - **Local\_19** (Number of landfill and strategic waste management sites permitted):
    - Q1-3: 0 (For reference, 2024/25 = 0)

## OTHER PLANNING-RELATED DATA

- In Q3, we commented on 28 'major'<sup>9</sup> planning applications.
  - Q1: 22
  - Q2: 20
  - **Q3: 28**
  - Q1-3: 70
  - For reference, the figure for the equivalent period Q1-3 2024/2025 also was 70.
- In Q3, we commented on 23 'minor' planning applications.
  - Q1: 24
  - Q2: 25
  - **Q3: 23**
  - Q1-3: 72
  - For reference, the figure for the equivalent period Q1-3 2024/2025 was 69.

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<sup>6</sup> 'Major development', in this context, is as defined in paragraph 190 and footnote 67 of the [National Planning Policy Framework](#) (i.e. taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined).

<sup>7</sup> 125m tall wind turbine, Dyrham and construction of Cable Sealing End Compound at Postlip.

<sup>8</sup> 27 dwellings at Tetbury, s.73 application at Oathill Quarry and redevelopment of Avonpark Village care village at Winsley near Bath.

<sup>9</sup> 'Major' development, in this context, is as defined in Part 1, [Article 2](#), of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (i.e. 10+ dwellings, etc.).

## OTHER PLANNING-RELATED ACTIVITY

- Other planning-related activity since the last PIWG report for the Executive Committee meeting on 23 September 2025 includes:
  - **Local Plan consultations:**
    - **South Worcestershire Development Plan:** We had two meetings with officers from the Malvern Hills and Wychavon District Councils to discuss the main modifications that had been proposed by the Planning Inspector regarding the proposed allocation at Mitton, in the setting of the CNL. We had previously objected to this allocation on the basis of the impact that the increased traffic movements from this allocation could have on the tranquillity of the CNL. However, we withdrew this objection when further evidence was submitted to demonstrate that the increase in traffic movements would be acceptable.
    - **Bath & North East Somerset Local Plan Options consultation:** The proposed options included five housing site options within the CNL (165 dwellings in total), of which we recommended that one (Bathford Nurseries North, 70 dwellings) should be removed and one (Bathford Village – Ashley Road, 20 dwellings) should be reduced in scale. The proposed options also included an allocation for student halls of residence at the Sulis Club, within the CNL, which we recommended should be removed. We recommended that the West of Bath site option (850-1,950 dwellings), in the setting of the CNL, should be removed. We also recommended that the following site options should be reduced in scale and extent – North Keynsham, West Saltford (North of the A4) and Odd Down. We recommended that further assessments of site options should be undertaken before the next round of consultation. We also made recommendations on the draft policies relating to affordable housing, renewable energy, biodiversity net gain and the Cotswolds and Mendip Hills National Landscapes.
    - **West Oxfordshire Local Plan Preferred Spatial Options consultation:** The preferred spatial options included four proposed housing allocations within the CNL (220 dwellings in total). Of these, we recommended that one of these allocations (Jefferson's Place at Charlbury, 40 dwellings) was potentially suitable, that two of these allocations (Burford, 70 dwellings, and Land South of Hydac at Charlbury, 40 dwellings, should be reduced in scale) and that further evidence was required to justify the allocation of 70 dwellings at Kingham Station. We also recommended that the proposed strategic scale housing allocation at Chipping Norton (750 dwellings), just outside the CNL boundary, should be reduced in scale and that some of the allocations at Witney and Carterton should also be reduced in scale. We recommended that further assessments should be undertaken before the next round of consultation.
    - **Cotswold District Local Plan Preferred Options consultation:** The housing need figure for Cotswold District has more than doubled as a result of changes to the Government's standard method for calculating housing need in December 2024. The District Council faces the difficult challenge of trying to balance this housing need with the fact that 77% of the District lies within the CNL. They have taken the bold step of proposing setting a housing requirement figure for the Local Plan than only meets 78% of the housing need figure. Whilst we have supported the District Council intention to set a lower housing requirement figure,

we have highlighted that even their preferred option is likely to result in significant harm to the natural beauty of the CNL. The Preferred Options consultation set out anticipated housing figures for principal and non-principal settlements but did not identify specific allocations (apart from several strategic scale housing schemes). The proposed housing figures for some CNL settlements represent a significant increase from the current baseline. One of the largest proposals is for the strategic scale extension to Moreton-in-Marsh, which would provide 2,130 additional homes by 2043 (nearly doubling the current baseline of 2,663 homes) and a further 2,260 homes beyond 2043. The total quantum of housing would then be 7,053 homes – 2.6 times larger than the current baseline. The strategic scale extension itself is outside the CNL but it is an extension to a CNL settlement. As such, the impacts on the CNL are likely to be significant. With these points in mind, we have recommended that the District Council should consider setting an even lower housing requirement figure in their Local Plan.

- **Significant planning-related decisions (since the last Executive Committee meeting):**
  - **P25/00901/F: Replacement wind turbine, Land associated with Talbot Farm Dyrham (South Gloucestershire Council):** The Board objected to this application for a 125m replacement turbine on the Escarpment. We considered that the proposal comprises major development in the context of NPPF paragraph 190 and that the exceptional circumstances required by paragraph 190 have not been demonstrated. The proposal would give rise to significant additional harm to the landscape and scenic beauty of the CNL, when compared to the existing turbine. The proposal also provides neither an effective means of mitigating this harm nor any enhancement to the CNL and would not further the purpose of the CNL's designation. Despite this objection and the objection of the Council's Landscape Officer, the application was approved by the Case Officer under delegated authority. In the view of the Board's Planning Officer, the decision did not adequately address the landscape and visual impacts of the proposal or the 'seek to further' duty and overly relied on the appeal decision which permitted the smaller turbine that the new turbine would replace.
  - **22/00519/FUL: 190 dwellings at land off Winnycroft Lane, Gloucester (Gloucester City Council):** The Council approved this application contrary to the Board's recommendations. We considered that the development, located within the setting of the CNL, would unacceptably extend the urban edge of Gloucester, impinging on the connected landscape between the Cotswold Escarpment and Robinswood Hill. The Council's Planning Committee considered that the benefits of the proposal, including the above-policy level of affordable housing outweighed the harms, particularly in light of the Council's inability to demonstrate a five year housing land supply.
  - **22/01370/FUL: Creation of allotments, Parcel 4234, Combe Hay, Bath (Bath & North East Somerset Council):** The Council's Planning Committee refused this application, contrary to Officer's recommendation to approve, with one of the reasons being the impact upon the CNL. The application sought permission for the creation of allotments connected with the first phase of this allocated site which has now been built out; however the applicant proposed a site outside of the allocation boundary, which would have extended the development

further into the CNL and Green Belt. The Board objected as we considered that the land for these allotments should be found within the allocation boundary as part of the remaining phases of the development.

- **Significant planning applications that we have objected to (since the last Executive Committee meeting):**
  - **25/03757/EFUL: Erection of student accommodation providing 962 bed spaces, Eastern Sports Field, Sports Training Village, University of Bath Campus (Bath and North East Somerset Council):** This application is for a large purpose-built student accommodation development on the University of Bath campus, within the CNL. Although the site is allocated, the Board raised an objection, raising a number of concerns regarding conflicts with the Core Strategy policy allocating the site for this development, the assessed significant adverse impacts of the development on the natural beauty of the CNL and its setting and its dark skies and the effectiveness of the proposed mitigation and enhancement measures. We recommended several areas require further information or further consideration/refinement/clarification of the proposal.
  - **25/02687/FUL: Detailed application for 60 dwellings, Land Parcel East of Willersey Business Park, Willersey (Cotswold DC):** The Board has raised a holding objection to this full application for 60 dwellings within the CNL's setting as we consider that insufficient information has been submitted to demonstrate that the proposal would conserve and enhance the landscape and scenic beauty of the CNL. We have particular concerns regarding the visual impact on views from the Escarpment and lack of justification for the scale of the development, which exceeds the site's allocation in the current Cotswold Local Plan.
  - **25/02983/OUT: Outline application for up to 30 dwellings, Land North of Folly View, Willersey (Cotswold DC):** The Board has raised a holding objection to this outline application for up to 30 dwellings on an unallocated site within the CNL. The Board considers the proposal comprises major development within the CNL and has made some specific recommendations regarding evidence of housing need specific to Willersey and revisions to the submission to demonstrate that the development can moderate the assessed significant adverse impacts on the development on views to the Cotswold Escarpment to an acceptable degree.
- **Miscellaneous:**
  - **Undergrounding of high voltage cables:** John has secured approval for £370,000 undergrounding project at the Kemerton / Overbury section of Bredon Hill. The project will involve the removal of approximately 1.6km of overhead electricity cables and 18 cable poles and will involve approximately 2.4km of electricity cable being laid underground. This will significantly enhance the visual amenity of the area, particularly with regards to views looking southwards, across the vale, from Bredon Hill.
  - **National Landscapes Association:** John provided input into the NLA's draft Housing Position Statement.
  - **Southern Protected Landscapes Planning Officers Group (SPLPOG):** John chaired the SPLPOG meeting on 22 September.

## DECISIONS REQUIRED

- No decisions required.

## **NEXT STEPS**

- Key work areas over the next few months will include:
  - Over-arching review of planning-related Position Statements (which has been postponed, to-date, due to the recent number of Local Plan consultations).
  - Set up a meeting with the Board's local authority appointees and parish council appointees to discuss issues relating to housing (as requested at the last Board meeting).
  - Respond to the consultation on the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan.
  - Respond to the National Planning Policy Framework consultation.
  - Present a paper on the Planning & Infrastructure Bill at the next Board meeting.
- Next PIWG meeting - date to be confirmed.

## **NO SUPPORTING PAPERS**

JANUARY 2026