



COTSWOLD
District Council

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The Rt. Hon Angela Rayner MP
Secretary of State for Communities,
Housing and Local Government
2 Marsham Street
London
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22 July 2025

Dear Secretary of State,

I am writing to raise serious concerns about the impact of revised housing targets on the Cotswold district, following updates in December 2024 to the National Planning Policy Framework (NPPF).

As part of the revised standardised methodology, the Cotswold district – revered around the world for its natural beauty, and home to almost half of the 790 square-mile Cotswolds National Landscape, the largest designated area of outstanding natural beauty in England, Wales and Northern Ireland – has been allocated a new housing requirement of 1,036 homes per year. This is more than double the 420 homes per year set out in our current local plan. This disproportionate target does not take into account the very unique constraints of development in our district.

While we fully support the government's ambition to address the national housing crisis, and share your vision to deliver more affordable and socially rented housing, the scale of these new requirements – in a district so heavily constrained by protected landscapes – poses significant risks to our communities, environment, and local economy.

I am therefore seeking your support in reviewing the implications of these targets and considering a more proportionate approach, especially while we work to update our local plan.

Approximately 80 per cent of the district lies within the Cotswolds National Landscape, which has the highest level of protection in planning policy. A further four per cent of land is either at the highest category of flood risk, subject to severe constraints listed in the NPPF, or already developed. This leaves just 16 per cent of land potentially available for development - much of which is either unavailable or lacks the infrastructure to support new housing.

The consequences of this are already being felt. Our housing land supply, which stood at 7.3 years prior to the NPPF update, was reduced overnight to just 1.8 years. This has left the district vulnerable to speculative development. Developers are now submitting applications for sites that are not supported by appropriate infrastructure and fall outside the scope of our existing local plan.

Over the coming months, our planning committee will feel obligated to permit piecemeal developments that will meet housing targets, but will not deliver the benefits of a plan-led approach, undermining our robust adopted 2011 - 2031 local plan.

These developments are unlikely to come with the necessary infrastructure, such as roads, schools, and healthcare facilities. This will place additional pressure on services, compound congestion on roads that are already busy and stifle economic growth. According to [Cotswold](#)

[Tourism's most recent economic impact studies](#), the region's visitor economy contributes £1billion to UK GDP, and is hugely significant to prosperity in the South West. This could come under threat from piecemeal housing that doesn't come with enhanced infrastructure. Furthermore, if we are to contribute to greater UK economic growth from this district, we need land to remain available for employment and business growth. It can't all be swallowed up by housing.

Given the loss of our five-year housing supply we don't permit speculative housing development, the 'tilted balance' premise means that we are likely to lose at appeal – costing local taxpayers tens of thousands of pounds.

We are also concerned about the risk of unintended harm of speculative development to the Cotswolds National Landscape. The current approach risks overdevelopment on its boundaries, threatening the very qualities that make this area so special and economically valuable.

We welcome the government's stated commitment to plan-led development. In December, you said that "stronger action will ensure councils adopt up-to-date local plans or develop new plans that work for their communities." However, the regulations to support this aspiration have yet to be published.

Despite this, and out of necessity, Cotswold District Council committed on 16 July to a full update of its local plan, at pace, with the aim of submitting it to the Planning Inspectorate by the end of 2026. This will provide a comprehensive, evidence-based assessment of our situation and a reasonable plan that delivers more affordable housing in the district. This is now a council priority. The need for us to do this work comes at significant cost to local taxpayers – around £1million – at a time when central funding is being reduced, costs to deliver services are increasing, and member and senior officer time is being taken up with local government reorganisation.

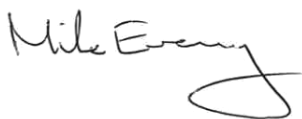
But of greatest concern is what happens here in the intervening period, while we work to update the local plan. We remain susceptible to developers running rough-shod over our communities and beautiful landscapes – feeling obliged to permit piecemeal housing schemes that meet targets, and targets only.

We urge the government to apply common sense to the situation we face. We ask – until such time that you have our updated local plan, and more sufficient and robust evidence to justify a higher target – that you revisit the housing requirement figures imposed on the Cotswold district and consider a more proportionate approach which accounts for the complex challenges set out in this letter.

We remain committed to delivering more affordable housing, a council priority which we have been performing well against – delivering over 600 affordable homes since 2019. But this must be balanced with the availability of suitable land and the need for supporting infrastructure to ensure genuine, sustainable economic growth.

As we move forward with our local plan update – which will include the relevant data and evidence to set a more reasonable housing target – the residents of the Cotswold district will be looking to government for its support and understanding.

Yours sincerely,



Cllr Mike Every
Leader of Cotswold District Council

CC: Matthew Pennycook MP, Minister of State for Housing & Planning
Sir Geoffrey Clifton-Brown MP, North Cotswolds
Roz Savage MP, South Cotswolds