

Introduction

The "Submission Draft" Cotswold Local Plan 2011-2031 was published in June 2016 [SD003] and the Council's "Focussed Changes" were published in January 2017 [SD004]. A consolidated version of the Plan that incorporates the Focussed Changes and Minor Modifications was published by the Council in June 2017 [SD007]; this is the subject of the Examination and all references to "the Plan" are to that document.

The Inspector invites the submission of written statements that set out succinct responses to the following matters, issues and specific questions that his examination of the Plan will focus on. The Council should answer all of the questions, whereas representors should only answer those questions relating to the subject of the representations that they made about the Submission Draft Plan and/or the Focussed Changes. Statements should not introduce new concerns or new evidence (unless this has subsequently become available and is of critical importance), nor include comments unrelated to the specific questions.

The questions reflect, and should be answered with reference to, the soundness criteria set out in the National Planning Policy Framework 2012 ("the NPPF") ie that plans should be positively prepared, justified, effective and consistent with national policy.

The deadline for statements relating to **matters 1 to 8** is **Wednesday 27 September 2017**, whereas for **matters 9 to 15** the deadline is **Wednesday 25 October 2017**.

Further information about the Examination, hearings and the format of written statements to be submitted in response to these questions is set out in the Inspector's Guidance Note published on 20 July 2017 [ED002].

The matters to be addressed during the Examination are:

1. Duty to Cooperate and other Procedural Issues
2. Development Strategy
3. Housing Requirement
4. Housing Supply
5. Strategic Site south of Chesterton, Cirencester
6. Allocations and Infrastructure Requirements in the South Cotswold Sub Area
7. Allocations and Infrastructure Requirements in the Mid Cotswold Sub Area
8. Allocations and Infrastructure Requirements in the North Cotswold Sub Area
9. Housing Design, Size and Type
10. Affordable Housing
11. Gypsy and Traveller Sites
12. Economic Development and Employment Land
13. Town Centres and Main Town Centre Uses
14. Natural, Built and Historic Environment
15. Other Issues

Matter 1: Has the Plan been prepared and is its content in compliance with relevant legal requirements and national policy?

Local plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Local plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in the NPPF, including the presumption in favour of sustainable development. Local plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change, and set out the opportunities for development and clear policies on what will or will not be permitted and where. They should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF. Local plans should be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date. They should be based on adequate, up to date and relevant evidence and take full account of market and economic signals.¹

The Council began work several years ago to replace the existing Cotswold Local Plan 2001-2011 that had been adopted in 2006. The Council consulted on core strategy issues and options at various times during the period 2007 to 2011; on its preferred development strategy in May 2013; site allocations in January 2015; and development management policies in November 2015. The Submission Draft Local Plan was published for consultation in June 2016 and Focussed Changes in January 2017. Sustainability Appraisal [SD005] and Habitat Regulations Assessment [SD006] have been carried out. A Legal Compliance Checklist has been completed [SD015].

Under this matter, the Inspector will examine whether the requirements of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act") and the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations"), along with other relevant legislation, have been complied with. In so doing, he will pay particular regard to advice in the NPPF, national Planning Policy Guidance ("PPG"), and The Planning Inspectorate's "Examining Local Plans Procedural Practice".

Issue 1.1: The Duty to Cooperate

Local plans should be based on cooperation with neighbouring authorities, public, voluntary and private sector organisations. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in local plans to enable delivery of sustainable development. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development. Local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts.²

The Council has submitted a Duty to Cooperate Statement of Compliance [SD012], and responded to a Preliminary Question related to this issue on 28 July 2017 [ED005].

1. Has the Duty to Cooperate under sections 20(5)(c) and 33A of the 2004 Act and regulation 4 of the 2012 Regulations been complied with, having regard to relevant national policy and guidance?

¹ NPPF paragraphs 150-158.

² NPPF paragraphs 157 and 178-181. Further relevant national guidance is in PPG ID-9.

Issue 1.2: Public Consultation and Engagement

The plan-led system is intended to empower local people to shape their surroundings. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and business is essential. A wide section of the community should be proactively engaged so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area³.

The Council has submitted a Local Plan Statement of Consultation [SD009], and responded to a Preliminary Question related to this issue on 28 July 2017 [ED005].

2. Has the public consultation that has been carried out during the plan-making process been in accordance with the Council's Statement of Community Involvement [SD001], national policy and guidance, and the requirements of the 2004 Act and 2012 Regulations?

Issue 1.3: Sustainability Appraisal

Sustainability appraisal, which meets the requirements of the European Directive on strategic environmental assessment, should be an integral part of the plan preparation process and should consider all the likely significant effects on the environment, economic and social factors⁴.

The Plan has been subject to sustainability appraisal during its preparation, the findings of which are contained in a report and non-technical summary dated January 2017 [SD005 and SD005a].

The Council responded to a Preliminary Question related to this issue on 28 July 2017 [ED005].

3. Has the Plan been subject to an appropriate sustainability appraisal as required by section 19(5) of the 2004 Act having regard to the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance?
4. Does the sustainability appraisal compare all reasonable alternatives⁵ including the preferred approach set out in the Plan and assess these against baseline environmental, economic and social characteristics of the area and the likely situation if the Plan were not to be adopted?
5. Does the sustainability appraisal identify all of the likely significant environmental, economic and social effects that the Plan is likely to cause along with measures to prevent, reduce and, as fully as possible, offset them?

Issue 1.4: Habitat Regulations Assessment

Where a local plan is likely to have a significant effect on a protected European wildlife site, a Habitat Regulations Assessment ("HRA") is required. Assessments should be proportionate, and should be started early in the plan-making process with key stakeholders being consulted in identifying the issues that should be covered⁶.

³ NPPF paragraphs 17 and 155. Further relevant guidance is in PPG ID-12-003 and ID-12-017.

⁴ NPPF paragraph 165. Further guidance is in PPG ID-11.

⁵ Reasonable alternatives are different realistic and deliverable options that are sufficiently distinct to allow different sustainability implications to be highlighted (PPG ID-11-018).

⁶ NPPF paragraphs 166-167.

The Plan has been subject to HRA during its preparation, the findings of which are set out in a report dated April 2017 [SD006]. This concludes that the Plan will not lead to adverse effects on the integrity of any protected sites.

The Council responded to two Preliminary Questions related to this issue on 28 July 2017 [ED005].

6. Have the requirements of the Habitats Regulations been complied with having regard to relevant national policy and guidance?
7. Have the potential impacts of increased traffic using the A419(T) on the North Meadow Special Area of Conservation (near Cricklade, Wiltshire) been adequately assessed?
8. Is there any substantive evidence to indicate that the conclusion of the HRA, that the Plan will not lead to adverse effects on the integrity of any protected sites, is incorrect?

Issue 1.5: Neighbourhood Plans

Neighbourhood plans must be in general conformity with the strategic policies of the local plan and should not promote less development than set out in the local plan or undermine its strategic policies. It is important to minimise any conflicts between policies in neighbourhood plans and those in an emerging local plan ... any conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation⁷.

In responding to one of the Inspector's Preliminary Question on 28 July 2017, the Council advised that the Lechlade-on-Thames Neighbourhood Plan was "made" in November 2016; that the Tetbury/Tetbury Upton and Fairford Neighbourhood Plans were submitted for examination in 2017; and that a number of other neighbourhood plans are at various earlier stages of preparation. Furthermore, the Council identified a number of significant inconsistencies between the Plan and four emerging Neighbourhood Plans, including the Fairford Neighbourhood Plan which has recently been submitted for examination.

In response to a request from the Inspector dated 3 August 2017 [ED007], the Council has agreed to work with Fairford Town Council to produce a Statement of Common Ground regarding the relationship between the Plan and the Fairford Neighbourhood Plan. This is expected to be published by Friday 8 September.

9. What significant conflicts remain between policies in the Plan and those in emerging neighbourhood plans in the District?
10. Does the Plan avoid duplicating planning processes for non-strategic policies in parts of the District where neighbourhood plans are in preparation?
11. (a) Are there parts of the District in which site specific allocations and other locally specific policies should be established in a Neighbourhood Plan that is currently in preparation rather than included in the Plan? (b) If so, how should the Plan be modified to ensure that the development needs of the District can be met in appropriate locations in a timely manner whilst allowing Neighbourhood Plans to determine non-strategic matters?

⁷ NPPF paragraph 184 and 185 and PPG ID-41-004 and 009.

Issue 1.6: Any other Legal and Procedural Matters

12. Have all other legal and procedural requirements been complied with, having regard to the NPPF and PPG?

Matter 2: Is the Development Strategy justified and likely to be effective in ensuring that development needs in the District can be met throughout the Plan period in a way that contributes to the achievement of sustainable development?

Local plans should take account of the different roles and character of different areas, promote the vitality of main urban areas, protect Green Belts around them, and recognise the intrinsic character and beauty of the countryside and support thriving communities within it. Patterns of growth should be actively managed to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable⁸.

The Council's Topic Paper 1 [EB010] summarises how the Plan's Development Strategy emerged and the evidence on which it is based.

Information provided by the Council on 22 August [ED010A] indicates the following distribution of new housing development between 2011 and 2031, taking account of completions, outstanding planning permissions, allocations, and expected windfalls. The retail hierarchy is taken from policy EC7 in the Plan.

<i>Principal Settlements DS1</i>	<i>Dwellings 2011-31</i>	<i>Retail Hierarchy EC7</i>
<i>South Cotswolds Sub Area Total</i>	<i>5,728</i>	
• <i>Cirencester (including strategic site)</i>	<i>3,562</i>	<i>Town Centre</i>
• <i>Down Ampney</i>	<i>80</i>	
• <i>Fairford</i>	<i>628</i>	<i>District Centre</i>
• <i>Kemble</i>	<i>110</i>	
• <i>Lechlade</i>	<i>138</i>	<i>District Centre</i>
• <i>South Cerney</i>	<i>207</i>	<i>Local Centre</i>
• <i>Tetbury</i>	<i>1,003</i>	<i>Key Centre</i>
<i>Mid Cotswolds Sub Area Total</i>	<i>1,371</i>	
• <i>Andoversford</i>	<i>109</i>	
• <i>Bourton-on-the-Water</i>	<i>449</i>	<i>Key Centre</i>
• <i>Northleach</i>	<i>119</i>	<i>Local Centre</i>
• <i>Stow-on-the-Wold</i>	<i>268</i>	<i>Key Centre</i>
• <i>Upper Rissington</i>	<i>426</i>	
<i>North Cotswold Sub Area Total</i>	<i>2,025</i>	
• <i>Blockley</i>	<i>77</i>	
• <i>Chipping Campden</i>	<i>255</i>	<i>Key Centre</i>
• <i>Mickleton</i>	<i>308</i>	
• <i>Moreton-in-Marsh</i>	<i>1,241</i>	<i>Key Centre</i>
• <i>Willesley</i>	<i>144</i>	
<i>Windfalls in other locations</i>	<i>100</i>	
<i>Total</i>	<i>9,822</i>	

⁸ NPPF paragraph 17.

Issue 2.1: Principal Settlements

13. Would focussing development on a limited number of towns and villages represent the most appropriate strategy for the District when considered against reasonable alternatives?
14. Have the 17 Principal Settlements listed in policy DS1 been selected using an appropriate methodology and proportionate evidence?

Issue 2.2: Strategic Scale Development at Cirencester

The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development⁹.

Whilst detailed issues associated with the proposed development of the strategic site south of Chesterton, Cirencester (policy S2) will be considered under matter 5, this issue is concerned with the justification for the inclusion of a large scale strategic site as part of the Plan's development strategy.

15. Is larger/strategic scale development in one or more location necessary to ensure that development needs in the District are met in a way that contributes to the achievement of sustainable development?
16. Is Cirencester the most appropriate location in the District to focus larger/strategic scale development on?
17. Is the land south of Chesterton the most appropriate location for larger/strategic scale development at Cirencester when considered against reasonable alternatives around the town?

Issue 2.3: Site Selection Methodology

Local plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics of the area and take full account of relevant market and economic signals. Sites should be allocated to promote development in suitable locations¹⁰.

The Council's Evidence Paper Supplement: To Inform Non-Strategic Housing and Employment Site Allocations [EB007] summarises the site selection process, methodology and evidence, and includes the site selection criteria and assessments for a number of sites in each Principal Settlement including all of those allocated for development in the Plan. The Council's Topic Paper 5: Non-Strategic Sites Matrix of Stages explains the timeline for each non-strategic site assessment since the 2014 Strategic Housing and Employment Land Availability Assessment and Community Engagement.

The Council responded to a number of Preliminary Questions related to this issue on 28 July 2017 [ED005].

⁹ NPPF paragraph 52.

¹⁰ NPPF paragraphs 47, 157 and 158.

Whilst detailed issues associated with the proposed development of the sites allocated in the Plan will be considered under subsequent matters, this issue is concerned with the methodology and evidence used in the site selection process.

18. Have the sites allocated for development in the Plan been selected using an appropriate methodology and proportionate evidence?
19. In selecting the sites allocated for development, has the Council given great weight to the aim of conserving the landscape and scenic beauty of the Cotswold Area of Outstanding Natural Beauty¹¹?
20. In selecting the sites allocated for development, has the Council paid special regard to the desirability of preserving or enhancing designated heritage assets¹²?
21. Have the sites allocated for development in the Plan been selected having due regard to flood risk, including through the application of a sequential test and, if relevant, exception test¹³?
22. In selecting the sites allocated for development, has the Council paid due regard to all other relevant considerations?

Issue 2.4 Development Boundaries

The Council's Topic Paper 2: Development Boundaries [EB011] sets out the background to the Plan's approach to Development Boundaries, the criteria used to draw them around the Principal Settlements, and changes that have been made to the Policies Map since the regulation 18 consultation in November 2015.

In the Council's response to main issues raised by representors published on 17 August 2017 [ED009], it suggests that a main modification is needed to the Plan to include an additional policy relating to development that is neither within the Development Boundaries of Principal Settlements (DS2) nor in Non-Principal Settlements (DS3).

23. Is the overall approach to development in Principal Settlements (policy DS2), in Non-Principal Settlements (policy DS3), and elsewhere in the District clear and likely to be effective?
24. Will the use of Development Boundaries allow sufficient flexibility to adapt to rapid change such that the Plan is likely to be effective in ensuring that development needs can be met throughout the Plan period in a way that contributes towards the achievement of sustainable development¹⁴?

Issue 2.5: Infrastructure Requirements

Identifying and coordinating development requirements, including the provision of infrastructure, is an essential component of achieving sustainable development. Local plans should include strategic policies to deliver all types of infrastructure, including transport, community, flood risk and green infrastructure. The costs of infrastructure contributions, along with all policy requirements and costs, should be taken into account to ensure viability and therefore enable the development to be deliverable. It is important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.¹⁵

¹¹ Section 85 of the *Countryside and Rights of Way Act 2000* and NPPF paragraph 115.

¹² *Planning (Listed Buildings and Conservation Areas) Act 1990* and NPPF paragraph 132.

¹³ NPPF paragraphs 99 to 102.

¹⁴ NPPF paragraph 14.

¹⁵ NPPF paragraphs 7, 114, 156, 162, 173 and 177.

The Plan is supported by an Infrastructure Delivery Plan and Funding Gap Analysis [EB061 and EB063], and a Whole Plan and Community Infrastructure Levy Viability Assessment [EB057].

The Council responded to a Preliminary Question related to this issue on 28 July 2017 [ED005] and to a number of Further Preliminary Questions on 10 August 2017 [ED008].

Whilst specific infrastructure proposals for Sub Areas and particular Principal Settlements will be considered under subsequent matters, this issue will consider whether the overall approach to infrastructure provision included in the Plan is justified including in terms of the effect on the viability of development and how it relates to Community Infrastructure Levy (CIL) Regulations, the CIL Draft Charging Schedule, and the CIL Regulation 123 List.

25. Is the approach to securing infrastructure provision in the Sub Areas and Principal Settlements set out in policies SA1-SA3 and S1-S19 justified and consistent with national policy?
26. Are the infrastructure projects included in policies SA1-SA3 and S1-S19 "critical", "essential" or "desirable"?
27. Are the requirements relating to off-site infrastructure and services set out in policy INF1 justified?
28. Are the requirements relating to the protection, enhancement and delivery of green infrastructure set out in policy INF7 justified?
29. Are the means by which the infrastructure requirements set out in the Plan will be delivered clear, and are they consistent with national policy?
30. Have the cost implications of the infrastructure requirements set out in the Plan been appropriately reflected in the viability assessment?
31. Is there a reasonable prospect that the infrastructure proposed in the Plan will be deliverable in a timely fashion?

Issue 2.6: Potential Main Modifications

32. What, if any, main modifications are needed to ensure that the Development Strategy is justified and likely to be effective in ensuring that development needs in the District will be met throughout the Plan period in a way that contributes to the achievement of sustainable development?

Matter 3: Is the Plan's housing requirement justified, and will it ensure that objectively assessed needs are met in the District having appropriate regard to needs in the wider Gloucestershire housing market area?

One of the core principles of national planning policy is that every effort should be made objectively to identify and then meet the housing needs of an area¹⁶. Whilst establishing future housing need is not an exact science and there is no one methodological approach

¹⁶ NPPF paragraphs 17 and 159.

that provides a definitive assessment, use of the standard methodology set out in national guidance is strongly recommended¹⁷.

The Strategic Housing Market Assessment Further Update (HDH, April 2016) [EB016] provides information about the Cotswold housing market; affordable housing needs; and housing requirements of specific groups of the population. The Objectively Assessed Housing Needs of Cotswold District (NMSS, December 2016) [EB009] is intended to present in a single, standalone document all of the material that is relevant to an up to date assessment of the OAN. The Council's Housing Topic Paper (June 2017) [EB017] explains the background and pulls together the main evidence supporting the Plan's policies relating to OAN and the housing provision target.

The Council responded to a number of Preliminary Questions related to this matter on 28 July 2017 [ED005] and to a number of Further Preliminary Questions on 10 August 2017 [ED008].

The issues and questions related to this matter are concerned with establishing whether the Plan clearly sets out a justified housing requirement for the period 2011 to 2031 such that it seeks to meet objectively assessed housing needs where it is reasonable to do so and consistent with achieving sustainable development. Furthermore, it also seeks to establish whether the current five year requirement has been appropriately identified.

Issue 3.1: Objectively Assessed Need for Housing

National guidance is clear that the latest household projections published by the Department for Communities and Local Government ("DCLG") should be the starting point for establishing the need for housing. Whilst these projections may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends, any changes need to be clearly explained and justified on the basis of established sources of robust evidence¹⁸.

The Council advises that the DCLG 2014-based household projections indicate an additional 50,400 households in Gloucestershire and an additional 5,900 households in the District between 2011 and 2031 [ED008].

This issue is concerned with establishing the net additional household growth that is likely to occur in the District between 2011 and 2031.

33. Has the objectively assessed need for housing in the wider Gloucestershire housing market area, of which Cotswold District forms part, been adequately taken into account in the preparation of the Plan?
34. In establishing the objectively assessed need for housing in the District, has appropriate consideration been given, and where necessary adjustments made, to the 2014-based DCLG household projections to take account of:
 - a) more recent demographic evidence, including Office for National Statistics ("ONS") population estimates;
 - b) household formation rates potentially being different to those in the past;
 - c) migration levels potentially being different to those in the past, for example due to realistic but aspirational assumptions about future economic and employment growth and the objective of minimising unsustainable commuting patterns¹⁹;

¹⁷ PPG ID-2a-005 and 014.

¹⁸ PPG ID-2a-015 and 017.

¹⁹ PPG ID-2a-018.

- d) market signals, including (i) land prices, (ii) house prices, (iii) rents, (iv) affordability, (v) rates of development, and (vi) overcrowding;
 - e) the needs of particular groups, including those that would live in (i) residential institutions and care homes (Use Class C2); (ii) sheltered housing; (iii) purpose built student accommodation; and (iv) houses in multiple occupation (Use Class C4);
 - f) ONS' unattributable population change (UPC); and
 - g) any other relevant factors.
35. Based on your answers above, what do you consider the objectively assessed need for housing in Cotswold District to be for the period 2011-2031?

Issue 3.2: Housing Requirements

This issue is concerned with establishing the minimum number of additional dwellings that the Plan ought to ensure can be built in the District between 2011 and 2031 having regard to the objectively assessed need for housing and other relevant factors.

36. In order to determine a housing requirement for the district, to what extent (if any) should the objectively assessed need figure be adjusted to take account of:
- a) the expected number of vacant and second homes in the District;
 - b) unmet needs from outside the Plan area;
 - c) whether an increase in the overall housing requirement would be likely to help deliver more affordable homes;
 - d) environmental constraints; and/or
 - e) any other relevant factors.
37. Based on your answers above, what do you consider the net housing requirement figure should be for Cotswold District in the period 2011-2031?

Issue 3.3: Five Year Requirement

In order to ensure that the Plan is positively prepared, effective and consistent with national policy it should set out what the five year requirement is in the annual monitoring period prior to adoption. This needs to take account of any shortfall in delivery since the start of the plan period, and include either a 5% or 20% buffer (applied to the base requirement and any shortfall) depending on whether there has been a record of persistent under delivery of housing.

38. Based on a longer term view that takes account of peaks and troughs in the housing market, has there been a record of persistent under delivery of housing in the District²⁰?
39. What, if any, shortfall in delivery has there been since 2011?

²⁰ NPPF paragraph 47 and PPG ID-3-035.

40. What do you consider the current five year requirement to be assuming (a) a 5% buffer and (b) a 20% buffer in accordance with NPPF paragraph 47?

Issue 3.4: Potential Main Modifications

41. What specific changes, if any, are needed to make the Plan sound in terms of it setting out a housing requirement for the period 2011 to 2031 that is justified and will ensure that objectively assessed needs can be met in the District having appropriate regard to needs in the wider Gloucestershire housing market area?

Matter 4: Does the Plan identify an adequate supply of housing land and contain sound policies to ensure that it will be effective in meeting housing requirements in a timely manner?

Local plans should set out a clear strategy for allocating sufficient land which is suitable for development in their area to meet the full, objectively assessed need for market and affordable housing as far as is consistent with policies set out in the NPPF. They should identify key sites which are critical to the delivery of the housing strategy over the plan period. A supply of specific deliverable sites sufficient to meet an appropriately calculated five year requirement should be identified, as well as a supply of specific, developable sites or broad locations for years 6-10 and, where possible, for years 11-15²¹.

The Development Strategy, including the Council's decision to focus residential development on 17 Principal Settlements and a strategic site, along with the approach to choosing which sites to allocate and infrastructure improvements, were discussed under matter 2.

Policy DS1 states that sufficient land will be allocated, which together with commitments, will deliver at least 8,400 dwellings over the Plan period 2011-2031. Table 1 refers to 2,385 dwellings having been completed in the period 2011 to 2016; there being extant planning permissions at 1 April 2016 for 3,367 dwellings; a strategic site delivering 2,350 dwellings and new land allocations delivering 760 dwellings. An allowance of 960 dwellings is also made for dwellings being built on small windfall sites not identified in the Plan between 2019 and 2031 (80 dwellings per year). In total the Plan assumes that sufficient land will be available to accommodate 9,822 new dwellings between 2011 and 2031.

This matter, along with matters 5 to 8, is concerned with establishing whether the Plan will be effective in meeting housing requirements by identifying an appropriate supply of "deliverable" and "developable" sites²² and containing appropriate mechanisms to ensure that sufficient dwellings will be delivered in a timely manner over the plan period.

A number of representors have proposed that sites be allocated for housing development either in addition, or as alternatives, to those included in the Plan. A list of "omission sites" is included in the Council's summary of main issues dated 17 August 2017 [ED009], and maps together with details about each site are available on the examination website [ED011]. However, the purpose of the examination is to assess the soundness of the Plan, rather than to consider the merits of omission sites. Should the situation arise that additional land for housing development needs to be identified in order to make the Plan sound, then the Council will be asked in the first instance to suggest further allocations which would then be considered as part of the examination.

²¹ NPPF paragraph 47.

²² NPPF footnotes 11 and 12.

Therefore the Inspector will not be considering representations and evidence about "omission sites" under this matter, and will not need to do so unless he considers that the Plan does not include sufficient deliverable and developable sites to meet housing requirements.

The Council responded to a number of Preliminary Questions related to this matter on 28 July 2017 [ED005] and to a number of Further Preliminary Questions on 10 August 2017 [ED008].

Issue 4.1: Extant Planning Permissions

Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented in five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans²³.

42. Is the assumption that, by 31 March 2031, 3,367 dwellings will be built on sites that had planning permission on 1 April 2016 justified?
43. Is the assumption that, by 31 March 2021, 3,136 dwellings will be built on sites that had planning permission on 1 April 2016 justified?

Issue 4.2: Windfalls

Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens²⁴.

Table 1 of the Plan indicates that 960 dwellings are expected to be delivered on windfall sites between 2019 and 2031 (80 dwellings per year). Information provided by the Council on 22 August [ED010A] indicates the following distribution of those windfalls:

Windfalls 2019-31

• Cirencester	169
• Down Ampney	7
• Fairford	79
• Kemble	11
• Lechlade	17
• South Cerney	29
• Tetbury	133
• Andoversford	12
• Bourton-on-the-Water	60
• Northleach	14
• Stow-on-the-Wold	37
• Upper Rissington	61
• Blockley	7
• Chipping Campden	19
• Mickleton	44

²³ NPPF footnote 11.

²⁴ NPPF paragraph 48.

- *Moreton-in-Marsh* 148
 - *Willesley* 13
 - *Other locations* 100
44. Is the inclusion of a windfall allowance of 960 dwellings between 2019 and 2031 justified and consistent with national policy?
45. Are the windfall assumptions for each of the Principal Settlements between 2019 and 2031 justified?
46. Is the assumption of 100 windfalls in “other locations” (outside Principal Settlements) between 2019 and 2031 justified?
47. Is the inclusion of a windfall allowance of 160 dwellings in the five year supply justified and consistent with national policy?

Issue 4.3: Strategic Housing and Economic Land Availability Assessment Sites

48. Is the assumption that 27 dwellings will be built between 2016 and 2021 on sites over 5 units within Development Boundaries identified in the Strategic Housing and Economic Land Availability Assessment justified?

Issue 4.4: Current Five Year Supply

49. Based on your answers to the above, what do you consider the five year housing land supply to be on 1 April 2016?

Issue 4.5: Housing Trajectory

50. Is the housing trajectory included in the Plan (Figure 1) justified and will it help to ensure that the policies for the supply of housing can be effectively implemented and monitored?

Issue 4.6: Maintaining a Five Year Supply throughout the Plan Period

51. Are the Plan’s policies for the supply of housing likely to be effective in ensuring that sufficient dwellings will be delivered in a timely manner over the Plan period?

Issue 4.7: Potential Main Modifications

52. What specific changes, if any, are needed to ensure that the Plan will be effective in meeting housing requirements by identifying an adequate supply of “deliverable” and “developable” sites and containing sound policies to ensure that sufficient dwellings will be delivered in a timely manner over the Plan period?

Matter 5: Is the proposed Strategic Site south of Chesterton, Cirencester justified and does the Plan contain effective policies to ensure that it can be developed in an acceptable and timely manner?

The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to villages and towns that follow the principles of Garden Cities. Working with the support of their communities,

local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development²⁵.

Policy S2(1) allocates a 120 hectare strategic site south of Chesterton, Cirencester for a sustainable, high quality, mixed use development including up to 2,350 dwellings (up to 40% of which would be affordable) and 9.1 hectares of employment land. Policy S2(2) sets out infrastructure and other requirements, including in relation to a neighbourhood centre, community, culture, education, health care, open space, sport recreation, transport, flood management, waste water, drainage and water supply. Policy S2(3) states that the site will be masterplanned and implemented on a comprehensive basis, and that it will be designed and phased to ensure maximum practicable integration between different uses within and beyond the site; the delivery of supporting infrastructure and community facilities in synchronisation with housing and employment development; and the maintenance of a timely supply of housing and employment land over the Plan period. Appendix B sets out a vision and objectives for how the development would look and function.

The Council advises that an outline planning application for the development of the site has been submitted and is expected to be determined in September 2017. It is not the role of the Inspector to consider the merits of that planning application, or indeed any other specific scheme for the Chesterton strategic site. Rather, the purpose of the examination is to consider whether the Plan is sound, as defined in the NPPF. The strategic need for a large site at Cirencester was considered under Matter 2. This matter will consider whether the Chesterton site allocated in the Plan is justified, including in terms of whether it is "developable" as defined in the NPPF and is likely to accommodate the number of new homes and other development assumed in the Plan by 2031.

The Council responded to a Preliminary Question about the annual dwelling delivery assumptions for the site on 28 July 2017 [ED005]. The Council has advised that it will provide further evidence about the delivery of the site by Wednesday 27 September 2017.

53. Are the infrastructure requirements for the strategic site south of Chesterton, Cirencester set out in policy S2 justified?
54. Having regard to the infrastructure requirements of the Plan, including those set out in policies S2 and INF1, would adequate infrastructure be in place, both on the site and elsewhere, to serve future as well as existing residents?
55. Would development of the site help minimise the need to travel in the District, and would future residents be able to access services and facilities by sustainable modes of transport?
56. Could safe and suitable access be provided, and could the additional traffic be satisfactorily accommodated on the local and strategic road networks and in the town centre?
57. Would development of the site be likely to affect the character and appearance of the area? Specifically, what would be the effect on (a) heritage assets (including listed buildings and Scheduled Ancient Monument); (b) the setting of Cirencester; (c) the setting of nearby settlements; and (d) the surrounding rural landscape (including the AONB)?
58. Would development of the site be likely to affect the living conditions in existing dwellings close to the site?

²⁵ NPPF paragraph 52.

59. Would development of the site be likely to affect the biodiversity and geodiversity of the area?
60. Has appropriate weight been given to the potential for using areas of poorer quality agricultural land in preference to that of higher quality?
61. Would development of the site affect ground water quality, having regard to it being partially within Groundwater Protection Zone 3 and a groundwater abstraction management area?
62. Would site constraints, including utilities infrastructure and an historic landfill site, affect development of the site?
63. Would policies S2, Appendix B and other policies in the Plan provide an effective framework to ensure that high quality sustainable development will be achieved?
64. Is the assumption that 2,350 dwellings will be built on the strategic site by 2031 justified by the available evidence?
65. Is there a reasonable prospect that the site will be available for development and that it could be viably developed?
66. Is the requirement for approximately 9.1 hectares of the site to be development for B1, B2 and B8 uses justified, and is such development likely to be viable and delivered during the plan period?
67. What specific changes, if any, need to be made to ensure the Plan is sound with regard to the proposed Strategic Site south of Chesterton, Cirencester?

Matter 6: Are the Housing, Employment and Infrastructure Proposals for the South Cotswold Sub Area justified?

The strategic site at Chesterton, south of Cirencester was considered under matter 5. This matter will consider the other proposals in the South Cotswold Sub Area.

Issue 6.1: Cirencester

68. Are the three housing sites allocated in policy S1 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, and local infrastructure and services?
69. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S1 reasonable and justified by the available evidence?
70. Is the protection of the existing employment sites listed in policy S1 justified?
71. Are the mixed use sites allocated in policies S1 and S3F justified and suitable for the types of development proposed?
72. Does policy EC4(3) provide an effective and justified framework for the development of the Royal Agricultural University, Cirencester over the Plan period?

Issue 6.2: Down Ampney

73. Are the three housing sites allocated in policy S4 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, and local infrastructure and services?
74. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S4 reasonable and justified by the available evidence?

Issue 6.3: Fairford

In response to a request from the Inspector dated 3 August 2017 [ED007], the Council has agreed to work with Fairford Town Council to produce a Statement of Common Ground regarding the relationship between the Plan and the Fairford Neighbourhood Plan. This is expected to be published by Friday 8 September. The relationship between the Plan and Neighbourhood Plans was considered under Matter 1.

75. Is the inclusion of the two housing allocations in the Plan (policy S5) justified and consistent with national policy having regard to the emerging Fairford Neighbourhood Plan?
76. Are the two housing sites allocated in policy S5 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, and local infrastructure and services?
77. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S5 reasonable and justified by the available evidence?
78. Is the inclusion of the four existing employment sites in policy S5 justified?

Issue 6.4: Kemble

In the Council's response to main issues raised by representors published on 17 August 2017 [ED009], it suggests that a main modification is needed to the Plan to clarify how policies S6 and EN3 are intended to be applied to housing allocation K_2 (land at Station Road) and Local Greenspace LGS7 (Community Gardens).

79. Are the three housing sites allocated in policy S6 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, and local infrastructure and services?
80. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S6 reasonable and justified by the available evidence?

Issue 6.5: Cotswold Airport

In response to a Further Preliminary Question, the Council advised on 10 August 2017 that policy SP2(1) is intended to ensure that hangars and other aerodrome related buildings located near to the airport runway remain available for uses closely related to the aerodrome's primary function, whereas policy SP2(2) allows hangars and other buildings in more outlying locations to potentially be used for more general employment uses. The Council will produce an inset to the Policies Map to show the buildings that policies SP2(1) and SP2(2) will be applied to.

81. Does Policy SP2 set out an effective and justified framework for development at Cotswold Airport over the Plan period?

Issue 6.6: Lechlade-on-Thames

82. Are the sites allocated in policy S7 consistent with policies in the Lechlade-on-Thames Neighbourhood Plan?
83. Are the two housing sites allocated in policy S7 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, flood risk, and local infrastructure and services?
84. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S7 reasonable and justified by the available evidence?
85. Is the allocated employment site in Lechlade-on-Thames (policy S7) suitable and likely to be developed for B1 uses?

Issue 6.7: South Cerney

86. Is the identification of the Lakeside Business Park as an existing employment site (policy S8) justified?

Issue 6.8: Tetbury

87. Are the three housing sites allocated in policy S9 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, and local infrastructure and services?
88. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S9 reasonable and justified by the available evidence?
89. Is the allocated employment site in Tetbury (policy S9) suitable and likely to be developed for B1, B2 and/or B8 uses?
90. Is the inclusion of the three existing employment sites in policy S9 justified?

Issue 6.9: Infrastructure Requirements for the South Cotswold Sub Area

91. Is reference in policy SA1 to development proposals contributing, as appropriate, to the specific infrastructure projects for the South Cotswold Sub Area justified?
92. Is reference in policy SA1 to development proposals contributing, as appropriate, to "relevant requirements set out in the Infrastructure Delivery Plan" justified?
93. Are the infrastructure requirements for Cirencester set out in policy S1 justified?
94. Are the infrastructure requirements for Fairford, Kemble, Lechlade-on-Thames, South Cerney and Tetbury set out in policies S4 to S9 justified?
95. Are there other specific infrastructure projects that are essential to support the development proposed in the Plan in the South Cotswold Sub Area?

Issue 6.10: Potential Main Modifications

96. What specific changes, if any, need to be made to ensure the Plan is sound with regard to the housing, employment and infrastructure proposals for the South Cotswold Sub Area?

Matter 7: Are the Housing, Employment and Infrastructure Proposals for the Mid Cotswold Sub Area justified?

Issue 7.1: Andoversford

97. Is the housing site allocated in policy S10 suitably located for residential development, and could it be developed in an acceptable manner having regard to its particular characteristics, surroundings, and local infrastructure and services?
98. Are the numbers of dwellings assumed to be built on the housing allocation referred to in policy S10 reasonable and justified by the available evidence?
99. Is the inclusion of Andoversford Industrial Estate as an existing employment site (policy S10) justified?

Issue 7.2: Bourton-on-the-Water

100. Is the housing site allocated in policy S11 suitably located for residential development, and could it be developed in an acceptable manner having regard to its particular characteristics, surroundings, and local infrastructure and services?
101. Are the numbers of dwellings assumed to be built on the housing allocation referred to in policy S11 reasonable and justified by the available evidence?
102. Is the allocated employment site in Bourton-on-Water (policy S11) suitable and likely to be developed for B1, B2 and/or B8 uses?
103. Is the inclusion of Bourton Industrial Estate as an existing employment site (policy S11) justified?

Issue 7.3: Northleach

104. Is the inclusion of the two housing allocations in the Plan (policy S12) justified and consistent with national policy having regard to the emerging Northleach Neighbourhood Plan?
105. Are the two housing sites allocated in policy S12 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, and local infrastructure and services?
106. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S12 reasonable and justified by the available evidence?
107. Is the inclusion of the two existing employment sites in policy S12 justified?
108. Are the specific tourism initiatives proposed in Northleach (policy S12) justified?

Issue 7.4: Stow-on-the-Wold

109. Is the inclusion of the housing allocation in the Plan (policy S13) justified and consistent with national policy having regard to the emerging Stow-on-the-Wold Neighbourhood Plan?
110. Is the housing site allocated in policy S13 suitably located for residential development, and could it be developed in an acceptable manner having regard to its particular characteristics, surroundings, and local infrastructure and services?

111. Are the numbers of dwellings assumed to be built on the housing allocation referred to in policy S13 reasonable and justified by the available evidence?
112. Is the specific tourism initiative proposed in Stow-on-the-Wold (policy S13) justified?

Issue 7.5: Upper Rissington

113. Is the inclusion of Upper Rissington Business Park as an existing employment site (policy S14) justified?

Issue 7.6: Infrastructure Requirements for the Mid Cotswold Sub Area

114. Is reference in policy SA2 to development proposals contributing, as appropriate, to the specific infrastructure projects for the Mid Cotswold Sub Area justified?
115. Is reference in policy SA2 to development proposals contributing, as appropriate, to "relevant requirements set out in the Infrastructure Delivery Plan" justified?
116. Are the infrastructure requirements for Andoversford, Bourton-on-the-Water and Stow-on-the-Wold set out in policies S10, S11 and S13 justified?
117. Are there other specific infrastructure projects that are essential to support the development proposed in the Plan in the Mid Cotswold Sub Area?

Issue 7.7: Potential Main Modifications

118. What specific changes, if any, need to be made to ensure the Plan is sound with regard to the housing, employment and infrastructure proposals for the Mid Cotswold Sub Area?

Matter 8: Are the Housing, Employment and Infrastructure Proposals for the North Cotswold Sub Area justified?

Issue 8.1: Blockley

119. Are the two housing sites allocated in policy S15 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, flood risk, and local infrastructure and services?
120. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S15 reasonable and justified by the available evidence?
121. Is the inclusion of the three existing employment sites in policy S15 justified?

Issue 8.2: Chipping Campden

122. Is the inclusion of the three housing allocations in the Plan (policy S16) justified and consistent with national policy having regard to the emerging Chipping Campden Neighbourhood Plan?

123. Are the three housing sites allocated in policy S16 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, and local infrastructure and services?
124. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S16 reasonable and justified by the available evidence?
125. Is the allocated employment site in Chipping Campden (policy S16) suitable and likely to be developed for B1, B2 and/or B8 uses?
126. Is the inclusion of Campden Business Park as an existing employment site (policy S16) justified?
127. Does policy EC4(4) provide an effective and justified framework for the development of the Campden BRI, Chipping Campden over the Plan period?

Issue 8.3: Mickleton

128. Is the inclusion of Seyfield Industrial Estate as an existing employment site (policy S17) justified?

Issue 8.4: Moreton-in-Marsh

129. Are the three housing sites allocated in policy S18 suitably located for residential development, and could they be developed in an acceptable manner having regard to their particular characteristics, surroundings, and local infrastructure and services?
130. Are the numbers of dwellings assumed to be built on each of the housing allocations referred to in policy S18 reasonable and justified by the available evidence?
131. Are the two allocated employment sites in Moreton-in-Marsh (policy S18) suitable and likely to be developed for the uses proposed?
132. Is the inclusion of the two existing employment sites in policy S18 justified?
133. Does policy EC4(5) provide an effective and justified framework for the development of the Fire Services College, Moreton-in-Marsh over the Plan period?

Issue 8.5: Willersey

134. Is the housing site allocated in policy S19 suitably located for residential development, and could it be developed in an acceptable manner having regard to its particular characteristics, surroundings, and local infrastructure and services?
135. Is the allocated mixed use site in Willersey (policy S19) suitable and likely to be developed for 49 dwellings and B1, B2 and/or B8 uses?
136. Are the numbers of dwellings assumed to be built on the housing and mixed use sites referred to in policy S19 reasonable and justified by the available evidence?
137. Is the inclusion of Willersey Industrial Estate as an existing employment site (policy S19) justified?

Issue 8.6: Infrastructure Requirements for the North Cotswold Sub Area

138. Is reference in policy SA3 to development proposals contributing, as appropriate, to the specific infrastructure projects for the North Cotswold Sub Area justified?
139. Is reference in policy SA3 to development proposals contributing, as appropriate, to “relevant requirements set out in the Infrastructure Delivery Plan” justified?
140. Are the infrastructure requirements for Blockley and Chipping Campden set out in policies S15 and S16 justified?
141. Are there other specific infrastructure projects that are essential to support the development proposed in the Plan in the North Cotswold Sub Area?

Issue 8.7: Potential Main Modifications

142. What specific changes, if any, need to be made to ensure the Plan is sound with regard to the housing, employment and infrastructure proposals for the North Cotswold Sub Area?

Matter 9: Are the policies relating to the design, mix, size, type and tenure of housing provision justified and consistent with national policy, and are they likely to be effective?

Local plans should aim to achieve a mix of housing based on current and future demographic trends, market trends, and the needs of different groups in the community (including families with children, older people, people with disabilities, services families, and people wishing to build their own homes). Local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand²⁶.

The Council responded to a number of Preliminary Questions related to this matter on 28 July 2017 [ED005] and to a number of Further Preliminary Questions on 10 August 2017 [ED008].

Issue 9.1: Meeting Particular Needs

143. Is the Plan based on appropriate evidence about the needs of different groups in the community over the Plan period?
144. Would policies H1, H4, EN2 and the Cotswold Design Code paragraphs D.63 and D.64 provide an effective framework to ensure that sufficient and appropriate accommodation is provided for those with particular needs, including the elderly and people with disabilities?
145. Are the requirements relating to the development of specialist accommodation for older people set out in parts (a) to (d) of policy H4 justified?

Issue 9.2: Housing Design

The Government attaches great importance to the design of the built environment; local plans should develop robust and comprehensive policies that set out the quality of

²⁶ NPPF paragraph 50.

development that will be expected for the area; and local planning authorities should consider using design codes where they could help deliver high quality outcomes²⁷.

146. Is the expectation set out in policy EN2 that residential development should be of design quality that respects the character and distinctive appearance of the locality and comply with the Cotswold Design Code (Appendix D) justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?
147. Is reference to "following Lifetime Homes principles" in the Cotswold Design Code paragraph D.64 justified and consistent with national policy?

Issue 9.3: Space Standards

Internal space standards within new dwellings that are suitable for application across all tenures were published by the Government in 2015²⁸. Where a local planning authority wishes to require an internal space standard they should only do so by reference in their local plan to the nationally described space standards. Where a need for internal space standards is identified, local planning authorities should provide justification, taking account of need, viability and timing.²⁹

148. Is the requirement in policy H1(1) for development to comply with the Nationally Described Space Standards justified in terms of need, viability and timing?

Issue 9.4: Self or Custom Build Plots

149. Is the requirement in policy H1(3) for 5% of plots on sites of more than 20 dwellings to be provided for sale as serviced self or custom build plots justified and consistent with national policy?

Issue 9.5: Potential Main Modifications

150. What specific changes are needed to the Plan to ensure that the Plan is sound with respect to the design, mix, size, type and tenure of housing?

Matter 10: Is policy H2 likely to be effective in ensuring that identified needs for affordable housing are met to an extent that is justified and consistent with national policy?

Local plans should meet the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF. Where local planning authorities identify that affordable housing is needed, local plans should set policies for meeting this need on site unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified. Such policies should be sufficiently flexible to take account of changing market conditions over time³⁰.

In rural areas, an approach responsive to local circumstances should be taken and housing development should be planned to meet local needs, particularly for affordable housing including through rural exception sites where appropriate. Consideration should also be given to allowing some market housing where this would facilitate the provision of significant additional affordable housing³¹.

²⁷ NPPF paragraphs 56, 58 and 59.

²⁸ "Technical housing standards – nationally described space standard" (DCLG, March 2015).

²⁹ PPG ID-56-018-20-20160519.

³⁰ NPPF paragraph 50.

³¹ NPPF paragraph 54.

The Council's Strategic Housing Market Assessment Further Update (April 2016) [EB01] identifies a need for an additional 141 affordable homes per year between 2015 and 2031, having taken into account needs that are expected to be met from existing stock and also from 489 new affordable homes committed on sites where construction was underway in October 2015³².

The Council responded to a number of Preliminary Questions related to this matter on 28 July 2017 [ED005] and to a number of Further Preliminary Questions on 10 August 2017 [ED008].

Issue 10.1: Affordable Housing Needs

151. Is the Plan based on appropriate evidence about the need for affordable housing in the district over the Plan period?
152. Should the Plan identify the level of need for affordable housing that is expected in the period to 2031?

Issue 10.2: Affordable Housing Provision

The Council has suggested in its response to a Further Preliminary Question that policy H2(2) be modified to make it clear that it relates to housing developments that provide 6 to 10 dwellings, not all developments of 6 or more dwellings [ED08 FPQ4].

153. How many net additional affordable homes, over and above those already taken into account in assessing current needs, are likely to be built in the District between 2015 and 2031 as a result of (a) policy H2; (b) policy H3; and (c) other initiatives?
154. Is the requirement in policy H2(3), subject to viability, for up to 40% of homes on non-brownfield sites of 11 or more dwellings to be affordable justified?
155. Is the requirement in policy H2(3), subject to viability, for up to 30% of homes on brownfield sites of 11 or more dwellings to be affordable justified?
156. Is the requirement in policy H2(2), subject to viability, for all housing developments that provide 6 or more dwellings in settlements in rural areas to make a financial contribution by way of a commuted sum towards the District's affordable housing need justified and consistent with national policy?
157. Is the approach to the type, size and mix of affordable housing provision set out in policy H2(5) justified and likely to be effective?
158. Is the expectation in policy H1(2) for any affordable accommodation with two or more bedrooms to be houses or bungalows unless there is a need for flats or specialist accommodation justified?
159. Is the approach to "starter homes" set out in policy H1(4) and (5) justified and consistent with national policy?

Issue 10.3: Potential Main Modifications

160. What specific changes are needed to the Plan to ensure that the Plan is sound with respect to affordable housing?

³² EB016 paragraphs 3.20 and 3.28.

Matter 11: Is policy H7 regarding Gypsy, Traveller and Travelling Showpeople sites positively prepared, justified and consistent with national policy, and will it be effective in ensuring that identified needs are met at all times during the plan period?

Local plans should be based on the housing needs of different groups in the community³³. Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. In producing their local plan, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets; and identify a supply of specific, developable sites or broad locations for growth for years 6 to 10 and, where possible for years 11-15³⁴.

Paragraph 8.7.3 of the Plan refers to an assessment of pitches required by the travelling community carried out in 2013 and a need for an additional 26 pitches over the period 2013-2031. However, a Gypsies and Travellers Accommodation Needs Assessment ("GATANA") was published in March 2017 [EB027] which indicates a need for 3 additional pitches for households that meet the current national definition; a need for up to 11 additional pitches for households that may meet the definition; and a need for 13 additional pitches for households that do not meet the definition³⁵.

Policy H7(2) identifies four preferred sites for accommodating future accommodation needs of Gypsies and Travellers; in total these would provide 9 additional pitches. Policy H7(3) identifies a reserve site where 2 further pitches could be provided if any shortfall in supply is identified. The sites are identified on maps in Appendix C of the Plan.

In response to one of the Inspector's Preliminary Questions, the Council advised on 27 July 2017 that it would be appropriate to modify the Plan to include information from the latest GATANA, and to include two additional site allocations provided that they are assessed as being suitable and deliverable [ED005 PQ21].

Issue 11.1: Pitch and Plot Targets

161. Does the latest GATANA accurately identify pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople?

Issue 11.2: Meeting Identified Accommodation Needs

162. Is the site at Shorncote, near South Cerney suitably located for providing 2 pitches for Gypsy and Traveller accommodation, and could it be developed in an acceptable manner having regard to its particular characteristics, surroundings, and local infrastructure and services?

163. Is the site at Seven Springs, Coberley suitably located for providing up to 3 pitches for Gypsy and Traveller accommodation, and could it be developed in an acceptable manner having regard to its particular characteristics, surroundings, and local infrastructure and services?

164. Is the site at Meadowview, Fosseway, Bourton-on-the-Water suitably located for providing 4 pitches for Gypsy and Traveller accommodation, and could it be

³³ NPPF paragraph 50.

³⁴ Planning Policy for Traveller Sites (DCLG, August 2015) policy B.

³⁵ EB027 paragraph 6.31.

developed in an acceptable manner having regard to its particular characteristics, surroundings, and local infrastructure and services?

165. Is the site at Green's Close, Great Rissington suitably located for providing 1 pitch for Gypsy and Traveller accommodation, and could it be developed in an acceptable manner having regard to its particular characteristics, surroundings, and local infrastructure and services?
166. Will the four preferred sites, and the reserve site identified in policy H7(3), be sufficient to ensure that identified accommodation needs can be met in the period 2016 to 2021?
167. Does policy H7 identify a supply of specific, developable sites or broad locations to meet accommodation needs between 2021 and 2031?
168. If not on sites or locations identified in policy H7, where will the accommodation needs of Travellers who do not meet the current national definition be met during the Plan period?

Issue 11.3: Potential Main Modifications

169. What specific changes, if any, are needed to ensure that the Plan is sound with regard to meeting the accommodation needs of Gypsies and Travellers?

Matter 12: Does the Plan contain effective and justified policies to ensure that development needs arising from aspirational but realistic economic growth assumptions can be met in suitable locations and the promotion of a strong rural economy?

One of the core principles of national planning policy is to drive and proactively support sustainable economic development. Local planning authorities should assess the need for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period. Local plans should set out a clear economic vision and strategy and set criteria or identify sites for local and inward investment to meet anticipated needs³⁶.

The Council responded to a number of Preliminary Questions related to this matter on 28 July 2017 [ED005] and to a number of Further Preliminary Questions on 10 August 2017 [ED008].

Issue 12.1: Economic Growth and Employment Land Requirements

Having regard to the functional economic market area, local planning authorities should identify the future quantity of land or floorspace for economic development uses including both the quantitative and qualitative needs for new development and provide a breakdown of that analysis in terms of quality and location. This should be based on a range of data which is current and robust relating to sectoral and employment forecasts and projections (labour demand); demographically derived assessments of future employment needs (labour supply); and analyses based on the past take-up of employment land and property and/or future property market requirements³⁷.

³⁶ NPPF paragraphs 17, 21 and 161.

³⁷ PPG ID-2a-002, 012 and 031-034.

Paragraph 6.1.2 refers to total job growth of between 10,500 and 11,900 over the Plan period (2011 to 2031) and that providing for the baseline economic forecast plus a five year buffer would require in excess of 24 hectares of B class employment land.

170. Are the economic and job growth assumptions made in the Plan aspirational but realistic³⁸?
171. Is the requirement for the Plan to provide in excess of 24 hectares of B class employment land justified?

Issue 12.2: Employment Land Supply

Policy DS1 refers to sufficient land being allocated to deliver at least 27 hectares of B class employment land between 2011 and 2031. Policy EC1 states that employment development will be permitted provided that a number of criteria are met; policy S2 proposes the development of approximately 9.1 hectares of B1, B2 and B8 employment land on the strategic site south of Chesterton; policies S1 to S19 propose a number of employment allocations and identify a number of established employment sites that are subject to policy EC2; policy EC3 allows employment uses within the Development Boundaries of Principal Settlements in principle and small scale employment development elsewhere subject to a number of criteria being met; policy EC4 identifies Special Policy Areas for development associated with the business operations of three of the Districts larger institutions and employers; and policy SP2 relates to development at Cotswold Airfield.

Employment allocations, Special Policy Areas, and established employment sites in Principal Settlements are shown on the Policies Map insets included in section 7 of the Plan. Established employment sites in other locations are shown on maps 1-14 in Appendix E.

Matters 6 to 8 considered whether the specific employment allocations, Special Policy Areas, and existing employment sites in each of the Principal Settlements included in policies S1 to S19, along with the approach to development at Cotswold Airport (SP2), are justified. This issue is concerned with establishing whether the overall approach to the development of B class uses is justified and likely to be effective in proactively supporting sustainable economic development.

172. Would the site-specific employment development proposals included in policies S1 to S19, EC4 and SP2, along with the approach to development on existing employment sites and elsewhere, ensure that there is sufficient suitable land available in appropriate locations to meet quantitative and qualitative needs for all foreseeable types of economic activity falling within Use Classes B1, B2 and B8 over the plan period?
173. Is policy EC2 consistent with national policy that advises that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose³⁹?

Issue 12.3: Rural Economy and Tourism

A strong rural economy should be promoted including through support for the sustainable growth and expansion of all types of business and enterprise in rural areas both through the conversion of existing buildings and well designed new buildings; diversification of

³⁸ NPPF paragraph 154.

³⁹ NPPF paragraph 22.

*agriculture and other land-based rural businesses; and the provision and expansion of tourist and visitor facilities in appropriate locations*⁴⁰.

174. Is the approach to small scale employment development outside Development Boundaries set out in policy EC3(2) justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?
175. Is the approach to rural diversification set out in policy EC5 justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?
176. Is the approach to the conversion of rural buildings set out in policy EC6 justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?
177. Is the approach to the development of tourist facilities and visitor attractions set out in policy EC10 justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?
178. Is the approach to the development of tourist accommodation set out in policy EC11 justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?

Issue 12.4: Potential Main Modifications

179. What specific changes are needed to the Plan to ensure that it is sound with respect to economic growth, employment land, the rural economy, and tourism.

Matter 13: Is the Plan's approach to town centres and the development of main town centre uses justified and consistent with national policy, and are the relevant policies likely to be effective?

*Local plans should aim to ensure the vitality of town centres and set out policies for their management and growth over the plan period. Local plans should be based on assessments of the needs for land or floorspace for all foreseeable types of economic activity over the plan period, including retail and leisure development; the role and function of town centres and the relationship between them; and the capacity of existing centres to accommodate new town centre development.*⁴¹

*Main town centre uses are retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars, pubs, night clubs, casinos, health and fitness centres, bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries, concert halls, hotels and conference facilities)*⁴².

The Council responded to a number of Preliminary Questions related to this matter on 28 July 2017 [ED005] and to a Further Preliminary Question on 10 August 2017 [ED008].

⁴⁰ NPPF paragraphs 28.

⁴¹ NPPF paragraphs 23 and 161.

⁴² NPPF Annex 2: Glossary.

Issue 13.1: Need for Main Town Centre Use Development

180. Does the Plan accurately identify the scale and type of main town centre uses that need to be accommodated in the District during the plan period?

Issue 13.2: Hierarchy of Town Centres

Local plans should define a network and hierarchy of centres that is resilient to anticipated future economic changes⁴³.

181. Does policy EC7 clearly define an appropriate network and hierarchy of town centres in the District?

Issue 13.3: Accommodating Main Town Centre Use Development

Local plans should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make it clear which uses will be permitted in such locations⁴⁴.

Local plans should allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres such that those needs are met in full and not compromised by limited site availability. Appropriate edge of centre sites for main town centre uses that are well connected to the town centre should be allocated where suitable and viable town centre sites are not available⁴⁵.

182. Does Cirencester town centre have sufficient capacity to accommodate the identified quantitative needs for additional main town centre uses?
183. Do the five Key Centres, two District Centres, and two Local Centres have sufficient capacity to meet quantitative and qualitative needs for additional main town centre uses in those locations?
184. Is the sequential approach to accommodating main town centre uses within the retail hierarchy justified, consistent with national policy, and likely to be effective?
185. Would the development of B1 offices on allocated and existing employment sites identified in policies S1 to S19 be justified and consistent with national policy?

Issue 13.4: Impact Assessments

Local plans may include a proportionate, locally set floorspace threshold for impact assessments required for retail, leisure and office development outside town centres (if there is no locally set threshold, a default threshold of 2,500m² applies). In setting a locally appropriate threshold it will be important to consider the scale of proposals relative to town centres; the existing viability and vitality of town centres; cumulative effects of recent developments; whether local town centres are vulnerable; likely effects of development on any town centre strategy; and impact on any other planned investment⁴⁶.

186. Is the threshold of 100m² for retail impact assessments included in policy EC9 proportionate and justified?

⁴³ NPPF paragraph 23.

⁴⁴ NPPF paragraph 23.

⁴⁵ NPPF paragraph 23.

⁴⁶ NPPF paragraph 26 and PPG-ID-2b-016-2014.

Issue 13.5: Potential Main Modifications

187. What specific changes are needed to the Plan to ensure that the Plan is sound with respect to town centres and the development of main town centre uses?

Matter 14: Are the policies relating to the Built, Natural and Historic Environment and Local Greenspace justified, consistent with national policy and likely to be effective?

Sustainable development involves seeking positive improvements in the quality of the natural, built and historic environment. Planning should take account of the different roles and character of different areas; recognise the intrinsic character and beauty of the countryside; contribute to conserving and enhancing the natural environment; seek to secure high quality design; and conserve heritage assets in a manner appropriate to their significance⁴⁷

Issue 14.1: Landscape

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and great weight should be given to the conservation of the landscape and scenic beauty of the Cotswold Area of Outstanding Natural Beauty ("AONB")⁴⁸.

188. Is the approach to development in or affecting the Wider Natural and Historic Landscape, the AONB, and Special Landscape Areas set out in policies EN4, EN5 and EN6 justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?

Issue 14.2: The Built Environment and Cotswold Design Code

The Government attaches great importance to the design of the built environment; local plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area; and local planning authorities should consider using design codes where they could help deliver high quality outcomes⁴⁹.

The application of policy EN2 and the Cotswold Design Code to residential development was considered under matter 9. The purpose of this issue is to consider the overall approach to the design of the built environment set out in the Plan.

189. Is the expectation set out in policy EN2 that development should be of design quality that respects the character and distinctive appearance of the locality and comply with the Cotswold Design Code (Appendix D) justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?

Issue 14.3: Historic Environment

Local plans should set out a positive strategy for the conservation and enjoyment of the historic environment, and special regard should be paid to the desirability of preserving or enhancing designated heritage assets⁵⁰.

⁴⁷ NPPF paragraphs 9 and 17.

⁴⁸ NPPF paragraphs 109 and 115 and section 85 of the *Countryside and Rights of Way Act 2000*.

⁴⁹ NPPF paragraphs 56, 58 and 59.

⁵⁰ NPPF paragraphs 126 and 132 and the *Planning (Listed Buildings and Conservation Areas) Act 1990*.

190. Is the approach to development affecting designated and non-designated heritage set out in policies EN10, EN11, EN12 and EN13 justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?

Issue 14.4: Biodiversity and Geodiversity

Planning policies should aim to minimise impacts on biodiversity and geodiversity; provide net gains in biodiversity where possible; and set criteria against which proposals for any development on or affecting protected wildlife or geodiversity sites will be judged so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks⁵¹.

191. Is the approach to development affecting biodiversity and geodiversity set out in policies EN8 and EN9 justified, consistent with national policy, and likely to be effective in helping to deliver the plan's vision and objectives?

Issue 14.5: Local Green Spaces

Local communities through local and neighbourhood plans should be able to identify for special protection green spaces of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used where the green space is in reasonably close proximity to the community it serves; where the green space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and where the green space concerned is local in character and is not an extensive tract of land.⁵²

192. Is the designation of each of the Local Green Spaces listed in policy EN3 justified?

Issue 14.6: Potential Main Modifications

193. What specific changes are needed to ensure that the Plan is sound with respect to the built, natural and historic environment and local greenspace?

Matter 15: Other Issues

This matter covers other issues that could potentially affect the soundness of the Plan that have not been addressed in matters 1 to 14.

Issue 15.1: Transport

194. Are policies INF3 to INF6 justified, consistent with national policy, and likely to be effective?
195. Are the mitigation schemes identified in the Highway Capacity Assessment [EB061] and Supplementary Study [EB062a] likely to be implemented in order to ensure that development proposed in the Plan can be satisfactorily accommodated on the road network?

Issue 15.2: Flood Risk

196. Is policy INF8 justified, consistent with national policy, and likely to be effective?

⁵¹ NPPF paragraphs 109, 113, 114 and 117.

⁵² NPPF paragraphs 76 and 77.

Issue 15.3: Renewable Energy

197. Is policy INF10 justified, consistent with national policy, and likely to be effective?

Issue 15.4: Other Issues

198. Are there any other parts of the Plan that fail the tests of soundness set out in the NPPF?

Issue 15.5: Potential Main Modifications

199. What specific changes are needed to ensure that the Plan is sound with respect to these other issues?

End of matters, issues and questions

William Fieldhouse

Inspector

25 August 2017