

MAIN MODIFICATIONS TO DRAFT LOCAL PLAN

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION																						
	6.1.2	Providing for the maximum baseline forecast plus a 5 year buffer would requires in excess of 24 hectares of B Class employment land (19) for the period 2011-2031. Having regard to the economic forecasts, trends in employment land completions and the need to align with the GFirst SEP, the Local Plan, proposes to allocate 27ha <u>23ha</u> of B Class land, <u>support the delivery of its extant planning permissions for B Class employment development (14ha)</u> , whilst also...	<ol style="list-style-type: none"> 1. The baseline forecast plus a 5 year buffer is not a maximum. 2. To reflect the loss of two employment allocations (TET_E2A in Tetbury and MOR_E11 in Moreton-in-Marsh). 3. To clarify that extant planning permissions contribute towards meeting the Local Plan employment land requirement. 																						
	DS1	Sufficient land will be allocated, which together with commitments, will deliver at least 8,400 dwellings and at least 27 <u>24</u> hectares for B class employment use...	The identified need for employment land is 24 ha.																						
	Table 1 - Housing Requirement and Land Supply 2011-2031	<table border="1"> <thead> <tr> <th>Overall Housing Requirement and sources of Land Supply</th> <th>Number of units</th> </tr> </thead> <tbody> <tr> <td>Housing Land Requirement</td> <td>8,400</td> </tr> <tr> <td colspan="2">Housing Land Supply</td> </tr> <tr> <td>Completions 1st April 2011 - 31st March 20167</td> <td>2,385<u>3,176</u></td> </tr> <tr> <td><u>Deliverable¹ and developable² extant planning permissions at 1st April 20167</u></td> <td>3,367<u>2,897</u></td> </tr> <tr> <td><u>Additional deliverable planning permissions granted between 1 April 2017 and 2 November 2017 (not including windfalls)</u></td> <td>343</td> </tr> <tr> <td>Strategic Site</td> <td>2,350</td> </tr> <tr> <td>Other new land allocations in this Local Plan</td> <td>760<u>574</u></td> </tr> <tr> <td>Windfalls estimate 2019 <u>1st April 2017 to 31st March 2031 @ XX p.a.</u></td> <td>960 <u>1,191</u></td> </tr> <tr> <td><u>Lapse rate 1st April 2017 to 31st March 2020 lapse</u></td> <td>- <u>-27</u></td> </tr> <tr> <td>Total Supply</td> <td>9,822 <u>10,504</u></td> </tr> </tbody> </table>	Overall Housing Requirement and sources of Land Supply	Number of units	Housing Land Requirement	8,400	Housing Land Supply		Completions 1st April 2011 - 31st March 2016 7	2,385 <u>3,176</u>	<u>Deliverable¹ and developable² extant planning permissions at 1st April 20167</u>	3,367 <u>2,897</u>	<u>Additional deliverable planning permissions granted between 1 April 2017 and 2 November 2017 (not including windfalls)</u>	343	Strategic Site	2,350	Other new land allocations in this Local Plan	760 <u>574</u>	Windfalls estimate 2019 <u>1st April 2017 to 31st March 2031 @ XX p.a.</u>	960 <u>1,191</u>	<u>Lapse rate 1st April 2017 to 31st March 2020 lapse</u>	- <u>-27</u>	Total Supply	9,822 <u>10,504</u>	Factual change resulting from the Housing Land Supply Report (November 2017) and the Residential Land Monitoring Statistics Report (September 2017) [EB020]
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	6.1.1	<p>The Local Plan has identified sufficient land to provide The District's OAN is 8,400 new dwellings (420 dwellings per annum <u>on average</u>) across the Plan period, this. <u>The OAN includes market, affordable, sheltered and extracare dwellings. It does not include nursing and residential care home bedspaces.</u></p> <p><u>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.</u></p>	As per the Council's response to the Inspector's Week One Actions (ED041). A modification is proposed to paragraph 6.1.1 of the Local Plan to clarify which types of housing are included in the OAN.																						
	6.1.10	Based on past data, a realistic estimate of <u>146 windfalls are expected to be delivered between 1st April 2017 and 31st March 2020 and 95 windfalls</u> 80 dwellings p.a. are anticipated over the remainder of the Plan period from 1st April 2019.	Factual change resulting from the Housing Land Supply Report (November 2017)																						
	6.1.11	The Council has used a stepped approach to calculate the five year supply requirement, which takes account of past and future supply surpluses (as well as any shortfalls). The target for the five-year supply is five times the annual target (i.e. 420 x 5 = 2,100) <u>subtracting the delivery surplus (plus or adding any</u>	<ol style="list-style-type: none"> 1. Factual change resulting from the Residential Land Monitoring Statistics Report (September 2017) [EB020] 2. The OAN is now derived from the Objectively Assessed 																						

¹ As set out by Footnote 11 of the NPPF

² As set out by Footnote 12 of the NPPF

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		shortfall) from the earlier years of the plan period from 2011. Government also asks authorities to include a buffer of 5% (or 20% where there has previously been 'persistent under delivery'). Cotswold has not been persistently under delivering, therefore a 5% buffer has been applied. Indeed, an over-supply of 285 656 dwellings has been recorded over the period 2011-2016 7 when measured against the increased housing requirement figure resulting from the May December 2016 OAN housing requirement .	Housing Needs of Cotswold District (December 2016) [EB009]																																															
	6.1.12	At 1st April 2016 7 , the five-year housing land requirement for the plan area is <u>1,866 dwellings</u> . This increases to recorded as <u>1,959 dwellings</u> when a 5% buffer is added. ±	Factual change resulting from the Housing Land Supply Report (November 2017)																																															
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	Footnote 20	Further details on the calculations are provided in the latest Five-Year Housing Land Supply Report, which is available to download from the Council's Forward Planning Evidence and Monitoring pages at www.cotswold.gov.uk	Factual change resulting from the Housing Land Supply Report (November 2017)																											
	6.1.14	Over the five-year period 20167-20212, there is a land supply capable of delivering 3,323 3,145 homes. The identified supply exceeds five years' worth of housing requirements (2,100 1,866) by 1,223 1,186 dwellings. This is equivalent to 7.54 8.0 years' supply of land and is sufficient to provide ample flexibility and choice over the next five years.	Factual change resulting from the Housing Land Supply Report (November 2017)																											

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	Figure 1	<p>Figure 1 Cotswold Housing Trajectory 2011-2031, May 2016 November 2017</p>	Figure 1 has been updated to reflect the latest Housing Land Supply Report (November 2017)
6.1.16		<p>Policy DS1 states that at least 27 hectares B class employment land will be allocated within the District over the plan period the Local Plan employment land requirement of 24 hectares will be delivered through site allocations and committed developments.</p>	To reflect the Main Modification to Policy DS1
	Proposed new section and Policy (DS4): Open Market Housing outside Principal and Non-Principal Settlements	<p>Insert the following new sub-section, entitled 'Open Market Housing outside Principal and Non-Principal Settlements', after section 6.3:</p> <p>NPPF 55 states that, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The Local Plan's Development Strategy promotes this by focussing the main growth in 17 Principal Settlements, notably Cirencester (Policy DS2), while facilitating small-scale residential development in non-Principal Settlements (Policy DS3).</p> <p>NPPF 55 is clear that, in the absence of special circumstances, local planning authorities should avoid permitting new isolated homes in the countryside. Besides the provisions of NPPF 55, the Local Plan includes policies that allow for:</p> <ul style="list-style-type: none"> • affordable housing on rural exceptions sites (Policy H3); • housing for rural workers (Policy H5); • accommodation for gypsies and travellers (Policy H7); and • conversion of rural buildings (Policy EC6). <p>There is normally no justification for allowing new-build open market dwellings in the countryside. However, Policy DS5 facilitates flexibility to consider sites adjacent to Development Boundaries at times when the District Council's monitoring indicates that a housing land supply shortfall is looming.</p> <p>POLICY DS4: OPEN MARKET HOUSING OUTSIDE PRINCIPAL AND NON-PRINCIPAL SETTLEMENTS</p> <p>Subject to Policies DS2 and DS5, there is a presumption against permitting new-build open</p>	To plug a policy 'gap' identified at a recent planning appeal hearing 16/01256/OUT (The Leasows, Chipping Campden).

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		<p>market housing outside Principal and Non-Principal Settlements.</p> <p>The Local Plan’s Development Strategy facilitates sufficient development in sustainable locations, to meet the District’s identified housing needs over the Plan period. Other than when there is a housing supply shortfall, there is no reason to consider new-build open market housing beyond Development Boundaries, although small-scale development may be acceptable in non-Principal Settlements.</p> <p>Policy DS4 is designed to preclude the development of speculative open market housing which is not needed in rural locations and includes land adjacent to Development Boundaries. A rare exception, referred to in NPPF 55, might be a proposal for a country house that is truly outstanding or innovative and would help to raise standards of design more generally in rural areas.</p> <p>Policy DS4 does not preclude the creation of all open market housing in rural locations; for example dwellings resulting from the replacement or sub-division of existing dwellings, or housing resulting from conversions of rural buildings. It also would not prevent, in principle, alterations and extensions to existing buildings, or the development of domestic outbuildings within the curtilages of existing dwellings.</p>	
	<p>Proposed new section and Policy (DS5): Ensuring a Five Year Housing Supply during the Plan Period</p>	<p>Insert the following new section, entitled ‘Ensuring a Five Year Housing Supply during the Plan Period’: <u>The timely delivery of housing is a key objective of the NPPF.</u> <u>To boost significantly the supply of housing, NPPF 47 requires local planning authorities to produce robust evidence to ensure that Local Plans meet the full, objectively assessed, needs for market and affordable housing, and identify and update annually a supply of specific, deliverable sites. Sufficient land should be identified to demonstrate five years’ worth of deliverable land supply against housing requirements.</u> <u>Failure to demonstrate a five-year supply of deliverable housing land³ means that relevant policies for the supply of housing can no longer be considered up-to-date, irrespective of the age of the Plan. In that situation, NPPF 49 requires applications for housing development to be considered in the context of the ‘presumption in favour of sustainable development’. For decision-taking, this means that NPPF 14 would be engaged. In these circumstances, the practical reality is that housing proposals should be approved - even if they do not conform with the Local Plan’s housing policies – unless any adverse impacts of doing so would “significantly and demonstrably outweigh the benefits” or if specific NPPF policies indicate that development should be restricted.</u> <u>To avert this risk, Policy DS5 seeks to manage the delivery of housing by addressing any emerging housing supply shortfall before it reaches the point where NPPF 14 would be engaged. The policy directs any resulting additional development towards the periphery of the most sustainable settlements, adjacent to Development Boundaries.</u></p> <p><u>POLICY DS5 – ENSURING A FIVE YEAR HOUSING SUPPLY DURING THE PLAN PERIOD</u></p> <ol style="list-style-type: none"> 1. <u>If the District Council’s residential land monitoring indicates that the District’s housing land supply is 5.5 years or less, proposals for residential development on land adjoining a Development Boundary will be approved provided that they are in accordance with other policies in the Plan.</u> 2. <u>Applicants will be required to demonstrate the measures that will be taken to ensure proposals contribute to the District’s five year housing land supply.</u> 3. <u>If the District Council’s residential monitoring demonstrates less than 5.5 years’ worth of deliverable housing land, and there has been no recovery in the supply position over two successive monitoring years, this will trigger an increase from 5% to a 20% buffer.</u> 4. <u>If, after applying a 20% buffer, the District Council’s residential monitoring indicates that it has not been possible to demonstrate at least 5.5 years’ worth of deliverable housing land over further two years, this will trigger a full or partial review of the Local Plan.</u> <p><u>The delivery of housing across the District is assessed through the production of annual residential monitoring reports, including the maintenance of an up-to-date housing trajectory and five year housing supply position statement. These are normally published around May each year.</u></p>	<p>This Policy is proposed as a fall-back position in the event of the supply position falling to five years plus a 5% buffer, and to ensure that a continuous supply of deliverable land is in place to meet the District’s objectively assessed need for housing throughout the plan period.</p>

³ In reality, 5.25 years for most local planning authorities (i.e. 5 years plus 5% buffer). For authorities deemed to have persistently under delivered, a 20% buffer (equivalent of 6 years’ supply) must be applied.

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		<p><u>Section 6.1 explains how the five year requirement will be calculated throughout the Plan period. It also sets out the land supply position at 1st April 2017, which demonstrated a healthy 8.0 years' worth of supply at that date. About 650 dwellings over and above the housing requirement for the District were delivered over the first six years of the Local Plan period (2011-2017). Cotswold District therefore does not considered to be a persistent under deliverer and a 5% (rather than 20%) buffer applies to the District's land supply calculations.</u></p> <p><u>Although the Council has significantly boosted supply over the last six years, it is not complacent and Policy DS5 has been introduced with the following, primary, aims:</u></p> <ul style="list-style-type: none"> • <u>To ensure that the supply of deliverable housing land continues to remain healthy.</u> • <u>To address any looming housing shortfall before it occurs.</u> • <u>To ensure that any temporary housing supply shortfall is addressed by directing additional development towards the most sustainable, off-plan, locations adjacent to Principal Settlements.</u> <p><u>NPPF 14 would normally be engaged if the annual housing monitoring reports demonstrated a supply of less than 5 years plus a 5% buffer, i.e. the equivalent of 5.25 years. Such a scenario would potentially leave the District Council vulnerable to speculative planning applications in almost any location, which would compromise the sustainability objectives upon which the Local Plan's Strategy is based.</u></p> <p><u>For this reason, the flexibility afforded by Policy DS5 would be applied at a time when monitoring demonstrates that the housing land supply had, at that date, dipped below 5.5 years. This is considered to be a reasonable measure because it represents a further 5% buffer over and above 5.25 years, which would normally indicate a supply shortfall.</u></p> <p><u>It is anticipated that the flexibility afforded by Policy DS5 will be sufficient to help restore housing supply to a healthy position by the time the next annual monitoring report is published. In the unlikely event that this does not happen, the policy would continue to be applied. If the supply does not return to a healthy position after two years, the Council will increase the buffer, for supply calculation purposes, from 5% to 20% - a rationale that is consistent with the theme of boosting significantly the supply of housing in NPPF 47.</u></p> <p><u>If increasing the buffer failed to boost the housing supply sufficiently within two years, this would trigger a full or partial review of the Local Plan.</u></p> <p><u>The underlying reason for Policy DS5 is to ensure that a continuous supply of deliverable land is in place to meet the District's objectively assessed need for housing over the period 2011-2031. The Council will expect any resulting dwellings to be built within a reasonable timeframe. To that end, the policy requires applicants to demonstrate what measures will be taken to ensure that new dwellings will be available for habitation within five years. This would be set out in a legal agreement.</u></p> <p><u>Development Boundaries are an important tool for focussing the majority of growth on the Principal Settlements. They have been carefully defined to enable the Plan to deliver sufficient land to meet its housing requirement in the most sustainable locations to 2031. This helps to prevent urban encroachment onto the surrounding countryside. It also helps to 'future proof' the District's sustainability by ensuring that housing delivery continues to be focussed on the Principal Settlements. The Council, however, recognises that there may be occasions when there is no option but to boost the supply of housing land by permitting developments outside Development Boundaries.</u></p> <p><u>Without prejudice to the consideration of any sites under Policy DS5, land adjacent to Development Boundaries is, in principle, potentially more sustainable than land in other locations. Such sites, assessed against the NPPF's presumption in favour of sustainable development, offer the most suitable opportunities for boosting housing supply without compromising the principles underpinning the Local Plan's Development Strategy.</u></p> <p><u>In this context, it is important to appreciate that, just because a site is located adjacent to a Development Boundary, this does not, in itself, make it suitable. Any proposals would also need to be considered against other policies in the Local Plan as well as any other material considerations.</u></p> <p><u>For land to be considered as adjacent to a Development Boundary, this must be interpreted literally. Sites that do not directly abut a Development Boundary, including for example being separated by a road, do not qualify.</u></p>	
	6.3.5	Small-scale residential development means housing which is proportionate to, and complementary with, the size and character of the settlement and its surroundings, including, for example, two-bed	The deleted text that was included in error. Its deletion removes doubt and improves clarity

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		<p>properties. In this context, the policy applies to the provision of any new residential units through the alteration, replacement, conversion or sub-division of an existing dwelling, as well as through new build. Any development provided through this policy, besides being proportionate in scale and ...</p>	
7.0.1		<p>A total of at least 8,400 houses is planned to be delivered in the settlements over the plan period to 2031 together with 27 ha of employment land. Housing and employment sites are allocated. The Local Plan includes site allocations that will meet the District's identified needs, which are set out in the settlement strategy policies set out below. The level of growth planned for each settlement will also help to address local affordable housing needs, sustain existing facilities and maintain the <u>each</u> settlement's role as a service centre.</p> <p><u>As part of the site allocation process, various constraints and issues (including flood risk, archaeology, landscape, form, scale and access) have been taken fully into account. In some instances, these considerations have resulted in fewer units or smaller areas being proposed for development than might otherwise have been anticipated. Further high level guidance on such considerations, and possible means by which they might be addressed, are included in the Local Plan evidence base, particularly the Strategic Housing and Economic Land Availability Assessment.</u></p>	<ol style="list-style-type: none"> 1. To avoid repetition of DS1 + the employment land need is 24ha, not 27ha. 2. The paragraph currently does not account for mixed use or retail allocations. 3. To add clarity and explain that constraints and assets to be retained in sites when they have been developed have been considered in setting the site capacities in the allocations and ensuring that they are deliverable.
7.0.12		<p>7.0.12 The strategic infrastructure required in each sub area is set out in policies SA1, SA2 and SA3. The policies for each individual settlement are numbered S1 -S19 and are located in the relevant sub area section. They identify specific land allocations, including housing and employment <u>as well as local non-strategic infrastructure</u>. The land allocations, development boundary and other land use planning designations are shown on the inset map for each settlement.</p> <p><u>7.0.13 The non-strategic infrastructure items referred to above were identified during engagement and consultation with local communities. Whilst these items are not critical or essential to delivery of the Local Plan, many may be regarded as contributing to local place-making. On this basis, it is reasonable to anticipate that the delivery of non-strategic infrastructure should normally be funded from the local apportionment of CIL revenue (which can only be spent on infrastructure provision). Alternative or supplementary funding routes may be available and could be pursued providing national policy and legislative rules governing the imposition of planning obligations are satisfied. It follows from this that parish and/or town councils could in the first instance consider managing the implementation process, using their CIL apportionment to procure delivery. Including the items in Neighbourhood Plans would also assist in the delivery process as a "made" Neighbourhood Plan will increase the CIL apportionment from 15% to 25%.</u></p>	<p>To clarify the delivery mechanism for infrastructure items identified in settlement policies.</p>
SA1		<p>Existing text of Policy SA1 to be deleted and replaced with the following:</p> <p>Policy SA1 STRATEGY DELIVERY - SOUTH COTSWOLDS SUB-AREA</p> <p>Within the context of policy INF1, the strategic infrastructure requirements for the South Cotswolds Sub-Area are:</p> <p><i>Healthcare</i></p> <ul style="list-style-type: none"> • Romney House surgery (Tetbury) - expansion or relocation; and • New doctors' surgery (Cirencester). <p><i>Flood management</i></p> <ul style="list-style-type: none"> • SUDS and soft measure interventions to manage flood risk. <p><i>Highways</i></p> <p>Junction improvements at:</p> <ul style="list-style-type: none"> • A429 Cherry Tree junction; • A417 (High Street)/ A361 (Thames Street), Lechlade; • A417 / Whelford Road; • A429 / A433; and • A433 (London Road) / A433(Long Street)/ Hampton Street/ New Church Street; and • A433 (Long Street) / A433 (Bath Road) / B4014 (Fox Hill) / Chipping Street. <p><i>Sport & Recreation</i></p> <ul style="list-style-type: none"> • Re-use of old former railway line for cycling between Tetbury, and Kemble and Cirencester; and 	<p>To simplify the policy and clarify the delivery mechanism for the infrastructure proposals in the Sub-Area.</p> <p>Having regard to the updated Highways Capacity Assessment. Struck-through item is no longer required</p>

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
		<ul style="list-style-type: none"> Cycling infrastructure in Cirencester, including improvements to Tetbury Road and London Road corridors. 	
	S3A – Retail and Main Town Centre Uses	'...floor space in the plan period within the town centre Cirencester'	To provide clarity that the retail floor space need is for the whole of Cirencester and not just the 'town centre'. A change to policy is required. This change is consistent with EC7 (FC054).
	Policy S1 Cirencester Town	<ol style="list-style-type: none"> C_39 – delete allocation C_97 – reduce capacity from 11 to 9 dwellings 	To accord with updated information in the SHELAA Review (September 2017)[EB012]
	7.1.1.2.9	Amend the supporting text to provide clarity on meaning of 'small-scale' shopping and service units and further explanation on the role of the neighbourhood centre.	More clarity is needed, resulting from the Inspector's MIQ 182
	<u>Sub-section 7.1.1.3 - Cirencester Town Centre</u>	<p>Delete entire sub-section 7.1.1.3 and replace with the following:</p> <p>7.1.1.3 Cirencester Town Centre</p> <p><u>7.1.1.3.1 Cirencester's retailing and commercial importance far outstrips anywhere else in the District. The town draws in large numbers of shoppers, commuters and others who, together with numerous visitors, help to create a vital and viable town centre economy.</u></p> <p><u>The rural nature of the surrounding areas, along with relatively poor public transport coverage, inevitably means that the majority of people from outside Cirencester travel into the town by car, thus fuelling the need for parking spaces. Parking capacity has been a growing issue for a number of years, but it has come to a head since 2015.</u></p> <p><u>7.1.1.3.2 Critical to Cirencester's attraction is its exceptional heritage - most of the buildings in the Primary Town Centre being statutorily listed for their architectural and historic importance. It is generally acknowledged that, in addition to each building's individual merits, their collective value creates a unified and exceptionally attractive historic townscape. Largely because of this and a healthy independent retailing offer, Cirencester has maintained a strong appeal both for users of, and visitors to, the town. However, the townscape in certain areas, particularly around some of the car parks, is of a significantly lower quality⁴.</u></p> <p><u>7.1.1.3.3 Like all town centres, Cirencester comprises a complex mix of uses, interactions and competing economic, social and environmental interests. To bring key principles and priorities together in a coherent, holistic manner, a flexible strategy is required which can respond to changing circumstances within the Plan's broader policy context.</u></p> <p><u>7.1.1.3.4 Certain issues, however, require specific policy guidance, including future retail provision, mixes of uses in the primary and secondary frontages, and parking provision. Policy 8.2 provides this guidance, while also requiring future development to adhere to the principles set out in the Cirencester Town Centre Strategy, which is set out after the following policy.</u></p> <p><u>POLICY S3 – CIRENCESTER TOWN CENTRE</u></p> <p><u>Town Centre Strategy</u></p> <ol style="list-style-type: none"> <u>Development within Cirencester Town Centre, the extent of which is indicated on Policies Map Inset 2, will be permitted, in principle, where it is consistent with the Cirencester Town Centre Strategy.</u> <p><u>Retailing and other main town centre uses⁵</u></p> <ol style="list-style-type: none"> <u>Provision will be made for about 400 sq.m of convenience goods retail floorspace and about 2,100 sq.m of net comparison goods floorspace in the plan period within the town centre Cotswold Retail Study Update⁶.</u> <u>Class A1 uses should be concentrated in the Primary Frontage, defined on Policies Map Inset 2. The loss of A1 uses from the Primary Frontage will be resisted where it would harm the vitality or viability</u> 	<ol style="list-style-type: none"> To clarify the proposed approach to off-street car parking provision, including the net gain in spaces being pursued. To clarify how redevelopment of existing surface level car parks and other elements of the town centre strategy are expected to be implemented following the delivery of decked parking. To distinguish between matters of policy and strategy. To bring the contents of this section up-to-date. To generally better explain the strategy for the town centre.

⁴ NS026 Cirencester Town Centre Conservations Area Appraisals

⁵ Defined in the NPPF Glossary broadly as: retail development; leisure, entertainment facilities the more intensive sport and recreation uses; offices; and arts, culture and tourism development.

⁶ Bilfinger GVA, June 2017

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
		<p>of the Primary Shopping Area, or harm Town Centre investment.</p> <p>4. <u>Within Secondary Frontages, identified on Policies Map Inset 2, class A1 uses and other main town centre uses will be permitted where they would complement and enhance the retailing offer of the Primary Shopping Area. The loss of main town centre uses in a Secondary Frontage will be resisted and, other than A1 uses, concentrations of single uses will not be permitted where this would adversely affect the vitality and viability of the Primary Shopping Area or harm wider Town Centre investment.</u></p> <p>5. <u>Where the loss of a main town centre use is proposed in either a Primary or Secondary Frontage, evidence must be submitted to demonstrate that the property has been continually, actively and effectively marketed for at least 12 months and that the use is no longer of commercial interest.</u></p> <p><u>Car parking</u></p> <p>6. <u>New development shall provide sufficient car parking capacity to meet its current and foreseeable needs.</u></p> <p>7. <u>Where appropriate town centre development is proposed on existing town centre car parks, alternative car parking provision shall be secured and implemented prior to the commencement of any development.</u></p>	
		<p><u>The Strategy</u></p> <p><u>7.1.1.3.5 A key aim for the town centre is to provide an attractive and vibrant place where people can access a good range of local services and facilities. This includes a diverse retail offer within the primary shopping area. Although Cirencester currently has a healthy town centre, it needs to evolve and improve to ensure that it continues to compete effectively by continuing to offer a different experience to larger neighbouring centres.</u></p> <p><u>7.1.1.3.6 Paragraphs 7.1.1.1.4 to 7.1.1.1.6 of this Plan explain the importance of Cirencester’s rich heritage, including archaeology, and the acute challenges this presents for the 'planning balance' when considering development opportunities in the town centre.</u></p> <p><u>7.1.1.3.7 A major study of the town centre and resulting policy guidance⁷ confirmed as long ago as 2007 that a looming shortfall in off-street parking provision at Cirencester needed to be addressed. This has now come to a head and it is imperative to plan for future parking requirements as well as address existing capacity issues.</u></p> <p><u>7.1.1.3.8 Cirencester currently has several surface-level car parks, and a number of these sites present the most obvious opportunities for redevelopment in the town centre. This includes the option of creating decked parking which would maximise capacity, initially at a single location. This will help to address the looming shortfall, which has been assessed at around 350 parking spaces over and above existing capacity (c. 1,310 spaces)⁸.</u></p> <p><u>7.1.1.3.9 Once the identified shortfall has been resolved, the redevelopment potential of other car park(s), which are no longer required for parking, could be 'unlocked'. Such sites could be then be considered for alternative uses that would both enhance the town centre’s role and function and benefit its economy. In considering any redevelopment options for existing car parks, it is important to bear in mind that land might well be required to satisfy potential additional parking needs in the longer term.</u></p> <p><u>7.1.1.3.10 Maximising parking in a single location and putting other existing car park(s) to alternative use(s) would also present the opportunity to consider options for managing traffic more effectively in the town centre.</u></p> <p><u>7.1.1.3.11 Cirencester has always lacked a purpose-built public transport 'hub' in the town centre. Prior to 2016, Southway was the main place where bus services terminated; however, since the Market Place environmental improvements were implemented, Southway’s use by buses and taxis has</u></p>	

⁷ Including Cirencester Town Centre SPD (November 2008) [EB071]; Cirencester Traffic and Movement Study (June 2007, Hyder Consulting) [NS021]

⁸ Cirencester Town Centre Off-Street Parking Study (Atkins, 3 February 2017):

<http://www.cmis.cotswold.gov.uk/CMIS5/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=Gzrb2ku8AbRAy5ODjakIh0awggJgwQwyMYwPo91QoZcn%2bYv7Ym3%2fIQ%3d%3d&rUzwRPF%2bZ3zd4E7lkn8Lyw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWctPHwdhUfCZ%2fL UQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9lXnlg%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFflUdN3100%3d&uJovDxwdJMPoYv%2bAjvYtyA%3d%3d=ctNJff55vVA%3d&FgPIIEJYlotS%2bYGoBi5oIA%3d%3d=NHdURQburHA%3d&d9Qjj0ag1 Pd993jsyOJqFvmyB7X0CSQK=ctNJff55vVA%3d&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJff55vVA%3d&WGewmoAfeNQ16B2MHuCPMRKZMwaG1PaO=ctNJff55vVA%3d>

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
		<p>intensified. It is self-evident that improvements around Southway are required and, ideally, a purpose-built transport hub created. Depending on future availability of the Forum car park, part of the site could be redeveloped in association with Southway to create this much-needed facility.</p> <p><u>CIRENCESTER TOWN CENTRE STRATEGY</u></p> <p><u>Historic Environment</u></p> <p>1. <u>The town centre’s historic environment should form an integral part of future redevelopment and/or other proposals that are aimed at improving Cirencester’s role, function and economy, including future transport and parking schemes. Wherever feasible, the historic environment should be a key driver of, and focus for, inward investment, regeneration and redevelopment.</u></p> <p>2. <u>Any planning applications for redevelopment within the town centre should be fully cognisant of both the Cirencester Conservation Area Appraisal & Management Plan and the Cirencester Town Centre SPD. The Cirencester Archaeology Review (January 2014) and any further assessment required should also be taken into account when considering the impact of a proposal on a heritage asset.</u></p> <p><u>Transport, Parking and Access</u></p> <p>3. <u>Through the implementation of Transport and Parking Strategies, future improvements should be directed towards supporting and facilitating an attractive, vibrant, town centre environment.</u></p> <p>4. <u>The aim of providing a net increase of at least 350 car parking spaces over and above the existing off-street parking capacity (c. 1,310 spaces), while reducing congestion and pollution, should be addressed through complementary measures, including:</u></p> <p>a. <u>The rationalisation and intensification of off-street parking, including decking at least one existing car park (ideally The Waterloo) to meet identified parking needs, including for retailing and long-stay commuting⁹;</u></p> <p>b. <u>Where justified, and subject to sufficient off-street parking being provided, considering the removal of on-street car parking where appropriate;</u></p> <p>c. <u>Creating an improved public transport interchange at Southway, potentially incorporating part of the Forum car park, subject to the latter no longer being required for parking;</u></p> <p>d. <u>Making walking and cycling safer, convenient, accessible, and more attractive by considering pedestrian priority schemes; access restrictions to discourage unnecessary through traffic; better segregation between cars and cycles; and by ensuring pedestrian and cycle routes, and associated facilities, are maintained to an appropriate standard¹⁰.</u></p> <p>5. <u>Through the design of new development schemes, opportunities should be taken to enhance the quality of pedestrian access and permeability within and to the town centre.</u></p> <p><u>Redevelopment Opportunities, Vitality and Viability</u></p> <p>6. <u>Subject to any land that is currently used for off-street public car parking becoming surplus to requirements, and sufficient off-street parking has been provided elsewhere in the town centre to meet current and future parking needs, consideration should be given to redevelopment for alternative, beneficial, town centre purposes.</u></p> <p>7. <u>The Brewery and Forum car parks have been identified as potentially favourable locations for retailing, though consideration should be given to reusing part of the Forum car park as a public transport interchange (see 4c above).</u></p> <p>8. <u>Any comprehensive redevelopment of key sites¹¹ should be guided by a master plan prepared by Cotswold District Council as a supplementary planning document. The master plan would include detailed guidance on such matters as: design; movement (including parking provision); and the general distribution of activities and uses in the wider area.</u></p> <p>9. <u>Wherever possible, redevelopment of town centre sites should be encouraged to contribute towards the town centre’s employment base, including class B1 office provision, and possibly studio/</u></p>	

⁹ Cirencester Parking Survey (GCC, August 2015)

¹⁰ Cotswold Cycling Strategy SPG - aims and objectives

¹¹ Key sites are likely to include existing off-street car parks, potentially together with adjoining areas.

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
		<p>start-up space.</p> <p>10. <u>Seek to improve the town centre’s vitality and viability by maintaining a rich and varied cultural and retail offer, and a locally-distinctive shopping experience, with some national multiples supporting niche independent shops, resulting in greater retention of shopping expenditure.</u></p> <p>11. <u>Tourism and cultural proposals should be encouraged where they strengthen the local economy and the attractiveness of Cirencester as a visitor destination throughout the year. Opportunities should be pursued to encourage the development of a hotel or similar type of tourist accommodation in and/ or adjacent to the town centre.</u></p> <p><u>Enhancing Environmental Quality</u></p> <p>12. <u>Improve the environmental quality of the town centre by supporting proposals and interventions that create an attractive public realm, including:</u></p> <ol style="list-style-type: none"> a. <u>Enhanced streetscape, urban environment, amenity, safety and the improvement of the ‘active’ street frontage;</u> b. <u>Improving the public realm with clear signposting and routing to key town centre destinations utilising distinctive local materials;</u> c. <u>Securing public art proposals and high quality and distinctive street furniture.</u> d. <u>Improving the provision of additional play space and facilities for children and young people, including restoring and upgrading Cirencester’s open air swimming pool; and sustaining/ enhancing green infrastructure, community spaces, open spaces and key landscape features.</u> <hr/> <p><u>7.1.1.3.12 To ensure that the town centre can continue to fulfil its important role in the District and support the wider local economy, new development and the intensification of existing uses is desirable. It is therefore important that the town centre’s vitality and viability maintains a rich and varied cultural and retail experience. A locally-distinctive shopping offer, with some national multiples supporting niche independent shops, is expected to produce the greatest retention of retail expenditure. Therefore, a competitive and attractive retail sector needs to be promoted within the town centre through sensitive expansion, redevelopment and intensification, including making more effective use of upper floors.</u></p> <p><u>7.1.1.3.13 The exceptional built heritage and wealth of listed buildings, however, present challenges for intensification and redevelopment when seeking to meet modern retail requirements. A balance needs to be struck between protecting heritage assets and the public benefit of promoting a vibrant and vital centre, which includes viable uses for historic buildings. Opportunities should therefore be taken, wherever possible, to put heritage at the heart of any development proposals in the town centre.</u></p> <p><u>7.1.1.3.14 The most substantial sites in the town centre that have potential for redevelopment, including for decked parking, are wholly or partly occupied by the following public car parks:</u></p> <ul style="list-style-type: none"> • <u>Abbey Grounds car park (97 spaces)</u> • <u>Beeches Road car park (144)</u> • <u>Brewery car park (298)</u> • <u>Forum car park (191)</u> • <u>Leisure Centre (122)</u> • <u>Memorial Hospital, Sheep Street (77)</u> • <u>Station/ Sheep Street ‘island’ (149)</u> • <u>Waterloo car park (233)</u> <p><u>7.1.1.3.15 The District Council, through the auspices of the Cirencester Car Parking Project Board, is actively reviewing parking provision in Cirencester and developing remedial options¹². Decked parking has emerged as the optimum solution for increasing parking capacity, with the Waterloo car park identified as the preferred location. This is reflected in Policy S1 (site CIR E14).</u></p> <p><u>7.1.1.3.16 Not all of the car parks, notably the ‘off centre’ ones at Abbey Grounds, Leisure Centre and Beeches, would necessarily be suitable or desirable options for redevelopment.</u></p> <p><u>7.1.1.3.17 The amount of redevelopment at any ‘surplus’, surface level car parks will depend on how</u></p>	

¹² <http://www.cotswold.gov.uk/residents/environment/parking-and-public-toilets/cirencester-parking-project/>

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
		<p>far the additional parking, provided through decking, goes towards meeting identified parking needs, whilst being mindful of the possible need to accommodate further needs in the longer term.</p> <p>7.1.1.3.18 The Cotswold Retail Study¹³ also indicates that opportunities within and adjoining the town centre are largely limited to the potential redevelopment of certain car parks and service areas, notably at the Brewery and Forum. This could enable the provision of modern A1 retail space (currently lacking), as well as a range of evening and leisure uses to complement existing provision. This would serve both local and sub-regional consumers and tourists, thereby providing an alternative to competing centres for A1 comparison shopping. It may, on balance, be appropriate to give over part of the Forum for a public transport interchange in association with Southway.</p> <p>7.1.1.3.19 In common with most town centres, ease of movement is a crucial issue in Cirencester. The town's historic street pattern and narrow pavements can make pedestrian access inconvenient. Despite this, the town centre has seen enhancements in permeability in recent years through schemes such as Swan Yard/ post office. More, however, could be done to increase pedestrian permeability, helping to strengthen Cirencester's reputation as a shopping destination with improved accessibility around the town centre, including to and from car parks.</p> <p>7.1.1.3.20 Currently, too much unnecessary traffic passes through the town centre and this is exacerbated by the location of certain car parks, which help to dictate the current traffic management regime. Once decked parking has been introduced, it will be possible to better manage town centre-bound traffic more effectively. Subject to parking capacity being increased, traffic management measures should be devised which:</p> <ul style="list-style-type: none"> • make most effective use of off-street parking; • encourage through traffic onto the ring road; and • improve road safety for pedestrians and cyclists. <p>7.1.1.3.21 The quality of the public realm throughout the town centre is variable, though in some instances there have been considerable improvements, notably Market Place, Gosditch Street/ West Market Place, Black Jack Street, Silver Street, Park Street and Park Lane. However, beyond these improved areas, the public realm throughout much of the town centre is generally mediocre, particularly Cricklade Street and areas that were redeveloped during the 1960s and 1970s, including around the car parks. There is sometimes a sharp contrast in the quality of townscape between the fronts and the backs of buildings.</p> <p>7.1.1.3.22 Proposals to improve Cirencester's townscape in line with the provisions of the Cirencester Town Centre SPD are supported in principle, focussed on making the town centre a more pedestrian-friendly environment.</p> <p>7.1.1.3.23 The Town Centre will, in the longer term, deliver significant retail and business opportunities along with new homes. This would be guided by a Town Centre Master Plan that will be produced by the District Council in association with other stakeholders, including the Town Council, Gloucestershire County Council, the local community, businesses and the Civic Society. The master plan will update and review the existing SPD and build upon the principles that are essentially still valid and supported. It will seek to develop Cirencester Town Centre in a holistic manner, balancing the need to manage traffic, and improve the appearance of the public realm with other competing, environmental, social and economic objectives.</p>	
	Policies S4 to S16 (except S12 and S14)	<p>Amend all policies as follows:</p> <p><u>Non-Strategic (Local) Infrastructure</u></p> <p>Once contributions to delivery of infrastructure required in the South Cotswolds Sub Area (Policy SA1) have been made, development proposals will, subject to viability, be expected to help deliver or make appropriate contributions towards Delivery of the following non-strategic infrastructure items will be funded from local CIL revenue apportionment unless regulatory requirements governing the imposition of planning obligations can be met:</p>	To help enable delivery of locally-identified non-strategic infrastructure having regard to the tests set out at paragraph 204 of the NPPF and within Regulation 122 of the CIL Regulations.
	Policy S5 Fairford	F_44 – reduce capacity from 28 to 12 dwellings	To accord with updated information in the SHELAA Review

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
			(September 2017)[EB012]
	Policy S6 Kemble	The allocation of 12 dwellings at K_2 has been reduced to 8 dwellings.	Reason for modification – Factual change to reflect that the allocation of 12 dwellings at K_2 has been reduced to 8 dwellings
	Policy S6 Kemble	Significant archaeological deposits have been found in the southern half of K_2a. Further assessment and evaluation will be required before any planning proposal can be approved. Proposals on site K_2a will be expected to ensure development takes account of the positive contribution the Local Green Space makes to the character of the wider site, including mitigating any potential impacts on natural features, such as trees. In accordance with the Design Code, Appendix D, proposals will need to be carefully proportioned and new buildings should not dominate their surroundings. Proposals will need to complement the existing landscape and sit comfortably within the setting of the Local Green Space, for example the height of buildings should provide a gentle transition from the open Local Green Space to existing residential dwellings that border the site. Applicants will also be required to investigate opportunities to locate Sustainable Urban Drainage, in accordance with Policy EN14, in the south west part of the site.	Reason for modification – Addition text added to the policy to provide clarity.
	Policy S7 Lechlade	L_19 – reduce capacity from 9 to 6 dwellings	To accord with updated information in the SHELAA Review (September 2017)[EB012]
	Policy S9 Tetbury	T_24B – delete allocation TET_E2A – delete allocation	To accord with updated information in the SHELAA Review (September 2017)[EB012]
	Policy SA2	Existing text of Policy SA2 to be deleted and replaced with the following: 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: <i>Highways</i> <ul style="list-style-type: none"> Improvement of Unicorn junction (A436/B4068) Stow-on-the-Wold. 	To simplify the policy and clarify the delivery mechanism for the infrastructure proposals in the Sub-Area.
	Policy S11 Bourton-on-the-Water	B_32 – delete allocation	To accord with updated information in the SHELAA Review (September 2017)[EB012]
	Policy S11 Bourton-on-the-Water	Insert additional text (new para. 7.2.2.5) <i>draft version</i> : <u>The redevelopment and re-use of the Countrywide Stores and former Co-op site for retail and leisure uses, will offer the opportunity to maintain the position of Bourton-on-the-Water in the retail hierarchy and stem the amount of shopping trips outside of the village. Proposals which would result in the primary re-use of the site for Class A1 retail use and other retail, food/beverage and Class D leisure uses will be supported in principle, subject to a sequential test and assessment of their impact on the health of, and investment within, Bourton Key centre.</u>	Consideration of site B_32 for the use or redevelopment of the site for retail purposes, following SHELAA Review [EB012] and Actions Required by Inspector for week 2.
	Policy S12 Northleach	N_13B – delete allocation	To accord with updated information in the SHELAA Review (September 2017)[EB012]
	Policy S13 Stow-on-the-Wold	S_8A – delete allocation	To accord with updated information in the SHELAA Review (September 2017)[EB012]
	Policy SA3	Existing text of Policy SA3 to be deleted and replaced with the following: 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: <i>Healthcare</i> <ul style="list-style-type: none"> Expansion or replacement of doctors' surgery (Chipping Campden). <i>Flood management</i> <ul style="list-style-type: none"> Flood alleviation bund and channel (northwest and south of Moreton-in-Marsh). <i>Highways</i> <ul style="list-style-type: none"> Improvements for Fosse Way, Moreton-in-Marsh; 	To simplify the policy and clarify the delivery mechanism for the infrastructure proposals in the Sub-Area.

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
		<ul style="list-style-type: none"> 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. <p><i>Education</i></p> <ul style="list-style-type: none"> Expansion of Chipping Campden Secondary School. 	
	Policy S15 Blockley	BK_14A – reduce capacity from 16 to 9 dwellings.	To accord with planning permission (refs: 16/05066/OUT and 16/03027/FUL)
	Policy S16 Chipping Campden	CC_23B and CC_23C – amend capacity to 36 dwellings.	To accord with planning permission (ref: 16/00937/OUT)
	Policy S18 Moreton-in-Marsh	M_12A – reduce capacity from 68 to 63 dwellings Delete the employment allocation MOR_E11	To accord with updated information in the SHELAA Review (September 2017)[EB012]
	H1 (2) Housing Mix and Tenure to Meet Local Needs	In settlements in rural areas, as defined under s157 of the Housing Act 1985, all housing developments that provide 6 to 10 new dwellings will make a financial contribution by way of a commuted sum towards the District's affordable housing need subject to viability."	To provide further clarity that the thresholds in criterion H1(1) apply.
	Para 8.2.3	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.	To clarify the District's need for net additional affordable homes. As per Councils response to Inspector's week one actions (ED041).
	Para 8.4.1	<p>The SHMA <u>Update (April 2016)</u> 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 should be one of include a range of tenures and should not contribute to unbalanced communities.</p> <p>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:</p> <p>Net additional dwellings designed for the elderly – by type (sheltered housing, care homes and other types of residential care accommodation).</p> <p>Net additional sheltered accommodation units (dwellings).</p> <p>Net additional extracare accommodation units (dwellings).</p> <p>Net additional nursing and residential care units (bedspaces).</p> <p>Vacant nursing and residential care units in Gloucestershire (bedspaces). This will identify spare capacity to meet nursing and residential care need.</p> <p>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).</p>	To quantify the need for Specialist Accommodation for Older People. As per Councils response to Inspector's week one actions (ED041).
	H7 – Gypsy, Traveller and Travelling Showpeople Sites	Policy H7, supporting text and, if necessary, maps in Appendix C will be reviewed to incorporate <ul style="list-style-type: none"> Findings for Cotswold from the latest GTAA; References to the August 2015 PPTA; and Any newly-identified sites assessed as being suitable and deliverable in an updated G&T SHLAA. 	To ensure that the Plan is up-to-date.
	Appendix K	Clarify the definition of 'Employment Land' in Appendix K. The following is suggested: Employment Land - land primarily used, with planning permission, or allocated in a development plan for B1, B2 and B8 Class employment uses	More clarity is needed, resulting from the Inspector's FPQ, q12. Amend glossary definition.

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
	Policy EC4	<p>Amend Policy EC4 (1):</p> <p>1. Development that is directly associated with the business operations of existing users <u>The Special Policy Areas (defined on the Policies Map) will be master-planned and development implemented on a comprehensive basis at the following locations:</u></p> <ul style="list-style-type: none"> • <u>Royal Agricultural University, Cirencester. At this site, proposals for the expansion of the existing University campus, including associated development for educational, training, business and research development, student accommodation and other operational floorspace required for the existing lawful use of the site, will be permitted.</u> • <u>Campden BRI, Chipping Campden. At this site, proposals for new laboratories, business space, conference, training facilities, staff and visitor facilities, ancillary development, and associated infrastructure to facilitate the use of the site as a food testing and research establishment, will be permitted.</u> • <u>Fire Services College, Moreton-in-Marsh. At this site, proposals for development of operational fire, rescue and emergency responders training facilities and associated infrastructure, will be permitted.</u> 	A modification is proposed to policy EC4, clause 1, to clarify the types of uses that would be appropriate at the three special policy area locations. Resulting from the Inspector's Week Two Actions Question/Issue 6.5.
	Policy EC6	Subject to Policy EN9 <u>EN13</u> (Conversion of...	Reference to policy EN9 incorrect, replace with reference to EN13.
	Policy EC8 / 9.3.2.2	<p>Amend Policy EC8 (7):</p> <p>7(d) except where the proposal is in conformity with an allocation for main town centre uses elsewhere in the Plan, comply with the sequential test, by demonstrating that there are no sequentially preferable sites or premises to...</p> <p>Additional explanatory text following Policy EC8, new paragraph 9.3.2.2.</p> <p><u>'Policy EC8 and the requirements for a sequential test and impact assessment will apply to proposals for main 'town centre uses' beyond the identified centre boundary. The requirement will not apply to proposals which are consistent with site allocations for main town centre uses in the Plan'.</u></p>	A modification is proposed to policies EC8 and supporting text, to clarify the Council's approach to the sequential test (and impact assessment) in relation to B1 office use. Resulting from the Inspector's MIQ 185, and SQ 185A and 185C.
	9.3.3.2	<p>Additional explanatory text following Policy EC9 in para. 9.3.3.2.</p> <p><u>'The impact test applies to retail, office and leisure proposals (for the latter two uses, the default national threshold will apply). The scope and level of detail required will vary according to local circumstance. For clarity, the impact assessment test will apply to proposals in established employment sites and those within the identified development boundaries, as supported in principle by Policies EC2 and EC3, and in these cases a proportionate approach can be taken. For main town centre uses, including B1 office use, where the proposed use is in conformity with the allocation and as such considered suitable and in accordance with the plan, no impact assessment is required'.</u></p>	Clarity is needed to explain when an impact assessment applies to B class development, resulting from the Inspector's MIQ 185, and SQ 185A and 185C.
	EN3 Local Green Spaces	<p>LGS7: Kemble – Community Gardens at Station Road (in conjunction with proposed housing allocation Policy S6, Site K_2)</p> <p>10.2.2.3</p> <p>Revised wording - Site LGS is proposed as a Local Green Space which can accommodate both community gardens and (8 dwellings). It has, therefore, been included in the proposed housing allocations (Policy S6, Site K_2), subject to securing the local-term protection of the community gardens.</p>	Reason for modification – Factual change to reflect that the allocation of 12 dwellings at K_2 has been reduced to 8 dwellings.
	EN3 Local Green Spaces	<p>10.2.2.5 – new text</p> <p>LGS3: Manor Fields, Bourton on the Water has planning permission, in conjunction with permitted development rights as a car parking facility for a total period of 42 days per year. (13/03379/FUL). It is considered appropriate to designate this site as a Local Green Space alongside its use as a car park.</p>	Reason for modification – Factual change. To reflect, in the Reason and Justification the fact that Manor Fields has planning permission for a car park.

REF.	POLICY / PARAGRAPH	PROPOSED MAIN MODIFICATION	REASON FOR MAIN MODIFICATION
	Policy INF1	<p>Delete existing policy text and replace with the following:</p> <p>Policy INF1</p> <p>INFRASTRUCTURE DELIVERY</p> <ol style="list-style-type: none"> 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. <p>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.</p> <p>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.</p> <ol style="list-style-type: none"> 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. 	To clarify the delivery mechanism for infrastructure provision.
	SP1 – Cheltenham and Gloucester Green Belt	<p>Amend to read as follows:</p> <p><u>"Inappropriate development within the Green Belt will <u>not</u> be permitted, having regard to national policy."</u></p>	To ensure policy SP1 is consistent with NPPF Green Belt policy.
	SP2 – Cotswold Airport	<p>Amend Policy SP2 as follows:</p> <ol style="list-style-type: none"> 1. —The change of use of existing buildings and any new development within the areas at Cotswold Airport, shown on the proposals Policies Map, will be permitted provided it is they are compatible with the use of the land as an aerodrome. 2. — Outside of the area shown on Proposals Map, re-use of existing hangars for employment purposes within use classes B1, B2 and B8 will be permitted. 	<ol style="list-style-type: none"> 1. To ensure that the Policy provides an effective framework to consider proposals for development directly related/ not related to the continued operation of the airport, both through the change of use of existing buildings and through the erection of new buildings. 2. To delete superfluous second clause, which duplicates Policy EC3.
	Para 12.2.5	<p>Add the following sentence at the end of para 12.2.5, which starts: "In March 2015, the Department for Transport wrote...":</p> <p><u>The Department for Transport published the General Aviation Strategy, which reiterated the importance of general aviation, in March 2015.</u></p>	To draw attention to this important national strategy for aviation.
	Para 12.2.8	<p>Add the following sentence at the end of para 12.2.8, which starts: "The rural location of Cotswold Airport...":</p> <p><u>Any proposals for small-scale employment development within Cotswold Airport would be subject to policy EC3, clause 2.</u></p>	To provide clarification on the deletion of the second clause of Policy SP2.