

**Actions Required following Hearing Sessions for
Matters 9 to 13 (Week Three)**

Further to the discussions at the week three hearing sessions (14-16 November), 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.

Unless otherwise stated, each of the action points is for the Council to pursue. Where appropriate and possible, the Council should liaise with relevant participants in preparing its response.

Responses should be submitted to the Programme Officer by midday on Thursday 30 November 2017. The responses will then be published on the examination website and sent to participants of the matter in question.

Matter 9: Design, mix, size, type and tenure of housing

Housing Mix and Tenure to Meet Local Needs

AP9.1 Modify paragraph 8.1.5 to ensure that it does not place an onerous requirement on developers to justify their scheme's proposed mix and tenure of housing, but rather that it advises that housing developments are expected to have regard to local evidence about housing needs including the latest SHMA and parish needs surveys.

Main Modifications schedule has been updated accordingly

Nationally Described Space Standard

AP9.2 Modify policy H1(1) and/or paragraph 8.1.4 to state that the requirement to comply with the nationally described space standard will come into effect 12 months from the date of the Plan being adopted (in order to provide an appropriate transition period in accordance with national guidance).

Main Modifications schedule has been updated accordingly

Self and Custom Build Housing

AP93. Modify policy H1(3) and/or the reasoned justification to clarify that self and custom build housing is encouraged on all allocations and on windfall sites that are in accordance with other policies in the Plan.

Main Modifications schedule has been updated accordingly

AP9.4 Modify policy H1(3) to clarify that the number of self build plots required on sites of more than 20 dwellings could be more or less than 5% depending on identified demand.

Main Modifications schedule has been updated accordingly

AP9.5 Modify paragraph 8.1.7 to clarify the cascade mechanism including with regard to the 12 month marketing period being from the start of development or earlier if appropriate (for example if a site is likely to be completed in less than a year), and that any plot offered to the Council or Registered Provider would be at market value.

Main Modifications schedule has been updated accordingly

Housing for the Elderly

AP9.6 Modify paragraph 8.4.1 to refer to the total number of (a) sheltered and/or extra care units and (b) residential care home bedspaces that are expected to be needed between 2017 and 2031 (as opposed to the figures included in the schedule of proposed main modifications published on 13 November [ED053]).

As set out in Council's response to MIQ145, the SHOP tool estimates as of March 2017 up to 2031 are for:

- 665 additional sheltered and extra care units up to 2031; and
- 580 additional nursing and residential care bedspaces.

The SHOP tool provides estimates in five yearly intervals and provides figures for 2030 and 2035. The Council has extrapolated the figures to provide a figure up to 2031.

For example, for nursing and residential care there is a need for 563 bed spaces up to 2030 and 649 bed spaces up to 2035. The difference is 86 bedspaces, which divided by 5 years equals 17 bedspaces. The 17 bedspaces are added to the 2030 need of 563 to arrive at the 580 need for 2031.

Main Modifications schedule has been updated accordingly.

AP9.7 Modify the opening sentence of policy H4 to refer to "sheltered and extra care housing, care homes ...".

Main Modifications schedule has been updated accordingly.

AP9.8 Modify policy H4(d) and paragraph 8.4.5 to clarify that all developments of specialist accommodation for the elderly that fall within use class C3 will be expected to include affordable housing in accordance with policy H2, and that developments that include self contained units as part of a larger residential care home scheme will also be required to provide a proportion of those self contained units

as affordable homes in accordance with policy H2. In drafting the modification, consideration should be given to the wording of the similar policy (as modified) in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.

Main Modifications schedule has been updated accordingly.

AP9.9 Modify paragraph 8.4.3 to clarify that, whilst regard should be had to the views of Gloucestershire County Council and NHS Gloucestershire, it is not a requirement for development to comply with those bodies' strategic aims and objectives or for them to provide written support for the proposed development.

Main Modifications schedule has been updated accordingly.

AP9.10 Delete the additional monitoring indicator for policy H4 included in the Council's schedule of proposed main modifications [ED053] that refers to "specialist accommodation for older people met through alternative strategies".

Main Modification has been deleted from the schedule.

Matter 10: Affordable Housing

AP10.1 Modify policy H2(2) and/or the reasoned justification to clarify that financial contributions by way of a commuted sum towards meeting affordable housing need would be made on completion of development.

Main Modifications schedule has been updated accordingly.

AP10.2 Modify the second sentence of policy H3(1) to refer to "... the built up areas of towns and villages ...".

Main Modifications schedule has been updated accordingly.

AP10.3 The Inspector does not, at least at this stage of the examination, require further information from the Council about the number of additional affordable homes that are needed during the plan period.

Noted.

Matter 11: Gypsy, Traveller and Travelling Showpeople sites

Evidence of Needs

AP11.1 Modify paragraphs 8.7.3 to 8.7.8 to refer to the latest evidence about the need for gypsy and traveller accommodation¹. The modified text should refer to that evidence indicating that there is a need for additional pitches for between 3 and 14 households that meet the national definition of "gypsies and travellers"² and that there are also

¹ Gloucestershire Gypsy and Traveller Accommodation Assessment (ORS, March 2017) [EB027].

² Planning Policy for Traveller Sites (DCLG, August 2015).

likely to be a further 13-24 additional households that will need appropriate accommodation who do not meet that definition.

Main Modifications schedule has been updated accordingly

Policy H7 and Site Allocations

AP11.2 Modify policy H7(2) to refer to there being capacity at the Shorncote site for an additional 5 pitches (to reflect the latest evidence of available pitches), and to delete reference to allocated site GT5 at Seven Springs for 1 pitch (on the basis that it now has planning permission).

Main Modifications schedule has been updated accordingly

AP11.3 The Inspector will advise in due course whether policy H7 in the submitted Plan is sound in other respects, or if not what main modifications are needed to ensure that it is. In the meantime, no modifications to policy H7 (other than those referred to in AP11.2) need be prepared by the Council.

Noted.

Matter 12: Economic Development

Cotswold Airport

AP12.1 Amend the last sentence of paragraph 12.2.8 that is included in the Council's schedule of proposed main modifications [ED053] to read as follows: "Any proposals for small scale employment development at Cotswold Airport outside the areas shown on the Policies Map would be subject to policy EC3 clause 2". The proposed inset to the Policies Map should be published with the Council's response to this action point. The Council should liaise with CEG regarding the proposed modification to SP2, reasoned justification and Policies Map.

Main Modifications schedule has been updated accordingly

Rural Diversification

AP12.2 Modify policy EC5 and/or the reasoned justification to clarify (a) what is meant by "land-based rural business" and (b) which elements of the "existing use" are necessary to ensure that the business as a whole can continue to operate viably.

- a) The Council proposes to delete the phrase "land based rural businesses" and focus the policy on Farms and Agricultural estates only. This approach reflects agriculture's role in the local rural economy and its significant influence on the Cotswold landscape. Much of what is thought as Cotswolds, has emerged from, and is dependent upon, a healthy agricultural industry. Continued changes in agricultural puts pressures on the industry and policy EC5 is therefore seeking to support diversification to aid the viability of farm units.

The range of diversification proposals is so varied that, in most cases, it is difficult and probably unnecessary, to establish specific policies for every potential use. Instead the plan contains a policy setting out the criteria against which individual proposals will be judged.

Modifications have been made to criteria (a) and paras 9.2.4.1 and 9.2.4.5. The Main Modifications schedule has been updated accordingly.

- b) With the focus of the policy now on Farms and Agricultural estates the Council proposes a modification to criterion (a) and insert a new paragraph (9.2.4.6) to provide guidance on the importance of avoiding conflict with the existing farming operation.

The Main Modifications schedule has been updated accordingly.

AP12.3 Modify policy EC5(c) and paragraph 9.2.4.5 to make it clear that a whole farm business plan will only be required to support proposals for rural diversification where necessary, and to clarify the circumstances when this is likely to be so.

Modifications have been made to criteria (c). The Council also proposes to insert a new para 9.2.4.6 to make the relationship between the scale of change/development and when a whole farm plan is required. Further guidance is also suggested to assist the applicant when preparing a whole farm plan.

The Main Modifications schedule has been updated accordingly.

Conversion of Rural Buildings

AP12.4 Modify policy EC6 to delete "Subject to policy EN9". Modify the reasoned justification to refer to other Plan policies that are likely to be relevant to proposals for the conversion of rural buildings (including H6 and EN13).

The Main Modifications schedule has been updated accordingly.

Cross Referencing between Policies

AP12.5 Further to AP12.4, consider whether there are any other policies in the Plan that, due to the specific nature of the development that they apply to, need to be cross referenced in the reasoned justification relating to other policies that deal with similar types of development.

Policies identified where the issue referred to in Action AP12.4 occurs are:

- S3A clause 1 (now S3, clause 2), which duplicates EC7, clause 3;
- EC8 clause 5 (which duplicates S3A (now S3 clauses 2 to 4));
- EC8 clause 8 (which defers to the provisions of EC9).

Main Mods have been produced for each of these, which: (i) deletes such

references from the policy wording; and (ii) includes reference to other, relevant, policies in the reasoned justification.

Tourist Accommodation

AP12.6 Modify policies EC11(1) and EC11(3) to refer to "... will be permitted only where ...".

Main Modifications schedule has been updated accordingly

AP12.7 Reinstate policies EC11(5) and EC11(6) regarding the removal of holiday let occupancy conditions that were deleted by FC061.

Main Modifications schedule has been updated accordingly

Matter 13: Town Centres

AP13.1 Modify policy EC8(5) relating to Cirencester town centre as necessary to reflect revised policy S3 included in the schedule of proposed main modifications [ED053].

Main Modifications schedule has been updated accordingly

ENDS