
Independent Examination of the Cotswold Local Plan

Cotswold District Council's responses to the Inspector's Further Preliminary Questions

10th August 2017

Housing

1. **What levels of household growth for the period 2011 to 2031 do the DCLG 2014-based household projections¹ indicate for (a) the Gloucestershire housing market area, and (b) Cotswold District?**

- (a) Gloucestershire: 50,400 households
(b) Cotswold District: 5,900 households

2. **(a) How has the objectively assessed need for housing in the Gloucestershire housing market area been taken into account in determining the Plan's housing requirement? (b) Have the needs across the housing market area been objectively assessed on a consistent basis? (c) Where are the needs of the other parts of the housing market area being / going to be met? (d) Overall, are adopted and emerging local plans in Gloucestershire likely to ensure that objectively assessed needs (based on latest evidence) will be met in the housing market area?**

(a) and (b) The analysis has been done on a consistent basis by one consultant – NMSS – using the same assumptions for all six districts. The analysis is up-to-date, being based on the latest DCLG households projections. Details of the latest assumptions and results are in Section 10 of the NMSS December 2016 Report.

(c) The needs identified in the other parts of the Gloucestershire HMA are being met, in full, within the respective districts.

(d) Yes.

3. **How have future changes in the number of people living in communal establishments, including care homes and students halls of residence, been taken into account in estimating future housing needs? Have these changes been identified separately to the changes in the number of households expected to live in conventional dwellings (use class C3)?**

Paragraphs 4.24-4.26 of the SHMA Update (EB016) consider student accommodation requirements. A waiting list for 60 rooms was identified. However, the SHMA comments that "It is important to note that the students are included in the ONS population projections and in the DCLG household projections. It would be appropriate to adjust the housing planned for if the further education establishments were planning to grow faster than they have historically. This is not the case here so it is not necessary to adjust the number of homes planned for."

The Chesterton strategic site allocation (Policy S2) includes provision for educational infrastructure (which includes student accommodation). Furthermore, the pending planning application for this site includes 100 units of student

¹ "The starting point" (PPG ID-2a-015).

accommodation, albeit that these units fall within the C3 use classification (Ref: 16/00054/OUT). There is also an extant planning consent for 110 further student accommodation units (C1 use class) at Brewery Court in Cirencester (Ref: 14/01529/FUL). The Local Plan and the existing planning consent therefore provide student accommodation provision above the identified need.

Nursing and residential care bed spaces are considered in paras 4.10-4.11 and 5.8 of the SHMA Update. The SHMA uses the Strategic Housing for Older People (SHOP) tool to estimate the need for nursing and residential care bed spaces. Updated SHOP tool estimates have since been received that update the position as of March 2017. The updated SHOP tool estimate is for 563 nursing and residential care home spaces up to 2030 and 649 spaces up to 2035 (the estimate up to the end of the Local Plan period at 2031 is not specified).

The SHOP guidance note, however, flags a significant issue with the use of the SHOP tool for calculating nursing and residential care requirements. The tool compiles data from a number of sources and makes simple assumptions. The guidance note states specifically that it is not intended to make decisions on any development proposals or solutions. Furthermore, the SHMA acknowledged that the SHOP tool estimates were not supported by Gloucestershire County Council, particularly as there are hundreds of empty care spaces in the county.

Gloucestershire Clinical Commissioning Group / Gloucestershire County Council (GCC) have provided the District Council with their strategy for residential and nursing care home provision, which gives a better indication of the requirement for these facilities. The strategy has been reiterated in GCC's consultation responses to planning applications for new nursing and residential care facilities in recent years.

"In line with national and local strategy Gloucestershire health and social care community is committed to enabling older adults to remain in their communities for as long as possible by utilising domiciliary and extra care services, promoting re-ablement services and making good use of Assistive Technology, thus providing increased choice in provision. The national and local direction is to reduce the numbers of people over the age of 65 years living in residential care and Gloucestershire currently has large numbers of vacancies across the care home sector. Utilising the current extra care provision and working towards increasing it and all other options for older people are key elements in diverting people from residential care."²

In keeping with this strategy, the District Council has sought not to allocate land for residential and nursing care accommodation. Instead, the Council has permitted more developments that align with the County Council's strategy in providing more mixed tenure extra care and alternative specialist accommodation units. These have fallen within both the C2 and C3 land use classifications.

Regarding C2 uses in particular, the District has gained approximately 500 specialist older accommodation units since the beginning of the Local Plan period that are either built or have extant planning consent that fall within ONS dwelling definition. In line with guidance provided by the PPG, these consents have been counted towards meeting the OAN. In addition, the District has seven extant planning consents that provide 321 further residential and nursing care bed spaces that do not meet the ONS dwelling definition and are not counted towards the OAN.

² Consultation response to the care home element of a planning application at Dunstall Farm, Moreton-in-Marsh (dated 1st November 2016, planning application ref: 16/05258/FUL)

Policy H4 of the Local Plan enables the delivery of nursing and residential care facilities should the need for such facilities change in future.

- 4. Please clarify how parts 1, 2 and 3 of affordable housing policy H2 are intended to be applied in terms of when a financial contribution would be sought as opposed to on site provision. "Settlements in rural areas" would appear to include a number of the Principal Settlements, so is it intended that all developments of 6 or more dwellings (including those of 11 or more dwellings) in those locations would be subject to policy H2(2) rather than H2(3)?**

The intention of the Policy is to be fully compliant with NPPG 'Planning Obligations' Paragraph: 031 Reference ID: 23b-031-20161116 (May 2016).

H2 (1) states that

"All housing developments that provide 11 or more new dwellings or have a combined floorspace of over 1,000 square metres will be expected to contribute towards housing provision....."

The intention of H2 (2) is to reduce this threshold to 6 dwellings or more in s157 areas and allow for schemes of 6 to 10 dwellings to make a financial contribution by way of commuted sum. In line with PPG, commuted sum payments would be 'in the form of cash payments which are commuted until after completion of units within the development'.

H2(1) would still apply to qualifying schemes within s157 areas i.e. schemes of 11 or more dwellings in these areas are subject to H2 (1) and H2 (3).

If it would assist the clarity of the policy, a modification could be made to H2 (2) as follows:

"In settlements in rural areas, as defined under s157 of the Housing Act 1985, all housing developments that provide 6 **to 10** new dwellings will make a financial contribution by way of a commuted sum towards the District's affordable housing need subject to viability."

5. Please provide an updated version of Table 5 in Topic Paper 1: Development Strategy [EB010] setting out, for each of the Principal Settlements, the number of dwellings built between 2011 and 2016; the number of dwellings with extant planning permissions on 1 April 2016; and the number of dwellings expected to be built on allocated sites.

SETTLEMENTS	PDS Requirement figure (updated as of 1/4/16))	Built 1/4/11 to 31/3/16	Permissions at 31/3/16	Local Plan Submission Draft Allocations	TOTAL built to 31/3/16 + permissions at 1/9/16 + Local Plan Allocations	Total built, committed and allocations +/- compared with PDS
Andoversford	130	63	9	25	97	-33
Blockley	60	10	31	29	70	10
Bourton-on-the-Water	300	89	268	32	389	89
Chipping Campden	160	40	76	120	236	76
Cirencester [excl. Chesterton]	860	710	302	31	1,043	183
Land south of Chesterton	2,500	0	0	2,350	2,350	-150
Down Ampney	0	1	44	28	73	73
Fairford	260	195	277	77	549	289
Kemble	80	7	56	36	99	19
Lechlade	140	18	85	18	121	-19
Mickleton	80	7	257	0	264	184
Moreton-in-Marsh	520	447	438	208	1,093	573
Northleach	130	32	51	22	105	-25
* Siddington	70	4	2	0	6	-64
South Cerney	220	116	62	0	178	-42
Stow-on-the-Wold	180	35	186	10	231	51
Tetbury	650	111	689	70	870	220
Upper Rissington	390	284	81	0	365	-25
Willersey	50	2	75	54	131	81
Windfalls in other locations	335	218	380	0	598	263
TOTALS	6,895	2,385	3,367	3,110	8,862	1,967

* Siddington was removed from the Development Strategy due to its lack of deliverable development sites.

The data for built and committed developments will be updated by the Residential Land Monitoring Statistics (2017) report. The report will be published in September 2017.

The Local Plan Submission Draft Allocation capacity figures will be updated following the publication of the Cotswold District Strategic Housing and Economic Land Availability Assessment Review (2017). This report will also be published in September 2017.

Viability

6. What are the expected costs of the infrastructure projects included on the CIL Regulation 123 list?

All large highways and transport schemes are considered by the Gloucestershire Economic Growth Joint Committee (GEGJC) prior to recommendation to the LEP Board. The GEGJC oversees the Gloucestershire Infrastructure Investment Pipeline (GIIP), which is a register of proposed future infrastructure across the County. Any new scheme, proposed for consideration by the LEP Board, must first be included on the GIIP, including those below. Not all have detailed costings, but as they are worked up details will be provided.

The following projects do not yet have costings:

South

- Cirencester – Improvements to A429 Cherry Tree junction
- Fairford – A417 / Whelford Road junction improvements
- Kemble – Junction improvement for A429 / A433
- Kemble – Re-use of old railway line for cycling between Tetbury and Kemble

North

- Moreton-in-Marsh – Improvement for Fosse Way, Moreton-in-Marsh

Other infrastructure projects on the list have cost estimates associated with them – set out below:

South

- Cirencester – SUDs and soft measure interventions to manage flood risk in Cirencester (this excludes SUDs and flood measures related to Chesterton strategic site) £250,000 – Gloucester County Council
- Tetbury – Improvements to A433 (London Road) / A433 (Long Street) / Hampton Street / New Church Street junctions-£695,000 (table 5-2 EB061)
- Tetbury – Improvements to A433 (Long Street) / A433 (Bath Road) / B4014 (Fox Hill) / Chipping Street junctions -£510,000 (table 5-2 EB061)

Mid

- A429 (Fosse Way)/A436 (Oddington Road/B4068 in Stow-on-the- Wold would cost approximately £1.2M (EB059 - Para 2.103)

North

- Moreton-in-Marsh – Widening of roads at junctions, modifications of mini-roundabouts to signal-controlled junctions, realignment of road markings and improvements to pedestrian facilities at A429 (Roman Road) / A44 (Oxford Street) and A429 (Roman Road) / A44 (Bourton Road) - £870,000 (Table 5-2 EB061) –Gloucester County Council Update- £1.2M
- Moreton-in-Marsh – A new flood alleviation channel to the south £450,000 (Gloucestershire County Council)

Chipping Campden – Expansion to Chipping Campden secondary school. Solution to be defined later in the plan period, however- £874,105 has been identified as the cost to mitigate the secondary education shortfall identified for the North of the District (Table 7 EB059) and a total cost of £3,395,659 has been identified to mitigate district wide secondary education impact of the growth in the local plan (tables 7, 11 &15 EB059). The approach to meeting these secondary educational need and the scale of the extension to Chipping Campden school will be determined later in the plan period.

Education costings are based on an indexed cost per pupil place, this being the known cost to expand or build school capacity. For Primary schools the cost is £13,560, and for secondary schools, including Sixth Form it is £20,680.

These multipliers use the expected level of growth contained within the emerging Local Plan, as set out in Table 1 of the Infrastructure Delivery Plan Update 2016 (EB059).

7. (a) What are the expected costs of the infrastructure projects set out in policies SA1-SA3 and S1-S19? (b) How have those costs been taken into account in the Cotswold District Council Whole Plan and Community Infrastructure Levy Viability Assessment (April 2016) ("VA")³?

(a) The Infrastructure Funding Gap Analysis May 2017 (EB060) sets out the overall funding requirement associated with housing growth in fig 1 (Pg2) of £21,120,629. This is the summary table of the Infrastructure costings set out in Infrastructure Delivery Plan 2016 update (EB059) in paragraphs 2.50-2.82 for the North of the district; paragraphs 2.83 – 2.106 for the Mid- district and paragraphs 2.107-2.130 for the South of the district. The prioritised funding gap related to transport, education, health and flood risk management is set out in Fig 3 (pg. 4)- £16,367,071 broken down in to infrastructure types in fig 4,5 & 6 for each part of the district. There is only £100,000 known funding giving a funding gap of £16,267,072 (Fig.8) to be made up from CIL and other funding sources. It is anticipated that non-housing and non-retail growth would mitigate their impact through s106 obligations.

b) The viability assessment includes a s106 input figure of £2,000 as a reasonable and strategic amount for site specific infrastructure taking into account the pooling limitations set out in Reg. 123 of the CIL Regulations. This is set out in paragraph 7.26- 7.31 Cotswold District Council Whole Plan and Community Infrastructure Levy Viability Assessment (April 2016) ("VA") (EB055).

8. Financial contributions committed to in section 106 obligations made in the period 2010 to 2016 appear to have been just over £4,000 per dwelling on average, whereas contributions actually made during that time appear to have averaged nearly £5,000 per dwelling⁴. Based on this, and bearing in mind the content of the Regulation 123 list, what is the justification for assuming financial contributions of £2,000 per dwelling in the VA?

The CIL: Historic s106 Agreement Evidence document 2016 (CIL025) provides detailed evidence on s106 obligations. This document is more detailed and updates the evidence referred to in the Whole Plan and CIL Viability Assessment - April 2016 (HDH) (EB055 -para 7.27) which sets out that the average amount collected per unit through s106 over the last three years is just under £3,000/unit (median £2,000/unit). The £2,000 per unit s106 input into the Whole Plan and CIL Viability Assessment - April 2016 (HDH) (EB055) is appropriate and conservative and as set out in para. 7.29 " ... It would be inappropriate to base the figure on historic payments due to the changes in the s106 regime (on pooling) that came into effect in April 2015..." The Historic s106 Agreement Evidence document (CIL025) illustrates the differences between the obligations paid and entered into which are for different schemes, at different times, resulting in different levels of payment and therefore different average amounts per dwelling. These differences are, amongst other things, due to the policies that apply, the nature of the

³ EB055.

⁴ CIL025 Tables 1 and 2.

development, proportion of affordable housing, the site viability and the level of mitigation required.

When looking at the justification for the £2,000 viability input figure it should be borne in mind that in addition to any s106 agreed as part of an application there will be the proposed £80 per SqM CIL charge. This CIL charge would result in £8,000 per 100sqm residential unit minus the relief given to affordable housing (30 or 40%) – see pt. 6 of the Appendix to Statement of Procedural and Legal Compliance (CIL016).

In devising the reg. 123 list the Council has borne in mind that the reg. 123 list is the list of infrastructure that the Council cannot spend s106 or s278 monies on and therefore it needs to be cautious not to limit itself by putting projects on the list that may be more effectively delivered by s106 or s278, in conjunction with other funding streams. It should also be borne in mind that it is not the exclusive list of what CIL can be spent on – see Pt 7 of the Appendix to Statement of Procedural and Legal Compliance (CIL016). The infrastructure listed on the reg. 123 list is infrastructure that would support the growth identified in the plan where CIL can contribute to its provision rather than s106 or s278.

9. The VA states that, “on the whole the modelling is in line with” the Nationally Described Space Standards⁵. Policy H1 requires all housing developments to comply with national minimum internal space standards. How, specifically, has the VA modelling taken into account these standards in terms of the assumptions made about (a) the size of new dwellings; (b) development densities; (c) development costs; and (d) development values?

This is covered at 8.18 of the Whole Plan and CIL Viability Assessment - April 2016 (HDH)(EB055). At the time of the work the Council had no plans to introduce the space standards, however most development has in fact been above these standards (as is the case in most parts of England outside the metropolitan centres). This is confirmed in Cotswold - the average sizes of new build houses sold in Cotswold are set out in Table 4.3 and 4.4 of the Whole Plan and CIL Viability Assessment - April 2016 (HDH) (EB055).

- (a) All the units modelled are at least as large as the space standards requirements.
- (b) In terms of development densities typical modern housing provides development densities of between 3,000m²/ha to 3,550 m²/ha on a substantial site, or sensibly shaped smaller site.

Having taken into account the open space requirements (see Table 9.5 8.18 of the Whole Plan and CIL Viability Assessment - April 2016 (HDH)(EB055)) and the unit/ha assumptions used elsewhere in the plan-making process (in the SHLAA) the densities modelled are at the lower end of this range or below it. The modelling is set out in Table 9.7 of the Whole Plan and CIL Viability Assessment - April 2016 (HDH) (EB055).

- (c) The development costs are derived from the BCIS costs as set out in the first part of Chapter 7 of the Whole Plan and CIL Viability Assessment - April 2016 (HDH)(EB055). These are applied on a £/m² basis to the gross internal area of the modelled units – so the construction costs fully reflect the costs of building the NDSS.

⁵ EB055 paragraph 8.20.

(d) Development values (as derived in Chapter 4 of the Whole Plan and CIL Viability Assessment - April 2016 (HDH)(EB055)) are applied to the modelled development on a £/m² basis to the gross internal area – so the value is applied to the NDSS area.

- 10. Paragraph 2.0.2 of the Plan refers to the area being internationally renowned for its natural beauty and the huge importance of the distinctive building stone; paragraph 10.2.1.8 refers to the need for new development to avoid replicating insensitive development that took place around some of the key settlements in the second half of the 20th century; and Policy EN2 refers to development being permitted which accords with the Cotswold Design Code. Section 3 of the “Key Design Considerations for Specific Development Proposals” in the Code, which relates to new build houses, sets out various requirements, including the use of natural local limestone in sensitive locations and high quality artificial stone elsewhere. Many of the housing allocations in policies S4 to S19 appear to be within the AONB, a Special Landscape Area and/or a conservation area. The VA refers to additional costs associated with using Cotswold stone potentially being up to 50% of base construction costs, and a scenario having been tested that increases costs by 15%⁶. However, the VA assumes that the Plan’s design policy requirements are not new or unusual and that the costs are reflected in BCIS baseline construction costs for “Estate Housing – Generally”⁷. So:**
- (a) Approximately what percentage of new dwellings on non-strategic housing allocations and windfall sites are, or are likely to be, in “sensitive locations”?**
 - (b) What is the evidence to demonstrate that the costs of complying with the Cotswold Design Code are reflected in BCIS “Estate Housing – Generally” construction costs?**
 - (c) Do the residual values set out in Tables 10.2 and 13.3-13.5 of the VA include any additional costs associated with using stone or meeting other requirements of the Design Code?**
 - (d) Do the residual values set out in Table 10.3 of the VA assume 15% additional cost for use of stone?**
 - (e) Policy S2 refers to development of the strategic site at Chesterton being high quality, and the vision in Appendix B refers to all buildings exhibiting high architectural quality and preserving contact with the best local building traditions, not least in the use of high quality materials. How have the Plan’s design quality policy requirements been taken into account in the viability assessment of the Chesterton site?**

In considering the requirements for stone it is important to note that whilst the use of stone is an important design feature of the area, the actual extent of stone is normally relatively limited and mixed with blocks, render, timber and other materials. This is well illustrated at the Bourton Chase scheme on the northern edge of Bourton-on-the-Water (14/02923/REM) where a pallet of materials are used.

The use of stone is not a policy requirement of the Council.

⁶ EB055 paragraph 7.9.

⁷ EB055 paragraph 8.26 and 7.3.

- a) Using your definition above (Area of Outstanding Natural Beauty, Special Landscape Areas and Conservation Areas) the approximate figures are:
Allocations: 83% and Windfalls: 72%.
- b) The evidence was tested through the consultation process and a number of changes were suggested.

It was agreed that the Whole Plan and CIL Viability Assessment - April 2016 (HDH)(EB055) should be carried out in line with the Harman Guidance (Viability Testing in Local Plans – Advice for planning practitioners (LGA/HBF – Sir John Harman) June 2012). The Harman Guidance says (page 34):

For build costs, these should be based on the BCIS or other appropriate data, adjusted only where there is good evidence for doing so based on specific local conditions and policies including low quantities of data. Where significant proportions of development are likely to be particularly complex or high density, then adjustments should be made based on specific professional advice.

It is important to understand that BCIS costs do not include external structural and local site works and are based on Gross Internal Area (GIA) but do not include circulation areas in flatted developments. Preliminary costs are included in the BCIS build costs figures so should not be included as a separate cost.

Adjustments are made for small sites and generally prices are lifted by 1.5% to reflect increased building standards.

It is accepted that stone construction can add to the costs of construction. This, at least in part reflected in the BCIS Costs. The area index for Cotswold is 105 compared to 101 in neighbouring Cheltenham or 102 in North Wiltshire (1st August 2017).

The costs of complying with the Council's various policy requirements are set out in Chapter 8 of the Whole Plan and CIL Viability Assessment - April 2016 (HDH)(EB055). The Cotswold Design Code was considered under the emerging Design and Landscape policy that said:

"New development (including alterations to existing buildings) will enhance the distinctive environment of the District by meeting the highest standards of architectural, sustainable, ecological and landscape design. Innovative contemporary design, construction methods and materials appropriate to the context will be welcomed, particularly where sustainability is enhanced."

These requirements are not new and are not unusual and are a summary of the Design Code. These are established costs in the area and it was assumed that the costs are reflected in normal development costs. This remains the case.

The impact of stone construction is considered separately.

Overall, the Design Code has been taken into account in the viability study (although it is timely to note that the Code is not saying anything new or introducing general principles that have not been a local requirement for some time). Stone is not a requirement or even an expectation on all sites and, on the whole, the implementation of the Code can be dealt with through careful consideration of form, massing and layout and materials rather than a dogmatic use of a limited materials pallet.

This is well demonstrated around the District where the use of a range of materials is widespread. A quick review of several recent schemes does show that stone is normally part of the choice of materials. Examples of development that have been undertaken in recent years that required high quality design and a mix of stone, reconstituted stone and other quality materials include:

- 14/02675/FUL- Land Parcel at the Sunground, Avening. 11 Dwellings -55% - 11 dwellings - 6 Affordable housing & 5 Private Dwellings. Materials- Reconstituted Stone and Reconstituted Tile (Conservation area)
- 13/00972/FUL Hitchings, Aldsworth 4 Affordable dwellings-Plot 1 in natural stone, Plot 2 and 3 in render and Plot 4 in artificial stone (AONB)
- 12/01469/FUL Middle Farm, Top road, Kempsford: 29 dwellings - 38 % Affordable Housing (18 private, 11 affordable housing), and other s106 obligations including provision of playing fields, Multi use games area and facilities, play area, library contributions. 15/00006/COMPLY - Condition 3 - materials to be used for the external walls and roofs - Ibstock Grosvenor Autumn Flame, Bradstone Rough Dressed Cotswold.

It is important to note that these schemes delivered affordable housing and developer contributions and two were either in the AONB or a conservation area.

- c) These table do not include an uplift specifically for stone – although they do cover the Council’s policy costs.
- d) No – these tables have no policy requirements – that are considered the bottom rung of the policy ladder.
- e) Within the high level testing carried out in the Whole Plan and CIL Viability Assessment - April 2016 (HDH) (EB055) a series of high level assumptions are made to allow this to be achieved. There is substantial open space and relatively low rates of development density, allowance has been made for professional fees and site works to allow these aims to be achieved, however on the whole these do not add to the overall costs of development over and above those used in the study. No specific allowance is made.

The Strategic Site at Chesterton is currently the subject of a planning application that is being reported to planning committee in September 2017. The Case Officer has stated that the design quality policy requirements of the emerging local plan, including the Cotswold Design Code, have been taken into account in the planning application for the site (16/00054/OUT), where a mix of materials has been agreed. The Officer report will be forwarded to you once available.

11. Evidence about the price actually paid for residential development land in recent years shows prices varying from less than £30,000 per hectare to over £2.5 million per hectare, with the average being a little over £1.1 million per hectare⁸. Is the Council satisfied that “this data supports the approach taken” in the VA which appears to include viability thresholds of just over £0.5 million per hectare ie around 50% of the average price paid?

The challenges of obtaining good information in this regard is recognised at Paragraph: 10-014-20140306 of the PPG which says ‘be informed by comparable,

⁸ CIL – Post PDCS Note (September 2016) [CIL009] page 11.

market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise.'

In an effort to obtain data the Land Registry searches have been carried out and presented. The average of these transactions was £1,168,000 and the median £1,044,000. If the two highest prices are ignored as they could be considered 'transacted bids are significantly above the market norm', they should not be used as part of this exercise the average of these transactions was £914,000 and the median £927,000.

The viability threshold used was derived through the consultation process. As well as being informed by market evidence Paragraph: 10-015-20140306 of the PPG says that:

"A competitive return for the land owner is the price at which a reasonable land owner would be willing to sell their land for the development. The price will need to provide an incentive for the land owner to sell in comparison with the other options available. Those options may include the current use value of the land or its value for a realistic alternative use that complies with planning policy."

This clearly points towards the Existing Use Value Plus approach used.

The Council is confident that the approach provides a 'competitive return for the land owner'.

12. The VA shows the development of larger supermarkets (around 4,000m²) to be unviable, and advises that this is due to rents being slightly lower and construction costs being slightly higher than elsewhere in England⁹. Are any such supermarkets expected to be developed in the District in accordance with policies in the Plan?

The Plan does not propose any such supermarkets in its policies, see Policy EC7, EC8 and EC9. Evidence for these policies is provided in the Cotswold Retail Study Update , June 2017 (EB041a-d).

Economic Growth and Employment Development

13 The key to the Policies Map refers to "employment allocation" (policy DS1) and "established employment site" (policy EC2). Policy EC2 refers to "established employment sites" and "existing established employment sites". Policy EC3 refers to "employment-generating uses". Policies S1 and S4-S19 refer to "protected existing employment sites". The Glossary (appendix K) refers to "employment land" being land used or allocated for "employment uses", but does not define "employment uses". Is the Council satisfied that the Plan is clear and therefore effective in terms of the approach to "employment development"?

Established Employment Sites, Existing Established Employment Sites and Protected Existing Employment Sites are the same as defined in Appendix E. For greater clarity and consistency, the Council suggests making an amendment so that all such sites are referred to as 'Established Employment Sites', which aligns with the evidence base.

Regarding the definition of 'Employment Land' in Appendix K, more clarity is needed, the following is suggested:

⁹ EB055 paragraph 11.9.

“Employment Land – land primarily used, with planning permission, or allocated in a development plan for B1, B2 and B8 Class employment uses.”

Regarding whether the plan’s approach to employment development is clear and effective, Policy DS1 requires at least 27 hectares of B Class employment land to be allocated over the plan period, which is informed by the Employment Land Update 2016 (EB038). On the basis of the policy requirement and an assessment of land availability set out in the Strategic Housing and Employment Land Assessment Consolidated Report (2016) (the SHELAA), Policies S1 and S4-S19 identify allocated employment sites for B Class Use and are defined as such on the relevant inset maps.

Policy EC2 sets out the Council’s approach to safeguard Established Employment Sites for B Class employment development that play a critical role in meeting the economic and business needs of the District. The Established Employment Sites are listed in Appendix E, identified in Policies S1 and S4-S19 and noted on the inset map. The extent of the Established Employment Sites is also defined in Appendix E.

Policy EC3 supports employment generating uses both within and outside development boundaries subject to specified criteria. Examples of employment generating uses are set out in paragraph 9.2.2.2. There is also reference at 9.2.2.2 to other Local Plan policies that provide for non-B class employment generating uses.

If the amendments set out above are made, the Council is satisfied that the Local Plan is clear and effective in terms of its approach to employment development and consistent with national planning policies and guidance (i.e. to proactively meet the development need of business, and to support competitive town centres and a prosperous rural economy).

14 (a) Are policies DS1, S1-S19, and EC1-EC6 intended to be permissive of B1 offices, which are “main town centre uses”? (b) Or is it intended that the sequential approach set out in policy EC8 would be applied to B1 offices, including on allocated sites?

Policies DS1, EC1-EC6 and S1-S19 are permissive of B1 offices subject to the criteria set out in those policies. For example, Policy EC4 supports development directly associated with existing business uses which may include offices. It is intended that the sequential approach (Policy EC8) would be applied to B1 offices.

Policy EC8 has been designed as the point of focus for consideration of main town centre use proposals in the District including office uses but excluding allocations. It provides clarity, in one location in the Plan, over: the Council’s approach to the preferred locations for main town centre uses; how it will approach consideration of proposals within defined town centres; and the policy tests which will apply to proposals for different types of main town centre uses located outside defined town centres in the retail hierarchy.

Policy EC8 confirms that in Cirencester and the other principal settlements defined in Policy EC7, the sequential approach to town centre uses applies.

The sequential test will not apply to allocated sites. Allocated sites by their very nature are considered a suitable location and they have already been through a process of elimination of alternative sites. This has included a Sustainability Appraisal (SD005). A review of other evidence has also been undertaken, including the Evidence Paper Supplement to Inform Non-Strategic Housing and Employment

Site Allocations (EB007), Economy and Employment Land Update (EB038), and the Retail Study Update (EB041 and EB041a-d).

The SHELAA (EB006) has also assessed each site allocation and their potential sequential alternatives against available (at time of publication), suitable and achievable / economically viable criteria. A similar assessment would form the basis of any sequential test.

The site allocations and their potential alternative sequential sites will be reviewed prior to the adoption of the Local Plan in the SHELAA (2017) (EB012).

15 Policy EC1 states that employment development will be permitted provided that a number of criteria are met. (a) Are these criteria intended to apply to proposals on all employment allocations, all established employment sites, and all other locations in accordance with policies EC3-EC6? (b) If so, is it intended to rule out development that does not meet the criteria stated in EC1? (c) If so, is the Council satisfied that this would not be unduly restrictive?

(a) Yes, this policy applies to all employment allocations, all established employment sites, and all other locations in accordance with policies EC3-EC6. (b and c) Policy EC1 is a high level and permissive policy that sets out a clear economic vision and strategy for Cotswold District which positively and proactively encourages sustainable economic growth (NPPF para 21). It is not an exclusive policy, which precludes development that is consistent with other Local Plan policies.

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16 Policy SP2(1) states that the change of use of existing buildings within the area, shown on the Proposals Map (sic), will be permitted provided that it is compatible with the use of the land as an aerodrome, and policy SP2(2) refers to re-use of hangars for employment uses outside of the area shown on the Proposals Map. (a) Where are the different areas at the Airport defined on the Policies Map? (b) What are these policies intended to achieve?

(a) The Policies Map is insufficiently detailed to indicate the location of existing buildings where a change of use that it is compatible with the use of land as an aerodrome would be permissible. A more detailed Policies Inset Map will be prepared to rectify this matter.

(b) The policies are designed to ensure that: (i) hangars and other aerodrome-related buildings located near to the airport runway, (including a number already occupied by businesses reliant on a functioning runway), remain available for uses closely related to the aerodrome's primary function; and (ii) hangars and other buildings previously associated with Kemble Airfield in outlying locations are potentially suitable for more general employment uses.

[N.B. The incorrect reference to 'Proposals' (rather than Policy) Map has been noted].