

Cotswold District Local Plan – Policy Review Toolkit

Purpose of the report

This report has been prepared alongside the PAS Local Plan Route Mapper Toolkits, specifically one¹ and two².

The purpose of this toolkit is to expand on matters identified in the PAS toolkits that are directly influencing the need to update the Cotswold District Local Plan so as to provide additional granularity and commentary on each Local Plan policy.

Changes to one policy affect other. Therefore, a key aspect of the review is to establish the connections that policies have with one another. The report identifies ‘dependencies’ - both in terms of evidence and policies - that may need updating as a result of changes made elsewhere in the plan.

This report is only a snapshot in time and future events, such as the publication of revised evidence, revised national policy and guidance and representations made at consultation, may affect the scale of the eventual update.

¹ WHEN AVAILABLE INSERT WEB LINK

² WHEN AVAILABLE INSERT WEB LINK

Policy / Section	WHAT? Matters that need addressing through a Local Plan Update	WHEN? Signif. issue influencing an update now? (before 2031)	WHEN? Update policy longer term? (beyond 2031)	WHY? Why does the policy need to be updated? Are their cause and effects? Are there any dependencies?	HOW? How will the matter be resolved? (NB: Specify the extent of the change)	WHO? List specific stakeholders that have a duty to cooperate and engage with
Introduction	<p>Short term</p> <ul style="list-style-type: none"> - Introduction is fit for purpose but minor modifications would be needed to reflect latest context and any clarity required as a result of changes to national guidance. E.g. Make clear the role of Neighbourhood Plans (NPPF para 29) <p>Long Term</p> <ul style="list-style-type: none"> - Full update required to reflect new planning horizon, updated national planning policy / guidance and the Council's corporate aims and objectives. 	No (continue to monitor)	Yes (full update)	<p>Why – No changes are required but an update to the wider plan is likely to require some consequential minor modifications to text to reflect latest context / information. In the longer term this section will need to be reviewed as part of wider and deeper update of local plan to reflect a plan period beyond 2031.</p> <p>Dependencies - Sustainability Appraisal; Corporate Strategy; National policy, guidance and regulations.</p>	<p>No significant changes required, although consequential minor modifications to text required.</p> <p>Opportunity to make clear role of NDPs - e.g. purpose is to help local communities develop a shared and more refined vision for their area.</p> <p>No additional evidence required to support change.</p>	Development Management Local community
Portrait	<p>Short term</p> <ul style="list-style-type: none"> - Portrait is fit for purpose but minor modifications would be needed to reflect latest context. <p>Long Term</p> <ul style="list-style-type: none"> - A wider update would be required to principally explain extended plan period. 	No (continue to monitor)	Yes (full update)	<p>Significant changes are not required but an update to the wider plan is likely to require some consequential minor modifications to reflect latest context / information. In the longer term this section will need to be reviewed as part of wider and deeper update of local plan to reflect a plan period beyond 2031.</p> <p>Dependencies - Sustainability Appraisal; Corporate Strategy; National policy, guidance and regulations.</p>	<p>Consequential minor modifications to text required.</p> <p>No additional evidence required to support change.</p>	Development Management GCC's intelligence unit Local community
Issues	<p>Short term</p> <ul style="list-style-type: none"> - The section is fit for purpose although textual changes could help address / emphasise / reflect: <ul style="list-style-type: none"> • how Cotswold and the surrounding authorities will meet their housing needs (NPPF para 11 b)) • the need for different housing types (NPPF para 61) • the Council's climate emergency declaration • updated evidence (e.g. Sustainability Appraisal Scoping document) • issues identified in Council's Corporate Strategy • other public sector strategies (LEP, GCC, NHS, Neighbourhood Plans, Glos Statement of Common Ground, etc) <p>Long Term</p> <ul style="list-style-type: none"> - A wider update would be required to similarly respond to issues raised above and also examine the extended plan period. 	Yes (partial update)	Yes (full update)	<p>Why – Take account of latest context / information. In the longer term this section will need to be reviewed as part of wider and deeper update of local plan to reflect a plan period beyond 2031.</p> <p>Dependencies -</p> <ul style="list-style-type: none"> - <u>Policy</u> – All policies - <u>Dependencies</u> - Sustainability Appraisal; Climate Emergency Declaration (and Action Plan) - <u>Other Plans</u> - Corporate Strategy; Neighbourhood Plans; Statement of Common Grounds; LEP Strategies; GCC Plans 	<p>Consequential minor modifications required to reflect new strategies and updated evidence.</p>	Members Local organisations and businesses Town and Parish Councils; Members Local Community groups DTC partners GCC's intelligence unit
Vision	<p>Short term</p> <ul style="list-style-type: none"> - Address matters identified in Corporate Strategy and the emerging Glos Statement of Common Ground, <p>Long Term</p> <ul style="list-style-type: none"> - A new vision would be required to reflect new time horizon to 2041. 	No (continue to monitor)	Yes (full update)	<p>Short Term: Why – The new Corporate Strategy places more emphasis on making the District carbon neutral and deliver social rented affordable housing, etc. This remains compatible with the Vision and therefore no update is required.</p> <p>Long Term: Why – update required to ensure conformity with national policy and guidance. Reflect matters identified in the Council's Corporate Strategy, other relevant strategies and community ambitions.</p> <p>Dependencies -</p> <ul style="list-style-type: none"> - <u>Policy</u> - Strategic policies - <u>Dependencies</u> - Sustainability Appraisal; Climate Emergency Declaration (and Action Plan) - <u>Other Plans</u> - Corporate Strategy; Neighbourhood Plans; Statement of Common Grounds; LEP Strategies; GCC Plans 	<p>Short term – Consequential minor modifications to text required. No additional evidence required to support change.</p>	Members Local organisations and businesses Town and Parish Councils; Members Local Community groups DTC partners

Policy / Section		WHAT? Matters that need addressing through a Local Plan Update	WHEN? Signif. issue influencing an update now? (before 2031)	WHEN? Update policy longer term? (beyond 2031)	WHY? Why does the policy need to be updated? Are their cause and effects? Are there any dependencies?	HOW? How will the matter be resolved? (NB: Specify the extent of the change)	WHO? List specific stakeholders that have a duty to cooperate and engage with
Objectives		<p>Short term</p> <ul style="list-style-type: none"> - Needs to take account of the Local Industrial Strategy and economic information on emerging sectors/productivity - Address issues identified in Corporate Strategy and Glos Statement of Common Ground, <p>Long term</p> <ul style="list-style-type: none"> - A wider update would be required to similarly respond to issues raised above and also examine the extended plan period. 	No (continue to monitor)	Yes (full update)	<p>Why – Significant changes are not required currently but any update would likely require consequential minor modifications to text to reflect latest context / information. In the longer term this section will need to be reviewed as part of wider and deeper update of local plan to reflect a plan period beyond 2031.</p> <p>Dependencies -</p> <ul style="list-style-type: none"> - Policy - Strategic policies - Dependencies - Sustainability Appraisal; Climate Emergency Declaration (and Action Plan) - Other Plans - Corporate Strategy; Neighbourhood Plans; Statement of Common Grounds; LEP Strategies; GCC Plans 	Consequential minor modifications required to reflect new strategies and updated evidence.	Engage with Members, statutory stakeholders, local community and local businesses;
Local Plan Strategy							
DS1	Development Strategy	<p>Short Term</p> <ul style="list-style-type: none"> - New housing need based on the standard methodology (NPPF para 60). - Employment land requirement may need updating (NPPF para 81b). - Consider housing need figures for designated Neighbourhood Areas (NPPF para 66). - Consider additional supply to ensure 5YHLS remains robust <p>Long Term</p> <ul style="list-style-type: none"> - New planning period / horizon – 2021 to 2041 - New housing need based on the standard methodology (NPPF para 60). - Employment land requirement will need updating (NPPF para 81b). - Consider housing need figures for designated Neighbourhood Areas (NPPF para 66). 	Yes (partial update)	Yes (full update)	<p>Why – Update policy with new housing requirement / target. The Policy remains fit for purpose and remains on course to delivered identified levels of growth against extant target. The Review does not indicate that the increased need will significantly impact the delivery of the development strategy, although updated evidence such as SHELAA, Settlement Role and Functions Study, Sustainability Appraisal will test this hypothesis. A modest supply of additional housing land is likely to be required ('S' policies) to ensure the Council maintains a 5YHLS throughout the plan period and to provide sufficient supply to meet full plan needs by 2031.</p> <p>Dependencies -</p> <ul style="list-style-type: none"> - Policy - Strategic policies - Dependencies - Sustainability Appraisal; Climate Emergency Declaration (and Action Plan); Housing Needs Assessment; Employment Needs Assessment; Settlements Role and Function Study; SHELAA; - Other Plans - Corporate Strategy; Neighbourhood Plans; Statement of Common Grounds; LEP Strategies; GCC Plans 	Consequential changes may be required to replace housing requirement with a new figure that derived from the Government's Standard Method.	Town and Parish Councils; Members; Local Community groups; DTC partners; local businesses;
DS2	Development Within Development Boundaries	- The development boundaries will need to be redrawn to accommodate the additional housing and economic allocations.	Yes (partial update)	Yes (full update)	<p>Why – To accommodate additional land supply / allocations.</p> <p>Dependencies – SHELAA; site allocations; development boundary review; Sustainability Appraisal; Neighbourhood Plans;</p>	Update development boundaries on inset maps	Development Management; Town and Parish Councils; Members; Local Community groups; local businesses;
DS3	Small-Scale Residential Development in Non-Principal Settlements	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	Yes (partial update)	<p>Why – In the short term the policy continue to be in conformity with national policy although some minor amendments to the policy and support text would aid clarity / decision makers. Longer term the policy will need to be assessed as part of a wider update to the development strategy to ensure it remains fit for purpose.</p> <p>Dependencies - Continue to monitor the policy through the Authority's Monitoring Report</p>	<p>Short term - Minor amendments to policy to aid clarity and continue to monitor effectiveness;</p> <p>Long term – update policy and supporting text (if required).</p>	Development Management Town and Parish Councils; Members; Local Community groups; local businesses;
DS4	Open Market Housing Outside Principal and Non-Principal Settlements	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decision that might alter the intention of the policy.	No (continue to monitor)	Yes (partial update)	<p>Why – In the short term the policy continue to be in conformity with national policy although some minor amendments to the policy and support text would aid clarity / decision makers. Longer term the policy will need to be assessed as part of a wider update to the development strategy to ensure it remains fit for purpose.</p>	Minor amendments to policy to aid clarity;	Development Management Town and Parish Councils; Members; Local Community groups;

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				Dependencies - Continue to monitor the policy through the Authority's Monitoring Report		local businesses;	
Delivering the Strategy							
SA1-SA3	Strategic Infrastructure Delivery	<ol style="list-style-type: none"> Infrastructure priorities will need to accommodate the growth of additional development and updated evidence from external sources. Overarching viability policy / viability testing for the Local Plan Review will be required in accordance with NPPF para 57. Delete completed infrastructure projects from the Local Plan identified in Policies SA1-SA3. Combine three strategic infrastructure policies into one. 	Yes (partial update)	Yes (full update)	<ol style="list-style-type: none"> Update to reflect latest evidence, data and development needs. So the Local Plan remains effective and deliverable. So the Local Plan remains effective and deliverable. To make the Local Plan more concise and avoid repetition. <p>Dependencies – Sustainability Appraisal; Infrastructure Delivery Plan; Site Allocations; Sport, Recreation and Open Space evidence; Highway Capacity Assessment; Green Infrastructure Strategy; Viability Assessments</p> <p>Short term = Addendum to IDP to reflect additional sites Long term = fully revised IDP to reflect new plan period and additional housing growth.</p>	<ol style="list-style-type: none"> IDP, together with other supporting evidence, will confirm if additional infrastructure is required and this will provide justification for an updated policy (and supporting text). Incorporate viability report recommendations. Consequential change. Consequential change. 	Engage with members and statutory stakeholders on development needs, supporting local plan evidence and emerging local plan strategies and policies.
SI and S4-S19	Settlement policies	<p>Short Term</p> <ol style="list-style-type: none"> Evidence indicates that Policy DSI should be modified to increase the housing requirement. Additional site allocations will be needed in the Principal Settlements. Undeliverable / not developable site allocations and those that now have planning permission or are complete could be removed from the Local Plan. Adjustments may be needed to some site allocations to make them deliverable / developable. Some site allocations require further detail to specify how they should be developed (e.g. development briefs included within the policy). The site allocations should include detail on how they will benefit climate change (e.g. areas identified for carbon capture, SUDS to reduce flood risk, etc.). Established Employment Sites are identified at Appendix E and are unnecessarily repeated in Policies SI and S4-S19. If the non-strategic infrastructure projects and Established Employment Sites are relocated, all that remains are the site allocations (note that some settlements do not have any site allocations) and the descriptive reasoned justification about each settlement. These could be condensed into a single policy. <p>Long Term</p> <ul style="list-style-type: none"> Update policies to reflect new development strategy and strategic policies Local Plan policies need to reflect emerging and made Neighbourhood Plan proposals, policies and allocations 	Yes (partial update)	Yes (full update)	<p>Why</p> <ol style="list-style-type: none"> The Local Plan must deliver the full objectively assessed needs and maintain a five year housing land supply. The Local Plan should not include undeliverable / not developable site allocations. Some allocations may need to be adjusted so that they can become deliverable. Planning applications on some existing site allocations do not accord with the intended vision for those sites. The Council has issued a climate change emergency and want to make the Local Plan “green to its core”. The Local Plan should be concise and should avoid repetition where possible, whilst also being easy to use in practice. Established Employment Sites are sufficiently identified in Appendix E. For the same reason given in Point 7 above, the Local Plan would be more concise if the site allocations are grouped together into a single policy. <p>Dependencies</p> <ol style="list-style-type: none"> SHELAA Update; Public Consultation; Viability evidence; Sustainability Appraisal update to include the new allocations; SHELAA Update. SHELAA Update. SHELAA Update; landscape evidence; Sport, Recreation and Open Space Study. Climate change evidence. Neighbourhood plans / neighbourhood plan groups. None, as consequential change. None, as consequential change. 	<p>How</p> <ol style="list-style-type: none"> Incorporate additional site allocations to meet identified needs. Delete site allocations that are undeliverable / not developable. Adjust site allocations where it is necessary to make them deliverable. Use the SHELAA, landscape studies and other evidence to provide additional detail within the policy (i.e. a design brief). This should specify particular features that will be essential within the design of sites but it should not include any unnecessary detail. Use climate change and other evidence to justify features that should be included within site allocations to give them a positive contribution to tackling the climate change issue. Delete references to Established Employment Sites from Policies SI and S4-S19. Appendix E and do not need to be repeated in SI and S4-S19. Delete this part of the 	Engage with members and statutory stakeholders on development needs, supporting local plan evidence and emerging local plan strategies and policies.

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						7. Combine the site allocations from Policies S1 and S4-S19 into a single policy. Policies maps could be made into a new appendix. The descriptive text for each settlement could either become part of the Portrait or the RJ for DSI.			
S2	Strategic Site, south of Chesterton, Cirencester	Outline permission has been granted and the Section 106 agreement has been signed. Reserved Matters application is due in 2020 and development is expected to start in 2021 – in line with expectations,	No (continue to monitor)	No (continue to monitor)	Outline planning permission has been granted. Reserved Matters applications due in 2020. Continue to monitor progress and delivery against Local Plan objectives.	N/A		N/A	
S3	Cirencester Central Area Strategy	<ul style="list-style-type: none"> - Update to address the changing nature of the High Street and emerging Town Centre Masterplan - To reflect on parking capacity and needs within the context of the climate emergency and changing nature of the high street, - Remove references to Primary and Secondary Retail Frontages, which are no longer NPPF compliant. 	Yes (full update)	Yes (full update)	<p>Why – Update to reflect latest evidence, data and development needs / opportunities.</p> <p>Dependencies - Sustainability Appraisal; Town Centre Masterplan evidence (historic environment, Access and movement study; parking review); Green Infrastructure Strategy; Retail Study;</p>	<p>How – engage with members and statutory stakeholders on development needs, supporting local plan evidence and emerging local plan strategies and policies.</p>	<p>Cirencester Town Councils; Members; Local community groups; local businesses and retailers; LEP Growth Hub; Chamber of Commerce; Arts and creative industry; Gloucestershire County Council</p>		
Housing to Meet Local Needs									
H1	Housing Mix and Tenure to Meet Local Needs	<ol style="list-style-type: none"> 1. H1(3) – It is unclear how the 5% of dwelling plots for sale as serviced or custom build plots should be applied. 2. H1(4) – The Government has not passed the legislation for new Starter Homes and none have been delivered³. That said, the government has recently published a consultation document⁴ on this matter. Policy will need to reflect eventual government policy to ensure it remains effective and deliverable. 	Yes (partial update)	Yes (partial update)	<ol style="list-style-type: none"> 1. To provide clarity. 2. So the Local Plan only contains effective and deliverable policies. <p>Dependencies - Sustainability Appraisal; Viability Assessments; Local Housing Needs Assessment; Self-Build and Custom-Build Register; Government decision on whether to scrap Starter Home scheme.</p>	<ol style="list-style-type: none"> 1. Add further clarity within the Policy H1(3) to specify how the 5% should be applied. 2. Monitor Government updates about Starter Homes. 	No external stakeholders required to input into these policy changes.		
H2	Affordable Housing	<ol style="list-style-type: none"> 1. The NPPF definition of affordable housing has changed and now includes affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership (see NPPF Annex 2: Glossary). 2. The new Corporate Strategy places greater emphasis on providing social-rented homes. Future site allocations and criteria based policies contained within the Local Plan's housing chapter should reflect these changes and expectations. 3. H2(1) – “all housing developments that provide 11 or more new dwellings or have a combined gross floorspace of over 1,000sq.m will be expected to contribute towards affordable housing”. In line with this, 10 dwellings would not require affordable housing. However, NPPF para 63 and the PPG now refer to affordable housing not being sought for 	Yes (partial update)	Yes (full update)	<ol style="list-style-type: none"> 1. Update to reflect latest evidence, data and /or national policy / guidance. 2. The Lib Dem manifesto seeks to provide more affordable housing. 3. Apart from being inconsistent with national policy, the District is missing out on some affordable housing by stating that 10 dwelling schemes do not need to provide such housing. 4. Apart from being inconsistent with national policy, the District is missing out on some affordable housing by stating that 6-10 dwelling schemes need to contribute affordable housing when the threshold could be much lower. 5. For clarity. 6. For clarity. 7. This would ensure that replacement dwellings are not included in 	<ol style="list-style-type: none"> 1. Update Local Plan Glossary Affordable Housing definition to reflect the NPPF definition and amend the policies to reflect this change (e.g. to respond to any additional needs). 2. Investigate whether a policy that would provide further social-rented housing can be included within the Local Plan. 3. Make Policy H1(1) consistent 	<ol style="list-style-type: none"> 1. No external stakeholders required. 2. Engage with members, statutory stakeholders, housing organisations and house builders on housing mix and tenure needs. 		

³ <https://www.bbc.co.uk/news/business-50296672>

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/864265/First_Homes_consultation_document.pdf

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Policy / Section	Matters that need addressing through a Local Plan Update	Signif. issue influencing an update now? (before 2031)	Update policy longer term? (beyond 2031)	Why does the policy need to be updated? Are their cause and effects? Are there any dependencies?	How will the matter be resolved? (NB: Specify the extent of the change)	List specific stakeholders that have a duty to cooperate and engage with	
	<p>residential developments that are not major development. The new NPPF Glossary definition for major development is “For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more”.</p> <p>4. NPPF para 63 states that policies may set out a lower threshold of 5 or fewer affordable housing units in designated rural areas (i.e. AONBs). However, Policy H2(2) sets an affordable housing threshold in designated rural areas of 6-10 homes.</p> <p>5. There is uncertainty about how H2 should apply if a development of 5 or fewer dwellings, with a gross floorspace of over 1,000m², is proposed in a settlement in a rural area.</p> <p>6. It is unclear how the affordable housing proportion of developments should be calculated.</p> <p>7. H2(3i) and H2(3ii) refer to 30% of new dwellings gross and 40% of new dwelling gross respectively. This conflicts H2(1) and H2(2), which refer to a net increases.</p> <p>8. A developer may submit a number of smaller schemes on a larger site, which in isolation would not exceed the affordable housing threshold, but cumulatively would require affordable housing.</p>			<p>the 30% or 40% and would remove the inconsistency in the policy.</p> <p>8. For clarity; to ensure that developers fulfil their moral obligation to provide affordable housing; and to boost the supply of affordable housing.</p> <p>Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Local Housing Needs Assessment.</p>	<p>with NPPF para 63 and the NPPF definition of Major Development.</p> <p>4. Review percentage of affordable homes being sought in designated rural areas to accord with NPPF 63.</p> <p>5. Additional policy detail is required to explain how H2 should apply if a development of 5 or fewer dwellings, with a gross floorspace of over 1,000m², is proposed in a settlement in a rural area.</p> <p>6. Further explanation is required to specify how the affordable housing contribution should be calculated.</p> <p>7. Policy H2(3i) and H2(3ii) should be 30% net and 40% net.</p> <p>8. Introduce some wording in the supporting text (if not the main policy) which covers the piecemeal development of a larger site in order to avoid the requirement to provide affordable housing.</p>		
H3	Rural Exception Sites	<p>1. Consider broadening the context of this policy to accord with NPPF para 71, which relates to “Entry Level Exception Sites on land which is not already allocated for housing and is adjacent to existing settlements”.</p>	No (continue to monitor)	Yes (partial update)	<p>1. Update to reflect latest evidence, data and /or national policy / guidance.</p> <p>Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Local Housing Needs Assessment; SHELAA; Self Build Register; Community Led Housing initiatives; Development Strategy.</p>	<p>1. Update the policy to accord with NPPF 71 (e.g. amend H3(2) to swap the word ‘villages’ to ‘settlements’).</p>	Engage with members, statutory stakeholders, housing organisations; house builders; T/P Councils; community organisations and groups.
H4	Specialist Accommodation for Older People	<p>1. Population continues to age – LHNA finds that 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>2. 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. Consider whether the policy needs to be adapted to ‘Specialist Accommodation’.</p>	Yes (partial update)	Yes (partial update)	<p>Why – Update to reflect latest evidence, data and /or national policy / guidance. Expand to incorporate needs for housing for different types of specialist accommodation, as identified by the Gloucestershire LHNA. Incorporate ethos of County Council’s new Housing with Care Strategy (e.g. provide more care at home, rather than in specialist care units).</p> <p>Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Local Housing Needs Assessment; SHELAA; Self Build Register; Community Led Housing initiatives; Housing with Care Strategy.</p>	<p>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 by expanding Policy H4.</p>	Engage with members, statutory stakeholders, housing organisations; house builders; T/P Councils; community organisations and groups. Also engage with the County Council and Clinical Commissioning Group.
H5	Dwellings for Rural Workers	<p>1. The policy only covers new build housing and any new home for a rural worker must be proportionate in scale for the need of that</p>	Yes (partial update)	No (continue to monitor)	<p>1. To close a loophole in the policy.</p> <p>2. To provide clarity about how the policy should be applied.</p>	<p>1. Minor alteration to the policy to also include extensions to</p>	

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Outside Settlements	<p>worker. The policy does not cover extensions to rural worker's dwellings. 19/01580/FUL was a significant extension that doubled the size of a rural worker's dwelling – a significantly greater size than the need for the worker.</p> <p>2. H5(d) states “a suitable alternative dwelling to meet the essential need is not available on a defined development site within the 17 Principal Settlements or within a village or hamlet”. It is unclear what a ‘defined development site’ is.</p> <p>3. Paragraph 8.5.5 of the supporting text to Policy H5 is unclear. It states ‘Proposals for isolated dwellings in the countryside should be avoided, however, it is recognised that occasionally there is a need for such a proposal. In such instances, where criteria a, b and d above are met, consideration will be given to the siting of a mobile home for a three year temporary permission’. This indicates that mobile homes will be accepted as an alternative to permanent dwellings for an initial 3 year period. This is distinct from stating that mobile homes should be sought for the first 3 years in order for the applicant to demonstrate that their business is viable. In the past (PPS7 Annexe A) it has been necessary for the applicant to demonstrate that the new business is sound before moving on to apply for the erection of a permanent dwelling.</p>			<p>3. To ensure that rural workers dwellings are only built to house workers for businesses that are viable.</p> <p>Dependencies – no dependencies.</p>		<p>rural worker's dwellings.</p> <p>2. Clarify whether a ‘defined development site’ is one of the housing allocation sites or whether it is any site within a Development Boundary. If it is the former then DM could not take into account the availability of dwellings within Development Boundaries but not on a housing allocation site.</p> <p>3. Include policy detail to say that mobile homes should be sought for the first 3 years in order for the applicant to demonstrate that their business is viable.</p>				
H6	Removal of Occupancy Conditions	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report		N/A		N/A	
H7	Gypsy and Traveller Sites	<p>Short Term</p> <p>1. NPPF para 61 cites homes for travellers. The Council will need to consider whether the District's need is so great that it requires a standalone policy or should be sub headed within a housing mix and density policy along with the other housing need groupings.</p> <p>2. The policy may need to be reviewed to accommodate needs from the updated Gloucestershire Gypsy and Travellers Accommodation Assessment.</p> <p>Long Term</p> <p>- Review policy in line with updated Gloucestershire Gypsy and Travellers Accommodation Assessment.</p>	No (continue to monitor)	Yes (partial update)	<p>1. To ensure that the plan is effective.</p> <p>2. Update to reflect latest evidence, data and /or national policy / guidance. Local Plan is required to meet its objectively assessed needs.</p> <p>Dependencies – Sustainability Appraisal; Local Plan and CIL Viability Assessments; Gloucestershire Gypsy and Travellers Accommodation Assessment; SHELAA.</p>		<p>1. Either combine with H1 or leave alone.</p> <p>2. Incorporate updated needs of GTAA.</p>		Engage with members, statutory stakeholders, housing organisations; house builders; T/P Councils; community organisations and groups.	
Economy, including Retailing and Tourism										
EC1	Employment Development	<p>- The Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.</p> <p>- The District is currently expected to deliver its full 24.4ha employment land requirement by 2031</p>	No (continue to monitor)	Yes (partial update)	<p>Why – No significant changes are required currently, but in the longer term the policy is likely to require changes to reflect the Local Plan beyond 2031. New evidence may result in updating the policy and/or identify new sites for employment use.</p> <p>Update to reflect latest evidence, data and /or national policy / guidance.</p> <p>Modifications might be required to reflect and address matters contained within GFirst Local Enterprise Partnership's Local Industrial Strategy. The effect of Covid19 is another consideration.</p>		<p>Any future review of economics/figures or other assessment /employment trends would need a Consultant.</p> <p>Partial update to policy and RJ required to reflect new assessment/evidence in the longer term and future employment need/sites</p>		<p>Local businesses</p> <p>Town and Parish Councils</p> <p>GCC</p> <p>Development Management</p>	

WHAT?		WHEN?		WHY?	HOW?	WHO?	
Policy / Section	Matters that need addressing through a Local Plan Update	Signif. issue influencing an update now? (before 2031)	Update policy longer term? (beyond 2031)	Why does the policy need to be updated? Are their cause and effects? Are there any dependencies?	How will the matter be resolved? (NB: Specify the extent of the change)	List specific stakeholders that have a duty to cooperate and engage with	
				Housing numbers (OAN) - Economic forecasts inform the OAN and may require updating for new housing figures. Uncertain economy - In light of BREXIT the 2015 forecasts were likely to represent the highest levels of growth. Outline as a 'strategic' policy in light of new NPPF (para.21)	Moderate Change longer term – to meet OAN and economic strategy for Local Plan, new sites not necessarily a change in direction		
EC2	Safeguarding Employment Sites	- The revised NPPF does not carry forward the original Para 22 on the long-term protection of employment sites. This policy will need updating. - Similarly Paragraph 121 states that LPAs should take a positive approach to applications for alternative land uses where this would help to meet identified development needs. Point a) in particular refers to using retail and employment land for homes in areas of high housing demand provided this would not undermine key economic sectors.	No (continue to monitor)	Yes (partial update)	Why – Partial update to reflect latest evidence including a review of the District's employment land, data and national policy / guidance. (e.g. para. 121) Local Plan is required to meet its objectively assessed needs Remove reference in text to NPPF para 22 .(LP para 9.2.3) (minor) Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Gloucestershire Economic Assessment; SHELAA; IDP? – may identify 'barriers to investment'	Partial update to policy and RJ required to reflect new assessment/evidence in the longer term and future employment need/sites Detailed Employment Land Review to assess economic and business needs of the District. (support the Glos Economic Assessment) would need a Consultant. Moderate Change longer term – to meet OAN and economic strategy for Local Plan, new sites not necessarily a change in direction for existing sites	Engage with members, statutory stakeholders, housing organisations; house builders; T/P Councils; community organisations and groups. Development Management. Development Management
EC3	Proposals for all types of Employment-Generating Uses	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Why – No changes required currently. Continue to monitor the policy through the Authority Monitoring Report Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Gloucestershire Economic Assessment; SHELAA;		
EC4	Special Policy Areas	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Why – No changes required currently. Continue to monitor the policy through the Authority Monitoring Report Continue to monitor land owner intentions to promote business uses on the sites. SHELAA will be a useful tool in this respect. Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Gloucestershire Economic Assessment; SHELAA; Continue to monitor land owner intentions to promote business uses on the sites. SHELAA will be a useful tool in this respect.		
EC5	Rural Diversification	- NPPF paras 83-84 say that planning policies and decisions should enable the growth and expansion of all types of businesses in rural areas through conversion and well-designed new buildings.	No (continue to monitor)	Yes (partial update)	Why – No changes required currently . Future update to reflect latest evidence, data and /or national policy / guidance. or an updated economic strategy Consider making rural site allocations for employment (NPPF para 84). Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Gloucestershire Economic Assessment; SHELAA;	Partial update to policy and RJ required to reflect new assessment/evidence in the longer term and possible future employment sites in rural areas. Significant change in long term if increased role rural sites as would be a change of policy direction otherwise more moderate change – related to NPPF and updated Local Plan	engage with members, statutory stakeholders, housing organisations; house builders; T/P Councils; community organisations and groups Development Management

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Policy / Section	Matters that need addressing through a Local Plan Update	Signif. issue influencing an update now? (before 2031)	Update policy longer term? (beyond 2031)	Why does the policy need to be updated? Are their cause and effects? Are there any dependencies?	How will the matter be resolved? (NB: Specify the extent of the change)	List specific stakeholders that have a duty to cooperate and engage with	
EC6	Conversion of Rural Buildings	<ul style="list-style-type: none"> - The GPDO allows the creation of up to five dwellings from agricultural buildings outside the AONB. However, does the extant policy provide sufficient protection / advice for proposals that fall within the AONB? - Is policy EC6 relevant to proposals to create new employment uses in the countryside? It may be relevant to the conversion of historic buildings which the plan positively supports. Given consideration as to how policies EC1, EC3 and EC6 and para 83 of the NPPF work collectively to support conversation of rural buildings. - Policy EC6 does not distinguish between modern and historic farm buildings. 	Yes (partial update)	Yes (partial update)	<p>Why – Update to reflect latest evidence, data and /or national policy / guidance. Consider unintended consequences of proposals and their impacts to the AONB. Development Management process has identified the need to improve the clarity and purpose of the policy;</p> <p>Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Gloucestershire Economic Assessment; SHELAA;</p>	<p>economic strategy</p> <p>How –Consider including a definition of what constitutes a ‘Rural Building’ in the local plan; Make clear the policy is the re-use of redundant rural buildings</p> <p>Policy to be strengthened to provide more protection / advice for proposals that fall within the AONB, with emphasis on the wording of NPPF para 55 and in particular the immediate setting. Moderate Change – required to establish clarity and strengthen the policy</p>	Engage with members, statutory stakeholders, rural land agents; rural house builders; T/P Councils; community organisations and groups.
EC7	Retail	<ul style="list-style-type: none"> - NPPF para 85d states that planning policies should 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. Town centre boundaries should be kept under review where necessary. - Town Centre policy will need to take account of evidence base for predicting future needs over the next ten years in a rapidly changing retail environment. - NPPF para 85a states that planning policies should define a network and hierarchy of town centres and promote their long term vitality and viability - by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses and reflects their distinctive characters. - NPPF para 91c focuses on the role of local shops in supporting healthy lifestyles to encourage walking and cycling and access to healthier food. 	Yes (partial update)	Yes (full update)	<p>Why – Update to reflect latest evidence, data and /or national policy / guidance before the end of the plan period. Address changing nature of the High Street. The effect of Covid19 is another consideration.</p> <p>Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Gloucestershire Economic Assessment; SHELAA; Retail study; Cirencester Town Centre Masterplan evidence. Policy Cirencester Central Area S3, Map Inset 2, Policy EC8</p> <p>Test whether this is in scope at I&O – re Cirencester Masterplan. Also Applies to EC8</p>	<p>How – Commission a review of Retail and Town Centre evidence including leisure; modify policy</p> <p>Significant change – latest evidence and NPPF could require a change in direction/ emphasis of retail policy – within shorter (10year) time span</p>	members, statutory stakeholders and local retailers
EC8	Main Town Centre Uses	<ul style="list-style-type: none"> - Address issues identified in the formulation of town centre strategy Address issue in context of possible changes to Policy Cirencester Central Area S3 - NPPF para 25 and the new NPPF para 88 both refer to there being no need for a sequential test for ‘small scale’ rural offices or other development. - New NPPF para. 89 no longer refers to office development outside town centres requiring an impact assessment - Policy may require more clarity 	Yes (partial update)	Yes (partial update)	<p>Why – Partial update to reflect latest evidence, data and /or national policy / guidance. Additional leisure strategy / evidence will help plug previous gaps.</p> <ul style="list-style-type: none"> - In light of significant changes in the nature of the ‘traditional high street’, such as increased role of residential use in to town centres <p><u>Beyond 2031 (but could pragmatically be updated now)</u></p> <ul style="list-style-type: none"> - EC8 (8) is not considered to be in conflict with the NPPF as it ‘removes’ a requirement to apply the impact test - No change to original NPPF and no definition of ‘small scale’ in policy NPPF is a material consideration where LP is silent; - Consider simplifying the policy. <p>Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Gloucestershire Economic Assessment; SHELAA; Retail study; Cirencester Town Centre Masterplan evidence. And related policies (policy S3)</p>	<p>How – Commission a review of Retail and Town Centre evidence including leisure; modify policy; consultant query a ‘primary shopping area’ in Cirencester but still NPPF compliant.</p> <p>Moderate Change – several changes could be made. But no significant change unless major issue linked to ‘nature of high street’ evidence (EC7)</p>	Engage with members, statutory stakeholders and local business owners; DM

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EC9	Retail Impact Assessments	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Why – No changes required currently Continue to monitor the policy through the Authority Monitoring Report Dependencies - Retail and Town Centre study;				
EC10	Development of Tourist Facilities and Visitor Attractions	- Policy should be explicit that it is about tourist facilities and visitor attraction only; - Address issue in context of possible changes to EC11.	Yes (partial update)	Yes (partial update)	Why – Development Management process has identified the need to improve purpose of the policy; Add clarity to DM process. Dependencies - Sustainability Appraisal;		How – Modify policy to address ambiguity and consider including reference to viability assessments; Engage with members, statutory stakeholders and local business owners;		Engage with members, statutory stakeholders and local business owners; DM
EC11	Tourist Accommodation	- Policy should be explicit when policy applies (e.g. new and/or existing accommodation); - Address issue in context of possible changes to EC10.	Yes (partial update)	Yes (partial update)	Why – Development Management process has identified the need to improve purpose of the policy; Add clarity to DM process. Dependencies - Sustainability Appraisal;		How – Modify policy to address ambiguity; Minor – no change in direction policy, only clarity		Engage with members, statutory stakeholders and local business owners; DM
Built, Natural and Historic Environment									
EN1	Built, Natural and Historic Environment	- NPPF para 171 states that Plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value where consistent with other policies in this Framework; 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.	No (continue to monitor)	Yes (full update)	Why – Update to reflect latest evidence, data and /or national policy / guidance. Consider the practical application of the policy – is the policy being used? Dependencies - Sustainability Appraisal; Soundness Checklist.		How – Engage with members and DM officers;		
EN2	Design of the Built and Natural Environment (DEISGN CODE)	- Design and building standards will play an increasing vital role in the adaptation and mitigation of the climate emergency; - The NPPF places a greater emphasis on good design. Para 125 states that design policies should be developed with local communities so that they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics. - Para 126 states that to provide maximum clarity about design expectations at an early stage, plans should use visual tools such as design guides and codes. - The Local Plan Review will need to consider more detailed design policies as the NPPF places greater emphasis on place shaping.	Yes (full update)	Yes (full update)	Why – Update to reflect latest evidence, data and /or national policy / guidance. The policy has the potential to play a central role in reducing carbon emissions from the construction and life of the development. Dependencies - Sustainability Appraisal; Soundness Checklist; Design Code; Strategic Housing's zero carbon homes project; Climate emergency evidence; Viability evidence; CIL levy; Building with Nature Benchmark; Nature Recovery Network		How – Engage with members and DM officers; The inclusion of maps that allocate these areas within the district. Heritage and Design resources to support Local Plan making;		Natural England CCB LNP local communities Other LAs and PC/TCs Historic England
EN3	Local Green Spaces	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy. - Neighbourhood Plans are using the policy to added new sites.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report		How – Engage with members and DM officers. Heritage and Design resources to support Local Plan making.		Natural England CCB LNP local communities Other LAs and PC/TCs Historic England
EN4	The Wider Natural and Historic	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report		How – Engage with members and DM officers. Heritage and Design resources to support		Natural England CCB LNP

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	Landscape	intention of the policy.				Local Plan making.	local communities Other LAs and PC/TCs Historic England
EN5	Cotswolds Area of Outstanding Natural Beauty	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report	How – Engage with members and DM officers. Heritage and Design resources to support Local Plan making.	Natural England CCB LNP local communities Other LAs and PC/TCs Historic England
EN6	Special Landscape Areas	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report	How – Engage with members and DM officers. Heritage and Design resources to support Local Plan making.	Natural England CCB LNP local communities Other LAs and PC/TCs Historic England
EN7	Trees, Hedgerows and Woodlands	- NPPF para 11 (footnote 6) now includes ancient woodland and veteran trees by virtue of the definition of irreplaceable habitats as set out in the glossary.	Yes (partially)	Yes (partially)	Why – Minor modification required to reflect latest evidence, data and /or national policy / guidance. Dependencies - Minimal evidence required as change is largely textual; although alteration to be examined through Sustainability Appraisal, Soundness Checklist and public consultation.	How – Heritage and Design resources to support Local Plan making; External expertise; Engage with members, stakeholders and DM officers;	Natural England CCB LNP local communities Other LAs and PC/TCs Historic England
EN8	Biodiversity and Geodiversity: Features Habitats and Species	- Address Biodiversity net gain requirements	Yes (partially)	Yes (partial update)	Why – Modifications are required to reflect latest evidence, data and /or national policy / guidance. Specifically the Local Plan does not take account of how Net Gain and Natural capital, Ecosystem Services will contribute to the quality of the landscape (NPPF para 174). Dependencies - Change is largely textual but some supporting evidence might be required e.g. Sustainability Appraisal, Soundness Checklist, public consultation, biodiversity evidence and the Green Infrastructure Strategy.	How – Heritage and Design resources to support Local Plan making; External expertise; Engage with members, stakeholders and DM officers;	Natural England CCB LNP local communities Other LAs and PC/TCs Historic England
EN9	Biodiversity and Geodiversity: Designated Sites	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report		
EN10	Historic Environment: Designated Heritage Assets	- Section 16 (Conserving and enhancing the historic environment) of the Revised NPPF remains largely unchanged from the 2012 NPPF. Local Plan policy remains largely consistent.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report		
EN11	Historic Environment: Designated Heritage Assets - Conservation	- Section 16 (Conserving and enhancing the historic environment) of the Revised NPPF remains largely unchanged from the 2012 NPPF. Local Plan policy remains largely consistent.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report		

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	Areas								
EN12	Historic Environment: Non-designated Heritage Assets	- The policy states that “Proposals for demolition or total loss of a non-designated heritage asset will be subject to a balanced assessment ...”; however the NPPF (para 197) states that: “... a balanced judgement will be required have regard to the scale of any harm or loss and the significance of the heritage asset.”.	Yes (partially)	Yes (partially)	Why – Minor modification required to reflect latest evidence, data and /or national policy / guidance. Dependencies - Minimal evidence required as change is largely textual; although alteration to be examined through Sustainability Appraisal, Soundness Checklist and public consultation.		How – Heritage and Design resources to support Local Plan making;		
EN13	Historic Environment: The Conversion of Non-Domestic Historic Buildings	- The phrase ‘proportionate to the significance of the asset’ does not accord with NPPF paras 132-134 in respect of designated heritage assets – and the need to weigh impact against public benefits.	Yes (partially)	Yes (partially)	Why – Minor modification required to reflect latest evidence, data and /or national policy / guidance. Dependencies - Minimal evidence required as change is largely textual; although alteration to be examined through Sustainability Appraisal, Soundness Checklist and public consultation.		How – Heritage and Design resources to support Local Plan making;		
EN14	Managing Flood Risk	- NPPF para 156 states that strategic policies should be informed by strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in or affecting, local areas susceptible to flooding.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report				
EN15	Pollution and Contaminated Land	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report				
Infrastructure									
INF1	Infrastructure Delivery	<ol style="list-style-type: none"> Overarching viability policy/viability testing for the Local Plan Review will be required in accordance with NPPF para 57. Key question emanating from para 57 is whether the viability evidence is up to date? What are consequences if not? Site allocations, design code, affordable housing (any policy with a cost to development). Further clarity is needed about what infrastructure will be paid for through CIL and what infrastructure will be expected from S106. Potentially combine INF1 with SA1-SA3? 	Yes (partially)	Yes (partially)	<ol style="list-style-type: none"> Minor modification required to reflect latest evidence, data and /or national policy / guidance. To ensure the Plan remains effective and deliverable. To provide clarity. To make the plan more concise and easier to use. Dependencies <ol style="list-style-type: none"> Minimal evidence required as change is largely textual; although alteration to be examined through Sustainability Appraisal, Soundness Checklist, public consultation, Infrastructure Delivery Plan and CIL Viability Assessment. Updated viability evidence. Agreement with County Council and other delivery partners. CIL spending protocol. None. 		<ol style="list-style-type: none"> Update viability evidence. Update viability evidence. Write clear protocol for CIL collection / S106 contributions. Consequential change. 		Engage with members, developers, Gloucestershire County Council S106 team; CIL Manager; other statutory stakeholders, service providers.
INF2	Social and Community Infrastructure	<ol style="list-style-type: none"> The Revised NPPF sets out a standardised approach to viability at paragraph 57. Paragraph 92a) of the Revised NPPF places emphasis on positive planning for the use of shared spaces to deliver community facilities. Need to consider how this policy can better address health and wellbeing as per Revised NPPF Para 91) c and Para 92b) and how this links with other Plan Policies such as local centres, green infrastructure and sports facilities. 	Yes (partially)	Yes (partially)	<ol style="list-style-type: none"> The policy should reflect the latest evidence, data and national policy / guidance. The policy should reflect the latest evidence, data and national policy / guidance. The policy should reflect the latest evidence, data and national policy / guidance. CAMRA is a key player in the pubs business. To make the policy effective and workable in real life. 		<ol style="list-style-type: none"> Update to reflect latest evidence, data and /or national policy / guidance. Review policy in light of NPPF 92a Review policy in light of NPPF 91c and 92b. Review policy in light of CAMRA’s model planning 		Engage with members, developers, statutory stakeholders, service providers and DM officers;

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	<ol style="list-style-type: none"> Consider CAMRA's model planning policy. INF1 (2a) requires "no local demand for the facility or service". This would indicate that if local residents demonstrate a demand for a facility it should be retained even if the main service provider (e.g. NHS, GCC) is stating that there is no longer a need. The policy would benefit from some clarity on the fact it can also apply within a Principal Settlement (beyond the town centre boundary) Clause 2b should specify that completion of replacement facilities will be required before the development is completed. 			<ol style="list-style-type: none"> INF2(2a) is currently not effective, as it is not a workable or logical. To ensure that replacement facilities are delivered and are not left undelivered indefinitely. <p>Evidence – Sustainability Appraisal; Soundness Checklist; CAMRA model policy; Local Plan and CIL Viability Assessment.</p>	<ol style="list-style-type: none"> Replace with "no identified local need for the facility or service". Add some additional policy text to clarify about town centres. To ensure that 		
INF3	Sustainable Transport	<ol style="list-style-type: none"> NPPF para 104 states that planning policies should support an appropriate mix of uses, prepared with the active involvement of local highways authorities so that strategies for supporting sustainable transport and development patterns are aligned; identify and protect sites and routes which would be critical in developing infrastructure to widen transport choice and provide for high quality walking and cycling networks. The demolition of former railway bridges is permitted development. A case in Jan 2020 (at Kemble) highlights that the Council has little power to object to the notification to demolish the rail bridge. 	Yes (partially)	Yes (partially)	<ol style="list-style-type: none"> Update to reflect latest evidence, data and /or national policy / guidance. To preserve railway infrastructure for sustainable transport schemes. <p>Dependencies - Sustainability Appraisal; Soundness Checklist; Local Plan and CIL Viability Assessment; Cotswold District Transport Strategy; Climate Change evidence; Strategic Growth Options assessment.</p>	<ol style="list-style-type: none"> Modify policy to identify and protect sites and routes critical to developing sustainable transport infrastructure. Investigate how the policy gap can be plugged. 	<ol style="list-style-type: none"> Engage with members, developers, statutory stakeholders, service providers and DM officers. Liaise with DM, Gloucestershire County Council and Network Rail to see if the gap can be plugged.
INF4	Highway Safety	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report	N/A	N/A
INF5	Parking Provision	<ol style="list-style-type: none"> The Council has resolved in Motion 13 of 2019/20 Council Meeting that should the local plan be reopened, the Council resolves to: review its policy on communal parking and the ratio between dwellings and parking spaces. INF5(1) – it is unclear what constitutes 'clear and compelling evidence'. Appendix F parking toolkit does not set minimum standards. It simply provides parking space guidance based on number of on-site spaces proposed by the applicant. Appendix F Parking Toolkit - The toolkit calculations are based on the number of bedrooms in the property rather than the number of rooms. The DCLG parking research guidance refers to rooms rather than bedrooms. Appendix F - Parking standards do not make reference to non A or B use classes. What about C and D Use Classes, A2 Use Class. 	Not at this stage - monitor	Continue to monitor	<ol style="list-style-type: none"> Political decision. The policy effectively places the responsibility on the Council to demonstrate that on-site parking provision is required. An applicant could provide 0, 1, 2, 3 or more on-site parking spaces for a 3 bed dwelling. The toolkit does not specify which should be required as a minimum. There have also been cases where applicants want to remove a requirement to provide parking (17/03828/FUL). The applicant does not seek to provide any on-site parking whereas the approved scheme requires one on site space per dwelling. Applicants can easily get round the issue by annotating a room as a study or office rather than a bedroom. A potential 3 bed house then becomes a 2 bed house when using the toolkit. To provide parking standards for all use classes. 	<ol style="list-style-type: none"> To ensure that sufficient parking spaces are provided within new developments. Suggested ratios are given in the motion. Review the soundness of the nationally-derived parking standards evidence that underpins Policy INF5. On-site parking should be provided unless the applicant can provide clear and compelling evidence to demonstrate why it cannot. Amend Appendix F to set minimum standards A calculation based on rooms rather than bedrooms gets around this issue. Create parking standards for C and D Use Classes, A2 Use Class, etc. 	<ol style="list-style-type: none"> Gloucestershire County Council; Heritage and Design; DM. Gloucestershire County Council; Heritage and Design; DM. Gloucestershire County Council; Heritage and Design; DM. Gloucestershire County Council; Heritage and Design; DM.
INF6	Vale of Evesham	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report and Duty to Cooperate arrangements	N/A	N/A

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	Heavy Goods Vehicle Control Zone	to national policy and guidance and appeal decisions that might alter the intention of the policy.					
INF7	Green Infrastructure	1. NPPF paras 96–101 relating to open space and recreation remain largely unchanged from the 2012 version. However, potential need for stronger links to communities, health and design policies. 2. Add references to the GI benchmark and potentially use it within the policy.	Yes (partially)	Yes (partially)	1. Modification required to ensure policy reflects latest evidence, data and national policy / guidance. 2. To ensure that the policy references the GI benchmark. Dependencies - Minimal evidence required as change is largely textual; although alteration to be examined through Sustainability Appraisal; Gloucestershire Health and Wellbeing Strategy; Green Infrastructure Study 2020; Glos Statement of Common Ground. NPPF para 174 (Ecological networks)	Modify policy to reflect other strategies that promote health and wellbeing and the need for stronger links to communities, health and design policies; Heritage and Design resources to support Local Plan making;	Natural England CCB LNP local communities Other LAs and PC/TCs Historic England
INF8	Water Management Infrastructure	- NPPF para 156 states that strategic policies should be informed by strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in or affecting, local areas susceptible to flooding. - Existing Local Plan policy appears to be largely consistent with the Revised NPPF.	No (continue to monitor)	No (continue to monitor)	Why – Update to reflect latest evidence, data and /or national policy / guidance. Dependencies - Sustainability Appraisal; SHELAA; Climate change evidence; Water Cycle study SFRA Level one and two.	How – Commission a review of local plan evidence; modify policy (where required); Engage with members, statutory stakeholders and local communities;	Engage with local communities, town and parish councils; utility providers; Council’s flood engineers; GCC Flood lead authority
INF9	Telecomms Infrastructure	1. The policy is not consistent with NPPF 112 in that it is not explicit that developers are required to deliver superfast broadband connections within all new dwellings. This isn’t quite accurate - NPPF 112 refers in this context to new development not new dwellings.	Yes (partially)	Yes (partially)	1. To make consistent with NPPF 112 “to provide the future occupiers of the developments with a greater opportunity for home working and a reduction in car based commuting” (as per appeal decision). Dependencies - Minimal evidence required as change is largely textual; although alteration to be examined through Sustainability Appraisal; Local Plan and CIL Viability Assessments;	Investigate whether it is feasible to require all new developments to have superfast broadband, or how far we could take this idea. Modify the policy accordingly.	Engage with internet providers; house builders.
INF10	Renewable and Low Carbon Energy Development	- Wholesale review of policy required.	Yes (full update)	Yes (full update)	Why – Update to reflect latest evidence, data and /or national policy / guidance. Address changing nature of climate and promote renewable sources of energy. Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; SHELAA; Climate change and renewable energy constraints evidence.	How – Commission a review of Renewable Energy potential and resource; modify policy; Engage with members, statutory stakeholders and local communities;	
Other Spatial Issues							
SP1	Gloucester and Cheltenham Green Belt	- NPPF para 136 reiterates that green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through plan preparation. Strategic policies should establish the need for any changes to Green Belt boundaries. Exceptional circumstances have already been established through the BDP Examination and are set out in the Inspectors’ Report with the need for an early review included in the BDP.	No (continue to monitor)	No (continue to monitor)	Continue to engage with the Joint Core Strategy local planning authorities and any review of green belt that there may undertake in the future.		
SP2	Cotswold Airport	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report		
SP3	Thames and Severn Canal	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report. Any future changes are likely to be related to review of IDP, Local Transport Plan and/or related policies such as INF3, and any restoration plans.		Thames and Severn Canal Trust
SP4	The River	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report		

WHAT?		WHEN?		WHY?	HOW?	WHO?
Policy / Section	Matters that need addressing through a Local Plan Update	Signif. issue influencing an update now? (before 2031)	Update policy longer term? (beyond 2031)	Why does the policy need to be updated? Are their cause and effects? Are there any dependencies?	How will the matter be resolved? (NB: Specify the extent of the change)	List specific stakeholders that have a duty to cooperate and engage with
Thames	to national policy and guidance and appeal decisions that might alter the intention of the policy.	monitor)	monitor)	Report		
SP5	Cotswold Water Park Post-Mineral Extraction After Use - There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	Yes (Partial)	Why - The Council is working on biodiversity strategy for the CWP and consideration may need to be given to how this will be reflected in the local plan,	How - Policy remains sound but a minor modification could be made to the support text on the topic of NPPF 174. This would improve clarity of policy and provide a spatial dimension to the ecological network in this area.	
SP6	Former Cheltenham to Stratford-upon-Avon Railway Line - There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	Continue to monitor the policy through the Authority Monitoring Report. Any future changes are likely to be related to review of IDP, Local Transport Plan and/or related policies such as INF3, and any restoration plans.		
Appendix A: Local Green Spaces	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	New sites maybe identified through the plan making process.		
Appendix B: Chesterton Vision and Objectives	- Retain	No (continue to monitor)	No (continue to monitor)	Chesterton now has planning permission – consider deleting policy		
Appendix C: Gypsy and Traveller Accommodation	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	New sites maybe identified through the plan making process.		
Appendix D: Cotswold Design Code	- Update to address Zero Carbon commitments - Consider how council can provide an effective framework to support NDPs	Yes (full update)	Yes (full update)	Why – Update to reflect latest evidence, data and /or national policy / guidance. Address changing nature of climate through design. Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Climate change and renewable energy constraints evidence.	How – Commission a review of climate change evidence (including retrofit); modify policy; Engage with members, statutory stakeholders and local communities;	
Appendix E: Established Employment Sites	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	No (continue to monitor)	New sites maybe identified through the plan making process.		
Appendix F: Parking Standards and Guidance	- Update to address Climate Change and modal shift	Yes (partially)	Yes (full update)	Why – Update to reflect latest evidence, data and /or national policy / guidance. Address the transport network’s role in adapting to and mitigating climate change. Dependencies - Sustainability Appraisal; Local Plan and CIL Viability Assessments; Climate change and renewable energy constraints evidence; Local Transport Plan; How – Commission a review of climate change evidence (including retrofit); modify policy; Engage with members, statutory stakeholders and local communities;		
Appendix G: Natural and Historic Environment Objectives	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the	No (continue to monitor)	Continue to monitor	New sites maybe identified through the plan making process.		

WHAT?		WHEN?		WHY?	HOW?	WHO?
Policy / Section	Matters that need addressing through a Local Plan Update	Signif. issue influencing an update now? (before 2031)	Update policy longer term? (beyond 2031)	Why does the policy need to be updated? Are their cause and effects? Are there any dependencies?	How will the matter be resolved? (NB: Specify the extent of the change)	List specific stakeholders that have a duty to cooperate and engage with
	intention of the policy.					
Appendix H: Strategic Principles for Green Infrastructure in Gloucestershire	- There are no significant issues that would suggest the need to review this policy.	No (continue to monitor)	No (continue to monitor)	Why – No update required at this stage. Although other aspects of the local plan may need to reflect the new Cotswold GI Strategy. Dependencies - Sustainability Appraisal; Climate change evidence; Green Infrastructure Strategy;		
Appendix I: Index of Policies v Local Plan Objectives	- There are no significant issues that would suggest the need to review this policy. However, this may require updating as a result of modifications to the plan.	No (continue to monitor)	Yes (partially)	Why – Update to reflect latest evidence, data and /or national policy / guidance. Dependencies - Sustainability Appraisal;	How – update table to reflect new and updated policies;	Engage with members, statutory stakeholders and local communities;
Appendix J: Monitoring Indicators	- Needs to include the Housing Delivery Test (NPPF paras 73–75)	Yes (partially)	Yes (partially)	Why – Update to reflect latest evidence, data and /or national policy / guidance. Dependencies - Sustainability Appraisal; Climate change evidence; Green Infrastructure Strategy;	How – update table;	Engage with members, statutory stakeholders and local communities;
Appendix K: Glossary	- There have been changes to national planning policy definitions. - Update may be require as a result of wider modifications to the plan.	Yes (partially)	Yes (partially)	Why – Update to reflect latest evidence, data and /or national policy / guidance. Dependencies - Sustainability Appraisal;	How – update list to aid clarity;	Engage with members, statutory stakeholders and local communities;
Appendix L: Replacement of 'Saved' Policies	- There are no significant issues at 2019 that would suggest the need to review this policy. However the Council should be mindful of changes to national policy and guidance and appeal decisions that might alter the intention of the policy.	No (continue to monitor)	Continue to monitor	Continue to monitor policies through the Authority Monitoring Report		
Suggested new policies						
Neighbourhood Planning	- Required to consider providing a housing need figure for designated Neighbourhood Areas (NPPF para 66). - Reference to the adverse impacts of allowing development that conflicts with the Neighbourhood Plan (NPPF para 14).	New policy		- Explain how Neighbourhood Plans are part of the development plan. - Could provide an overarching protocol on preferred approach/ how to make NDPs – perhaps with some sort of toolkit? - Policy or protocol on how NDPs should plan for a housing number (and what happens if they don't) - Guidance on allocating housing sites, designating LGS and NDHAs or climate change policies? - Explain how NDP allocations (housing, employment, LGS) will be reflected in the Local Plan review. - A suggested template for a NDP	How – Literature review. Engage with stakeholders.	Engage with members, statutory stakeholders and local communities;
Climate Change	NPPF para 150 states that new development should be planned for in ways that a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are more vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures including through the planning of Green Infrastructure.	New policy		- Review approach. Should Climate change be 'seeded' through all policies or should there be a standalone strategic policy?	How – Literature review. Engage with stakeholders.	Engage with members, statutory stakeholders and local communities;
Health & Wellbeing	NPPF para 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs. For example through the provision of safe	New policy		There is increasing recognition that where we live and work has an impact on our health and wellbeing. It ties into one of the three central stands of GI (water, wildlife and health). We could; - Include a chapter on 'health' in the LP and re-arrange with policies on	How – Literature review. Engage with stakeholders.	Engage with members, statutory stakeholders and local communities;

WHAT?		WHEN?		WHY?	HOW?	WHO?
Policy / Section	Matters that need addressing through a Local Plan Update	Signif. issue influencing an update now? (before 2031)	Update policy longer term? (beyond 2031)	Why does the policy need to be updated? Are their cause and effects? Are there any dependencies?	How will the matter be resolved? (NB: Specify the extent of the change)	List specific stakeholders that have a duty to cooperate and engage with
	and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. NPPF chapter 8, 92 (c) also has a clearer emphasis on enabling healthy lifestyles			GI, pollution, renewable energy and/or climate change for example and/or, - Include a generic policy on health and wellbeing – linking up with GI policies and others; include provisions to reduce health inequalities, planning for ageing population, access to new or expanded healthcare, access healthier food, active travel, enhancing safety etc. - Include a specific policy or clause in LP to include requirement (?) for Health Impact Assessments for (major?) planning applications and LP policies to identify all potential health impacts and mitigate any adverse impacts arising from the proposal, to ensure health and wellbeing is factored into considerations and to make applications more robust. - Include a specific policy or clause to the generic policy in LP to include age-friendly environments for the elderly and those living with dementia – this could also tie in with H4 and/or as part of the design code.		
Small and Medium Sized Sites	Potential specific policy on small and medium sites in accordance with NPPF para 68, which requires local authorities to identify at least 10% of their housing development on sites of less than one hectare.		New policy		How – Literature review. Engage with stakeholders.	Engage with members, statutory stakeholders and local communities;
Dark Skies	NPPF para 180 reaffirms the commitment to limit the impact light pollution. Reference is made in the reasoned justification of Policy EN4 (Local Plan para 10.4.11). However, 10 of the 12 Cotswolds AONB LPAs have policies for avoiding/limiting light pollution. BANES and Cherwell have specific policies for dark sky management or enhancement.		New policy		How – Literature review. Engage with stakeholders.	Engage with members, statutory stakeholders and local communities;