

PAS Local Plan Route Mapper Toolkit

Part 1: Local Plan Review Assessment

The following matrix has been designed by the Planning Advisory Service (PAS) to assist Cotswold District Council and other local planning authorities to undertake a review of policies contained within their respective local plans. This will help establish whether the Cotswold District Local Plan needs updating.

The following PAS instructions have been retained to explain the process and parameters of the review.

Why you should use this part of the toolkit

The matrix is intended to supplement the [National Planning Policy Framework](#) (NPPF) (paragraph 33 in particular) and the associated [National Planning Practice Guidance](#) on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This part of the toolkit deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Part 4 of the toolkit.

How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the [Planning and Compulsory Purchase Act 2004 \(as amended\)](#); [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#) and the most up to date NPPF. To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the [NPPF](#). Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. This will assist you in completing question 1 in the assessment matrix provided below, and in deciding whether or not you need to update policies in your plan, and to what extent.

To use the matrix, consider each of the statements listed in the “requirements to consider” column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any ‘made’ neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:

- Disagree (on the basis that your plan does not meet the requirement at all);

- Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

How to use the results of this part of the toolkit

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT:</p> <p>As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the 'content' requirements of the current NPPF (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	DISAGREE	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>National policy and guidance recognise that, "polices age at different rates according to local circumstances and a plan does not become out-of-date automatically after five years. In determining whether a policy is out-of-date the High Court explains (May 2019) that the, "...passage of time per se is not sufficient to conclude that a policy is out-of-date, but the question properly understood was whether or not the passage of time had led to the policy being overtaken by events"¹.</p> <p>The <i>CDC Local Plan Policy Toolkit, PAS Toolkit 2 and the Sustainability Appraisal Scoping Document</i> (the toolkits) provide detailed commentary and assessment of events. Taken together the policies of the Local Plan remain broadly consistent with national policy and guidance. For example, the development / spatial strategy is proving robust and rates of land supply and delivery are on target. Critically, strategic policies are withstanding challenges at Section 78 appeals.</p> <p>Be that as it may, the Review has found that certain policies should be updated and/or would benefit from being updated to aid conformity with national policy and to reflect recent updates to evidence and changes to local and national strategic priorities. The toolkits also identify dependencies. For example, additional updates might be required as a result of a change to a dependant (parent) policy and /or evidence. The toolkits provide commentary on the short and long term impacts and suggest when the policy will need to be updated and / or to what extent.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT:</p> <p>Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison</p>	AGREE	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council adopted its Local Plan on 3rd August 2018, prior to the introduction of the Standard Method in the PPG on 20 February 2019.</p> <p>National Planning Practice Guidance (PPG) states, "Local housing need will be considered to have changed significantly [bullet points added to aid reader]:</p> <ul style="list-style-type: none"> • where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or • [where it] has been subject to a cap where the plan has been adopted using the standard

¹ Paragraph 61 <https://www.bailii.org/ew/cases/EWHC/Admin/2019/2143.html>

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	<p>with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>		<p>method.”</p> <p>The first clause is relevant to Cotswold District and a key matter to consider is what constitutes ‘significant’. National planning policy or guidance does not define the word ‘significant’. However, its ‘effect’ can be measured indirectly. The effects are complex and nuanced and further discussion is provided below.</p> <p>The Local Plan’s annualised housing requirement is 420 dwellings per year (8,400 dwellings over a 20-year plan period). The starting point for calculating future housing needs is the Government’s Standard Method (the Standard Method), which is considered further in the emerging Gloucestershire Local Housing Needs Assessment (LHNA). The Standard Method indicates that the Council’s housing need should increase to 490 dwellings per annum. A key reason for the higher housing need figure is the District’s high affordability ratio (the difference between the average wage and the average house price). Therefore, the Council’s housing land supply should be examined to establish if sufficient headroom is available to meet increased needs or if additional supply is required and to what extent.</p> <p>The Council’s housing supply can be viewed through three lenses: (1) total housing supply over the remaining plan period; (2) the rolling five year housing land supply (5YHLS); and (3) the rolling housing delivery test (a test of housing delivery over the previous three years).</p> <p><u>(1) Total Housing Supply</u></p> <p>The difference between the adopted Local Plan housing requirement and the new housing need figure is approximately 700 additional dwellings (over the remaining 10-year period). There is some flexibility in the current housing supply to meet some of this additional need. However, 256 additional dwellings (based on 2019 predictions) will be required to meet the new housing need figure. In addition to this, a ‘buffer’ is required to provide flexibility in supply. For example, the Local Plan provides approximately 10,000 dwellings against a Local Plan housing requirement (target) of 8,400 dwellings.</p> <p><u>(2) 5YHLS</u></p> <p>A rise from 420 dwellings p.a. to 490 dwellings p.a. represents a 17% increase. The Council currently benefits from the residual requirement method that takes account of oversupply in the early part of the plan period – a unique situation in Gloucestershire. This currently reduces the annual requirement to 292 dwellings. The annual requirement is expected to reduce further to 238 dwellings p.a. by 2022/23. Therefore, the difference between the adopted local plan housing requirement and the current housing need calculation is substantially greater (68% at 2019/20 and 106% at 2022/23).</p>

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			<p>At the point the new housing need figure is applied this will 'zero' any past oversupply. The residual requirement method will therefore become less effective. Forecasts indicate that this is likely to have a significant impact on the Council's ability to maintain a 5YHLS.</p> <p><u>(3) Housing Delivery</u></p> <p>The Council is currently in the top five performing councils in the England for its housing delivery test score. However, forecasts indicate this will decrease over time. A scenario provided below (Housing Delivery Test Table) predicts there will be two instances where the Council will fall below 100%. The pass rate is 95%. The increase in housing need is unlikely to have a significant effect on the Council's ability to achieve the government's housing delivery test.</p> <p>A scenario based on the figures from the 1 April 2019 housing trajectory is provided below (Housing Land Supply Tables 1 and 2). Table 1 illustrates what would happen to the five year housing land supply if the 490 housing requirement were to be introduced on 1 April 2021. Table 2 does the same but moves the date forward to 2023. The Council must continue to demonstrate a rolling 5YHLS, which current estimates suggest will become increasingly difficult from 2023/24 onwards.</p> <p><u>Housing Land Supply Table 1 - (490 dwgs p.a. applied from 2021)</u></p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #2e8b57; color: white;"> <th></th> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>2029/30</th> <th>2030/31</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Annual Supply</td> <td>431</td> <td>483</td> <td>448</td> <td>574</td> <td>407</td> <td>618</td> <td>575</td> <td>452</td> <td>402</td> <td>407</td> <td>386</td> <td>375</td> <td>4,644</td> </tr> <tr> <td>5 Year Supply</td> <td>2,343</td> <td>2,530</td> <td>2,622</td> <td>2,626</td> <td>2,454</td> <td>2,454</td> <td>2,222</td> <td>2,022</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Cumulative completions from 2021</td> <td>N/A</td> <td>N/A</td> <td>448</td> <td>1,022</td> <td>1,429</td> <td>2,047</td> <td>2,622</td> <td>3,074</td> <td>3,476</td> <td>3,883</td> <td>4,269</td> <td>4,644</td> <td>-</td> </tr> <tr> <td>Residual Annual Requirement (490p/a from 2021)</td> <td>292</td> <td>280</td> <td>490</td> <td>495</td> <td>485</td> <td>496</td> <td>476</td> <td>456</td> <td>457</td> <td>475</td> <td>509</td> <td>631</td> <td>4,900</td> </tr> <tr> <td>5 Year Requirement</td> <td>1,461</td> <td>1,398</td> <td>2,450</td> <td>2,473</td> <td>2,424</td> <td>2,479</td> <td>2,378</td> <td>2,278</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>5 Year Requirement + 5% Buffer</td> <td>1,534</td> <td>1,468</td> <td>2,573</td> <td>2,597</td> <td>2,545</td> <td>2,603</td> <td>2,496</td> <td>2,392</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>5 Year Supply (Years)</td> <td>7.6</td> <td>8.6</td> <td>5.1</td> <td>5.1</td> <td>4.8</td> <td>4.7</td> <td>4.5</td> <td>4.2</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <div style="text-align: right; margin-top: 10px;"> <table border="1" style="border-collapse: collapse;"> <tr> <td>Housing requirement – housing supply</td> <td style="text-align: center;">256</td> </tr> <tr> <td>Housing requirement (+25%) – housing supply</td> <td style="text-align: center;">320</td> </tr> </table> </div> <p><u>Housing Land Supply Table 2 - (490 dwgs p.a. applied from 2023)</u></p>		2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Total	Annual Supply	431	483	448	574	407	618	575	452	402	407	386	375	4,644	5 Year Supply	2,343	2,530	2,622	2,626	2,454	2,454	2,222	2,022	-	-	-	-	-	Cumulative completions from 2021	N/A	N/A	448	1,022	1,429	2,047	2,622	3,074	3,476	3,883	4,269	4,644	-	Residual Annual Requirement (490p/a from 2021)	292	280	490	495	485	496	476	456	457	475	509	631	4,900	5 Year Requirement	1,461	1,398	2,450	2,473	2,424	2,479	2,378	2,278	-	-	-	-	-	5 Year Requirement + 5% Buffer	1,534	1,468	2,573	2,597	2,545	2,603	2,496	2,392	-	-	-	-	-	5 Year Supply (Years)	7.6	8.6	5.1	5.1	4.8	4.7	4.5	4.2	-	-	-	-	-	Housing requirement – housing supply	256	Housing requirement (+25%) – housing supply	320
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A3.	<p>You have a 5-year supply of housing land PROMPT:</p> <p>Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	AGREE	Yes, but this will become increasingly difficult to maintain from August 2023 onwards. Please see commentary provided at A2.
A4.	<p>You are meeting housing delivery targets PROMPT:</p> <p>Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	AGREE	Please see commentary provided at A2.
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period. PROMPT:</p>	AGREE	<p>The Local Plan contains a broad set of objectives that seek to:</p> <ul style="list-style-type: none"> (a) conserve and enhance the natural environment; (b) to provide an adequate supply of housing land to meet population and housing needs; (c) support the local economy; (d) implement the Infrastructure Delivery Plan (IDP); (e) reduce car use; and

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	Use (or update) your Authority Monitoring Report to assess delivery.		<p>(f) reduce the environmental impact of development and vulnerability to the impacts of climate change.</p> <p>The Local Plan also contains quantitative targets which help to measure whether these objectives are being delivered.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 35%;">Requirement</th> <th style="width: 15%;">Target by 2031</th> <th style="width: 50%;">Status at 2019</th> </tr> </thead> <tbody> <tr> <td>Housing Requirement (target)</td> <td style="text-align: center;">8,400</td> <td>Meeting needs ahead of target. Since 2011 4,893 dwelling have been built against an annual average requirement of 420 p.a. which equates to an 3,360 dwellings (8 years x 420 dwellings = 3,360); At April 2019 there were 4,263 with planning permission that are either under construction or yet to be built out.</td> </tr> <tr> <td>New sheltered & extra care housing</td> <td style="text-align: center;">665</td> <td>An additional 38 houses are required to meet total identified needs.</td> </tr> <tr> <td>New affordable homes p.a</td> <td style="text-align: center;">157 p.a</td> <td>Currently delivering the target but this is expected to decrease in the next year before picking back up when Chesterton Strategic site begins to deliver new homes. The Gloucestershire Local Housing Needs Assessment (LHNA) is updating the need for different house sizes, types and tenures to adequately house the District's population up to 2041. Local Plan Policy H1 is already sufficiently adaptive to enable the LHNA to be taken into consideration up to 2031 but not to 2041. The majority of housing required by the extant Local Plan has already been built or has planning permission. However, social rented housing only forms a small percentage of total dwellings delivered; the District's acute housing affordability issue continues to worsen. More radical policy intervention might be required to tackle worsening housing affordability. However, planning policy is unlikely to be the panacea and is only</td> </tr> </tbody> </table>	Requirement	Target by 2031	Status at 2019	Housing Requirement (target)	8,400	Meeting needs ahead of target. Since 2011 4,893 dwelling have been built against an annual average requirement of 420 p.a. which equates to an 3,360 dwellings (8 years x 420 dwellings = 3,360); At April 2019 there were 4,263 with planning permission that are either under construction or yet to be built out.	New sheltered & extra care housing	665	An additional 38 houses are required to meet total identified needs.	New affordable homes p.a	157 p.a	Currently delivering the target but this is expected to decrease in the next year before picking back up when Chesterton Strategic site begins to deliver new homes. The Gloucestershire Local Housing Needs Assessment (LHNA) is updating the need for different house sizes, types and tenures to adequately house the District's population up to 2041. Local Plan Policy H1 is already sufficiently adaptive to enable the LHNA to be taken into consideration up to 2031 but not to 2041. The majority of housing required by the extant Local Plan has already been built or has planning permission. However, social rented housing only forms a small percentage of total dwellings delivered; the District's acute housing affordability issue continues to worsen. More radical policy intervention might be required to tackle worsening housing affordability. However, planning policy is unlikely to be the panacea and is only
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A6.	<p data-bbox="241 730 766 855">There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p data-bbox="241 879 349 903">PROMPT:</p> <p data-bbox="241 927 766 986">A key employer has shut down or relocated out of the area.</p> <p data-bbox="241 1010 766 1102">Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p data-bbox="241 1126 766 1251">Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p data-bbox="241 1275 766 1394">You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need</p>	AGREE	<p data-bbox="981 730 1872 759">Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p data-bbox="981 783 1066 807"><u>Context</u></p> <ul data-bbox="1025 831 2121 1385" style="list-style-type: none"> <li data-bbox="1025 831 2121 924">• The Sustainability Appraisal Adoption Statement shows that employment in agriculture and forestry has decreased modestly against the base year (2015) but increased in leisure and tourism. Employment in emerging sectors has increased significantly in relative terms. <li data-bbox="1025 932 2121 1088">• Very few locations in Cotswold District offer positive viability thresholds for new employment development. The District's established employment sites therefore play a critical role in meeting the District's economic and business needs. Protection of such sites and support for their potential intensification is needed to attract new businesses and ensure that existing businesses are retained and have the opportunity to grow. <li data-bbox="1025 1096 1939 1125">• An ageing population will have an impact on the economically active age group. <li data-bbox="1025 1133 2121 1225">• Affordability of housing is a key issue for the District. There are difficulties in attracting workers as median wages are below the national average, the cost of living is high in terms of buying and renting a property and running costs. <li data-bbox="1025 1233 2121 1292">• Need for improved broadband connectivity, particularly in rural areas to support rural economy and reduce the need to travel. <li data-bbox="1025 1300 2121 1385">• Need to compete with larger surrounding towns such as Swindon, Cheltenham, Tewkesbury and Gloucester by focussing on its highly skilled workforce and attractive high quality environment to live and work. 									

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	<p>assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>		<ul style="list-style-type: none"> • The Council is not aware of significant local changes and/or closures to a key employer. Factors that the Council will need to monitor is the impact of the expansion of activities at RAF Fairford, road improvements to the A417 (Missing Link) at Birdlip, Brexit and the Climate emergency. <p><u>Economy and Employment</u></p> <ul style="list-style-type: none"> • 2020 to 2031 - If an update of the Local Plan is not carried out it is likely that the current Local Plan employment land allocations will deliver the full 24.4ha of employment land currently required by the end of the Local Plan period 2031; significant additional land is unlikely to be needed before the end of the Plan period. • 2031 to 2041 - Without continuation of the current policy stance, loss of employment land to residential development would continue to be an underlying issue .It may limit land supply and economic growth post the 2031 Plan period if there is no further strategic review of employment land or future safeguarding of sites. • Existing forecasts for economic growth are likely to be out of date post-Brexit and require revision to 2041. <p><u>Town Centres</u></p> <ul style="list-style-type: none"> • A revised approach to planning for town centres is required if long-term deterioration and attendant social and environmental problems is to be averted or ameliorated. Local Plan policies EC7 and EC8 require revision to reflect the changing nature of town centres. Policy EC9 should also be revised to include leisure and office proposals, as out-of-centre development of this type could have a negative impact on any revised strategic approach to town centres. • Cirencester town centre and other town centres may suffer a loss of vitality, which contributes significantly to their character, due to the changing retail landscape, unless new appropriate uses can be found. <p><u>Tourism</u></p> <ul style="list-style-type: none"> • Without a Local Plan Update, the tourism-related policies of the existing plan would remain in force. • Whilst many of the identified problems and issues lie outside of planning control, the supporting text of policy EC10 does refer to some of them. However, the policy itself does not explicitly address them. Moreover there is a conflict between criterion (b) which requires facilities to be “well related to the main tourist routes” and the problem of concentration of tourism in honeypot destinations.

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			<ul style="list-style-type: none"> Policy EC11 is essentially restrictive rather than enabling. Whilst this has regard to the recognised environmental sensitivity of much of the district, it tends to conflict with statements, again in the supporting text, that emphasise the importance of tourism as “a key employment sector in the district”.
<p>A7.</p>	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT:</p> <p>You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	<p>AGREE</p>	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Since the adoption of the Local Plan (Aug 2018), the Council has implemented a CIL levy (June 2019) on new development (residential and retail). Residential build rates continue as projected and the Council (against its extant housing requirement) continues to deliver new homes at a rate higher than its average annual target. In terms of delivery, the Council is in the top five across England. There is minimal indication through the Development Management process that development has become inherently unviable.</p>

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A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type.</p>	AGREE	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Strategic Site at land south of Chesterton, Cirencester is central to the delivery of the Local Plan, it will contribute 1,800 new dwellings by 2031 and 2,350 once complete in 2034. Outline permission was granted in 2019. A Reserved Matters application is due in early 2020 and building is expected to start in 2021. The Local Plan’s housing trajectory remains robust and is on course to deliver the housing requirement.</p>
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT:</p> <p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely</p>	AGREE	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> • The local plan covers issues relating to Biodiversity in policies EN8 and EN9. However, it does not take account of recent government advice and more detailed guidance regarding biodiversity and the need to identify pressures on internationally important sites (SACs). It also does not fully consider the implications of climate change for species and habitats • The Plan is not adequately prescriptive regarding where specific habitats should be enhanced and created to minimise and reverse habitat fragmentation and species loss. • The Nature Recovery Network for Gloucestershire, which will include Cotswold District is due to be published in early 2020. • Without a review the plan will not be able to deliver landscape scale habitat restoration set out in the Local Nature Recovery Network. • Without a Local Plan Review it is likely that the Council will be able to achieve national targets for net gain, both on and off sites, but not set its own, higher target. <p><u>Green Infrastructure</u></p> <ul style="list-style-type: none"> • National and local guidance/advice for GI has recently been published, including the update to

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	<p>significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		<p>the Cotswold District GI Strategy. Without a review, the Plan will be based on limited policy guidance, which does not reflect national updates.</p> <ul style="list-style-type: none"> • The Local plan includes a set of principles for high quality GI, set out in Policy INF 7 and elsewhere, but these do not fully integrate the Building with Nature benchmark and the emerging Natural England work on GI standards as well as the latest Cotswold GI Strategy. The review needs to incorporate these in the design code and related policies, which will provide clarity for developers and other industry members. • The data, evidence and priorities developed as part of the Cotswold District Council GI Strategy would not be reflected in policy, including more specific reference to appropriate GI standards, and the need for additional natural and open spaces. <p><u>Natural Capital (and ecosystems services)</u></p> <ul style="list-style-type: none"> • The role of natural capital and its services is likely to become more crucial when the weather is increasingly fluctuating, as is predicted by the climate change models. • The Natural Capital Committee, a Government advisory group made nine recommendations on how to account for natural capital. These are included in 25 year plan 2018 for the environment. • The Local Plan does not make reference to Natural Capital and ecosystem services. A review is required to establish where the most important resources of natural capital are located, the potential impacts of change and how the amount of natural capital can be increased. The review will need to consider how natural capital should inform policy preparation, site allocation and mapping. • Without a Local Plan review the ecosystem services provided by the natural capital of the District will not be fully recognised, leading to potential losses and missed opportunities for enhancement. There will be no evidence for Natural Capital and ecosystems services and the plan will fail to meet one of its strategic NPPF obligations. It will also weaken other policy areas in addressing climate change, both by mitigation and adaptation. <p><u>Climate Change</u></p> <ul style="list-style-type: none"> • In the future, the District will experience a higher temperature climate and more extreme weather events, including flooding: <ul style="list-style-type: none"> • <u>Fluvial flooding</u>: On larger main rivers in wider valleys such as the River Churn and the River Thames modelling indicates a noticeable increase in the mapped flood extent. Smaller watercourses in Cotswold tend to be in areas of steeper topography with quite confined floodplains, and in these cases increases in flow do

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			<p>not result in a significant increase in flood extent.</p> <ul style="list-style-type: none"> • <u>Surface water flooding</u>: Climate change is predicted to increase rainfall intensity in the future by up to 30%. This will increase the likelihood and frequency of surface water flooding, particularly in impermeable urban areas, and areas that are already susceptible such as Moreton in Marsh and Fairford. • <u>Groundwater flooding</u>: The effect of climate change on groundwater flooding problems, and those watercourses where groundwater has a large influence on winter flood flows (such as the River Churn), is more uncertain. Milder wetter winters may increase the frequency of groundwater flooding incidents in areas that are already susceptible. However, warmer drier summers may counteract this effect by drawing down groundwater levels more during the summer months <ul style="list-style-type: none"> • At present the Local Plan refers to climate change as an additional consideration alongside many others. Climate change requires a paradigm shift. It affects many land-use planning issues and the Review needs to reflect this in its policies (e.g. on energy efficiency of buildings) and structure. Without doing so the Local Plan will not be giving climate change sufficient weight. • No renewable energy development sites have been identified or allocated in the Local Plan – the Review needs to address this shortcoming. The reduction in “installed and declared” renewable energy needs to be addressed in the Review. • The adopted Local Plan’s land allocation policies have had full regard to available evidence relating to the management of flood risk (Water Cycle Study, SFRA 1 and 2, Sequential Test). An update will need to assess the extent to which this evidence requires updating. <p><u>Historic Environment</u></p> <ul style="list-style-type: none"> • There is currently insufficient data and evidence to ascertain whether the Local Plan policies are achieving their objectives. • The impacts of climate change on heritage assets is not covered in the Local Plan. • New ways to re-purpose historic retail premises are not adequately covered in the current local plan. <p><u>Landscape</u></p> <ul style="list-style-type: none"> • The Glover Review recommends managing AONBs and National Parks jointly, and reconsidering the role of both designations. This will need to be taken into account if its recommendations are supported by government and reflected in legislation, policy etc. • The potential linkages between GI, natural capital and landscape issues are not clearly set out in

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			<p>the current local plan, which may lead to lack of clarity which in turn could mean that the maximum benefits are not achieved.</p> <ul style="list-style-type: none"> • The Local Plan does not take account of how net gain and natural capital will contribute to the quality of the landscape. • Consolidation of evidence underpinning the Special Landscape Areas is required. <p><u>Soils and Air Quality</u></p> <ul style="list-style-type: none"> • Proposed development in the district has the potential to have adverse effects on air quality through increasing traffic flows and associated levels of pollutants. The “missing link” dualling of the A417 may ameliorate some of the air-quality issues at the Air Balloon junction. • Whilst problems and issues will be neither ameliorated nor exacerbated if the Local Plan is not reviewed, the plan can have a bearing on the need to travel by the private car / the degree to which people choose to use sustainable modes of transport such as walking, cycling and public transport. The Review presents an opportunity to reassess policy with a view to improvements in this area. • The identification of contaminated land and areas of poor air quality is not a matter for the LPA. Policy EN15 of the adopted Local Plan adequately addresses the land-use planning aspects of these issues. • The adopted Plan’s policies (DS2 and DS3) only tangentially refer to the need to the general principle of developing brownfield sites before greenfield sites. The Review needs to be more explicit. <p><u>Water Quality and Water Resources</u></p> <ul style="list-style-type: none"> • Hotter, drier summers due to climate change may exacerbate low river flows and the potential to dilute pollutant loads from wastewater effluents, affecting water quality. • Adopted Local Plan policy INF8 will adequately address these issues if the Local Plan Review does not take place. • Timely sharing of information relating to growth proposals will enable the water companies to tailor their Water Management Plans accordingly. • A new reservoir at Abingdon is proposed in all ‘new’ Water Supply Options by 2037.

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A10.	<p>There are no new sites that have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	<p>AGREE</p>	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There are no new sites that have become available that require the spatial strategy to be evaluated. The Council is on target to deliver its development strategy.</p>

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A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT:</p> <p>You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	<p>AGREE</p>	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council maintains a tool to track the delivery of infrastructure listed in policies SA1, SA2 and SA3. At this stage, there are no indications that infrastructure projects critical to plan delivery will not be delivered. However, there are still 11 years of the plan period remaining and this should be regularly monitored. The vast majority of infrastructure identified in the Local Plan relates to Transport and Education.</p> <p><u>Transport</u></p> <p>Transport exists in a dynamic relationship with other key strategic planning issues. Identified issues may in fact be an expression of deeper problems that will not be resolved simply by focussing on the symptoms. Commuting patterns, for example, may be the expression of a complex web of interrelated considerations such as demand for certain skills, housing availability and affordability, proximity to major employment centres in surrounding areas and so on.</p> <p>Squarely focussed on infrastructure and safety, the purpose of the current local plan transport policies INF3 and INF4 is to assist in implementation of the Local Transport Plan (LTP) prepared by Gloucestershire County Council as Highways Authority. Any revision of the LTP will need to be reflected in the Local Plan Review as appropriate.</p> <p>As it currently stands policy INF3 provides an adequate basis upon which to encourage modal shift and increase the number of electric vehicle charging points in the district. The other problems and issues raised are not susceptible to intervention via the transport policies of a revised Local Plan.</p> <p><u>Education</u></p> <p>Moreton in Marsh requires an additional primary school which has only become evident in late 2019 and is a result of Gloucestershire County Council updating its calculation of needs. This issue is now preventing future development schemes from being developed in the town. The Moreton in Marsh policy needs to be revised to reflect the changing circumstances and identify how this can be mitigated. Although an issue, it is not significantly impacting the delivery of the Local Plan's ability to meet its housing requirement, although this will need to be monitored regularly. Moreton in Marsh Town Council are in the process of preparing a Neighbourhood Plan – this might provide a timely mechanism to resolve current issues.</p>

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A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT:</p> <p>Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan's strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	AGREE	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There has been no significant increase in appeals recently. However, should the Council be unable to maintain a robust 5YHLS history indicates this will change.</p> <p>Officers maintain a local plan policy tracker tool that records improvements and points of clarity that are required as the policies have been used by decision makers. Most are not significant issues that prompt an update although an update would provide a useful opportunity to correct and improve policies.</p>

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A13.	<p>There are no recent or forthcoming changes to another authority’s development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT:</p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any relevant neighbourhood plans ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. ● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	AGREE	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Excluding Cotswold District, all Gloucestershire authorities are in the process of updating their local plans to 2041 (Stroud 2040). There are no significant changes that indicate and / or require the Council to update its Local Plan to take account of forthcoming changes. However, there are opportunities to work collaboratively together to mitigate, adapt and deliver shared ambitions and objectives (e.g. climate emergency, modal shift, decarbonising the economy, delivery of affordable housing and health & wellbeing).</p> <p>The Council is working with Gloucestershire partners to develop a statement of common ground. This will provide the basis for a shared spatial strategy for Gloucestershire; it will also set out (in broad terms) how development needs will be distributed across the County and identify key pieces of infrastructure. There has been no request from any neighbouring authority to deliver development needs in the district.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT:</p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on. 	<p>DISAGREE</p>	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Development Strategy (DS) policies address and deliver identified strategic priorities at point of adoption. However, since the adoption the Council, under a new administration, has updated its Corporate Strategy (2019 to 2023), which seeks to:</p> <ul style="list-style-type: none"> ● Respond to the challenges presented by the Climate Change Emergency; ● Deliver good quality social rented homes; ● Present a Local Plan which is Green to the Core; ● Ensure that all services delivered by the Council are delivered to the highest standard; and ● Help residents, businesses and communities to access the support they need to ensure a high level of health and wellbeing. <p>The new priorities do not directly impact the key tenets of the Plan (e.g. Strategic site at land south of Chesterton, etc.) but they do place a much greater emphasis on health and wellbeing, climate change and the delivery of social rented affordable homes. Whilst the Plan addresses these priorities, albeit to varying degrees, there is an expectation that these priorities act as a ‘golden thread’ that runs through the Plan.</p> <p>The Plan’s vision and objectives remain aligned and are fit for purpose. However, an update to the Plan would allow the Council to amend and include new policies to ensure the Plan delivers the strategic priorities. Additional matters will also need further consideration:</p> <ul style="list-style-type: none"> ● updated housing needs of Cotswold District and the surrounding authorities (NPPF para 11 b)); ● providing for the needs of a wider range of different groups of people (NPPF para 61); ● delivering the Climate Change Act requirements; and ● addressing other public sector strategies <ul style="list-style-type: none"> - GFirst LEP: Local Industrial Strategy; Inward Investment Strategy, etc. - GCC: Local Transport Plan, Local Developer Guide, Housing with Care Strategy, Health and Wellbeing Strategy, etc. - Blue light services, Neighbourhood Plans, Glos. Statement of Common Ground, etc.

ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES

		YES/NO	
A15.	You AGREE with <u>all</u> of the statements above	NO	<p>If no go to question A16.</p> <p>If yes, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	YES	<p>If yes, based on the above provide a summary of the key reasons why an update to plan policies is necessary in section A17 below and complete Section B below.</p>
A17.	<p>Decision: Update Local Plan policies</p> <p>The review disagrees with three statements relating to (1) Consistency with national policy and guidance; (2) Economic Conditions; and (3) Corporate Strategy. However, there are three additional statements (A2, A3 and A4) that, whilst fully consistent with national policy requirements at 2020, may not be from August 2023.</p> <p>(1) National policy and guidance (A1.) The <i>CDC Local Plan Policy Toolkit, PAS Toolkit 2 and the Sustainability Appraisal Scoping Document</i> (the toolkits) have identified that certain policies require updating, albeit to varying degrees (see list at question B4).</p> <p>(2) Local Housing Need and Supply (A2, A3 & A4.) The Council can currently demonstrate a robust 5YHLS, which is predicted to grow over the next two years. However, the new housing need figure is forecast to affect the Council's ability to maintain a 5YHLS from August 2023. Additional land for housing will need to be allocated in the Local Plan to address likely shortfall in terms of the 5YHLS and the total supply over the plan period. The effect of the government's 'Standard Method' is not significant because modest measures can be taken to rectify any shortfall in the plan period.</p> <p>(3) Economic Conditions (A6.) Update relates to the town centre economy only. Local Plan policies S3, EC7 and EC8 require revision to reflect the changing nature of town centres. Policy EC9 should also be revised to include leisure and office proposals, as out-of-centre development of this type could have a negative impact on any revised strategic approach to town centres</p> <p>(4) Corporate Strategy (A14.) The Local Plan is an important tool to deliver the Council's place shaping ambitions (including those supported by the Council at a more strategic level such as the Local Industrial Strategy developed by the Local Economic Partnership). Therefore, it is important they are not developed in isolation. Since the adoption of the Local Plan a new corporate plan has been adopted and it introduces five new priorities, which all have a spatial element. The vision and objectives and the</p>		

spatial strategy remain 'fit for purpose' and changes can be made to policies that do not affect these. A partial update to the Local Plan would allow the Council to amend and include new policies to ensure the Plan delivers its strategic priorities.

The NPPF makes clear the planning system should be genuinely plan-led and that plan should be kept up-to-date. It is within this context that the Council should update its local plan and avoid the alternative approach of the development management / appeal led system. This approach is a proportionate response to the known issues and is consistent with provisions contained within the NPPF (inc. paragraph 33). The Council has approximately three years before these issues will begin to affect the Council's local planning framework (e.g. the titled balance of the presumption in favour of sustainable development)

	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	NO	Cumulatively policies listed at B4 do not lead to a material change in the housing requirement. The review has not found the need to update the adopted the growth strategy and / or spatial distribution in Cotswold District, which continues to deliver as expected. The update will provide additional flexibility to the Council's housing land supply over the remaining plan period and provides additional mechanisms to deliver the new corporate strategy/priorities. It is likely that various parts of the local plan evidence base will need to be updated, for example, Infrastructure Delivery Plan, Local Plan viability, SHELAA, etc. However, any update will be proportionate to the matters, issues and context.
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	NO	The Spatial Strategy remains sound and provides a realistic and achievable framework against existing targets and expectations. Land supply evidence shows new residential and employment development are being delivered as predicted. The Council currently enjoys a very high position in national delivery league table (5 th in England) and can demonstrate approx. 7 years of housing land supply. There are at least two spatial policies that will need updating to reflect latest evidence but they do not significantly impact the growth strategy and / or spatial distribution of growth set out in the current plan. (1) Moreton in Marsh is experiencing higher numbers of pupils from development and therefore a new primary school is now required. This is affecting the last remaining residential allocation that is yet to receive planning permission. (2) The Cirencester Central Area Strategy is contextually grounded in an orthodox approach to town centre redevelopment/regeneration that sees retail as its lynchpin. Most agree that this orthodoxy may no longer be a sound basis for future planning. Also, the 'key' that unlocks town centre redevelopment, the decked Waterloo car park proposal, is also unlikely to deliver the expected number of new car park places that was originally envisaged in the Local Plan.

			<p>The update will deliver a modest supply of additional development using the adopted spatial strategy. Should evidence indicate that land is not available, suitable, achievable and deliverable then a review of the strategy will need to be considered (e.g. Duty to Co-operate). At the time of writing, extant evidence does not indicate this to be a significant issue. However, this position will need to be kept under review through the plan making process.</p> <p>The Council will continue to keep evidence up-to-date such as the Role and Functions Settlement Study and the Strategic Housing and Economic Land Availability Assessment to ensure the spatial strategy remains fit for purpose and provides a sustainable basis for locating development; this will also provide the basis for a more substantial update of the local plan in the latter half of the 2020s. Furthermore, the local plan update will be supported and assessed through the Sustainability Appraisal and Habitat Regulation Assessment processes to ensure it complies with necessary legal, regulatory and procedural requirements.</p>
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	NO	<p>The review has not found the need to update the Local Plan's single strategic site allocation, land south of Chesterton (policy S2), which now has the benefit of outline planning permission. A reserved matters application is expected in 2020/21 with building work expected to commence in 2021/22.</p> <p>The adopted Local Plan does not define strategic policies (which will need to be clarified in the update) - but the central development strategy policy, policy DS1, has not been identified as requiring a fundamental update at this time. The Policy will likely need to reflect the latest housing need figure, resulting from the government's Standard Method, which indicates that the Local Plan's average annual housing requirement should increase from 420 dwellings p.a. to 490 dwellings p.a. (see commentary at A2 and A17(2)).</p> <p>The increased housing need is likely to require a modest increase in housing land supply to address a potential shortfall.</p>
	You have answered yes to one or more questions above.	NO	You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	You have said no to <u>all</u> questions (B1 to B3) above	YES	If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.

B4

Decision: Partial Update of Plan Policies

The PPG provides a useful (but not exhaustive) list of what can consider when determining whether a plan or its policies should be updated²; the Review has been carried out within this context. The Planning Advisory Service recommends reflecting on ‘planning considerations’³, such as national planning policy and guidance, the Government’s standard method for calculating housing need, the implementation of local plan policies and changing circumstances (international, national and local). The following documents have been useful resources in the review process and have identified specific issues, characteristics and challenges that are relevant to Cotswold District and its adopted Local Plan:

- PAS Toolkit 2 – Local Plan Form & Content Checklist (2020);
- Cotswold District Local Plan – policy review report (2020);
- Sustainability Appraisal (SA) scoping document (2020); and
- Cotswold Annual Monitoring Report (2020).

The review process is a method to ensure that a plan and the policies within remain effective⁴. Local circumstances do not indicate that the spatial strategy should be updated; however the review does provide a cautionary note that a more comprehensive update will be needed before the end of the plan period to ensure strategic policies remain up-to-date. A partial update to the plan is the most appropriate and proportionate response to issues discussed in this review. The following table identifies policies that require updating and areas of the NPPF that are influencing the update.

Policy Theme	Local Plan Policies
Plan Making	Issues, S1, DS1, DS2, S4 to S19, Appendix J and K
Housing	H1, H2, H4, H5
Economy	EC6, EC7, EC8, EC10, EC11
Town Centres	S3
Natural Environment	EN7, EN8, EN12, EN13
Design	EN2, Appendix D
Infrastructure	INF1, INF2, INF3, INF7, INF9, INF10, SA1 to SA3, Appendix F

The policies largely fall into two categories, spatial policy (e.g. Cirencester Town Centre) and Development Management policies (e.g. Design, retail, affordable housing); most fall into the latter category. Some of these policies will impact other dependent policies, which will require additional modifications as well but are not listed here. Equally, and as a result of the plan making process other policies may be subject to an update to reflect latest evidence and /or stakeholder engagement and community consultation.

² PPG Plan Making Chapter - Paragraph: 065 Reference ID: 61-065-20190723 (<https://www.gov.uk/guidance/plan-making>)

³ PAS Local Plan Route Mapper – Diagram 2 <https://www.local.gov.uk/sites/default/files/documents/PAS%20Local%20Plan%20Route%20Mapper%20v1%200.pdf>

⁴ PPG Plan Making Chapter - Paragraph: 064 Reference ID: 61-064-20190315 (<https://www.gov.uk/guidance/plan-making>)

Date of assessment:	February 2020
Assessed by:	Forward Planning Team
Checked by:	Forward Planning Manager
Comments:	Submit to the Senior Management Team for consideration