

**Council's Response to Actions Required following Hearing Sessions for
Matters 1-5 (Week One)**

Further to the discussions at the week one hearing sessions, the following actions are required. The Inspector considers these to be necessary at this stage of the examination to inform his consideration of whether the Plan is sound and/or how it could be made sound by main modifications. All additional documents will be published on the examination website and sent to participants of the matter in question.

Matter 2: Development Strategy

2.1 The Council will prepare proposed modifications to policies SA1, SA2 and SA3 and policy INF1 to clarify that the requirements for development to make contributions to infrastructure provision will only apply when they are in accordance with the CIL regulations and NPPF paragraph 204. By Friday 27 October.

Policy INF1

INFRASTRUCTURE DELIVERY

1. Development will be permitted where infrastructure requirements identified to make the proposal acceptable in planning terms can be met. Provision of infrastructure will be secured having regard to regulatory and national policy requirements relating to developer contributions.

Where, on the basis of evidence, a need for on-site infrastructure and services is identified provision may, where necessary, be secured through planning obligations.

Where, on the basis of evidence, a need for off-site infrastructure and services is identified and/or negative impacts on existing off-site infrastructure and services are expected to arise, provision will be secured through either planning obligations and/or CIL tariff contributions as appropriate. Infrastructure provision in this context will take account of delivery of the strategic off-site infrastructure set out in policies SA1, SA2 and SA3.

2. New or upgraded infrastructure will be provided in accordance with an agreed, phased timescale. Provision will be made, where necessary, for the ongoing maintenance of infrastructure and services.
3. Where there is concern relating to the viability of the development having regard to infrastructure provision requirements, an independent viability assessment, in proportion with the scale, nature and/or context of the proposal, will be required to accompany the planning application. The reasonable costs of the viability assessment will be met by the applicant.

Policy SA1

STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA

Within the context of policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:

Healthcare

- Romney House surgery (Tetbury) - expansion or relocation; and
- New doctors' surgery (Cirencester).

Flood management

- SUDS and soft measure interventions to manage flood risk.

Highways

Junction improvements at:

- A429 Cherry Tree junction;
- A417 (High Street)/ A361 (Thames Street), Lechlade;
- A417 / Whelford Road;
- A429 / A433;
- A433 (London Road) / A433(Long Street)/ Hampton Street/ New Church Street; and
- A433 (Long Street) / A433 (Bath Road) / B4014 (Fox Hill) / Chipping Street .

Sport & Recreation

- Re-use of old former railway line for cycling between Tetbury, and Kemble and Cirencester; and
- Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors.

Policy SA2**STRATEGY DELIVERY – MID- COTSWOLDS SUB-AREA**

Within the context of policy INF1, the strategic infrastructure requirements for the Mid-Cotswolds Sub-Area are:

Highways

- Improvement of Unicorn junction (A436/B4068) Stow-on-the-Wold.

Policy SA3**STRATEGY DELIVERY - NORTH COTSWOLDS SUB-AREA**

Within the context of policy INF1, the strategic infrastructure requirements for the North Cotswolds Sub-Area are:

Healthcare

- Expansion or replacement of doctors' surgery (Chipping Campden).

Flood management

- Flood alleviation bund and channel (northwest and south of Moreton-in-Marsh).

Highways

- Improvements for Fosse Way, Moreton-in-Marsh;
- Junction improvements at A429 (Roman Road)/A44 (Oxford Street), Moreton-in-Marsh; and
- Junction improvements at A429 (Roman Road)/A44 (Bourton Road), Moreton-in-Marsh.

Education

- Expansion of Chipping Campden Secondary School.

2.2 The Council will prepare draft modifications to policy DS2 and a new strategic policy to cover market housing in locations not covered by policies DS2 or DS3 as described in its schedule of proposed main modifications [ED024], and consider whether policy DS3 and or the reasoned justification needs to be clarified with regard to references to “small scale”. The draft changes will be sent to participants for Matter 2 by Friday 27 October who will have an opportunity to send any comments about them for the Council’s consideration by Friday 3 November. The Council will then submit its proposed main modifications relating to those three policies by Thursday 9 November.

(A) New strategic policy to cover market housing in locations not covered by policies DS2 or DS3 as described in its schedule of proposed main modifications.

POLICY DS3: OPEN MARKET HOUSING OUTSIDE DEVELOPMENT BOUNDARIES

(B) Assess proposals for residential development adjoining Development Boundaries of Principal Settlements if more land is needed (triggered by 5 year supply falling below a certain level).

POLICY DS5: MANAGING THE DELIVERY OF HOUSING

(C) consider whether policy DS3 and or the reasoned justification needs to be clarified with regard to references to “small scale”.

In respect of (A), (B) and (C) above. Having considered the matters raised at the first session of the hearing it is considered sensible and prudent for the council to respond on these matters as part of a comprehensive response on 10 November along with the other responses. This is because it necessarily follows that the Council should first review and establish its new 5YHLS before conserving fully the Introduction and role of new policy - OPEN MARKET HOUSING OUTSIDE DEVELOPMENT BOUNDARIES; as well as consideration of whether to introduce a new policy - MANAGING THE DELIVERY OF HOUSING and deciding whether “small scale “ is the appropriate wording and if so, providing a commentary on the meaning of “small scale” in DS3.

Matter 3: Housing Requirements

3.1 The Council will consider whether modifications are needed to make it clear whether the need for additional residential care institutions is included in the overall housing requirement; whether that need ought to be quantified in the Plan; and how such development will be taken into account in monitoring progress towards meeting housing requirements. By Friday 27 October.

A modification is proposed to paragraph 6.1.1 of the Local Plan to clarify which types of housing are included in the OAN:

The Local Plan has identified sufficient land to provide The District’s OAN is 8,400 new dwellings (420 dwellings per annum on average) across the Plan period, this. The OAN includes market, affordable, sheltered and extracare dwellings. It does not include nursing and residential care home bedspaces.

The delivery of the housing requirement will be monitored annually to ensure the Council meets the District’s OAN in full and maintains a five year

housing land supply.

A second modification is proposed to paragraph 8.4.1 to quantify the need for Specialist Accommodation for Older People:

The SHMA Update (April 2016) has identified that, given the dramatic growth in the older population and the higher levels of disability and health problems amongst older people, there is ~~likely to be an increased a~~ requirement for 893 sheltered and 155 extracare housing units between 2014 and 2031. This forms part of the OAN. In addition, there is a requirement for 755 nursing and residential bedspaces between 2014 and 2031. This is in addition to the OAN. These identified needs are a snapshot in time and applicants must refer to the latest SHMA when submitting planning applications. for specialist housing in the District over the plan period. ~~However, this provision~~ Specialist accommodation for older people ~~be one of~~ include a range of tenures and should not contribute to unbalanced communities.

A third modification is proposed to the monitoring indicator for Policy H4 to clarify the measurement of progress of delivery of specialist accommodation for older people:

- ~~• Net additional dwellings designed for the elderly — by type (sheltered housing, care homes and other types of residential care accommodation).~~
- Net additional sheltered accommodation units (dwellings).
- Net additional extracare accommodation units (dwellings).
- Net additional nursing and residential care units (bedspaces).
- Vacant nursing and residential care units in Gloucestershire (bedspaces). This will identify spare capacity to meet nursing and residential care need.
- Need for specialist accommodation for older people met through alternative strategies (e.g. through enabling older adults to remain in their communities by utilising domiciliary and extra care services, promoting re-ablement services and use of assistive technology).

3.2 The Council will consider whether the Plan ought to refer to how any unmet housing need in other parts of the Gloucestershire housing market area, and/or other adjoining districts, may be addressed in the future through a review of the Plan or other means. By Friday 27 October.

The Council has identified several factors that negate the need to refer, in the Local Plan, to how any unmet housing need in HMA and/or adjoining districts can be met.

Is there any unmet need arising from neighbouring authorities?

The Council is not aware and has not been notified that there is unmet housing need currently arising within the Gloucestershire Housing Market Area (HMA) or adjoining authority areas. It is consistent with this that there has been no request or evidence submitted to suggest that Cotswold District is a suitable location to meet unmet needs that may or may not arise during the plan period.

Mechanisms in place to meet OAN across the HMA and adjoining authorities

Within the HMA, the Council maintains close liaison with the Gloucestershire local planning authorities. Each Gloucestershire local planning authority has entered into an agreement¹, which is a commitment that each authority will work together to address strategic and cross-boundary issues and specifically, the signatories will:

Work together to consider whether, if objectively assessed housing needs arising from one area cannot be met wholly within that area, those unmet housing needs can be met, where it is reasonable to do so, elsewhere in the same Housing Market Area;

None of the Gloucestershire local planning authorities have, at any stage, approached the Council with a request to meet unmet housing needs in their respective plan area and this remains the position. With respect to the Joint Core Strategy (JCS) plan area, the Inspector's Report² on the Core Strategy Examination states at paragraph 112

112. Subject to the identified main modifications, the Plan's housing requirements are soundly based. Although the JCS is unable to provide sufficient, deliverable housing at the current time, it appears that there are credible options for identifying additional supply within the Plan period. Accordingly, by giving a policy commitment to undertake early focused reviews of Gloucester's and Tewkesbury's supplies, this part of the Plan is made sound.

The Inspector's Report, makes clear throughout the report that "credible options" are in reference to potential opportunities within the JCS area, Stroud District and Wychavon District.

¹ SD012 (page 56)

<http://www.cotswold.gov.uk/media/1520012/SD012-DTC-Statement-of-Compliance-2017.pdf>

² https://drive.google.com/file/d/0BwVPoSbUL_uXbUJWbzRNQnN0Q3M/view

With respect of the Cotswold District Local Plan, there already exists a legal duty that requires local planning authorities, county councils and public bodies to engage constructively on cross boundary matters. Existing duty to co-operate arrangements will continue over the plan period and should circumstances change and/or new evidence come to light this provides an effective mechanism to review the Local Plan.

In this context it is relevant to note the following points.

- a. An Memorandum of Understanding has been produced between the Gloucestershire HMA authorities which, amongst other matters, seeks to align future reviews of local plans and work together to meet the objectively assessed housing needs of the HMA;
- b. The JCS authorities and Stroud District Council have signed a Statement of Cooperation, which establishes an agreed position between them regarding future reviews. The Statement recognises the functional relationship between Stroud District and the JCS authorities³; and
- c. There has been no requirement for an equivalent Statement of Cooperation with Cotswold District.

3.3 The Council will consider whether the Plan is sufficiently clear about the number of net additional affordable homes needed in the district. By Friday 27 October.

A modification is proposed to paragraph 8.2.3 of the Local Plan to clarify the District's need for net additional affordable homes:

~~The proposed 8,400 housing requirement for Cotswold District over the plan period 2011 to 2031 would deliver around 420 homes per year. The SHMA Update (April 2016) identifies that 1,423 net additional affordable homes are needed to adequately house the District's population at 2031. This is snapshot in time and applicants must refer to the latest SHMA when submitting planning applications. The Council will continue to maximise the delivery of affordable homes through the delivery of the 8,400 dwelling housing requirement to meet the District's affordable housing need, subject to development viability.~~

³ [http://www.gct-jcs.org/Documents/Examination-Document-Library/EXAM-63---Stroud-District-Local-Plan-Duty-to-Co-operate-Statement-\(para-48-referred-to-during-Matter-1\).pdf](http://www.gct-jcs.org/Documents/Examination-Document-Library/EXAM-63---Stroud-District-Local-Plan-Duty-to-Co-operate-Statement-(para-48-referred-to-during-Matter-1).pdf) [see Appendix 2]

Matter 4: Housing Supply

The Council will consider the implications of its response to question 51A which indicates that the Plan could lead to a situation whereby there is less than a five year supply of deliverable housing sites from 2022 onwards, and potentially from 2019 onwards, based on the Council's calculation of the five year requirement. In so doing, consideration should be given to the appropriateness of the Plan's housing trajectory including in terms of how the requirement is shown as a flat rate; the high level of expected completions in the next few years; and how high levels of completions since 2011 are likely to contribute to meeting the overall requirement for the Plan period. A response will be submitted by Thursday 9 November.

The Council will provide an answer by the 9th November.

Matter 5: Chesterton Strategic Site

5.1 The Council will consider whether policy S2 needs any additional criteria, or specificity about the nature of the infrastructure requirements, to be added in order to ensure that it includes sufficient detail to provide clarity about the nature of the development that is proposed⁴. Response by Friday 27 October.

This question is similar to a question presented in week two actions (ED033 – Matter 6). Both questions request the Council to consider the effectiveness of the 'S' policies with specific reference to PPG ID-12-010.

The Council believes it is more effective to provide a response to this question as part of its response to actions arising from week two. This approach will allow the Council the opportunity to reflect on all 'S' policies and, where necessary, propose Main Modifications consistently across the settlement policies.

5.2 Development Limited will send any comments it has on Save Our Cirencester's response to question 56A regarding trip generation assumptions by Friday 20 October.

Not a Council action

⁴ PPG ID-12-010.