

PAS Local Plan Route Mapper Toolkit

Part 2: Local Plan Form & Content Checklist

Why you should use this part of the toolkit

The following table sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF). Guidance to supplement the NPPF is set out within [National Planning Practice Guidance](#), which is regularly updated by the Government. You should review relevant sections of the National Planning Practice Guidance and consider any implications for your policies.

This part of the Toolkit will assist by informing all plan making stages, including any visioning and scoping exercises seeking to ascertain what the plan should cover. It should be applied before consultation or publication of a local plan update. This will help to ensure that you have considered all of the key plan-making requirements in preparing your plan in accordance with the NPPF.

This part of the toolkit deals only with the local plan content requirements specified in the NPPF. Toolkit Part 1 provides more detail on carrying out a review of the need to update policies within your plan. Toolkit Part 3 sets out the process requirements for local plan preparation as set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Toolkit Part 4.

How to use this part of the toolkit

You can use column C in the table to record the results of your assessment against the checklist for the following plan making stages:

Local Plan Review: The toolkit can be used to inform the decision on whether or not your local plan policies need to be updated. In this case:

- Ask yourself whether the development plan for your area (which may comprise more than one development plan document or include a spatial development strategy and/or neighbourhood plans) still meets current NPPF requirements.
- Identify which policy and document addresses the requirement in column C or identify why it is not relevant. **(Please refer to 'Local Plan Policy Toolkit Feb 2020')**

If your plan was adopted under the NPPF 2012 you might find the following quick reference colour codes helpful to identify new or revised NPPF requirements since the adoption of your plan:

Key:

New plan-making requirement of the NPPF 2019 not contained within the previous 2012 version

Revised plan-making requirement of the NPPF, containing some changes from the 2012 version

Requirement of the NPPF which has not changed from the 2012 version in relation to plan-making

Scoping your policies update: The checklist can also be used to determine the scope of your local plan policies update and ensure that content requirements are addressed. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/ planning context of your local authority area(s); and then
- consider whether your local plan policies update will need to address these content requirements or identify whether they are contained in other documents that form the development plan in your area.

Assessing your draft policies update: The checklist can also be used to ensure that your emerging draft policies update is adequately addressing content requirements of national planning policy. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/planning context of your local authority area(s); and then
- if it is, whether your draft local plan policies update addresses these content requirements (or identify whether they are contained in other documents that form part of the development plan in your area).

How to use the results of this part of the toolkit

This checklist is to help you review your policies and/or develop an update to these where required. There is no requirement to publish or submit this table to the Planning Inspectorate. However, you may find it (or some elements) helpful to assist you in demonstrating how the policies update does/does not accord with the NPPF.

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	<i>General Requirements</i>			
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	<p>Since the Cotswold District Local Plan 2011-2031 (the Plan) was adopted in August 2018, Highways England has announced the preferred route of the A417 Missing Link. A statutory consultation was held in Autumn 2019 and the Development Consent Order (DCO) proposal is programmed to be submitted to the Planning Inspectorate in 2020.</p> <p>As a nationally significant infrastructure project the scheme is required to be in conformity with National Policy Statement for National Networks (NPSNN). Appendix F of the Assessment Scheme sets out how each environmental topic conforms to the policy requirements of the NPSNN¹.</p> <p>The scheme itself does not trigger an update of the local plan. However, once completed, the impacts will need to be monitored closely and over time. For example, how will improved connectivity affect existing commuting patterns into, out of and through the District? Will this have significant impact on demographics, internal migration, the economy, etc.?</p>	No
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	The Local Plan provides a sound framework in so far as the Council continues to maintain a five year housing land supply and pass the Housing Delivery Test; policies are facilitating development in sustainable locations; policies are largely consistent with national planning policy and guidance; and policies continue to stand up to scrutiny at Section 78 appeals.	No

¹ https://highwaysengland.citizenspace.com/he/a417-missing-link/results/a417_missing_link_scheme_assessment_report.pdf

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	<p>NPPF para 11 has two clauses.</p> <ul style="list-style-type: none"> - The Local Plan contains positive policies that seek to meet the District's needs. The Local Plan has an identified housing supply 25% in excess of the minimum housing requirement which provides flexibility should there be rapid changes in the housing market and/or economy. Brexit is key factor in the short-term. The lack of comparable historical precedent of countries leaving major trading blocs makes it difficult to know with any certainty what the likely response of businesses and households will be, although the government has undertaken research to understand the possible impacts Brexit will have on the economy²; - At the point of adoption the Local Plan provides sufficient land to meet the identified objectively assessed needs to 31 March 2031. No request has been made to Cotswold District Council to meet the needs of neighbouring areas. However, updates resulting from the 'standard method' will need to be factored in (see question 14). How the District will meet its housing needs beyond 2031 will become a more pressing requirement in the latter half of the 2020s. 	No
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	The Plan provides a vision for the future of the District up to 2031. (Further discussion in Question 7)	No
5.	Plans should be:	NPPF Para	Aspirational and deliverable – Local Plan has been found sound.	No

² <https://commonslibrary.parliament.uk/brexit/brexit-and-the-economy-government-analysis-of-the-long-term-impact/>

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	<p>Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication</p>	16	<p>The Planning inspector identified necessary amendments to address deliverability, e.g. the build rate of houses at Land south of Chesterton was amended. At a strategic level the Plan continues to deliver development as projected.</p> <p>Contain clear and unambiguous policies – Policies have been in use for over a year with minimal impact on the decision making process. Officers from Forward Planning and the Development Management teams maintain a policy tracker tool to identify suggested improvements.</p> <p>Accessible through the use of digital tools – The Council has a link to its interactive/digital Local Plan on its website³.</p> <p>Serve a clear purpose avoiding duplication – Where appropriate, locally specific policies are provided in the Local Plan, which do not duplicate national policies. A key challenge is to support Neighbourhood Development Plans to adopt the same approach.</p>	
6.	<i>Plan Content</i>			
7.	<p>Include strategic policies to address ‘strategic priorities’ for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.</p>	NPPF Para 17, 20	<p>Development Strategy (DS) policies address 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; 	Required

³ <https://cotswold.maps.arcgis.com/apps/MapSeries/index.html?appid=885eb94398bf4819b17bd66d64275e59>

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<ul style="list-style-type: none"> - 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) but they do place a much greater emphasis on health and wellbeing, the climate emergency and the delivery of social rented homes. Whilst the Plan addresses these priorities, albeit to varying degrees, there is an expectation that these priorities are front and centre and will 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.</p> <p>Additional matters will also need 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 <p>addressing other public sector strategies (LEP, GCC, NHS, Neighbourhood Plans, Glos. Statement of Common Ground, etc.).</p>	
8.	Outline which policies are 'strategic' policies	NPPF Para 21	The Local Plan does not distinguish between strategic and non-strategic policies. The Local Plan is not consistent with national policy; an update would ensure the Local Plan is consistent.	Required

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
9.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> .	NPPF Para 22	From adoption the Plan looks ahead over 13-years (to 2031). The Plan is not consistent with national policy, although the Plan does identify an additional supply of dwellings that will be built during the period 2031 to 2034 (resulting from the strategic site at land south of Chesterton). To seek full compliance with this policy would likely require a significant appraisal of strategic policies to extend the plan period. This would not represent a proportionate response at this time.	No
10.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	The Local Plan contains a key diagram and policies map.	No
11.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	At adoption the Local Plan identifies sufficient land to address objectively assessed needs to 2031. However, since adoption the Standard Method calculates that the annual requirement should increase from a minimum of 420 dwellings per year ⁴ to a minimum of 490 dwellings per year. The Standard Method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour (e.g. the impact of the A417 Missing Link improvements and expansion of USAF activities at RAF Fairford). It also does not take consideration of the need for potential uplifts to accommodate economic growth or provide additional affordable housing. Therefore, the actual housing need may increase further still, although work commissioned ⁵ by Gloucestershire Council's will	No

⁴ The 420 dwellings per annum Local Plan requirement is an average based on 8,400 dwellings being over the 20-year period from 2011-2031. This does not take consideration of the Residual Requirement method of calculating housing need identified in Local Plan Policy DS1.

⁵ The Gloucestershire Housing Needs Assessment and the Gloucestershire Economic Needs Assessment

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<p>provide more detailed discussion on these issues. The Local Plan currently employs “the residual requirement method”, which adjusts annual housing requirement to take account of oversupply since 2011. The Standard Method effectively zeros oversupply, in so far as it takes account of historic provision and delivery rates. A key reason for the higher housing need figure is the District’s high affordability ratio (the difference between average wage and average house price). The Council must consider how it can accommodate the increased housing need and maintain a continued supply of housing land whilst ensuring there are no adverse impacts on protected areas such as the Cotswolds AONB. See PAS toolkit 1 Question A2.</p>	
12.	<p>Include non-strategic policies to set out more detailed policies for specific areas.</p>	<p>NPPF Para 18, 28</p>	<p>The Local Plan contains a suite of strategic and non-strategic local planning policies. However, the Plan does not make a distinction between them (see answer to question 8). The Council should seek to rectify this.</p>	<p>Required</p>
13.	<p>Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.</p>	<p>NPPF Para 34, 57</p>	<p>The Local Plan sets out expected contributions from development. Policies SA1-SA3 identifies the ‘strategic’ infrastructure needed to accommodate planned growth. The ‘S’ policies (and in particular Policy S2 Strategic Site, Land south of Chesterton) list the ‘non-strategic’ infrastructure required to deliver a successful and sustainable developments and communities. ‘H’ and ‘INF’ policies establish the level and types of affordable housing along with other infrastructure (education, health, transport, etc.). These have been viability tested and policy mechanisms put in place to ensure that infrastructure contributions do not undermine deliverability.</p> <p>The following matters have arisen since adoption that could impact</p>	<p>No</p>

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<p>the timing, type and scale of infrastructure required:</p> <ul style="list-style-type: none"> - Corporate Plan priorities (see question 7); - Revisions to the NPPF, PPG and the CIL Regs; - County-wide strategies (Local Industrial Strategy, Local Transport Plan, Energy Strategy, etc.) - Emerging Gloucestershire Statement of Common Ground; and - Updates to Gloucestershire-wide evidence (Local Housing Needs Assessment, Employment evidence, Local Transport Plan 4, Railway assessment). <p>These matters will continued to be monitored through the Council’s Annual Monitoring Report, and where necessary will inform any future Plan update.</p>	
<i>Housing</i>				
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 60	<p>The ‘Standard Method’ for determining housing need came into force post adoption of the Plan. The standard methodology identifies Cotswold District’s need to be 490 per annum, up from 420 per annum in the Local Plan⁶. Transitional arrangements provided by the NPPF (2019) ensure that the Local Plan housing requirement remains up to date until 3 August 2023, unless there has been a significant change to the local housing need figure (see NPPF para 33) – Further discussion is contained within the PAS Toolkit 1 (Question A2).</p> <p>Gloucestershire authorities are due to publish a Local Housing</p>	Required

⁶ The 420 dwellings per annum Local Plan requirement is an average based on 8,400 dwellings being over the 20-year period from 2011-2031. This does not take consideration of the Residual Requirement method of calculating housing need identified in Local Plan Policy DS1.

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			Needs Assessment (LHNA) and Economic Needs Assessment (ENA) in 2020; together these studies will provide greater clarity on housing and economic needs for the district in the short, medium and long term.	
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 61	<p>Local Plan Policy H1 sets out expected size, type and tenure. The LHNA⁷ will establish the needs for the housing sizes, types and tenures for different groups of people. For example, 90% of demographic change will be in the 65+ age group and notably those in 85+ age group; both of which will see significant increases.</p> <p>NPPF para 61 broadens the need for specialist accommodation, including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. Rather than relying predominantly on Policy H1 to obtain the right mix of housing from developments, the Local Plan would benefit from being updated to plan more specifically for the needs of different groups of people. This could be done, for example, by expanding Policy H4 (Specialist Accommodation for the Elderly).</p>	Beneficial
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 62	Policies H1 and H2 are consistent with the NPPF. However, the definition of affordable housing has been revised since adoption of the Local Plan and now includes affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership (NPPF Annex 2: Glossary).	Required

⁷ This was formally known as a Strategic Housing Market Assessment

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			Corporate Strategy also now places greater emphasis on providing social-rented homes. Future site allocations and criteria based policies contained within the Local Plan's housing chapter will need to reflect these changes and expectations.	
17.	Expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.	NPPF Para 64	Policy H2 is consistent with national policy. It states that, "The affordable housing requirement on all sites requiring a contribution, subject to viability is: i. Up to 30% of new dwellings gross on brownfield sites; and ii. Up to 40% of new dwellings gross on all other sites. Corporate Strategy places greater emphasis on providing social-rented homes. Future site allocations and criteria based policies contained within the Plan's housing chapter will need to reflect these changes and expectations. A viability assessment will need to be undertaken to ensure all new and revised policy considerations do not undermine the deliverability of new development.	Required
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 65	The Plan does not set out a housing requirement for designated neighbourhood areas. An update to the Plan would be beneficial, together with a robust methodology for determining how to establish neighbourhood area housing requirements.	Beneficial
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth,	NPPF Para 67	At adoption the Plan identified sufficient land to address objectively assessed needs to 2031, providing 13 years of specific and deliverable sites. However, since adoption the Standard Method	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	for years 6-10 and, where possible, for years 11-15 of the plan.		calculates that the annual requirement should increase from a minimum of 420 dwellings per year ⁸ to a minimum of 490 dwellings per year. See question 11.	
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 68	<p>The Local Plan is consistent with national policy. At 1 April 2019, it is estimated that 3,158 dwellings will be delivered on sites of 1ha or less between 2011 and 2031. This is 38% of the 8,400 dwelling Local Plan housing requirement. The ‘small site’ supply is expected from the following sources:</p> <ul style="list-style-type: none"> - 1,203 dwellings (net) completed between 2011 and 2019⁹ - 154 dwellings (net) allocated in the Local Plan¹⁰ - 566 dwellings (net) with planning permission at 1 April 2019¹¹ - 1,235 dwellings (net) windfalls between 2019 and 2031¹² <p>Even if the Plan housing requirement increases, it is still likely that more than 10% of housing delivery over the Local Plan period will come from sites of 1ha or less.</p>	No
21.	Support the development of entry level exception sites, suitable for first time buyers,	NPPF Para 71	The Plan is consistent with national policy. However, the Council might consider broadening the context of Policy H3 to reflect	Beneficial

⁸ The 420 dwellings per annum Local Plan requirement is an average based on 8,400 dwellings being over the 20-year period from 2011-2031. This does not take consideration of the Residual Requirement method of calculating housing need identified in Local Plan Policy DS1.

⁹ 119 in 2011/12; 197 in 2012/13; 21 in 2013/14; 117 in 2014/15; 229 in 2015/16; 191 in 2016/17; 184 in 2017/18; 145 in 2018/19

¹⁰ From site allocation refs: C_17; C_97; C_101A; BK_8; DA_2; DA_5A; DA_8; K_1B; K_2; K_5; L_18B; L_19; M_60; T_51; W_1A; and W_1B

¹¹ Excludes 20 dwellings on the Former Hospital Site, Moreton-in-Marsh, which has planning permission but is included in Local Plan site allocation figures

¹² The Council’s housing trajectory expects 1,411 dwellings to be delivered as windfalls between 2019 and 2031. Whilst windfalls can be delivered on large and small sites, historic evidence demonstrates that 962 windfalls were delivered on small sites between 2011 and 2019 out of total of 1,099 windfalls (87.5%). The Housing Land Supply Report (May 2019) provides detailed explanation about why windfalls will continue to be delivered on both large and small sites up to 2031. It is reasonable to expect that 87.5% of the 1,411 dwelling windfall allowance for 2019-2031 will be delivered on sites of 1ha or less.

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	unless the need for such homes is already being met within the authority's area.		national policy where it relates to <i>"Entry Level Exception Sites on land which is not already allocated for housing and is adjacent to existing settlements."</i>	
22.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 73	The Plan includes a housing trajectory that demonstrates how the 8,400 dwelling housing requirement will be fully delivered over the plan period. The Housing Land Supply Report updates the position annually and provides evidence to demonstrate the percentage buffer that should be applied to the housing land supply.	No
23.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 77	The Plan is consistent with national policy. Policies starting with 'DS' and 'H' play an important role in this respect. Both the Strategic Housing Market Assessment, which informed the Plan, and the Local Housing Needs Assessment, include sub-area analysis to enable the Plan to deliver the appropriate mix of houses to meet the needs of local circumstances. Neighbourhood Development Plans can also play an important role in this respect.	No
24.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 78	The Plan contains numerous policies (in particular DS policies and Policy INF2) which together support villages to grow and thrive. The Plan's Development Strategy was also informed by a Role and Function of Settlements Study, which considered whether there were any gaps in District that lacked service provision and whether there were any development opportunities that could resolve this issue. The Council is currently updating this study to bring it up to date. It will need to reflect on this and other studies to ensure the development strategy (principal settlements) remains sound in the long term.	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
25.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 79	This requirement is covered by Policy DS4. There are no significant issues at 2020 that would suggest the need to update this policy. However, the Council should be mindful of changes to national policy and guidance and case law that might alter the intention of the policy. Tweaks to the reasoned justification have been identified that would aid interpretation and application.	Beneficial
<i>Economy</i>				
26.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 80	<p>The Plan dedicates a whole chapter to the Economy, (including retailing and tourism). Policies have been designed to support the District's economy through the allocation of new employment land, the protection of existing employment land, and the creation of three special policies to support the specific needs of three of the District's key businesses. The Plan is also supportive of non-B class employment generating developments, rural diversification schemes, and the development of tourist facilities and visitor attractions.</p> <p>Evidence supporting the emerging Cirencester Town Centre Masterplan has identified issues relating to the changing nature of the retail environment and the challenges of promoting (and relying on) retail-led development to regenerate and grow the town centre economy. Policy EC2 may also need to be updated following a review of the District's employment land. Further employment allocations may also be required to accommodate needs identified by the Gloucestershire Economy Needs Assessment, which will be supported by a more detailed Employment Land Assessment study.</p>	Beneficial

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
27.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 81 (a)	<p>The introductory text to Plan’s economy chapter states, “<i>The Local Plan seeks to support strong and sustainable economic growth while recognising that the District:</i></p> <ul style="list-style-type: none"> - <i>is in a rural location within an Area of Outstanding Natural Beauty;</i> - <i>is relatively removed from the motorway network and has poor transport links with the rest of Gloucestershire and the M5; and</i> - <i>is an area where the residual value of commercial development does not support broader private sector or institutional investment.”</i> <p>Since adoption of the Plan, Gfirst LEP has commenced a review of the Gloucestershire Local Industrial Strategy (LIS), which will provide the new economic strategy for the county. The consultation draft LIS identifies AgriTech as one of several key focusses for Cotswold.</p> <p>Improved connectivity to Gloucester, Cheltenham and the M5 corridor from the planned improvements to the A417 Missing Link at Birdlip is another significant issue that would affect the Local Plan’s economic policies. In addition, the Council’s new Corporate Strategy has a bearing on how sustainable economic growth is delivered through the Local Plan. The Plan’s (and indeed the Council’s) economic strategy may need to be updated to reflect these issues.</p>	Beneficial
28.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 81 (b)	Local Plan Policies S1-S19 allocate several sites for ‘B-Class’ employment use, as well as several further sites for mixed-use development (notably in Cirencester town centre). Two sites for	Beneficial

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			<p>new car parking are also identified.</p> <p>Whilst Policies EC1-EC6 and EC10 also discharge these requirements, the corollary of an updated economic strategy will be reassessment and, where necessary, revision of those policies to support delivery of the updated strategy.</p>	
29.	<p>Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.</p>	<p>NPPF Para 81 (c)</p>	<p>Strategic Objectives 3 and 4 of the Plan address the Local Economy and Infrastructure & Service provision respectively. Whilst Objective 4 does not specifically focus on tackling inadequacies in extant provision, its delivery is via the Infrastructure Delivery Plan (IDP) and the policies of the Plan that implement that IDP (SA1-SA3 and S1-S19). The IDP should be kept up to date to ensure that it addresses problems that may have emerged as barriers to investment since the Plan was adopted.</p> <p>Car parking and a public transport interchange are further infrastructure requirements not identified by the IDP but form part of the Cirencester Central Area Strategy (Policy S3). This policy may need updating within the Cirencester Town Centre Masterplan.</p> <p>Policy S2 addresses the site-specific infrastructure requirements needed to deliver the Chesterton strategic site.</p> <p>The 8,400 dwelling Local Plan housing requirement factors in an uplift to accommodate the population resulting from economic growth. The Plan provides adequate supply to meet full objectively assessed housing needs. The Plan is delivering housing and employment land as projected and is not considered to be acting as a barrier to investment.</p> <p>The Cotswold's built and natural environment are said to be an</p>	<p>Required</p>

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			attraction for investment, rather than a barrier. The Plan seeks to protect and enhance the District's natural, built and historic environments.	
30.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 81 (d)	<p>Consistent with national policy. Policies EC1, EC3, EC8 and EC9 are sufficiently flexible to enable new 'B Class' employment developments, employment-generating uses, and retail developments to be granted planning permission, even if the proposed development sites are not allocated in the Plan. Policy EC5 is also permissive of rural diversification schemes.</p> <p>Policy H1 requires all housing developments to "<i>provide a suitable mix and range of housing in terms of size, type and tenure to reflect local housing need and demand in both the market and affordable housing sectors, subject to viability</i>". The 'suitable mix' is linked to the latest available evidence, including the need for live-work accommodation. Furthermore, Policy H5 is permissive of dwellings for rural workers outside settlements.</p>	No
31.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 82	<p>Currently consistent with national policy. The Plan designates three 'Special Policy Areas' (Policy EC4) that provide specialist knowledge clusters for agricultural training, fire service training, and food research.</p> <p>The Plan also allocates several employment development sites in Cirencester, Bourton-on the-Water, Chipping Campden, Moreton-in-Marsh, and Willersey. These provide a variety of scales and locations for new industries to flourish, whilst also enabling several of the District's more successful employment estates to expand.</p> <p>As explained in Q30, the Plan is also sufficiently flexible to enable</p>	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			the District to capitalise on opportunities for the District to accommodate a wide-variety of specialist employment uses.	
32.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 83	Consistent with national policy. Para 83(a) of the NPPF (Feb 2019) is exactly the same as para 28 (bullet point 1) of the NPPF (March 2012). The Plan was found to be sound when assessed against the NPPF 2012. This includes Policy EC6 (Conversion of Rural Buildings), the 'EN' Policies, and the Cotswold Design Code (Appendix D of the Plan).	No
33.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 83	Consistent with national policy. Para 83(b) of the NPPF (Feb 2019) is practically the same as para 28 (bullet point 2) of the NPPF (March 2012). The Plan was found to be sound when assessed against the NPPF 2012. This includes Policy EC5, which supports rural diversification schemes.	No
34.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 83	Policies EC10 (Development of Tourist Facilities and Visitor Attractions) and EC11 (Tourist Accommodation) support sustainable rural tourism and leisure developments but have sufficiently robust criteria to ensure that developments respect the character of the countryside. Some improvements to EC10 and EC11 have been identified, although the policies remain consistent with national policy in their current form.	No
35.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 83	Para 83(d) of the NPPF (Feb 2019) is practically the same as para 28 (bullet point 4) of the NPPF (March 2012). The Local Plan was found to be sound when assessed against the NPPF 2012. This includes Policy INF2, which promotes the protection of, and delivery of new, social and community infrastructure. Some improvements to INF2 have been identified to provide further clarity, although the policy	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			remains consistent with national policy in its current form.	
36.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 84	<p>Policy DS4 restricts new-build open market housing developments outside Principal and Non-Principal Settlements. However, no equivalent Plan policy exists that explicitly prevents local business or community uses from being developed adjacent to or beyond existing settlements. Policy EC3 (clause 2) is consistent with NPPF84.</p> <p>Local Plan Objectives include <i>“Locating most developments in sustainable locations where there is better access to public transport”</i>, and <i>“supporting improvements in public transport.”</i></p> <p>NPPF 84 also contradicts Local Plan Policy INF2 (Social and Community Infrastructure), which only supports proposals that are well-linked and accessible to the local community by foot, bicycle or public transport. NPPF 84 also contradicts Policy INF3 (Sustainable Transport), which is permissive of developments providing they actively provide, enhance and promote safe and recognisable connections to existing walking, cycling and public transport networks; and provide access to public transport facilities taking account of the travel and transport needs of all people.</p>	Beneficial
37.	<i>Town centres</i>			
38.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 85	Policy EC7 identifies the hierarchy of town centres. But in light of well-publicised problems facing the retail sector in the ‘traditional high street’ the promotion of their long-term vitality and viability	Required

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			will required a strategic approach that is less reliant on retail as the predominant town centre use. This is a particularly acute issue for Local Plan policy S3 (Cirencester Central Area & Strategy) which seeks retail-led redevelopment of the town’s largest car parks (subject to first rationalising car parking in the town.	
39.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 85	<p>Policies EC7 and EC8 discharge this requirement. Whilst these policies are flexible, they will need to be revised to allow a strategic realignment of the use profile of town centres away from retail dominance towards a more mixed range of uses. Plainly, this will need to be underpinned by a revision of the evidence base.</p> <p>Annex 2 of the NPPF (2019) states that references to town centres or centres apply to town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. The Plan also designates ‘Key Centres’, which in practice have the same function as town centres but further explanation is needed to clarify this.</p> <p>The Policies Map also identifies Primary and Secondary Shopping Frontages, which relate to Policy S3 and para 9.8.8. However, the NPPF (2019) drops the requirement to define Primary and Secondary Shopping Frontages, so the plan will likely need to be updated to reflect this.</p>	Required
40.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 85	Markets are mentioned at para 9.8.4 of the Local Plan: <i>“the Local Planning Authority will, as part of the approach to retail and town centre development, put measures in place to: [...]Support and promote markets”</i> . But the relevant policies are silent. An update to the Local Plan could rectify this.	Beneficial

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
41.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 85	The Cotswold Retail Study Update considered potential sites for redevelopment in the District's 'town centres' ¹³ and made recommendations on suitable sites. This is reflected in Policy S1, which sets out the strategy for Cirencester Town Centre and allocates several sites for redevelopment. Site allocations propose retail led developments which now appear to be at odds with the market. Mixed uses are more viable in town centre locations. This is related to commentary at Q38, Q39 and Q43.	Required
42.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 85	Edge of Centre sites were allocated in Cirencester Town Centre (Policy S1). Policy EC8 also makes provision for additional edge of centre sites to come forward as part of the sequential approach to town centre development.	No
43.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 85	Local Plan Policy EC8 allows residential development of the upper floors of town centre premises. In strategic terms the Plan does not recognise the important role that residential development can play in ensuring the vibrancy and vitality of town centres. This issue is related to earlier commentary (Q38 and Q39) on the need to reconsider the approach to the formulation of town centre strategy in light of significant changes in the nature of the 'traditional high street'.	Required
44.	<i>Healthy and safe communities</i>			
45.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and	NPPF Para 91	Largely consistent with national policy, although a new policy on Health and Wellbeing is proposed to respond to NPPF Para 91 and	Beneficial

¹³ As identified by Annex 2 of the NPPF (2019), references to town centres or centres apply to town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. The Local Plan also designates 'Key Centres', which have the same function as town centres.

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	accessible, and enable and support healthy lifestyles.		support the growing health agenda and GI strategy, in promoting healthy developments. This may also include a requirement for Health Impact Assessments and a policy requirement for age-friendly and care-friendly developments. The Design Code (Appendix D of the Local Plan) will need updating to reflect this and the Council's emerging Leisure and Wellbeing Strategy.	
46.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 92	NPPF (2019) para 92(a) and NPPF (2012) para 70 (bullet point 1) are the same except the NPPF (2019) also includes 'open space' within the list. Local Plan Policy INF2 (Community Infrastructure) in particular responds to this policy and will continue to be effective in future. Open spaces are also supported, protected and enhanced by Policies DS2; DS3; S2; S3; EN11; INF2; INF7; and the Cotswold Design Code (Appendix D).	No
47.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 92	NPPF (2019) para 92(b) and NPPF (2012) para 17 (bullet point 12) are practically the same, although the NPPF (2019) broadens " <i>...social and cultural well-being for all</i> " to " <i>...social and cultural well-being for all the community</i> ". Despite this, the Local Plan remains consistent with national policy, particularly policies EN2; INF1; INF2; and the Cotswold Design Code (Appendix D).	No
48.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 92	NPPF (2019) para 92(C) and NPPF (2012) para 70 (bullet point 2) are exactly the same. The Local Plan remains consistent with national policy, particularly Policy INF2(2). However, the policy would benefit from some clarification of what is meant by 'need' and 'demand' for facilities.	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
49.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 92	NPPF (2019) para 92(d) and NPPF (2012) para 70 (bullet point 3) are practically the same, although the NPPF (2019) drops the requirement to develop and modernise “ <i>in a way that is sustainable</i> ”. The Local Plan remains consistent with national policy, particularly Policies EC5; EC7 (1 & 2); and INF2.	No
50.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 92	NPPF (2019) para 92(e) and NPPF (2012) para 70 (bullet point 4) are exactly the same. The Local Plan remains consistent with national policy, but this objective will again need to be delivered if new sites are to be allocated in the revised Local Plan to accommodate further growth.	No
51.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 93	Given the nature of the District, the Local Plan does not specifically address this issue, although the Plan read as a whole does support these tenets	Beneficial
52.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 95	Whilst the Cotswold Design Code (Policy D1) makes passing reference to matters of public safety in respect of ‘inclusive design’ and Green Infrastructure, and Policy EN15 addresses safety in terms of forms of pollution, the Local Plan does not directly address these issues.	Beneficial
53.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 95	The Local Plan was informed by an Infrastructure Delivery Plan, an Open Space, Sport and Recreation Study, and other needs assessments for sports facilities. Policies SA1-SA3 and S1-S19 identify the requirements for these facilities. If further planned growth is required, then a proportionate updated to the evidence base will be required to assess the required open space, sports and recreational facility needs of any further planned growth. This would need to be reflected in Policies SA1-SA3 and S1-S19.	No (but would be required if there is a requirement for additional growth)

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
54.	Protect and enhance public rights of way and access.	NPPF Para 98	A further policy clause may be beneficial to specifically protect and enhance public rights of way and access, although the Local Plan remains consistent with national policy. NPPF (2019) para 98 and NPPF (2012) para 75 both require planning policies to protect and enhance public rights of way and access. Whilst Local Plan Policy EN1 does not directly refer to PROWs, it protects them by requiring new developments to <i>“where appropriate, promote the protection, conservation and enhancement of the historic and natural environment by ensuring the protection and enhancement of existing historic assets and their settings in proportion with the significance of the asset”</i> .	Beneficial
55.	<i>Transport</i>			
56.	Should actively manage patterns of growth in support of objectives in Para 102. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 103	<p>The Plan is consistent with national policy. The Development Strategy focusses strategic growth around 17 Principal Settlements, which are the most sustainable locations in the District, to minimise the number and length of journeys resulting from new development. Contributing factors in the decision about the scale of development attributed to each settlement over the plan period were the level of services and facilities on offer in those settlements, and whether additional services could be provided as a result of new development in order to make settlements more sustainable.</p> <p>Policies S1-S19 also seek, where possible, to maximise opportunities for sustainable transport solutions (e.g. a public transport interchange in Cirencester town centre; using former railway lines to improve cycle connectivity between Cirencester - Kemble - Tetbury and Fairford - Lechlade; etc.).</p>	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
57.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 104	<p>The Plan is currently consistent with national policy. The Development Strategy took consideration of a Role & Function of Settlements Study. This Study identified the most sustainable settlements in the District where services and facilities are located, and where required growth should be directed to minimise the number and length of journeys resulting from that growth. The Role & Function of Settlements Study is being updated to support longer term plan making.</p> <p>Policy S2 (the Chesterton strategic site) also requires an appropriate mix of uses to minimise journeys from that location. More generally, the Local Plan policies also support the provision of new employment and services and facilities in locations that minimise journeys, particularly Policies EC1, INF2 and INF3.</p>	No
58.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 104	<p>The Plan is consistent with national policy. The Policies Map identifies the District's former railway lines. Policy INF3 permits development that makes a positive contribution, where appropriate, to the restoration of former railway lines by retaining existing embankments, cuttings, bridges and related features. Policies SA1, S5, S7 and SP5 support the delivery of sustainable transport initiatives on several of these former railway lines. Safeguarding the other former railway routes protects opportunities for additional infrastructure improvements to widen transport choice in future. The IDP and Local Transport Plan provide robust evidence to support these policies.</p> <p>Policy SP2 supports Cotswold Airport and the many businesses that are reliant on its functioning runway.</p> <p>Policy SP3 supports the protection and restoration of Thames and</p>	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<p>Severn Canal route. Policy SP6, furthermore, supports the protection and restoration of the former Cheltenham to Stratford-upon-Avon railway line. Both schemes have active restoration plans.</p> <p>Policies S1-S19 propose various non-strategic infrastructure projects, many of which seek to widen transport choice. Similarly, the Cirencester Central Area Strategy (Policy S2) provides a policy hook for the provision of a public transport interchange on a site in Cirencester town centre.</p>	
59.	Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 104	<p>Policy INF3 permits development that assists in delivery of the objectives of the Local Transport Plan, particularly actively supporting travel choice through provision, enhancement and promotion of safe and recognisable connections to existing walking and cycling networks and that gives priority to pedestrians and cyclists. The policy also permits developments that incorporate, where feasible, facilities for secure bicycle parking.</p> <p>Plan polices were informed by an IDP, which identified two proposed cycle routes as ‘critical and essential’ infrastructure that are needed to support planned growth. Further ‘non-strategic’ pedestrian / cycle infrastructure is identified in Policies S1-S19.</p> <p>Despite the policies being consistent with national policy, failures in delivery, mainly due to the lack of necessary funding, mean that is difficult to establish funding mechanisms to deliver high quality walking and cycling networks and supporting facilities. Continued engagement with GCC and the LEP is essential.</p>	No
60.	Provide for any large-scale transport facilities	NPPF Para	This is primarily a matter for Highways England in relation to the	Beneficial

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	104	<p>A417 Missing Link scheme – a Development Consent Order (DCO) proposal is programmed to be submitted to the Planning Inspectorate in 2020; and the Local Transport Plan (LTP) – currently undergoing revision. An update will take forward any locally-specific requirements identified in the LTP revision and from the Missing Link DCO.</p> <p>The Cirencester Town Centre Masterplan supports the delivery of a new public transport interchange. Policy SP2 supports Cotswold Airport and the many businesses that are reliant on its functioning runway. Policy SP3 supports the protection and restoration of Thames and Severn Canal route. Policy SP6 supports the protection and restoration of the former Cheltenham to Stratford-upon-Avon railway line.</p>	
61.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 104	See response to question 60.	No
62.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 107	See response to question 60.	No
63.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on	NPPF Para 108	Policies INF3-INF5 adequately addresses these considerations.	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.			
64.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	NPPF Para 109	The Local Plan remains consistent with national policy. Local Plan Policy INF4 requires development to provide “safe and suitable access and includes designs, where appropriate, that incorporate low speeds”. This policy also avoids development where “where the cumulative impact of congestion or other undesirable impact on the transport network is likely to remain severe following mitigation”.	No
65.	<i>Communications</i>			
66.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 112	The Local Plan is not fully consistent with national policy. Policy INF9(1) enables new telecommunications infrastructure and INF9(3) requires new allocations to “include the provision of telecommunications infrastructure with sufficient flexibility to support the fastest available data transfer speed at the time of development.”	Beneficial
67.	<i>Making effective use of land</i>			
68.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment	NPPF Para 117	Taken together (and notwithstanding the comment on Q69), the Local Plan policies discharge this requirement.	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	and ensuring safe and healthy living conditions.			
69.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 117	The Local Plan site allocation process gave preference to brownfield sites where possible. Policy DS2 also tacitly encourages the redevelopment of brownfield sites within Principal Settlement Development Boundaries in preference to the development of greenfield sites that either adjoin settlements or are in the open countryside. However, the Local Plan's policies are silent in respect of explicitly maximising the use of previously-developed or brownfield land. A revision to the plan may be required to address this. The strategy to accommodate any further planned growth will also need to make preference of brownfield sites.	Required
70.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 118	<p>Partially consistent with national policy. The NPPF 2012 and 2019 are very similar on this issue; the main difference being that the NPPF (2019) wants to "<i>achieve net environmental gains</i>", whereas the NPPF (2012) only wanted recognition "<i>that some open land can perform many functions</i>".</p> <p>The Local Plan has several policies to encourage multiple benefits of land:</p> <ul style="list-style-type: none"> - S1, S2 and S19 allocate six mixed-use sites. - EC3 supports live/work units. - EC5 supports rural diversification schemes. - EC8 seeks to maintain an appropriate mix of uses in Town Centres, but is sufficiently flexible to allow mixed uses. This policy is also permissive of residential development on upper floors. 	Required

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<p>- Policy SP5 promotes various uses at Cotswold Water Park after mineral extraction has taken place.</p> <p>The retail policies may need to be relaxed to enable a greater diversity of uses that may be needed to support town centres in future.</p> <p>Regarding 'net environmental gains' Policy EN8(1) requires this from developments in relation to biodiversity and geodiversity. However, the NPPF (2019) refers to other types of net environmental gain, such as improved public access to the countryside. The Local Plan has some policies on this (e.g. cycle links between Cirencester-Kemble-Tetbury and Fairford-Lechlade), although an improved policy may be needed to deliver the required wider net gains.</p>	
71.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 118	NPPF (2019) para 118(b) and NPPF (2012) para 17 (bullet point 9) are practically identical. Several Local Plan policies already respond to this issue, although Local Plan Policy INF7 (Green Infrastructure) relates most strongly to it. Despite this, further policy initiatives may be needed to respond to the Council's Climate Change Emergency and the new Corporate Strategy.	Beneficial
72.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 118	<p>The Local Plan site allocation process gave preference to suitable brownfield sites within settlements where possible. Preference would also be given to suitable brownfield sites within settlements if further allocations are needed to accommodate additional needs in the revised Local Plan.</p> <p>The Local Plan policies are silent on the weighting of planning decisions regarding suitable brownfield sites within settlements.</p>	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<p>However, national policy should not be repeated in a Local Plan if it is not needed.</p> <p>Policy EN15(3) covers Pollution and Contaminated Land and supports development of affected sites providing that the developer and/or landowner undertakes appropriate investigation(s) and carries out the necessary remedial works.</p>	
73.	Promote and support the development of under-utilised land and buildings.	NPPF Para 118	<p>Consistent with national policy. The Local Plan allocates land on the least impact sites, and made use of under-utilised land and buildings. This would likely be the same if further allocations are needed in the revised Local Plan.</p> <p>Policies support the development of under-utilised land within Principal Settlements (DS2) and in non-Principal Settlements. Policy EC6 also supports the conversion of rural buildings to alternative uses provided that three criteria are met. Policy EN13 supports conversions of non-domestic historic buildings to alternative uses.</p>	No
74.	Support opportunities to use the airspace above existing residential and commercial premises for new homes. <i>(i.e. upward extensions / additional storeys).</i>	NPPF Para 118	<p>(Policy EC8(6) supports proposals for residential development on the existing upper floors of town centre premises.)</p> <p>Other Local Plan policies do not prohibit making use of the airspace above existing residential and commercial premises for new homes, although there is no specific policy that supports this idea. The Design Code (Local Plan Appendix D), for example, outlines that “Extensions to existing buildings should be in scale and character with the parent building.” Given the relatively low massing and height of most buildings in the District the construction of additional storeys on existing buildings could prove problematic in</p>	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<p>terms of retaining the scale and character of the parent building. In that context no new policy actively encouraging upward extension is considered appropriate for the District.</p> <p>The Local Plan also does not prohibit residential sub-divisions; there is therefore already scope for the existing upper storeys of dwellings to become separate dwellings. Any applications to construct additional storeys in order to create new dwellings could be considered under the current suite of local plan policies</p>	
75.	Reflect changes in the demand for land.	NPPF Para 120	<p>Consistent with national policy:</p> <ul style="list-style-type: none"> - The Local Plan housing land supply has in-built flexibility to respond to fluctuations in the housing market, which provides a buffer of around 25% in addition to the 8,400 housing requirement. - Policy H1 requires a suitable mix and range of housing in terms of size, type and tenure to reflect local housing need and demand in both the market and affordable housing sectors. - Policy H2 requires the type, size and mix, including the tenure split, of affordable housing to address the identified and prioritised housing needs. - Policy H2 also removes the requirement to provide self or custom build plots if demand identified on the Self-Build and Custom Register, or other relevant evidence, demonstrates that there is a higher or lower level of demand for plots. - Policy H5 supports dwellings for rural workers where there is an essential need. - Policy H6 enables the removal of occupancy conditions of rural workers dwellings where there is no longer a need. 	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<ul style="list-style-type: none"> - Policy EC2 safeguards Established Employment Sites and allocated employment land “<i>unless there is no reasonable prospect of the site being used for employment purposes</i>”. - Policy INF2 allows proposals that lose local community facility or service if there is no demand for that facility. 	
76.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 122	Taken together, the Local Plan policies adequately discharge these requirements.	No
77.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.	NPPF Para 123	The current approach provides flexibility based on the proposal, the time and the location. The Cotswold Design Code and, in particular D.14, require applicants to play close attention to density (amongst other matters) when designing new development. The Local Plan does not use a minimum density standard and one would question how effective this largely urban tool would be in rural district containing over 180 settlements. The Council should continue to monitor the effectiveness of the Design Code and in particular the size of houses and their land take.	No
78.	<i>Design</i>			
79.	Set out a clear design vision and provide maximum clarity about design expectations.	NPPF Para 125 & 126	Local Plan Policy DS1 and the Cotswold Design Code (Local Plan Appendix D) discharge this requirement. However, the Design Code will need to reflect on UK and local governments’ ambitions to	Required

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			assist society and commerce to become carbon neutral by 2050. The Council has been awarded grant funding to investigate how the Cotswold Vernacular can become carbon neutral. Equally the Design Code should reflect. Cotswold District Council's Design Code has recently been nationally recognised for its excellence ¹⁴ . Be that as it may, the Design Code should reflect on this report and the government's " <i>Building Better, Building Beauty Commission</i> " ¹⁵ .	
80.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 127	NPPF (2019) para 127 largely corresponds with NPPF (2012) paras 17, 57 and 58, although the revised NPPF has some new criteria. These include ensuring that new developments are sympathetic to landscape setting while not preventing or discouraging appropriate innovation or change (such as increased densities); the requirement to not only establish but also now maintain a strong sense of place; and a greater emphasis on health and wellbeing. Policies are particularly strong in response to NPPF (2019) para 127; notably the 'EN' policies that cover the Built, Natural and Historic Environment. However, a new policy on Health and Wellbeing would be beneficial. A further policy or an update to the Design Code (Local Plan Appendix D) may also be required to provide a local context on how developments can be sympathetic to the landscape while still being able to deliver appropriate innovation or change.	Beneficial
81.	<i>Green Belt</i>			

¹⁴ Living with Beauty - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf

¹⁵ <https://www.gov.uk/government/groups/building-better-building-beautiful-commission>

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
82.	Set out proposals for new Green Belts within strategic policies. This should demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances, consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 135	Historically, the Council has not sought to introduce new Green Belt. The Council has access to a range of Development Management policies that help to manage the scale and location of development. Should the Council wish to pursue such an approach it would need to demonstrate exceptional circumstances, for example, when planning for larger scale development such as new settlements or major urban extensions.	No
83.	Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 136	A very small (113 hectares) part of the Gloucester-Cheltenham Green Belt extends into the western edge of the District at Crickley Hill Country Park. There are currently no significant changes in circumstances that indicate the Green Belt should be altered. Any alteration to the boundary would need to be considered as part of the Strategic Green Belt Review that would inform the Cheltenham Borough, Gloucester City and Tewkesbury Borough Joint Core Strategy Update.	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
84.	Strategic policies should make as much use as possible of suitable brownfield sites and underutilised land and optimise the density of development including promoting an uplift in minimum density standards in town and city centres and locations well served by public transport. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	NPPF Para 137 & 138	See response to Questions 82 and 83.	No
85.	When defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development, not include land which it is unnecessary to keep permanently open, identify areas of safeguarded land between the urban area and the Green Belt where necessary, make clear that the safeguarded land is not allocated for development at the present time, be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period,	NPPF Para 139	See response to Questions 82 and 83.	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	and define boundaries clearly.			
86.	<i>Climate change, flooding and coastal change</i>			
87.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 149	<p>The NPPF remains largely unchanged. However, the national context has changed significantly.</p> <p>The UK is legally bound by the Climate Change Act to reduce emissions 80% by 2050. However on 12 June 2019 (and subsequent to the adoption of the Local Plan), the Government laid the draft Climate Change Act 2008 (2050 Target Amendment) Order 2019 to amend the Climate Change Act 2008 by introducing a target for at least a 100% reduction of greenhouse gas emissions (compared to 1990 levels) in the UK by 2050. The Order came into force on 27 June 2019.</p> <p>The Government has announced a HM Treasury Net Zero Review. This included a priority to ensure a fair balance of contributions from all those who will benefit, including considering how to reduce costs for low income households. The Review will also consider how to avoid offshoring emissions (i.e. how to reduce UK emissions without causing those emissions to be created by another country).</p>	Required

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			<p>A final report is expected in Autumn 2020.</p> <p>Since passing this legislation, the Council declared a climate emergency in July 2019 that commits the Council to review the Plan to ensure that climate change is a strategic priority for planning and new development, and to introduce Supplementary Planning Documents where necessary to provide greater clarity and ambition on planning for renewable energy generation and storage, housing energy efficiency, green infrastructure, sustainable drainage and low-carbon transport solutions.</p> <p>The net zero carbon target is a significant step change for the Council and in its capacity as the local planning authority careful consideration will need to be given to the future management of land uses within the District. Whilst the Plan requires future development to mitigate and adapt the impacts of climate change (through the plan making process and subsequently through the determination of planning applications) the Plan does not include, for example, specific policies that would require new development to be zero carbon. The climate emergency cuts across all aspects of the Plan and therefore an update is required to take account of recent changes to national legislation and local strategic priorities. Significant engagement and cooperation with its partner authorities and organisations (e.g. Local Enterprise Partnership, Gloucestershire County Council, blue light services, utility providers, etc.) is also an absolute necessity to meet the challenging net zero carbon target.</p>	

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
88.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 149	See response to Question 87.	Required
89.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 151	Local Plan Policy INF10 (Renewable and Low Carbon Energy Development) is a development management policy that is fundamentally protective in nature. It is not the type of pro-active policy needed to deliver the revised NPPF requirements. No suitable areas for development of renewable energy or low carbon sources are identified. The Local Plan revision will need to address this.	Required
90.	Strategic policies should manage flood risk from all sources.	NPPF Para 156	<p>The NPPF remains largely unchanged. The Local Plan recognises that frequent flooding, exacerbated by climate change, and increasing water demand due to population growth in the UK has made the need for managing flood risk increasingly important. The Local Plan includes policies to address these issues, such as EN14 (Managing Flood Risk), INF8 (water management infrastructure), EN2 (Design of the built and natural environment) and the Design Code (Appendix D).</p> <p>The Local Plan is supported by Strategic Flood Risk Assessments (SFRA) which identifies areas of flood risk and incorporates additional headroom to adapt to climate change. Equally the Council's Water Cycle study assesses the capacity of infrastructure in relation to water supply, wastewater collection, wastewater treatment and water quality.</p>	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
			The policies remain consistent with national policy and are not considered out of date. Local Plan evidence will need to be update to assess future development needs beyond 2031 and update baseline line assumptions about climate change and fluvial and pluvial flooding.	
91.	Avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 167	Policy EN14 requires all proposals to avoid areas at risk of flooding, in accordance with risk, based on a sequential approach that takes account of all potential sources of flooding. This is consistent with national policy and is not considered out of date.	No
92.	<i>Natural environment</i>			
93.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 170	The relevant Local Plan policies largely discharge these requirements other than in explicitly addressing the relatively new concepts of natural capital and ecosystem services. The revised Plan will need to address this.	Beneficial
94.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 171	See response to Question 93.	Beneficial
95.	Conserve the special character and importance	NPPF Para	Cotswold District does not contain coastal areas.	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	of Heritage Coast areas.	173		
96.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 174	See response to Question 93.	Beneficial
97.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 178 & 180	NPPF (2019) paragraphs 178 and 180 carry over from various paragraphs of the NPPF (2012) ¹⁶ and there have been no substantive changes to national policy. Local Plan Policy EN15 (Pollution and Contaminated Land) already covers most of the issues raised in the NPPF. Policy EN15(1b) could be updated to deliver the ambition of providing a 'Dark Skies' policy, similar to equivalent policies in adopted Local Plans elsewhere in the Cotswolds AONB.	No
98.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 181	Policy EN15 addresses pollution and contaminated land, referring in the supporting text to Air Quality Management Areas and Source Protection Zones, but requires revision so that it better reflects the requirements of this paragraph.	Beneficial

¹⁶ NPPF (2019) para 178 and NPPF (2012) para 121 are practically the same; the initial part of NPPF (2019) para 180 corresponds with NPPF (2012) para 120; NPPF (2019) para 180(a) corresponds with NPPF (2012) para 123 (bullet point 2); NPPF (2019) para 180(b) corresponds with NPPF (2012) para 123 (bullet point 4); NPPF (2019) para 180(c) corresponds with NPPF (2012) para 125.

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
99.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 182	Mostly consistent with national policy, although could be improved. The reasoned justification for Policy EN2 explains that an inclusive approach to design is required, which ensures that “ <i>new developments are integrated both physically and socially with current communities and places</i> ”. Policy INF4 also requires development to be well integrated with the existing transport network within and beyond the development itself, avoiding severance of communities. However, the Plan does not set out that applicants / agents should provide suitable mitigation measures before developments are completed where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity (as required by NPPF 182).	Beneficial
100.	<i>Historic Environment</i>			
101.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 185	NPPF (2019) para 185 carries forward NPPF (2012) para 126. The Council’s adopted Heritage Strategy ¹⁷ forms part of the Local Plan’s evidence base. Should the Council conclude the Local Plan requires an update then consideration should be given to updating the Heritage Strategy as well. This could, for example, reflect on the Council’s Corporate Strategy (2019-2023), projects such as the Cirencester Town Centre Masterplan, the Climate Emergency and the delivery of the actions contained within section five of the Heritage Strategy.	Beneficial
102.	<i>Minerals</i>			

¹⁷ <https://www.cotswold.gov.uk/media/1624885/5201-Historic-Environment-Strategy-%E2%80%93-Apr-2016.pdf>

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
103.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 204	A Gloucestershire County Council matter	No
104.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 204	A Gloucestershire County Council matter	No
105.	Safeguard mineral resources by defining Mineral Safeguarding Areas.	NPPF Para 204	A Gloucestershire County Council matter	No
106.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 204	A Gloucestershire County Council matter	No
107.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 204	A Gloucestershire County Council matter	No
108.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 204	A Gloucestershire County Council matter	No
109.	Recognise that some noisy short-term activities, which may otherwise be regarded as	NPPF Para 204	A Gloucestershire County Council matter	No

	A. NPPF Requirement	B. NPPF Paragraph	C. Record your assessment results	D. Update Required?
	unacceptable, are unavoidable to facilitate minerals extraction			
110.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 204	A Gloucestershire County Council matter	No