8 Housing to Meet Local Needs

8.0.1 The purpose of this section is to guide delivery of the identified needs for housing in the District. Development will be required to provide an appropriate mix of dwelling sizes, tenures and types reflecting the overall Local Plan requirements and the requirements of the locality at the time of the development.

8.0.2 The SHMA provides the detail of the District’s housing requirements to 2031 for all tenure types. The following policies are intended to direct housing development within these national guidelines as appropriate to Cotswold District. Viability is also a key consideration in housing provision and reference should be made to the Whole Plan and Community Infrastructure Levy (CIL) Viability Assessment.

8.0.3 Changes to legislation have altered what has traditionally been the definition of affordable housing. For example, certain tenures can no longer be tied to those with a local connection and some cannot be kept as affordable in perpetuity. The Council will strive to provide housing to meet those in need, but are limited by these legal constraints. For clarity, the definition of ‘affordable housing’ is explained in the Glossary.

8.1 Housing Mix and Tenure to Meet Local Needs (POLICY H1)

8.1.1 The delivery of future housing should meet the needs and aspirations of people requiring market and affordable housing. Providing an appropriate mix of housing types and tenures is a vital part of creating sustainable communities and meeting the diverse needs of all people within the District.

8.1.2 The issue of housing affordability in Cotswold District is now affecting a larger proportion of the workforce. Those who traditionally would have been able to buy their own home, such as key workers groups and young professionals, are increasingly being priced out of the market. Whilst focus is often given to first time buyers, those who need to buy their next home, often to accommodate a growing family, are finding this harder to achieve as house prices increase beyond their reach. Therefore, a suitable range of affordable tenure types, not just those that fall within the ‘Affordable Housing’ definition, should be provided within new housing developments. For example, the provision of smaller open market homes will reduce the need for affordable sector homes, by providing market solutions for households with lower earnings.

8.1.3 It should be remembered that the existing housing stock will always be the main source of supply. The requirement for new homes is based upon the housing required to address existing deficits between the supply and local need / demand identified in the SHMA. The Local Plan will also compliment other Council strategies to encourage a better supply from the existing housing stock through meeting the requirements of those who are currently inadequately housed.

Planning applications will be determined in accordance with relevant policies in this Local Plan, which should be considered together, unless material considerations indicate otherwise.
Policy H1

HOUSING MIX AND TENURE TO MEET LOCAL NEEDS

1. All housing developments will be expected to provide a suitable mix and range of housing in terms of size, type and tenure to reflect local housing need and demand in both the market and affordable housing sectors, subject to viability. Developers will be required to comply with the Nationally Described Space Standard.

2. Any affordable accommodation with two or more bedrooms will be expected to be houses or bungalows unless there is a need for flats or specialist accommodation.

3. Proposals of more than 20 dwellings will be expected to provide 5% of dwelling plots for sale as serviced self or custom build plots unless demand identified on the Local Planning Authority’s Self-Build and Custom Register, or other relevant evidence, demonstrates that there is a higher or lower level of demand for plots.

4. Starter Homes will be provided by developers in accordance with Regulations and National Policy and Guidance.

5. Exception sites on land that has been in commercial or industrial use, and which has not currently been identified for residential development, will be considered for Starter Homes.

8.1.4 New housing should reflect the need and demand of the District’s existing and future communities and should improve the quality and mix of new market and affordable housing. Evidence shows that over half of dwellings, with three or fewer bedrooms granted permission between 2011 and 2016, fell below the national minimum space standards. If this trend were to continue over the Plan period it would result in a disproportionate number of smaller dwellings. Therefore, new housing is required to provide internal space standards contained in the ‘Technical Housing Standards - Nationally Described Space Standard March 2015’ or successor document. This standard was included in the viability assessment of the Local Plan and has been shown to be achievable. To provide an appropriate transition period the requirement, to comply with the nationally described space standard, will come into effect 12 months from the date of the Plan being adopted. For the purposes of this policy, affordable housing is as defined in the NPPF and latest legislation. Current definitions are included in the Glossary.

8.1.5 An appropriate mix of housing in new developments will help to enable a better flow of the existing housing stock (both market and affordable). New development should incorporate a range of housing types which contribute towards meeting the identified needs and demands for different demographic groups in the District. Developers should have regard to local evidence, for example, the latest SHMA and parish needs surveys, and show how the proposed mix of market housing provision will help to address identified local needs in terms of the size, type and tenure of housing.
8 Housing to Meet Local Needs

8.1.6 Development proposals which seek to meet the housing need and demand of local older people and address the need for self-build and custom-build housing across all tenures will be encouraged.

8.1.7 Self-build and custom-build encompasses a range of different project types, indeed, the Self-Build Portal identifies seven different types, ranging from a self-build individual plot through to a developer led group project. Self-build and custom-build housing is encouraged on small sites, and provision is expected to be made on all allocated and windfall sites that propose twenty or more dwellings where there is evidence of demand. Where the developer is required to provide self-build or custom-build plots it will be expected that:

- the developer will have regard to the District Council's Self-Build and Custom-Build Register in the design and type of plots they provide. It is acknowledged that a flexible approach is necessary as to the type of self and custom-build plots provided to assist the developer in ensuring the delivery and viability of the overall scheme. If no demand shown on the Register, then no plots will need to be provided;

- plots which have been made available and marketed appropriately for at least 12 months from the start of development, or earlier if appropriate (for example, where the site is likely to be built out in less than a year), and have not sold, may either remain on the open market as self-build or custom-build or be offered to the Council or a Registered Provider, at market value, before being built-out by the developer; and

- planning permissions specific to the self-build plot will include conditions requiring self-build developments to be completed within three years of a self-builder purchasing a plot.

8.1.8 The District Council will work in a positive and proactive way with landowners and developers to secure a supply of land suitable for Starter Homes exception sites to deliver housing for young first-time buyers in the area. When Starter Homes come forward, reference should be made to the national policy and guidance, and to regulations.

8.1.9 The SHMA will provide more detailed information of the housing mix required for individual schemes. This will be supported by the update of the Cotswold District Council’s Affordable Housing Supplementary Planning Document.

8.2 Affordable Housing (POLICY H2)

Current and Projected Need for Affordable Housing

8.2.1 Affordable housing is required for eligible households whose needs are unable to be met within the open market. Affordable housing includes: social rent, affordable rent, and intermediate low cost home ownership (including shared ownership, discounted and equity model) as defined in national policy and guidance.

Planning applications will be determined in accordance with relevant policies in this Local Plan, which should be considered together, unless material considerations indicate otherwise.
8.2.2 Increasing the supply of affordable housing is a challenge within Cotswold District. The inclusion of an up to date policy within the Local Plan to set out the local requirement for affordable housing will help to boost the supply of affordable homes in the District over the Plan period and help to re-balance the local housing supply ensuring that local people can access the housing that is urgently required.

8.2.3 The District’s affordable housing need is currently estimated to be 157 net additional affordable homes per year between 2015 and 2031\(^{[33]}\). This was calculated by adding the unmet need for affordable housing in 2015 to the projected future need up to 2031, then subtracting the current supply of affordable stock. This was then converted to an annual requirement for the period 2015 to 2031. Whilst the need for affordable housing is included within the OAN, the ways in which the two were calculated differs. The 157 figure is therefore not directly comparable with the annual OAN requirement.

8.2.4 The affordable housing need is a snapshot in time. Applicants should therefore refer to the latest evidence, such as the SHMA, when submitting planning applications.

8.2.5 Policy H2 aims to maximise the delivery of affordable homes to help meet identified needs whilst maintaining the economic viability of residential development. However, the number of affordable homes likely to be delivered by Policy H2(3) is unlikely to fully meet the need for additional affordable homes. The affordable housing need is identified at a District-wide level, although the need will vary from settlement to settlement. The majority of affordable homes will be delivered in the 17 Principal Settlements identified in the Development Strategy. Furthermore, the Plan also enables the delivery of some affordable housing in non-Principal Settlements (Policy DS3), on Rural Exception Sites (Policy H3), and within specialist accommodation developments for older people (Policy H4).

Policy H2

AFFORDABLE HOUSING

1. All housing developments that provide 11 or more new dwellings (net) or have a combined gross floorspace of over 1,000sqm will be expected to contribute towards affordable housing provision to meet the identified need in the District and address the Council’s strategic objectives on affordable housing.

2. In rural areas, as defined under s157 of the Housing Act 1985, all housing developments that provide 6 to 10 new dwellings (net) will make a financial contribution by way of a commuted sum towards the District’s affordable housing need subject to viability. Where financial contributions are required payment will be made upon completion of development.

3. The affordable housing requirement on all sites requiring a contribution, subject to viability is:

33 SHMA Update (April 2016), as updated by the Cotswold SHMA errata note (09 November 2017)
8 Housing to Meet Local Needs

i. Up to 30% of new dwellings gross on brownfield sites; and

ii. Up to 40% of new dwellings gross on all other sites.

4. In exceptional circumstances, consideration may be given to accepting a financial contribution from the developer where it is justified that affordable housing cannot be delivered on-site, or that the District's need for affordable housing can be better satisfied through this route. A financial contribution will also be required for each partial number of affordable units calculated to be provided on site.

5. The type, size and mix, including the tenure split, of affordable housing will be expected to address the identified and prioritised housing needs of the District and designed to be tenure blind and distributed in clusters across the development to be agreed with the Council. It will be expected that affordable housing will be provided on site as completed dwellings by the developer, unless an alternative contribution is agreed, such as serviced plots.

6. Where viability is questioned or a commuted sum is considered, an “open book” assessment will be required. The local planning authority will arrange for an external assessment which will be paid for by the developer.

8.2.6 In calculating whether a development has a combined gross floorspace of over 1,000sqm, account should be taken of the gross internal area only.

8.2.7 In Cotswold District, the designated rural area, under s157 of the Housing Act 1985, is the Cotswolds AONB. However, the Council may in future have to apply an additional area designated by order of the Secretary of State.

8.2.8 Developers will be expected to engage with the local planning authority at the planning application stage to agree the affordable housing provision. It is assumed there will be no public subsidy towards affordable housing provision. Any relaxation of the policy requirements will only be considered where the Local Planning Authority is satisfied, on a site-by-site basis, that such a requirement will render any development proposals unviable having first varied the mix and type of housing to improve viability in agreement with the local planning authority.

8.2.9 On-site affordable dwellings will be transferred to the purchasing Registered Provider in line with the number, size, type and tenure of affordable homes required by the local planning authority's policies in accordance with the SHMA; the Affordable Housing Supplementary Planning Document; and relevant housing plans and advice from the Council. Occasionally, it may be appropriate to provide free serviced land for the provision of the required units to a Registered Provider or the local planning authority by agreement. A s106 agreement will be used to ensure transfer to a Registered Provider and that the affordable housing remains available as such in perpetuity for eligible households.
8.2.10 The development of any affordable housing and the calculation of any financial contributions should be in conformity with the details set out in the Affordable Housing Supplementary Housing Document.

8.2.11 For the purposes of the Local Plan, the definition of a dwelling is that as defined by DCLG, which is currently a self-contained unit of accommodation. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household’s accommodation are behind a single door which only that household can use.

8.3 Rural Exception Sites (POLICY H3)

8.3.1 Whilst the Development Strategy concentrates on directing development towards the 17 most sustainable settlements, this does not mean that rural housing needs beyond those towns and villages will not be met. In addition to residential development allowed under Policy DS3, Rural Exception Schemes will be encouraged where: a proven need for Affordable Housing can be identified; where no agreed means of achieving required affordable housing can be found within the local area; and where no sites are allocated within the Local Plan or relevant Neighbourhood Plans.

Policy H3

RURAL EXCEPTIONS SITES

1. Land which may not be considered appropriate for residential development may be released for a rural exception scheme for affordable housing development where there is an identified need within that parish or community for affordable housing. Where a need for affordable homes has been identified, development of an appropriate scale will be permitted within, adjoining, or closely related to, the built up areas of towns and villages, taking into account Parish Housing Surveys and Parish Plans or other local evidence, and provided that:

   a. the developers enter into a legal agreement with the Local Planning Authority to ensure that the affordable housing provided through the rural exception scheme will be managed to meet the District's need for affordable housing in perpetuity; and

   b. rural exception schemes will normally be expected to provide 100% affordable housing for local needs. Other types of tenure will be considered where it can be demonstrated, through a viability assessment, that this is essential to facilitate the affordable housing scheme to meet the identified local need.

2. Single self-build plots may be brought forward as rural exception sites within, adjoining, or closely related to the built up areas of villages where the applicant meets all of the following criteria:
8 Housing to Meet Local Needs

- is in housing need;
- is unable to access a suitable home currently available on the open market in the parish (or within 5km of the site);
- has a need to live locally; and
- has strong local connections to the Parish.

8.3.2 For rural exception schemes, proposals should be encouraged to be adjacent to the settlement boundary of the village, generally supported by the local community, supported by evidence of local housing need, appropriate in scale of development, and include long-term mechanisms to limit occupancy to local people.

8.3.3 It is assumed that there will be no public subsidy towards affordable housing provision. Any relaxation of the policy requirements will only be considered where the District Council is satisfied, on a site-by site-basis, that such a requirement will render any development proposals unviable having first varied the mix and type of housing to improve viability in agreement with the local planning authority.

8.3.4 On site affordable dwellings will be transferred to a Registered Provider (RP) of the number, size, type and tenure of affordable homes required by the Local Planning Authority's policies in accordance with the SHMA, the Council's Housing Supplementary Planning Document 2007 and consequent update, and relevant housing plans of the Council. Occasionally, it may be appropriate to provide free serviced land for the provision of the required units to a RP or the District Council with the agreement of the Local Planning Authority. A s106 agreement will be used to ensure transfer to a RP and that the affordable housing remains available as such in perpetuity for eligible households.

8.3.5 The development of any affordable housing and the calculation of any financial contributions should be in conformity with the details set out in the Cotswold District Affordable Housing Supplementary Housing Document 2007 or its successor document.

8.3.6 To engender additional community resilience and sustainability, and increase the affordable rural housing stock, a ‘self-help’ scheme is proposed enabling qualifying people to find and build their own affordable home on single plot exception sites. These plots are intended for those people who have a strong local connection to a specific area (eg a parish or group of parishes) who are unable to afford or secure open market housing in that area. The future resale value of the affordable home is fixed in perpetuity below open market value (normally 60% of market value) to ensure that it remains affordable for subsequent occupiers, who must also meet the qualifying criteria. This will be secured by means of a s106 agreement.

Planning applications will be determined in accordance with relevant policies in this Local Plan, which should be considered together, unless material considerations indicate otherwise.
8.4 Specialist Accommodation for Older People (POLICY H4)

8.4.1 The SHMA Update (April 2016) anticipates a dramatic growth in the older population in Cotswold District with higher levels of disability and health problems amongst older people. There is a requirement for 665 sheltered and extracare housing units between 2017 and 2031. This forms part of the OAN. There are also a requirement for 580 nursing and residential bedspaces between 2017 and 2031. This is in addition to the OAN. Identified needs are a snapshot in time and applicants must refer to the latest evidence, such as future updates to the SHMA, when submitting planning applications. Specialist accommodation for older people should include a range of tenures and should not contribute to unbalanced communities.

Policy H4

SPECIALIST ACCOMMODATION FOR OLDER PEOPLE

Proposals for specialist accommodation for older people, including sheltered and extracare housing, care homes and other appropriate models of accommodation for the elderly and those with particular needs, will be permitted provided that the development:

a. meets a proven need for that type of accommodation;

b. is designed to meet the particular requirements of residents with social, physical, mental and/or health care needs;

c. is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and their visitors; and

d. where accommodation is provided on a freehold or leasehold basis, it should provide affordable housing in accordance with Policy H2. This includes proposals for self-contained units of accommodation within a residential institution (use class C2). In the case of sheltered accommodation and extra care accommodation a mix of tenures will be encouraged. Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purpose of determining the appropriate affordable housing requirement.

8.4.2 This policy sets out the criteria for assessing proposals for specialist accommodation for older people including sheltered housing; extra care accommodation; and care homes, including locations that are consistent with NPPF paragraph 50.

8.4.3 Applicants will be expected to have regard to the strategic aims and objectives of Gloucestershire County Council and NHS Gloucestershire when demonstrating a local need for the service.

Planning applications will be determined in accordance with relevant policies in this Local Plan, which should be considered together, unless material considerations indicate otherwise.
8 Housing to Meet Local Needs

8.4.4 Residential care accommodation should normally be located within settlements where there is easy access to a range of services, e.g. shops, healthcare and social facilities. This should enable non-car access to local facilities for residents and staff, and ensure that the facility is accessible for staff and visitors. It is important for applicants to demonstrate local need for residential care provision, having regard to Gloucestershire County Council strategies. Indeed, it is the position of Gloucestershire County Council to significantly reduce the numbers of people in residential and nursing care and significantly increase community care and support services.

8.4.5 There is sometimes confusion as to whether specialist accommodation for older people falls into the use class defined as a residential institution (C2) or a dwelling house (C3). Be that as it may, development which creates living spaces that retain the essential characteristics of a self-contained dwelling, even if some care is provided, will be expected to provide affordable housing in accordance with Policy H2.

8.4.6 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.

8.4.7 If the site is considered unsuitable, for example, due to the location or affordability of the units, the local planning authority may instead wish to accept a commuted sum to meet the need off-site.

8.5 Dwellings for Rural Workers Outside Settlements (POLICY H5)

8.5.1 The Cotswold countryside, besides being very beautiful, is a place of work. Alongside agriculture and forestry there are other rural businesses. For the most part, people employed on the land or in businesses can live in nearby towns and villages and travel to work. However, from time to time, an essential need for a dwelling at a place of work can be clearly established.

Policy H5

DWELLINGS FOR RURAL WORKERS OUTSIDE SETTLEMENTS

Outside settlements, new dwellings for rural workers will be permitted where:

a. it is demonstrated that there is an essential need for a worker to live permanently at or near their place of occupation in the countryside;

b. a financial test is submitted to demonstrate the viability of the business proposed or as proposed to be expanded;

c. a new dwelling cannot be provided by adapting an existing building on the holding;

d. a suitable alternative dwelling to meet the essential need is not available on a defined development site within the 17 Principal Settlements or within a village or hamlet;

Planning applications will be determined in accordance with relevant policies in this Local Plan, which should be considered together, unless material considerations indicate otherwise.
8.5.2 In order to promote sustainability, development should be located where it will enhance or maintain the vitality of rural communities and avoid the building of new, isolated, homes in the countryside. However, it is recognised that, from time to time, there may be special circumstances that justify this taking place; for example, it may be essential for a rural worker to live permanently at or very near their place of work. Whether this is essential will depend on the needs of the enterprise concerned and not on the personal preferences or circumstances of any of the individuals concerned.

8.5.3 When considering such applications, the history of the holding, the recent pattern of land use and building and, recent disposals of land and property, will be taken into account. The recent sale of land and property could constitute evidence of lack of need.

8.5.4 Where an essential need for a dwelling is proven, a condition will be imposed on the planning permission limiting the occupancy of the new dwelling to those employed in the type of business in question.

8.5.5 Proposals for isolated dwellings in the countryside should be avoided; however, it is recognised that occasionally there is a need for such a proposal. In such instances, where criteria a, b, and d above are met, consideration will be given to the siting of a mobile home for a three year temporary permission, where renewal would only be considered to provide continued occupation whilst a permanent dwelling is constructed on a site permitted for such a purpose.

8.6 Removal of Occupancy Conditions (POLICY H6)

8.6.1 Over time, the situation that made it essential to provide a new dwelling for someone employed on the land can change. When this happens, a planning application may be made to remove the occupancy condition so that the property can be sold on the open market.

Policy H6

REMOVAL OF OCCUPANCY CONDITIONS

Outside Development Boundaries, removal of an occupancy condition will be permitted where all of the following criteria are demonstrated:

- The proposed dwelling is located within or adjacent to the existing enterprise or other buildings on the holding;
- The size of the proposed dwelling is proportionate to its essential need; and
- Occupancy is limited by way of a planning condition or obligation.

Planning applications will be determined in accordance with relevant policies in this Local Plan, which should be considered together, unless material considerations indicate otherwise.
8 Housing to Meet Local Needs

1. Existing authorised sites for Traveller uses will be safeguarded provided there remains a need for these uses within the District.

Planning Policy for Traveller Sites (POLICY H7)

8.7.1 Gypsies and Travellers (collectively known as Travellers) pursue an active, itinerant lifestyle and are generally self-employed people. However, Traveller communities are increasingly becoming more settled. Travelling Showpeople are business people who have traditionally been involved in holding fairs and circuses for many hundreds of years.

8.7.2 Planning Policy for Traveller Sites (PPTS)\(^{(34)}\) requires Local Authorities to use evidence to plan positively and manage development for the travelling community, using ‘a robust evidence base to establish accommodation needs to inform the preparation of Local Plan and make planning decisions’.

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34 Planning Policy for Traveller Sites (DCLG, August 2015) www.gov.uk

Planning applications will be determined in accordance with relevant policies in this Local Plan, which should be considered together, unless material considerations indicate otherwise.
2. The following locations, indicated on the Policies Maps in Appendix C, are identified as preferred sites for accommodating the future needs of Travellers:

- Four Acres, Shorncote, near South Cerney – 7 pitches
- Meadowview, Fosseway, near Bourton-on-the-Water – 4 pitches

3. The following approach will be used to determine the acceptability, in principle, of planning applications for Traveller development:

a. First preference will be sites specifically allocated in this Plan for Travellers.

b. Second preference will be to designate additional pitches/plots within the boundaries of existing suitable Traveller sites, including sites that have already been identified for this use.

c. Third preference will be to extend existing suitable Traveller sites adjacent to existing boundaries.

d. Where a sufficient supply of pitches or plots cannot be achieved at the above locations new sites will be considered.

8.7.3 A jointly-commissioned review to assess the number of pitches required by the travelling community across the Gloucestershire Housing Market Area was published in March 2017 (GTAA)\(^{35}\). Essentially, the GTAA establishes three categories of Travellers:

- Households that meet the PPTS planning definition;
- Households that could not be interviewed, hence their status is ‘unknown’; and
- Households that do not meet the new definition.

8.7.4 The GTAA concludes that there is an identified need to provide three pitches for Travellers who meet the PPTS definition over the period 2016-2031 in Cotswold District. Those needs, which originate from Travellers at the Shorncote site, should be met by 2021.

8.7.5 Regarding ‘unknowns’, the GTAA concludes that a potential need for up to 11 more pitches may arise from Traveller households currently residing in Cotswold District. This is derived from the estimated number of households who could not be interviewed and, therefore, whose status could not

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35 Gloucestershire (Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud and Tewkesbury) Gypsy and Traveller Accommodation Assessment (Opinion Research Services, March 2017)
be ascertained. Based on over 100 previous studies, the GTAA indicates that around 10% of ‘unknowns’ are likely to meet the 2015 definition. Notwithstanding this, the survey indicates that the number of additional pitches could range between 0 and 11.

8.7.6 The 2017 potential sites update for Cotswold\(^{(36)}\) found that two sites have a realistic prospect of delivering Traveller pitches over the Plan period. These sites, located at Four Acres, Shorncote and Meadowview, Fosse Way, near Bourton-on-the-Water, have been assessed as having the potential to deliver a total of up to 11 pitches. Besides meeting the need for three pitches specifically identified in the GTAA for Travellers meeting the PPTS definition, they also provide flexibility to meet the potential needs of any Travellers whose status is currently ‘unknown’ and any additional needs that have not been identified.

8.7.7 A sequential approach for meeting any further provision is set out in clause 3 of Policy H7. Should any of the allocated sites be considered unsuitable, compelling reasons must be produced as to why it is necessary to consider an alternative location.

8.7.8 Regarding Traveller households who do not or may not meet the PPTS definition, the GTAA establishes a potential need for 13-23 plots arising from those currently living in Cotswold District. The housing needs of those households will have to be met, and it may be appropriate for some to be accommodated on sites proposed in Policy H7.

8.7.9 The GTAA concludes that there is no requirement to provide pitches for Travelling Showpeople within Cotswold District.

8.7.10 Given the uncertainties associated with forecasting future Gypsy, Traveller and Travelling Showpeople accommodation needs, it is quite possible that additional needs to those identified will arise during the plan period. Therefore, needs and the availability of sites will be monitored regularly throughout the Plan period and an early review of Policy H7 will be carried out if necessary to ensure that identified needs can be met in accordance with the PPTS.

\(^{(36)}\) Identification of Potential Gypsy and Traveller Sites Update (CDC, December 2017)